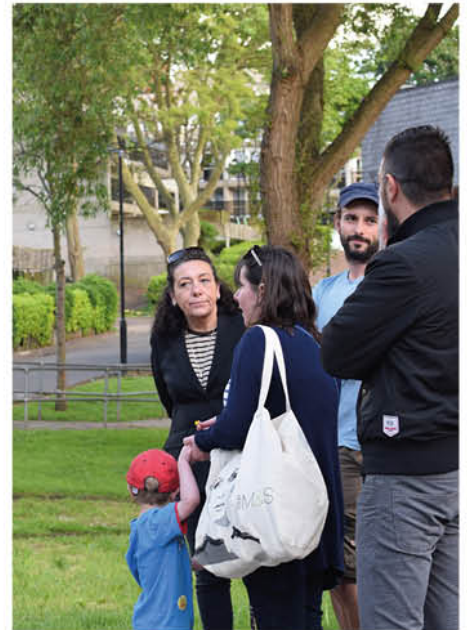


RESPONSE TO THE MAYOR'S DRAFT HOUSING STRATEGY



From Sian Berry AM
Green Party Member of the London Assembly
December 2017



SUMMARY

Londoners cannot afford to be failed by two successive Mayors on housing.

The Mayor's new Housing Strategy is a chance to start to turn around a market that is failing far too many Londoners, denying them their right to a safe and secure place to live.¹

The deficit in the amount of housing at low-cost social rents has grown dramatically in recent years, with the new Strategic Housing Market Assessment (SHMA) showing that 31,000 new social rented homes are needed per year, up over 15,000 from the 2013 assessment.²

In total, 66,000 new homes are needed by Londoners each year, and 65 per cent need to be at low-cost social or intermediate rents.

My response to the Mayor's draft Housing Strategy focuses on four areas of concern:

- whether the amount, tenure and rental cost of the 'affordable' homes proposed will meet Londoners needs
- whether policies do enough to prevent demolition or properly appraise the impact of the demolition of existing homes
- whether Londoners taking action for themselves are getting enough support from our new Mayor under this strategy
- whether groups of Londoners are being left out of the policies proposed.

I am concerned that the gypsy and traveller community, young people and community-led housing organisations have only been mentioned briefly in parts of the strategy, but have needs that should be addressed throughout the document.



In addition to policy areas where the Mayor has spending powers, or direct control over developments through influence on land, planning policies are crucial in making sure wider developments contribute to the strategy.

The first draft of the next London Plan has also now been published, following up on planning policies trailed in this draft strategy.³ I am encouraged by many elements of this plan, particularly the way transport and housing planning are integrated. This approach to reducing the need to travel, prioritising more sustainable modes of travel, is also reflected in the housing strategy.

However, in addressing London's housing crisis as a whole, neither the policies in the draft strategy nor the draft London Plan go as far as they should. A number of key further measures are justified by evidence and should be pursued, particularly on affordability and powers to regulate rented homes.

I know that Londoners put housing at the top of their concerns during the 2016 election and many of them will echo my concerns in their responses to this strategy. I hope the Mayor will listen and make the changes our city needs.

Sian Berry AM
December 2017

1. KEY POLICIES: THE NEED TO DELIVER

More than anything that will help our housing crisis, London needs new low-cost rented homes and the Mayor has a mountain to climb in achieving this.

In August 2017, I highlighted that no social rented housing had started under Mayoral funding programmes since the Mayor was elected in May 2016.⁴

The London Tenants' Federation highlights in their submission to this strategy that, between 2005 and 2015, London Plan targets for market homes were over-achieved at 124 per cent of targets, while only 53 per cent of targets for social and affordable rented homes were achieved.⁵

The 2017 SHMA was published on 1 December. It analyses the need for new housing, and comes to some stark new conclusions on our growing housing crisis.

Overall the SHMA concludes that:

- 66,000 new homes are needed per year
- Of these 31,000 need to be at low-cost social rents
- A further 12,000 intermediate 'affordable' homes are needed.



The release of the SHMA only towards the end of the consultation on this draft strategy is very frustrating for those of us tasked with scrutinising the Mayor's policies.

The fundamental purpose of the Housing Strategy is to set out how the Mayor will meet London's housing needs. Yet these needs, particularly the split between tenures required, are not stated in the strategy at all, let alone how the measures planned will meet them.

In the final Housing Strategy, I expect to see clear estimates of how far the policies will meet the needs of Londoners using the Mayor's current powers, and a clear statement of what further measures and powers are needed from Government to fully meet them.

SHMA: Net annualised requirement for new homes in London, 2016 to 2041⁶

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms	Total	% of total
Market	10,682	2,043	4,101	6,210	23,037	35%
Intermediate	4,334	3,434	2,409	1,693	11,869	18%
Low cost rent	21,318	5,311	2,462	1,881	30,972	47%
Total	36,335	10,788	8,971	9,783	65,878	100%
% of total	55%	16%	14%	15%	100%	



Annual targets for each tenure

The final strategy must provide year-on-year targets for net housing starts and completions for each tenure, and a delivery plan showing how each programme is expected to contribute to these targets.

Policy 3.1 A of the draft Housing Strategy says that there will be “clear housing delivery target for every council in London.”

These are now published in table 4.1 of the draft London Plan but also need to be broken down by tenure for each council area. Notably the targets in the London Plan are net targets, so breaking these down by tenure will also provide a target for council for each type of affordable home, and one that doesn't artificially reward demolition – see section below.

OVERCROWDED LONDONERS

A very clear measure of the Mayor's success in tackling housing problems is the effect on overcrowding, which tracks a real housing outcome for Londoners.

The Mayor should therefore also be setting targets and monitoring progress on the reduction of overcrowding in London.

The draft Housing Strategy estimates that 250,000 London households are living in overcrowded conditions, and recognises that overcrowding can contribute to mental and physical health problems.

The evidence base for the strategy also shows that over the past three years on average

Table 4.11: Percentage of households with overcrowding by age of household reference person (HRP) and tenure⁷

Age of HRP	Own with mortgage	Own outright	Private renter	Rent from local authority	Rent from housing assoc	Total
16-24	0	0	9	37	11	12%
25-34	4	9	11	18	13	10%
35-44	4	7	15	22	21	12%
45-54	5	4	8	13	14	8%
55-64	4	3	4	6	7	4%
65 or over	2	1	3	3	2	1%
Total	4%	2%	11%	14%	12%	8%

Table 4.12: Percentage of households with under-occupation by age of household reference person (HRP) and tenure

Age of HRP	Own with mortgage	Own outright	Private renter	Rent from local authority	Rent from housing assoc	Total
16-24	22	0	4	3	2	4%
25-34	20	26	3	0	3	7%
35-44	24	38	6	3	0	14%
45-54	31	46	18	4	6	23%
55-64	37	53	13	19	13	36%
65 or over	63	62	33	17	18	50%
Total	29%	55%	8%	8%	7%	24%



11 per cent of private renting households, and 14 per cent of local authority renters, are overcrowded, compared with 2-4 per cent of owner-occupiers.⁸ The SHMA also estimates that the number of 'concealed' family units (families sharing with others but who need their own homes) in London has risen from 400,000 in 1996 to 730,000 in 2017.

The overcrowding figures above are based on the 'bedroom standard', which is measured by the English Housing Survey. However, the current structure of the survey means that, although we can see a rolling average for London as a whole in the evidence cited above, data are no longer available on how many people are living in overcrowded conditions on a ward or borough basis.⁹

This has already had an impact on the ability to track targets for improvements in overcrowding in the 2012 Games 'Growth Boroughs', as shown in the most recent Convergence Annual Reports.¹⁰

The Mayor should correct this gap in knowledge and say in his final strategy how he will gather ongoing evidence to monitor overcrowding on a borough and ward level, including how he will look at effects on different protected groups and set measurable targets to reduce it.

Matching family homes with families

Building new homes is not the only way to address overcrowding and meet the housing needs of Londoners. Alongside overcrowding, under-occupancy is also a big problem in London, and I believe that the draft strategy misses the chance to do more to address the distribution of existing homes

Tables 4.11 and 4.12 from the Economic Evidence Base for London 2016 (reproduced on page 4) illustrate how both under-occupancy

and overcrowding affect people in different tenures and age groups. The most severe under-occupancy is in owner-occupiers who are 65 and over, with more than six in ten of these households affected.

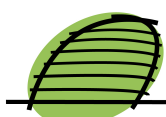
The SHMA states that a range of different scenarios were explored in making its estimates, including one with reduced under- and over-occupancy. Paragraph 0.21 says that: "assuming that all households occupy only the size of home they require results in a net requirement for one-bed homes only and a net surplus of others."

This is not a realistic target to aim for. However, it is clear that housing need estimates, particularly for family homes, are very sensitive to assumptions made about the distribution of homes. A set of measures to do more to better match people with existing homes could go a long way to helping Londoners living both in overcrowded conditions and under-occupied homes.

The Housing Strategy is the right place to address this, and I am disappointed that the many ways the Mayor could work to help with the redistribution of existing homes are only briefly covered in the measures so far.

