

Community and Voluntary Sector Response
to
Draft London Housing Strategy
(17 February 2014)

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Introduction

This comprehensive response captures a wide range of views on the London Housing Strategy (LHS) from London's voluntary and community sector (VCS). It draws on discussion held at a VCS consultation held on 15 January 2014 at Resource for London. This event brought together 70 people from a range of VCS organisations, and included a presentation and Q&A with Alan Benson (GLA Housing), and workshop discussions which were recorded and collated.

The issues and recommendations in this document were initially raised and discussed at that event, and have been subsequently revised, with a draft circulated and organisations invited to sign up to this response.

Our overriding concern is London's housing crisis, which exists as a result of decades of failures to address the unaffordability of housing in the capital. This has created high levels of homelessness and overcrowding and led to large parts of central and inner London becoming increasingly affordable (and accessible) only to the wealthy, with lower income households being pushed out. Unaffordability has led to high levels of transience (in both the private and affordable rent sectors) which makes it very difficult to create or sustain active, supportive and engaged neighbourhoods.

We are of the opinion that any meaningful housing strategy produced during such a crisis has to acknowledge, address and propose solutions to these underlying issues. The scale of the housing crisis itself is such that only creative and innovative thinking and action will begin to solve this.

Sadly, there is nothing in the strategy that indicates to us this is taking place. Consequently it is our view that the growing problems of poverty and spiralling rents that blight the lives of tenants living in the capital will continue to get worse.

We feel strongly that new ideas must be explored and taken forward in a collaborative way which includes the VCS. An Equality Impact Assessment should urgently be carried out on the LHS, with the support of the VCS and utilising the expertise within the Mayor's Housing and Equalities Standing Group.

Community engagement

The Mayor's engagement with tenants and the most disadvantaged Londoners needs to be more formalised, better resourced and better supported in developing the LHS.

Whilst the Mayor's Housing Forum includes some representatives from excluded Londoners and tenants groups, this has never been sufficiently wide in terms of VCS representation, and it now meets only once a year.

The London Housing and Equalities Standing Group will be submitting its own response to the LHS and calling on the Mayor to continue to support the group so that it can offer advice and support the review of how the strategy impacts on protected characteristic groups.

Community engagement brings value not only in operational issues of estate and housing management, but in strategic discussions relating to London housing policy. The LHS must engage with excluded groups of Londoners if it is to address the difficulties they face. Mechanisms also need to be developed and strengthened for housing associations and private tenants, alongside the existing council tenants groups.

Recommendations

We would like to meet with the Mayor to discuss:

- Strengthening VCS representation within the housing partnership structures that develop and implement the London Housing Strategy.
- Establishing a quarterly VCS housing forum, administered by the VCS but meeting at City Hall and attended by the Mayor's representatives.
- Identifying resources to support engagement with VCS on housing issues, either within existing GLA budgets or by taking control of the Tenant Empowerment Fund for London (previously under the Homes and Communities Agency and now held by the Department for Communities and Local Government).

Meeting London’s diverse housing needs

General need and the evidence base

In recent years the nature and scale of the delivery of new homes in London has borne little or no relation to need. Analysis by London Tenants Federation of housing need versus housing delivery in London over the last nine years shows an over-delivery of market homes and massive shortfall of social rented homes:

- 20,695 more new and additional market homes were delivered in London than required, and
- 160,450 fewer new and additional social-rented homes were delivered than required.¹

Table: Housing need and delivery in London 2003-12

10 year housing need	Social-rented	Intermediate	Market
2004 housing needs survey	207,900	24,500	121,100
2008 SHMA	245,000	-38,000	142,000
Average of the 2004 and 2008 10-year assessments of need	226,450	-7000	131,550
Average of the 2004 and 2008 10-year assessments of need applied for 9 year period of 2003-12	203,805	-6300	118,395
New and additional homes delivered 2003-12	43,355 (21%)	32,650	139,090 (117%)

The LHS’s targets for market and intermediate homes are questionable. The 2013 Strategic Housing Market Assessment (SHMA) identifies that that there is a backlog of 67,369 social homes while there is a surplus or minus backlog figure of 101,886 market homes.

The LHS targets seem to be based on the assumption that if higher levels of market homes are not delivered, market housing costs will remain at unaffordable levels. However, there is no detail or evidence on how long it might take to reduce the costs of market housing, if at all, through delivering more market homes; or on what

¹ Analysis carried out by London Tenants Federation. Net housing delivery figures taken from Annual Monitoring Reports of the London Plan. Housing need figures used are an average of figures from the 2004 Housing Needs Survey and the 2008 Greater London Strategic Housing Market Assessment.

quantity of market homes might be required to facilitate reduced market housing costs.

Nor are there any proposals around what happens in the meantime to the majority of newly forming households and those living in inadequate homes who will never be able to afford market homes for sale or rent.

We are particularly concerned about what is happening at the top end of the market, which appears to be key in determining the cost of market housing in London. The Smith Institute's 2012 report *London for Sale* revealed that 65% of central London market homes are being brought by overseas investors. Other analyses suggest this percentage could actually be as high as 75%. The Smith Institute report also said that anecdotal evidence suggests that many of these homes are being left empty. While the GLA says this is not the case, again there is a lack of evidence. Anecdotal evidence from grass roots groups suggests that the lights are never on in more than 25% of flats in luxury blocks.

The 2013 SHMA provides no analysis of the impact on housing need of welfare reforms, in particular changes to Local Housing Allowance, the total household benefit cap, and Universal Credit. Private rents are continuing to rise in London and there is a lack of evidence that increasing the numbers of private rented homes will meet long term housing needs or assist in supporting strong and sustainable communities.

A key concern here is that homeless and vulnerable households who would previously have been considered as needing social-rented housing are forming an increasingly large section of private renters. We are concerned that many are likely to be living in poorer quality homes with higher fuel costs. We fear that the transient nature and lack of security of tenure of the private rented sector will impact detrimentally on children's educational and health outcomes. This will result in mounting long-term costs to the public in terms of health, education and welfare. This could be minimised through delivery of secure