For example, paragraphs 4.54 to 4.56 of the draft strategy refer to the Housing Moves and Seaside and Country Homes schemes, where social housing tenants are encouraged to move within and out of London. However, it does not address some of the problems with this scheme, such as older people reporting being put under pressure to move away from London and their support networks to seaside homes that they do not want.

Section 5.34 talks about the "need to increase opportunities for older homeowners to move to accommodation more suited to their needs, which could include them choosing to



downsize.” However, the policy levers outlined are limited to encouraging the Government to think about incentives.

I would like to see the final Housing Strategy set out a real, concerted set of proposals to address this issue. Paramount will be the need to preserve choice both for social housing tenants and owner-occupiers and ensure that any help is completely voluntary and fully meets their needs and desires.

The demand for this kind of move is clearly evident in the case of co-housing. However, for the most part people are not even being encouraged to think about this yet, let alone offered incentives or asked what they would like to see built in their local area to meet their needs.

The Mayor could do much more, with huge potential benefits, and possible measures could include:

- setting up a task force to look at this issue in more detail, including older people's groups, councils, community-led housing organisations, Neighbourhood Forums and housebuilders
- properly assess the situation for older people and different groups of Londoners in each tenure (current overcrowding data does not allow for this) and the kind of homes wanted by under-occupiers
- co-ordinating with councils to make the GLA Housing Moves scheme work better and include people who want to stay in the communities they know
- exploring the development of a service similar to the social housing 'homeswap' system to match under-occupiers with overcrowded families in the owner-occupied sector. This could include an exploration of novel financial arrangements

to make home exchanges possible without immediate sales

- briefings and support for Neighbourhood Forums, boroughs and local community groups, delivered as part of the small sites programme, to help with finding and earmarking potential sites for downsizers in each area
- tasking the Mayor's Design Advocates to do further work on the design possibilities for high quality homes for downsizers within local communities
- creating new grant schemes alongside councils, small builders and co-housing groups to develop the market for suitable alternatives.

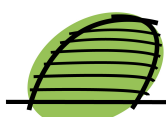
“Co-housing could also offer an alternative way of growing older, one that eschews the institution and is also based on both neighbourliness and independence.”

The Mayor's Design Advisory Group,
Ageing London report¹¹

Are more 2-bedroom homes needed?

In the draft London Plan, the Mayor has committed to “consult on benchmarks for older people's housing requirements,” but I believe more could be done to look strategically at this issue, particularly in establishing whether more 2-bedroom homes may be required.

Many older people support family and grandchildren and need spare rooms, so planning only for 'right size' homes is likely to end in failure.



Between the 2013 SHMA and this year, the figures in the table below show that the annual number of 2-bedroom market homes required has reduced significantly, while the number of 1-bedroom market homes has increased.

Market homes	1-bed	2-bed
2013 SHMA	2,798	5,791
2017 SHMA	10,682	2,043
Difference	+7,884	-3,748

I would therefore like the Mayor to look in more detail at the assumptions in this year's SHMA and whether the need for 2-bedroom market homes has been underestimated, particularly if the need to offer suitable homes for downsizing is taken into account.



The demand for co-housing

“We had some BBC exposure before Christmas and we had 400 emails from women wanting to join the waiting list or to be told how we did it. Our own work over the last 18 years has increased the brand name of ‘co-housing’ so that older people now are googling for co-housing groups near them rather than having to be introduced to what the notion is because they understand it.

“They like it; they want it. They do not like going into care. They do not like sheltered housing. They do not like settings where they lose their autonomy and their right to make decisions about their own lives.”

Maria Brenton, Older Women’s Co-housing organisation, who gave evidence to the Housing Committee earlier this year.¹²

www.owch.org.uk

2. KEY POLICIES: PUBLIC LAND FOR PUBLIC GOOD

I welcome the new focus from the Mayor on land as a limiting factor in addressing London's housing crisis. Both the availability and cost of land are significant barriers to getting more low-cost homes built.

The draft Housing Strategy contains some wide-ranging and imaginative proposals to improve the situation, using assets in the Mayor's control and from the wider market.

However, we need to see real progress on securing land with these new approaches quickly, especially if some key sites in London are not to be lost. With much of the public sector currently reviewing its estates and land, no time can be lost in getting moving on this.

The Mayor's commitment to achieving at least 50 per cent affordable homes on public land is very welcome, but if some of the land cost issues can be dealt with there is no reason not to set a higher target – especially given the identified need for 65 per cent affordable homes in total across London.

MORE LAND FOR LOW-COST HOUSING

Policies 3.1 B and 3.1 C are about the Mayor's new initiatives on land assembly.

They set out plans for how the Mayor will support councils and housing associations to acquire land, directly intervene to aid land assembly, and work towards making sure more public land is used for housing, including potentially purchasing sites directly from other public bodies.



Key sites: Holloway prison

Local residents around the former women's prison in Holloway, Islington, have joined with prison reform campaigners to push for this large site to be used for social housing and a women's building to provide services to help women affected by violence and the criminal justice system.

Their ideas can currently be seen at www.reclaimholloway.strikingly.com

In paragraph 3.33 this is described by the Mayor as “a greater focus on brokering deals on the ground.”

The housing and land markets have failed spectacularly to provide the homes Londoners need and therefore this new willingness to intervene is very welcome. I would like the Mayor to focus his efforts on finding the following types of land and supporting their acquisition for public housing or mixed-use projects:

- sites next to existing council estates that could be used for infill
- Network Rail land alongside Transport for London sites



- consolidating industrial and retail parks that may sit alongside council-owned land
- car parks
- investigating and unblocking 'abandoned' sites with unclear or unknown ownership status.

In particular, I am excited by the possibility of land acquisition next to existing housing estates to enable infill and extensions without demolition. A working group should be set up to explore where this might be possible, alongside the London Land Commission, housing campaigners and groups of residents on estates who may wish to lead on developing these sites for new homes as part of their estates, particularly if these are for older residents and downsizing.

However, I have some concerns about possible unintended consequences from some of these policies and I would like the final strategy to set out ways these will be avoided.

Firstly, the proposed reform of compulsory purchase order (CPO) processes, and the activity outlined in sections 3.46 to 3.48 of the draft strategy, must not further disadvantage leaseholders on estates when their homes are earmarked as part of regeneration.

A second public inquiry is about to begin to consider CPOs for leaseholder homes on the Aylesbury Estate in Southwark. The Mayor should pay close attention to the evidence and final decision given in this case, with respect to human rights and appropriate compensation for existing homeowners on sites that are purchased.

Secondly, I am concerned that the purchase of small sites by councils and housing associations may disadvantage local resident groups and community-led housing organisations who may wish to take on these sites. A policy that also

helps these groups to acquire land and doesn't allow them to be pushed aside under this new approach would be welcome.

Thirdly, I would like to see something in the final strategy about how the Mayor will use land assembly powers to encourage more diversity within big sites. Potentially this could include breaking sites up after land assembly to allow for small builders and community-led groups to develop parts of these sites.

Currently there is no mention of these groups being supported either in policy 3.1 or paragraph 3.32, which has more information.

MAKING THE MOST OF EXISTING PUBLIC LAND

The draft Strategy very positively outlines the Mayor's ambition to increase the supply of public land for new homes in London.

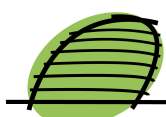
In particular, policy 3.1 C (i) states that the Mayor will be lobbying for: "more devolution of powers to the Mayor to ensure Government-owned surplus public land is released quickly to deliver more housing for Londoners."

However, there are a number of barriers and sticking points that need to be dealt with more thoroughly in the strategy to make this possible, and some new ideas that should be explored.

Defining 'best consideration'

Section 123 of the Local Government Act 1972 states that:¹³

"(2) Except with the consent of the Secretary of State, a council shall not dispose of land under this section, otherwise than by way of a short tenancy, for a consideration less than the best that can reasonably be obtained."



In practice, this means that, for most public authorities that are disposing of land, 'best consideration' closely aligns with monetary value, leaving out the wider benefits that could be achieved by the land, including saving public funds in future.

I am therefore encouraged to read in the draft strategy (paragraph 3.45) that the Mayor will try to work with Government to reform public land disposal rules to correct this, with the aim of getting more affordable homes on public land in London. I hope that more details of his proposals for reform will be published soon.

The balance of long vs short-term benefits also needs attention. The New Economics Foundation has made the point that:¹⁴ "rather than prioritising the one-off sale value of a site, a focus on the best long-term value for land would achieve wider social benefits – meeting other public service needs such as health and social care, for example."

In the final strategy, I would like to see two new things from the Mayor:

- a specific policy outlining that long-term benefits will have greater weight when considering selling off any GLA controlled land
- a pledge to put together evidence and a proposed methodology for taking account of the wider benefits of developing public land for the public good.

This should include factors such as public health, social benefits, reductions in welfare benefits and increases in economic activity from better housed residents.

It could help formalise the ways in which these benefits are measured and provide a clear cost-benefit case for the Treasury to allow for more sub-market sales of public land.



Key sites: St Ann's Hospital

In Haringey, residents have set up the St Ann's Redevelopment Trust (StART) – a community land trust to bid for a large area of land that is being sold at the St Ann's Hospital site.

They have successfully crowdfunded for expert support to draw up their plans and you can see more about their work at: www.startharingey.co.uk

In London, we are ideally placed to put resources behind this work.

Government land

I have already discussed with the Mayor both the St. Ann's Hospital NHS site and Holloway Prison, owned by the Ministry of Justice.¹⁵ In both cases the local community has put forward ideas for how these sites could be used for the maximum public benefit.

I am happy to see in section 3.44 that the Mayor is pushing for London to have the same influence and power over surplus public land that the Homes and Communities Agency has in the rest of the country. However, for these key sites, I am very concerned that sales may go through soon and that they will pass outside the Mayor's influence.



Speed is vital in acquiring Government land for public use but, once secured, it is important that speed of development should not be at the expense of fewer social rented homes or giving the community a real say in how sites are planned and delivered.

Transport for London land

Transport for London (TfL) owns 5,700 acres of land, with much of it dedicated to transport infrastructure.

Although the draft Transport Strategy estimates that by 2020/21, TfL will start on sites that will deliver 10,000 homes,¹⁶ in its June 2017 report, Homes Down the Track, the London Assembly Housing Committee examined TfL's plans for its land and found that only 13 sites were set to start by 2020 that could provide 4,500 homes.¹⁷

More recently I have received an updated schedule from the Mayor, which show that now only 3,089 homes are scheduled to be completed, and only by 2022.¹⁸

Year	TfL land home starts
2018/19	367
2019/20	271
2020/21	495
2021/22	1956

The committee also found that TfL faced some trade-offs in delivering affordable homes on its land, including:

- prime locations, and large opportunity costs if market value from sales is foregone (most sites are in zones 1 and 2 near transport hubs)
- operational constraints (such as the restrictions to work undertaken around transport facilities)

- TfL’s own priorities relating to upgrading the transport system, which will delay the use of some large sites.

With targets already slipping, I am concerned that TfL is facing more difficulties than anticipated with bringing its land forward.

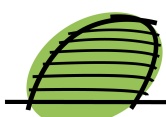
Creating new land around transport infrastructure

A number of organisations have recently produced research into how much housing capacity in London could be created by building above transport infrastructure and creating viable new land by, for example, decking over tracks in cuttings.

Centre for London published the report, Ideas above Your Station, in September 2017, which stated that:¹⁹

“The complexities of planning, politics, financing and engineering make over-station development a tough proposition in London. But in a city that is short on space and short of funding to maintain and enhance its rail networks, developing at and around new and existing stations cannot be neglected: it is a sustainable form of development, a source of funding for new and improved infrastructure, a means of creating mixed civic ecosystems at transport hubs, and a way of strengthening and connecting communities.”

I tend to agree that any opportunities to create more public space for housing without having to buy land on the open market should be looked at and would like to see more about this issue included in the final Housing Strategy



MOPAC and Metropolitan Police Service land

Paragraph 3.35 of the draft Housing Strategy anticipates bringing forward many sites on MOPAC and Metropolitan Police Service (MPS) land by 2022, with the potential to deliver up to 2,500 homes.

With this land under the direct control of the Mayor it is important that we get the most out of these assets for the wider public benefit not just for MPS budgets.

In my response to the draft MOPAC/MPS Public Access and Engagement Strategy I said:²⁰ “the property disposal strategy for assets that are to be closed should be coordinated with the Mayor so that it fits into his overall land and housing strategy, with the maximum possible provision of social housing.”

The Deputy Mayor for Policing and Crime responded to me saying the Mayor will:²¹ “advise all developers to have regard to local authority requirements for affordable housing and encourage them to make sure of opportunities to access funding to maximise affordable housing opportunities.”

However, the final MOPAC/MPS Public Access Strategy, published in November 2017, did not give any more information, and did not set any targets for the number of affordable homes or give these targets by tenure.²²

I hope that the final Housing Strategy will provide more detail of the Mayor's strategy for MPS land.

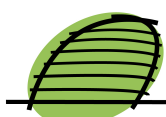
Keeping land in public hands

One way to give a more level playing field to councils and community-led initiatives that want to develop on public land is to not sell the freehold at all, but retain this and offer a long-term lease to projects instead.

Gradual profits, and longer-term income rather than short term gains is something I've pushed the Mayor, Government and local councils to focus on.

Following a series of written questions and exchanges during committees and Assembly meeting with the Mayor, Deputy Mayor for Housing and Transport for London, as well as with former Housing Minister Gavin Barwell, I was led to believe that the Mayor and TfL were both keen to focus more public land on deals such as joint ventures with developers who aim to provide long-term rental homes – deals that would not sell off the land and would create a long-term revenue stream.²³

Although 'joint ventures' with councils are mentioned in section 3.89 of the draft strategy, I can't find any more on alternative approaches that would prioritise long-term income over short term sales, and would like to see these ideas reflected more strongly in the final strategy.



3. KEY POLICIES: WHAT DOES AFFORDABLE MEAN?

The importance of clearly defining what 'affordable' rent means in London cannot be overstated.

In recent years, under Government policies and those of the previous Mayor, the 'affordable' component of many developments has been entirely made up of shared ownership and 'affordable' intermediate rented units.

The rents in these homes are able to go up to "no more than 80 per cent of the local market rent," as defined by the Government in the National Planning Policy Framework (NPPF).²⁴

We have uniquely high private market rents in London. Rents here are nearly twice as high as the median for other regions of England (see the chart below, taken from evidence in the draft strategy). The impact of this runs right through the housing crisis, preventing Londoners saving for deposits and pushing many people into homelessness.

With rent inflation also outstripping wages, the case for defining affordability in terms of incomes not market rates is overwhelming.

'NO MORE THAN 80 PERCENT OF THE LOCAL MARKET RENT'

This year, I have spoken in committees and the Assembly with the Mayor and Deputy Mayor James Murray about strengthening the definition of 'affordable' in London.

I have asked them to make the case to Government more strongly that London should be able to set a definition of affordable that is

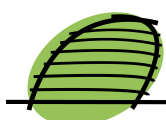


below this maximum and, ideally, defined in terms of wages not market rates.

The Mayor states in a number of places within the draft strategy that he doesn't believe the Government's definition is right for London, most notably in a pull quote on page 101, which comes from paragraph 4.13.

He has also defined, as part of his funding programme, a new London Affordable Rent at social rent levels (though these would be higher than the current average paid by social tenants in London) and a new London Living Rent, set at a third of average local household incomes.²⁵

However, this strategy and the London Plan will apply not only to homes funded by the Mayor but also to the private developments that are expected to meet most of London's affordable housing needs, through the contributions they make to gain planning permission.



Average rents in London compared with the rest of England, 2016²⁶



I am therefore very concerned to see that section 4.22 includes the comment: “All intermediate rented homes should provide at least a 20 per cent discount on market rents.”

The policies for affordable housing include not only London Affordable Rent and London Living Rent in their description of what will qualify as affordable housing but also policy 4.1 B (iii), which says: “supporting a range of other types of intermediate rented homes as long as they are genuinely affordable to Londoners, generally meaning that they should be accessible by those whose household incomes fall under £60,000.”

Details of other types of homes that might be supported are given in section 4.13, which says this is aimed at innovative schemes such as ‘live-work spaces’, however, this is not codified in policies 4.1 or 4.2.

With the Government definition and similar policies also proposed in the draft London Plan, I am concerned that we are maintaining a loophole that developers will exploit, and in practice, failing to move away from the old definition of ‘affordable’ in planning at all.

REDEFINING ‘AFFORDABLE’ FOR LONDON

There are two ways London could seek to set a more realistic upper limit of ‘affordable’ rent that would apply to planning decisions for private developments:

1. In the Mayor’s discussions with Government for devolved housing powers, he should seek to allow London to set its own definition of affordable within both our funding programmes and planning policies, based on the acute challenges the city faces and the high cost of market rent in London. This would be the most effective way to achieve our goal as any new definition should be set in relation to wages, rather than market rates, and this requires a clear deviation from the NPPF.
2. Through the London Plan, we should define intermediate ‘affordable’ rent at a lower maximum proportion of the local market rate. This would still be compliant with the NPPF, as it would not be above 80 per cent, but there is enough evidence to convince an examiner of the validity of a policy that required a lower limit in London.

GROSS OR NET?

In terms of meeting need, the net gain in low-cost rented homes is far more important than any gross measure for Londoners and Assembly Members who want to monitor the Mayor's progress. However, the distinction between these two measures is not made consistently in either the draft strategy or the draft new London Plan.

The current London Plan key performance indicator (KPI) for affordable housing is given in net numerical gains. However, the draft London Plan has changed the relevant KPI to this gross measure: "Positive trend in percentage of planning approvals for housing that are affordable housing (based on a rolling average)."

In the draft strategy, the targets set out in Table 2 have been confirmed as gross targets for affordable housing starts under the Mayor's programmes.

In areas of the strategy where required percentages of affordable homes are given (for example the introduction to policy 4.2 and policy 4.2 B (iii)) it is not stated whether these are net targets, taking into account what already existed on sites, or gross targets that include only the new homes eventually built.

The strategy refers also to the Mayor's Affordable Housing and Viability Supplementary Planning Guidance 2017, which sets out a new threshold of 35 per cent affordable housing, below which a more rigorous approach to viability assessment will be taken.²⁷

However, even this document does not say whether the threshold is defined as the proportion of net new homes that are affordable or just the eventual gross total.

This is confusing for residents wanting to hold developers, councils and landlords to account, especially where schemes involve the demolition of existing affordable homes.

The final strategy needs to be clearer on whether targets both for planning and funding gains in affordable housing are for gross or – preferably – net new homes.

AFFORDABLE STUDENT HOMES

The draft strategy says hardly anything on student homes. However, the draft London Plan sets out how a proportion of these will be required to be affordable.

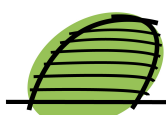
This is a big step forward from the current London Plan, which does not properly define an affordable student rent except "in the context of average student incomes and rents for broadly comparable accommodation provided by London universities."²⁸

Soon after being elected I asked the Mayor about defining a Student Living Rent at Mayor's Question Time (MQT) and I'm very pleased to see this policy in the draft London Plan.

However, I am concerned that this affordable student rent is set at 55 per cent of the maximum income from living cost loans for UK students, and have asked the Mayor why this is so much higher than the proportion of income used for the London Living Rent.

In the final strategy, I would like to see the London Plan policies for student accommodation reiterated, with targets set for the delivery of affordable student homes.

We also need to see plans to monitor the cost of current student accommodation and for the Mayor to work with universities, colleges, and student bodies, to help reduce this.



TENURE-BLIND DESIGN

I welcome the Mayor's resistance to the growing trend for 'poor doors' and the segregation of people in the affordable housing component of new developments from those in full market price homes.

The draft strategy's support for tenure-blind design in new housing developments in paragraph 5.17 is good, though the requirements are not repeated in the policy boxes.

Section 4.3.8 of the new draft London Plan repeats this goal but, again, it is not reiterated in the actual policies.

Policies for tenure-blind design should therefore be strengthened and made more explicit in policies in the final draft strategy and the London Plan.

I have recently seen at least one disturbing example of a development with different tenures for different blocks, which gave children in the market and affordable homes separate rooftop play areas.

Therefore, I also believe policies to avoid tenure segregation should be extended to apply to playgrounds and outdoor spaces for residents. This is not made clear enough in the requirement for 'communal play space' in the draft London Plan, and is not mentioned in the draft strategy.



4. HELPING LONDONERS WHO RENT PRIVATELY

The Housing Strategy needs to make a difference for people living in existing homes in London, not just change what is newly built. Improving conditions for London's millions of private renters is the main way it can do this.

I am pleased to see a section of the draft strategy devoted to private renting. However, I have some concerns about the ambition of these policies, and would like the final strategy to go further.

More people are finding themselves privately renting for the long term. Families, couples and older people are a growing proportion of those privately renting in London today and many of them are very unhappy with their situation.²⁹

Costs are rising but, in a market that is relatively unregulated compared with other major cities in Europe and around the world, the quality and security of homes has not improved to match.

In 2016, my Big Renters Survey asked 1,500 London renters for their views and found that nine out of ten had experienced four or more serious problems during their time renting in London.³⁰ These most commonly included a rent rise they struggled to afford and seven in ten renters had suffered from repairs and maintenance problems.

Campaign group Generation Rent, in a recent opinion survey, found that private renters are more likely to be stressed or anxious (53 per cent) than other tenures, including home owners at 35 per cent.³¹

Section 6.12 of the draft strategy, says: "While he lacks formal powers in this area, the Mayor's



vision is for an effective system of regulation that gives councils and other agencies the tools they need to support wholesale improvements in property conditions and management."

Rather than simply describe this as 'a vision' I would like to see a greater commitment and more detail in the final strategy, including how he will continue to lobby the Government for more powers over this crucial tenure.

MORE POWERS OVER RENTING

The Mayor should be more ambitious in his work to devolve more renting powers to London.

Policy 6.1 B (i) provides strong support for "well designed and operated council licensing schemes, including calling for devolution of powers over such schemes to the Mayor," and I welcome this. Currently councils are overly restricted in how extensive any landlord licensing schemes can be. There is a good case for borough and London-wide licensing and it should be up to the Mayor to determine these.

Policy 6.2 C is introduced with: "The Mayor supports measures that would limit unacceptable rent increases without negatively

impacting on housing supply, and he will work with Government to address long term affordability for London's renters."

However, neither of the two points that follow mention the possibility of London gaining powers to control or stabilise rents. The draft could and should go further in setting its sights on these powers, which is not an unusual thing to see in major cities elsewhere.

In March 2016, the Assembly Housing Committee published a majority report, At Home with Renting, which recommended that the Mayor should lobby Government for delegated power to introduce appropriate rent stabilisation measures in London.³²

In November 2016, the London Assembly passed a motion I proposed, which asked the Mayor to continue to press for the devolution of more powers over the private rented sector in London.³³

I was disappointed to be told in response to a written question to the Mayor recently that the only further power under discussion was landlord licensing, and to see this repeated in the draft strategy.³⁴

A stated aim to gain further powers, including to stabilise and control rents for existing homes, should be included in the final strategy and the Mayor should commit to lobby the Government for these powers.

'BUILD TO RENT'

'Build to rent' developers are a small but increasing part of the housing landscape and it is positive that the Mayor is seeking through policy 3.3 to improve standards.

Section 3.78 of the draft strategy outlines minimum standards for management, including longer tenancies and limits on rent rises during

tenancies for 'build to rent' schemes. These requirements are also included in the draft new London Plan, and this a bold attempt to regulate this new sector before significant problems arise, which I applaud.

I am also pleased to see policies to require a proportion of homes at 'affordable' levels in the new draft London Plan, although policy H13 says only that these should be "preferably London Living Rent level" rather than making this a requirement. As I have set out in section three of this response, there is a very good case for London Affordable Rent and London Living Rent to be made the only valid definitions of affordable rent for London.

The current draft strategy doesn't include the affordability requirements from the draft London Plan, so I would like to see these reflected in an updated policy 3.3 in the final document.

I would also like to see the viability of new 'build to rent' developments carefully monitored as more of them come forward, in order to improve our knowledge of this market and see whether higher affordable housing requirements might be possible.

The London Plan should therefore include a requirement to disclose full viability information as part of planning for 'build to rent' developments, whether or not threshold percentages of affordable rented homes are provided.

ENFORCING RENTING STANDARDS

I am glad to see the Mayor, in section 6.13 of the draft strategy, commit to taking action to increase support for council Trading Standards departments to help enforce existing and new legislation to protect private renters.



It is a major victory for renters and campaigners to see the Government now preparing to ban letting agent fees from being charged to tenants in the private rented sector.

In response to my survey last year, a third of private renters told me they had been hit by unexpected fees when moving, and with many renters moving more than once a year, these costs have a big impact on already hard-pressed Londoners.

My recent report, Letting them get away with it, found that London councils had conducted very little investigation and enforcement of letting agents who were not complying with the previous law.³⁵ With new rules coming in, their resources will be even more stretched in future without help.

SETTING HIGHER STANDARDS

The Mayor says in several places, including in policy 6.2 A, that he is developing a 'London Model' for reform of renting. This is also described as 'a new deal' and a 'positive vision' but the draft is unclear exactly what this means.

If he is developing a new accreditation scheme, ideally one that is compulsory, that would be good to hear. If it is not to be compulsory for landlords then the Mayor needs to say how this will be different from the previous Mayors' London Rental Standard – which has now been dissolved, and only managed to recruit around 2,000 landlords.³⁶

In paragraph 6.31 the Mayor says he will work with landlord representative bodies and groups representing tenants, to explore options for this new model, which is welcome, but I would like to see much more public consultation and involvement in developing this, and much more detail in the final strategy.

ROGUE LANDLORD AND LETTING AGENT DATABASE

Box 11 in the draft strategy sets out details of the Mayor's long-awaited database of rogue landlords and letting agents.

I have regularly asked the Mayor about this in written and oral questions and have been pleased to hear recently that, although it has been delayed and is more limited in scope than I hoped (a pilot for six boroughs initially), it will include London-wide enforcement data from the London Fire Brigade.³⁷

I would like the Mayor to include in the final strategy plans to explore how renters' groups could add to the value of this database. He should also use the website to advertise other sources of support, such as renters' rights groups, and helplines for people who are facing housing problems or at risk of homelessness.

I would also like to see the Mayor commit to use his new Chief Digital Officer and City Hall staff to support more councils in adapting their internal systems to collect and provide data in a consistent format sooner to speed up making the database London-wide.

Londoners in boroughs that are not good at managing or sharing data should not be left behind in being able to access this vital information.

TENANCY DEPOSIT LOANS

Since being elected to the Assembly, I have been pushing the Mayor to extend loan schemes for tenancy deposits across the GLA group of organisations and I am pleased that he has now done this.

I am also happy to see policy 6.2 B (ii) in the draft Housing Strategy, which says the Mayor will be: "working with employers to widen



access to Tenancy Deposit Loan schemes to help renters manage the upfront costs of renting, along with other incentives to help with employees' housing costs."

I have discussed this issue with him recently at MQT.³⁸ Although progress is being made, only 107,000 employees in London currently have access to these loans. The target for the Fifty Thousand Homes campaign, with whom the Mayor is working on this, was originally to reach 500,000 employees by the end of 2017.

I have asked the Mayor to work harder alongside these campaigners, investigate why some employers are finding it difficult to sign up to this scheme, and offer more help to sectors that may face barriers. These plans should be outlined in the final strategy too.

OLDER PRIVATE RENTERS

Age UK London published a report, Living in Fear – experiences of older private renters in London, in September 2017.³⁹ This makes it clear that, for many older people in London, the private rented sector is their only option and that it simply isn't working for this age group.

The report found that the number of older private renters aged 45-64 has more than doubled in the last ten years and recent estimates suggest that the number of private renters in London aged 65 and over could double between 2014 and 2039.

Security of tenure is the number one priority for change in this group – who are often seeking a home for the rest of their lives. Many are also struggling with high costs because their incomes are relatively fixed and unable to be supplemented. An additional problem is the poor quality of private rented homes and low energy efficiency.



I encourage the Mayor to look at this report and its recommendations to strengthen renting policies for older Londoners, in particular:

- working with landlords to give longer tenancies to older renters, with security on rental costs
- help for home adaptations and energy efficiency work to make existing homes more suitable for ageing tenants
- ensuring new 'build to rent' homes, which the Mayor is already seeking to ensure do have longer tenancies and guaranteed rents, are built to lifetime homes standards and aimed at older renters not just young professionals.



FUEL POVERTY ACTION

The draft strategy has some positive policies on new buildings and climate change.

In response to the draft Environment Strategy, my colleague Caroline Russell has welcomed the Mayor's commitment to maintain the zero carbon homes requirement for new homes and all other new buildings from 2019.⁴⁰ She asks the Mayor to pilot and set, as soon as possible, a standard for climate positive buildings that generate more clean energy than they consume.

In that strategy, the Mayor also commits to using the zero carbon homes policy offset fund for investment in renewables, energy efficiency and tackling fuel poverty. It is vital that any fuel poverty and energy efficiency measures are targeted at private landlords to help renters reduce their costs.

In the draft Housing Strategy, therefore, I welcome policy 5.1 B (ii) that "seeks to improve the energy efficiency of existing homes and addressing fuel poverty through a world class domestic energy efficiency programme, a Fuel Poverty Action Plan, and making it easier for homeowners and landlords to invest in their homes."

The strategy points to the Environment Strategy for detail of these measures, so I would urge the Mayor to read carefully my colleague's comments on this and also those from the Assembly Environment Committee, when finalising this document.⁴¹

Recommendations for improvement include much more detail on how the Mayor will:

- rapidly develop insulation and retrofit programmes that are attractive to residents and businesses
- provide zero percent or very low interest loans for the owner-occupied sector
- push the Government hard on the successor to its failed Green Deal to work in parallel with the Mayor's own insulation programmes

The Government is also bringing in new standards for private rented housing energy efficiency. However, campaigners including 10:10 have expressed concerns that the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015, due to come into force in April 2018, are too weak.⁴²

Currently the regulations require landlords to improve all private rented sector properties to at least energy performance band E, but will allow landlords to exempt themselves if required improvements present a cost to them.

I have asked the Mayor to lobby Government to set a £5,000 cost cap for affected private landlords to ensure tenants are not left in fuel poverty in London. In response to my questions, the Mayor has agreed with me that "these exemptions are unwarranted" and has promised to "continue to call on government to amend the regulations."⁴³

I welcome the Mayor's response and acknowledge that he has outlined this in his draft Fuel Poverty strategy. However, as I also requested in my response to the draft Health Inequalities Strategy,⁴⁴ I hope to see a strong commitment in the Mayor's final Housing Strategy to campaign until these regulations are changed.

5. HELPING LONDONERS WHO ARE TAKING ACTION THEMSELVES

The housing crisis is at the top of many Londoners' minds and, as a result, people all over the city are working together and coming up with ideas to help provide new, more affordable homes and stand up for their rights as tenants, homeowners and private renters.

The Mayor's Housing Strategy needs to be much clearer about how he will support Londoners who are taking action on housing, and put more policies into his final strategy that will help their ideas thrive.

COMMUNITY-LED HOUSING

The term community-led housing describes a range of different types of organisations, including traditional co-operatives, community land trusts and co-housing.

In recent years more and more people are looking at community-led solutions to the housing crisis in their area, and seeking to set up community organisations to develop new homes.

An alliance of organisations has developed the following definition of community led housing:

- the community must be integrally involved throughout the process in key decisions
- a presumption in favour of community groups that take a long-term, formal role in ownership, management or stewardship of the homes
- the benefits to the local area and/or specified community are clearly defined and legally protected in perpetuity.



Overall, I have been encouraged by the Mayor's efforts so far to support the growth of community-led housing in London, for example funding the development of a community housing hub to advise and encourage new groups.

However, policies to support this sector could be much better integrated into the strategy as a whole.

Currently only policy 5.3 (Community support for homebuilding) gives explicit support to community-led housing. There is no mention of this model of providing genuinely affordable homes in any of these policies where it would also fit well:

- 3.1 (Increasing the supply of land for new homes)
- 3.3 (Diversifying the homebuilding industry)
- 4.1 (Genuinely affordable homes)
- 4.2 (Increasing delivery of affordable homes).

If the Mayor is going to support the growth of community-led housing more consistently, it should be mentioned alongside councils and housing associations as a provider of new homes throughout the final strategy.

SUPPORT FOR PEOPLE'S PLANS ON ESTATES

Many resident groups are not seeking to own or run their own housing, but want to have their ideas for council or housing association-owned estates listened to, particularly during regeneration plans.

In many cases they are putting together 'people's plans' with ideas that create new homes on their estates through infill and extension, avoiding the disruption of full demolition plans while providing the new homes people need.

I recently visited the Kipling Estate run by Leathermarket JMB in Southwark, and saw how the resident-led tenant management organisation was building homes suitable for older residents on underused land.

In my response to the Mayor's draft Good Practice Guide to estate regeneration, I said that:⁴⁵



"residents' own plans and ideas for their estates should receive practical support from the Mayor. Their ideas should be sought at the earliest stage of the plans, and developed with independent funding and expert support provided via a unit in City Hall."

I recommended that this unit should be funded by contributions from developers or by the GLA. I also warned that, if this was left to developers and councils to arrange, it would lead to lower levels of trust from residents.

In our proposed amendment to the 2017/18 GLA budget, the Green Group on the London Assembly proposed doubling the Mayor's community-led housing budget to provide more practical support for residents in this way, saying: "Staff, either within City Hall or outside it in groups already involved in this work, would be tasked with helping more Londoners learn about and start to develop their own community-led housing plans."

I have recently asked the Mayor whether the new Mayor's Design Advocates could support community groups who want to design their own plans for their estates and local areas⁴⁶ In reply he stressed how busy this team already was, but I think they would be well placed to scope this work and suggest ways in which, for example, the new Public Practice initiative to bring planning and design professionals into councils on year-long secondments (box 9 in the draft strategy) could be used to supplement

City Hall's staff and provide this service to resident groups too.

In the final strategy, the Mayor should look at all these ideas and find ways to give practical, impartial expert support to residents who are making their own plans for their estates.

ORGANISING PRIVATE RENTERS

My Big Renters' Survey last year identified that six out of ten renters would want to join an independent London-wide renters' organisation if it existed, and they would be prepared to pay a small fee to have this kind of group representing them and their interests.

Helping support an independent renters' union was an idea I have previously proposed,⁴⁷ and I have asked the Mayor about the potential to support such a group to establish itself.⁴⁸

The organisation, once set up, would be very likely to be sustainable through ongoing member contributions. However, I believe there remains a strong case for the Mayor to provide start-up funding and resources to help establish such an organisation.

It could contribute to the Mayor's goals to improve standards in the private rented sector, help gather data to support his efforts to 'name and shame' rogue landlords and provide support to renters wishing to enforce new rules.

The process of supporting such a group could be similar to the community housing hub, with the Mayor's support serving to speed up the development of independent social infrastructure that could empower millions of Londoners.

Providing information about renters' current rights

The Mayor should also see providing clear information about the current rights and responsibilities of private renters and landlords as part of his strategic role.

Tower Hamlets Council recently produced a private renters' charter online to help residents understand their tenant rights and responsibilities. I asked the Mayor recently about this and he said that, alongside the release of the 'name and shame' landlord and letting agent database he will provide a series of information pages online.⁴⁹

This is a good response that I hope to see acted upon promptly.

BETTER HOUSING MANAGEMENT AND GOVERNANCE

The draft strategy makes some attempts to define higher standards for the management of homes, notably the provisions in section 3.78 setting out key management standards that will be required in planning for 'build to rent' developments.

However, I think the Mayor could go further. The London Assembly Housing Committee will be investigating these issues in 2018 and the Mayor should consider any recommendations made when finishing this strategy.

Issues of tenant and resident rights and their involvement in managing their homes have been brought to the fore by a number of recent events, including the appalling treatment of residents who were raising concerns about Grenfell Tower, and the difficulties experienced by many residents of new developments when



challenging failings in the quality of their homes.

The Mayor should be seeking to influence and improve the management and governance of both new and existing housing developments and estates through this strategy, as well as putting in place strong requirements across all tenures of new homes in his London Plan.

These should ensure that accountability of landlords and freeholders is high across London, and that all residents – including leaseholders, tenants and private renters – are able to take a strong role.

The draft strategy looks at some of these issues (but only for social housing tenants and leaseholders) in sections 5.66 to 5.71. I support the proposals for reform at a national level, including changes to the role of the new Social Housing Regulator, reform of how complaints are taken to the Housing Ombudsman, and the Mayor's call for a national Commissioner for Social Housing Residents.

However, there is no reason for the Mayor not to commit to appoint his own commissioner to stand up for the rights of residents of all kinds on estates to bring their voices more firmly into City Hall.

SUPPORTING NEIGHBOURHOOD PLANS

I am very surprised to see nothing about the growing network of Neighbourhood Forums in London and the benefits of neighbourhood planning in the draft strategy, even in the chapter called 'High quality homes and inclusive neighbourhoods'.

The Mayor needs to acknowledge the strongly proactive role Neighbourhood Forums can play

in devising community-led plans for brownfield sites, and the detailed way many forums are seeking out small sites that could be brought forward.

The powers of Neighbourhood Forums are not huge, but they do include the ability to further protect local green spaces, nominate Assets of Community Value in their area and bring forward Community Development Orders to encourage the use of vacant land in their areas.

In the final strategy, this gap should be corrected, with details of how the Mayor will work with these groups to adapt and include new Mayoral initiatives and goals into their Neighbourhood Plans, and recruit them to help with his small sites strategy.

MEANWHILE COMMUNITY USES

In September 2016, I discussed with the Mayor the issue of empty buildings in London, which citizens' groups are keen to make use of as 'meanwhile' spaces for community benefit.

A wide range of groups interested in meanwhile uses, including community and cultural organisations and workspace non-profits serving small businesses, are struggling to find spaces for their projects.⁵⁰ And in housing, there are many existing or new co-operatives who might want to make short-term use of empty buildings more ethically than property guardian companies.^{51,52}

I am pleased to see that throughout the draft London Plan (policy H4, policy SD8 B (d), policy D7 K and section 3.7.1) the Mayor firmly supports temporary or 'meanwhile' uses of vacant properties and land. This should also be reflected within his Housing Strategy and I hope to see more about this in the final document.



6. HELPING LONDONERS WHO WANT THEIR SAY ON CHANGES TO THEIR AREA

Throughout the draft Housing Strategy, the Mayor indicates that the focus of the new Mayor's regeneration plans will be on town centres. Comments in sections 3.18, 3.19, 5.19 and policy 3.1 A (i) suggest a move away from focusing on redeveloping existing housing, and more onto converting low density retail and industrial land into mixed developments with more housing and more viable local economies.

This could be a positive change, as people across London are very concerned about recent and planned 'estate regeneration' projects that are not preserving local communities and what they believe is good about their areas, and not giving them a full say in the plans.

Unfortunately, parts of the strategy, from announcing new plans for 'joint ventures' with councils in section 3.88 to 3.89, ring alarm bells for people who are concerned 'regeneration' may mean plans to demolish existing homes in favour of developments that don't meet local needs and in fact push out existing residents and businesses.

The final strategy needs to do a lot more to reassure Londoners that major changes will not be focused on existing estates, and that the Mayor will not exclude them but involve them fully in making plans for their area.

GIVING ESTATE RESIDENTS A FINAL SAY

The Mayor's draft Good Practice Guide for estate regeneration was published in December 2016. A consultation closed in March this year and the final document was expected in September, but this has still not been published.



My response to the draft said it should be rewritten from scratch.⁵³ I asked for clear conditions to be set for councils and housing association to meet in order to qualify for GLA funding, for residents to be involved from the start, including setting goals for any plans, for non-demolition options to be included at all stages, and for expert support to be given to help develop residents' own ideas.

Crucially, I and many others demanded that existing residents – including tenants, resident leaseholders and private renters – should be given a final say in a ballot over any major plans to remodel their estates.

The draft strategy does not address these issues, instead referring only to the Mayor requiring the 1:1 replacement of demolished homes, and saying resident engagement details will be in the final Good Practice Guide.

I cannot comment further on this until the final guide is published. Meanwhile this is a serious gap in how Londoners can respond to this strategy, and we do not yet know whether the Mayor will fulfil his manifesto commitment to: "Require that estate regeneration only takes place where there is resident support, based on full and transparent consultation."⁵⁴



AVOIDING UNNECESSARY DEMOLITION

I am very concerned that the policies of the previous Mayor, which have been incentivizing the demolition of far too many affordable homes across London, will continue.

Already since May 2016, planning decisions across London have allowed for the demolition of nearly 1,500 existing social housing units, with the developments that are coming in their place only providing 1,000 new social homes.⁵⁵

In policy 4.3 D the Mayor commits to ensuring any affordable homes that are demolished are replaced, but that is as far as his policies to avoid unnecessary demolition go.

The net loss of council homes the Mayor has promised to halt seems set to continue at some speed if his new policies aren't strong enough.

It is not just in the net loss of homes that demolition causes harm – there are social and environmental costs too. The time taken to carry out drastic remodeling can be a blight on a whole area for many years, and there are opportunity costs if resources such as grants are used simply to replace homes that already exist.

Grants for demolished homes

The Mayor has confirmed in a recent written answer that his targets for giving grants for new housebuilding are all gross – measuring only new homes built and not taking into account whether they are genuinely new or only replacing homes that have been demolished.⁵⁶

The Mayor also confirmed in a recent Freedom of Information response that, since being elected, he has awarded more than £20 million in grants to 753 council homes that were simply replacement for existing homes.⁵⁷



This is a bizarre situation to be in. The SHMA could not be clearer that genuinely new homes are what matters in meeting London's housing needs, and the London Plan will be judged on the net gain.

I am also worried that, as outlined in section 3.92 of the draft strategy, giving flexibility to housing associations and removing the link between grants and individual homes will make tracking whether grants are supporting demolished and replaced homes even harder, and that it will potentially encourage even more demolition.

Proper cost-benefit assessment

While I welcome the call from the Mayor, in section 3.85 of the draft strategy, for VAT on repairs and refurbishment to be cut to five per cent, VAT bills are just one of the hurdles facing plans to refurbish homes when they are competing with demolition plans. There is much more the Mayor can do to change this.

The Housing Strategy is subject to a Strategic Environmental Assessment and I would expect a key assessment point in this would be the strength of policies to avoid unnecessary demolition.

The social and environmental impacts of demolition include communities being temporarily or permanently dispersed, noise, dust and disruption during construction, and

the climate costs of the 'embodied carbon' in the lost buildings and new materials used.

I wrote a detailed letter to the Deputy Mayor for Housing and Residential Development in August 2016, asking for a cost-benefit analysis of these issues to be required when assessing options for estates and for planning decisions on large schemes. This is common when making other major investment and planning decisions, such as with transport projects.

Analysis should include the social and environmental impacts above, calculating up front carbon emissions from the project, including the embodied carbon in any buildings that are to be replaced and the new construction, comparing these with any energy savings in the use of newer buildings. The time taken to 'pay back' initial carbon costs through energy efficiency would be known and there would be a more accurate 'return on investment' to compare with other issues.

The Deputy Mayor replied and said that we would need to wait for the new London Plan to see any new policies. There is no mention of the environmental and social impacts of demolition at all in the draft Housing Strategy, and I asked the Mayor whether housing officers were preparing any analysis of these issues in preparation for new policies within the London Plan, he confirmed they were.⁵⁸

But, while the new draft London Plan does cite the Circular Economy Hierarchy for Building, which puts refurbishment and refitting of existing buildings way above demolition in the very same paragraph (3.1.12) this important concept is brushed aside to put density at the top of the list of considerations, and not even a summary wider cost-benefit analysis is required, in contrast to detailed requirements for viability assessment.

Without including requirements for the wider social and environmental impacts of demolition

to be looked at when assessing options for estates, I am very concerned that local plans for refurbishment, infill and extensions will be unfairly disadvantaged, leading to plans going ahead without clear and measured costs and benefits. This needs to be corrected in the final strategy and the new London Plan.

Density and regeneration

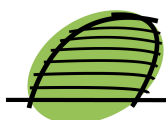
Paragraph 3.22 of the draft Housing Strategy signals that there will be a new approach to density and more details of this are now available in the draft London Plan.

As I say in my introduction to this response, I'm impressed with the way transport and housing planning have been integrated within both these draft documents, and fully support the spatial elements of these plans that seek to focus new housing development around areas of good public transport access and new links.

However, I am very concerned with the proposed wording of policy D6 in the draft London Plan, which says: "Development proposals must make the most efficient use of land and be developed at the optimum density," and states: "Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused."

According to the logic of this policy, when a social landlord is looking at options for a housing estate, a full demolition plan 'must' be preferable to any option that preserves existing homes if it adds even just one more home (of any tenure) to a site.

I assume that new planning policies on density will be reflected in the final version of this strategy and would like to see much more caution added so that increasing density does not have unintended consequences.



The wording of policies that prioritise density needs to be made more balanced, and I would like to see a commitment to planning guidance that sets clear tests for when density alone will not be able to trump social and environmental impacts in decisions about options for estates.

In cases when the provision of new homes on estates through infill and extensions can achieve nearly the same density as a demolition scheme with much less harm, these options should always be preferable.

INVOLVING LONDONERS IN OPPORTUNITY AREAS AND HOUSING ZONES

Throughout the strategy, but particularly in section 3, the Mayor sets out plans to develop a new list of Opportunity Areas, and he had already announced plans to increase investment in his Housing Zones.

Before expanding these schemes, London needs to see much more information about the current schemes, and to be able to assess evidence about whether these are a success.

In the draft strategy, paragraph 3.55, the Mayor says that the progress of Housing Zones has been held back due to a lack of resources and expertise in councils. The Mayor has committed to spending an additional £600,000 on supporting the 'strongest' Housing Zones. In addition, he outlines that he will be asking the Government to replenish the £150 million loan used in the Housing Zones.

In the final strategy document I would like to see details about the criteria for a 'strong' Housing Zone.

In trying to scrutinise both these sets of plans, I have found getting basic information about the Housing Zones in particular to be quite difficult,



with months of tiresome back and forth questions with the Mayor.⁵⁹

I have also struggled to get details of the expected home in each tenure and the number of demolitions per site.^{60,61} These are still not included in the recently updated webpages about the Housing Zones programme.

The final strategy needs to say more about how new Opportunity Areas will be decided, how the Housing Zones will be managed in future, and give better guarantees about communities being able to take the lead.

It should set out a clear set of principles and pledges for both transparency and resident involvement in any new plans, and these should also apply to the continued development of the current areas.

There should also be measurable goals set for each area and zone so Londoners and Assembly Members can track the Mayor's progress.

PROTECTING GREEN SPACES

In my response to the Mayor's vision document, A City for All Londoners, I said:⁶²

"Green Belt and Metropolitan Open Land currently have strong protections under the London Plan. However, in too many cases, rather weak arguments for 'exceptional circumstances' are being used to justify placing

housing and facilities such as schools on land with these designations.”

I am therefore pleased that the Mayor is sticking to his commitments, made during the election, to defend the Green Belt, and the draft strategy restates this in policy 3.1 A (ii).

He has also stated that higher protections will be applied to Metropolitan Open Land (MOL) – an equally important designation, which applies to many spaces inside the city that are highly valuable to local communities.

The draft new London Plan also contains policy 7.17 setting out strong protection against inappropriate development on MOL, and the Mayor has also committed to a vision for London as a National Park City, though this is not mentioned in the draft strategy.

These new commitments are positive, though I am not sure that smaller green spaces, particular in areas with good access to public transport, are going to fare as well under these policies.

The new approach to density signaled in the draft strategy is intended to help protect the Green Belt from sprawl. However, the stark wording of policy D6, where this is codified in the draft new London Plan, suggests that protecting the green and open spaces that are particularly valuable to communities in areas near transport hubs will prove secondary to the overriding drive for higher density.

The final strategy and London Plan must introduce wording that specifically protects green spaces in cases where density is a competing consideration, or the Mayor’s stated goal to make London a greener city will fail.



7. HELPING LONDONERS WHO HAVE SPECIFIC NEEDS

In several areas of policy, the draft Housing Strategy doesn't go into enough detail about how it will help groups of Londoners who may have specific disadvantages or housing needs that should be addressed.

THE GYPSY AND TRAVELLER COMMUNITY

I believe that the impact of policies on the gypsy and traveller community should feature more consistently through the draft strategy wherever this group may be affected.

For example, there are clear implications from new policies on densification and regeneration for this community. These policies could potentially lead to displacement of gypsy and traveller sites, worsening living conditions and access to transport, health and education.

However, there is almost no mention of this community in the draft Impact Assessment accompanying the policy, and no mitigation for these impacts is mentioned within the sections of the strategy on regeneration.

The London Gypsies and Travellers organisation has submitted its own response to the draft strategy that outlines how the final documents could interweave the issues of the gypsy and traveller community throughout the final document. It also asks for the Mayor's plans for land acquisition and assembly, and TfL's current programme of land development, to be used to increase provision for traveller accommodation.

The group has met with GLA planning officers at their recent forum to talk about these and other issues, including the London Plan and the



way affordable housing funds are so far failing to support new pitches.⁶³ I urge the Mayor to read this response, take note of the other feedback received and include new policies in the final strategy.

HOMELESS LONDONERS AND THE 'HIDDEN HOMELESS'

I am pleased to see that the Mayor has dedicated a chapter of the draft strategy to tackling homelessness and helping rough sleepers, setting out a collaborative and multiagency approach to help homeless people by increasing temporary accommodation and move-on homes.

Supported housing schemes need both capital and revenue funding to provide more help to people with additional needs. As the Mayor outlines in paragraph 7.5 and 7.6 for complex reasons including the shortage of affordable housing, many people are placed in private rented sector homes that they cannot sustain. The lack of homes to move to from hostels and supported accommodation mean that some can live in temporary homes for years.

The Housing Committee's report, Hidden Homelessness, published in September 2017, found that 13 times more people are homeless but hidden than are visibly sleeping rough – as many as 12,500 people each night in London.⁶⁴ However, the draft strategy fails to address this situation directly and only mentions hidden homeless people briefly in reference to young people 'sofa surfing'.

The Mayor has committed an initial £300,000 to a TfL team dedicated to helping the rising number of homeless people who use night buses and tubes as a place to sleep.⁶⁵ This is a good start in helping to find concealed rough sleepers, particularly women, but is only briefly mentioned in the draft strategy.

It is also important for the Mayor to help councils gather consistent data across London on the characteristics of people who present to them as homeless, including those turned away not just those given local authority support. This was recommendation two of the committee's report and should be included in the research work of the No Nights Sleeping Rough taskforce.

Recommendation three of the report called on the Mayor to do more to help councils consistently apply criteria for vulnerability that determine whether someone is offered support (unfortunately, simply being homeless is no longer defined as enough to qualify as vulnerable and in need of help). Although the Mayor commits in the draft strategy to work further on lobbying with regard to welfare changes, more work on this issue should be added to policy 7.1 B.

The committee also looked closely at ways to prevent homelessness, and recommended that the Government should review the resources available to councils for implementing the Homelessness Reduction Act.

In October 2017, the Government released new funding to help reduce the burden on councils.⁶⁶ However, this may not be enough. To give just one example, Camden Council has recently estimated additional costs of up to £2 million per year, while the Government 'additional burdens' funding is just £878,000 spread over three years.⁶⁷

I believe the Mayor should monitor the impact of the Act on councils and help them to lobby for more funding, so I'm pleased to see there is a commitment to do this in policy 7.1 A (i).

LONDONERS ESCAPING DOMESTIC VIOLENCE

I was encouraged to read policy 7.1 B (iv) that seeks to provide a "package of interventions to address homelessness caused by violence against women and girls."

I hope these interventions will be guided by MOPAC's updated Violence Against Women and Girls Strategy that is expected to be published soon.⁶⁸

The Assembly Housing Committee has been looking at these issues in our investigations into supported housing and hidden homelessness, and have heard from Solace Women's Aid about the shortfall in refuge bed spaces, which is increasing as a proportion of London's population.⁶⁹

The Women's Aid Annual Survey in 2016 found that:⁷⁰

- on a typical day, two thirds of women in refuges had their children with them
- more women and children were turned away from refuges than were let in.

Shortfall in London refuge spaces:

	2010	2011	2012	2013	2014	2015	2016
London bed spaces	798	756	722	793	799	815	812
London population*	8,204,407	8,204,407	8,204,407	8,308,369	8,416,543	8,416,543	8,538,689
Target (based on one space per 7.5k population)	1,094	1,094	1,094	1,108	1,122	1,122	1,138
Shortfall	296	338	372	315	323	307	326
*ONS mid year estimate for:	2011	2011	2011	2012	2013	2014	2015

In policy 7.2 C the Mayor identifies the need to invest in hostels and refuges and commits to spending £30 million of capital funding on these.

However, it is unclear how much is going to be spent on each separate service. This is important as both hostels and refuges have different needs to address. I have asked the Mayor to clarify the spending on each service.

The London Assembly Housing Committee report, Supported Housing in the Balance, revealed an unclaimed £23.4 million from the second phase of the Mayor’s Care and Support Specialised Housing Fund.⁷¹ It found that refuges in particular were not easily able to find the private partners required to bid.

The report recommended that: “The Mayor needs to review his Care and Support Specialised Housing Fund. There should be more flexibility in the conditions applied to capital grant to encourage innovation and more agile provision. The revised Fund needs to be better promoted to raise awareness among developers from all sectors.”

I would like to see more about how the Mayor will deal with some of these specific problems faced by refuges in the final strategy, including how he will address the lack of spaces available to a parent seeking refuge with their dependent male or adult children.

WOMEN ON LOWER INCOMES

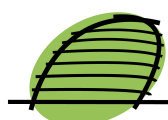
The draft strategy does not address how the inequalities experienced by women may also negatively affect their opportunities to access decent housing.

In May 2016, I received a commitment from the Mayor that, when developing the definition of the London Living Rent, he would take into consideration the fact that women’s earnings are, on average, only 81 percent of those received by men.⁷² The Mayor told me then that he did not want to: “inadvertently not give the benefits to Londoners who are women that I intend to give to men.”

I have unfortunately been unable to speak with the Mayor to follow up on this promise, and there is no mention of this factor or any practical measures to mitigate it in the draft strategy, the draft Impact Assessment, or the earlier Affordable Homes Programme 2016-21 Funding Guidance.⁷³

MIGRANTS AND THE ‘HOSTILE ENVIRONMENT’

I very much welcome the Mayor’s commitments in section 5.37 of the draft strategy to work with local councils and Government to develop a city-wide scheme to



help Syrian refugees resettle and build their lives in London.

A motion passed by the London Assembly in June 2016 in support of Syrian refugees outlined how civil wars and the increase in natural disasters are pushing up the numbers of people fleeing their countries of origin.⁷⁴

This issue goes much further than the Syrian conflict and I believe that if 'London is open' we should also be offering a permanent helping hand to similarly displaced vulnerable people from all over the world and bringing them into this scheme in future.

While the London Assembly and the Mayor are clearly committed to making sure London is a welcoming city for everyone, including migrants, the Government has continued to push through policies to support its draconian 'hostile environment' agenda, and several of these relate to housing, particularly the 'right to rent' requirements on landlords.

This policy is described in section 6.27 of the draft strategy: "Since last year landlords have been required to check the immigration status of prospective tenants under the Right to Rent regulations. These checks create additional costs and delays for landlords, and they also open the door to discrimination."

I am pleased to see this view reflected in the policies within this strategy too – specifically policies 4.3 B (ii) and 6.1 A (iii). Both of these commit the Mayor to continuing his strong position against these discriminatory policies.

However, I would like to see more detail of the actions that the Mayor will take to lobby the government and campaign on this issue in the final strategy.

KEY WORKERS

More than half of emergency 'blue light' workers in London are now unable to live within the city.

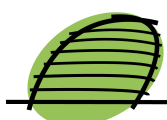
My report, *Where do Police Officers live?*, the London Chamber of Commerce report, *Living on the Edge*, and the first recommendation in the Harris review into London's preparedness for a major terrorist incident, all asked the Mayor to consider where these key public service workers live.^{75,76,77}

In paragraph 3.42 of the draft strategy, the Mayor acknowledges the challenges that key workers face. This says: "The Mayor will also support approaches that set aside a proportion of homes on land owned by Government departments and agencies for key workers, such as health and education professionals. This should be in addition to these sites providing genuinely affordable homes."

However, there are no details of how this additionality will work, or how these requirements might impact on the ability of councils and housing associations seeking to bid for public land to compete with private developers. It looks more like an afterthought than a well-developed plan, and there is nothing in the policies on land or affordable housing to back this up.

I am also concerned by the Mayor's recent response to the Harris review, which concluded that recommendation one, which related to the housing needs of key workers, had now been 'resolved'.⁷⁸

This combination of rhetoric without policy in the draft strategy and brushing off a clear recommendation from a commissioned expert review gives very mixed messages about what the Mayor will actually do to support housing for key workers.



I hope that the final strategy will provide more details about new policies, and include targets for increasing the proportion of vital key workers able to live in our city.

'First dibs'

The Mayor's manifesto famously pledged to give Londoners 'first dibs' on housing and this was a prominent feature of many of his campaign statements.⁷⁹ At MQT in June 2016, I sought to understand this policy and highlight some of my concerns, but no further detail has yet emerged.⁸⁰

In June 2017, in response to a written question, the Mayor pointed to the report of the Homes for Londoners Board on the impact of overseas buyers on the housing market, and said that he would publish a response "in due course".^{81,82}

In the draft strategy, this policy is only briefly referenced in section 4, and similar words appear in the draft London Plan. I have recently asked the Mayor for an update on 'first dibs' and he has replied along the same lines: "I want Londoners to be able to access more new homes in London and I will be announcing further measures in due course."⁸³

This lack of clarity must be cleared up in the final version of this strategy. The Mayor has now been in office for 19 months but Londoners still do not know how he intends to fulfil his manifesto pledge, leaving us unable to hold him to account on his promises.

YOUNG PEOPLE

Young people and practitioners are hugely concerned about the lack of affordable housing for this group.⁸⁴

Young Londoners are disadvantaged by the current housing market in many different ways. They find it difficult to access social housing and to afford private rented property, and many now believe that owning their own home in London is permanently unachievable. They are also faced with intersectional challenges, including with employment opportunities and wages.

London Youth's report, *Young People's Capital of the World?*, stated that:⁸⁵

"The Mayor of London and the Greater London Authority should put mechanisms in place to ensure that young people have a clear voice, brokered through community youth organisations, in the development of London strategies and in key local decisions around service provision, housing and regeneration, and skills and employability."

I asked the Mayor at MQT in March 2017 to create a young people's strategy to ensure the needs of young Londoners are considered.⁸⁶

However, with no specific reference in the policies within the draft strategy to their needs, and no commitments to listening to young people in the further development of these policies, this signals to young people that they are not being considered as important stakeholders in new housing policies.

I urge the Mayor to convene new consultation and outreach events to listen to the opinions of young people and the organisations who represent them to gather feedback on this strategy. Their recommendations and comments should then be included in the final document.



Housing benefit

I am encouraged to read Policy 7.1 A (iii) that states that the Mayor will be lobbying the Government to overturn recent housing benefit changes for 18- to 21-year-olds. With young people making up a quarter of London's population, there is a surprising lack of data showing the effect these changes in Government policy are having on this age group.

The Mayor should correct this and conduct London-wide research to assess the impact on Londoners of this policy to help in providing evidence to the Government.

EX-OFFENDERS

I am surprised not to see any mention of a long-term solution for ex-offenders who leave prison without a secure home to go to.

The Mayor's Police and Crime Plan notes that 24 per cent of all offenders reoffend within a year of ending their sentence.⁸⁷

In September 2016, the Prison Reform Trust and Women in Prison released the report, Home truths: housing for women in the criminal justice system, which detailed the barriers that women offenders face on their release.⁸⁸

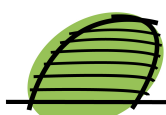
In October 2017, I asked the Mayor in written questions for his views on whether insecure housing is a contributing factor to the reoffending figures.⁸⁹

He replied: "There is little doubt that insecure housing can be a contributing factor. However, we also need to do far more in the criminal justice system to rehabilitate and drive down reoffending."



However, apart from £1 million for a Rough Sleeping Innovation Fund (paragraph 7.34), which is intended to improve provision for a whole range of groups, these issues are not well covered by measures in the draft strategy, and I would like to see policy aims and targets to support ex-offenders in the final document.

The Police and Crime Committee is currently investigating women and the criminal justice system, and I hope that the Mayor will also look at any relevant recommendations on housing when finalising this strategy.



WHAT DO YOU THINK?

I would like to hear more from you about my ideas for how the Mayor could tackle housing in London.

Please get in touch with me if you have any comments or suggestions.

Sian Berry AM, Green Party Member of the London Assembly

Tel: 020 7983 4391
E-mail: sian.berry@london.gov.uk
Address: London Assembly, City Hall, London, SE1 2AA

Azzees Minott, researcher

Tel: 020 7983 4358
Email: azzees.minott@london.gov.uk

This report sets out my views as an individual Assembly Member and not the agreed view of the entire Assembly.

Picture credits:

Older Women's Co-housing by Tim Crocker
Child in London playground by Tom Page on Flickr
Demolition at Woodberry Down by Nico Hogg on Flickr
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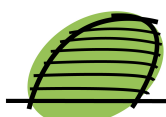
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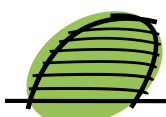
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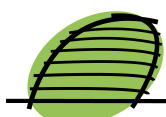
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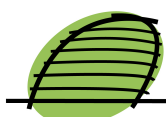
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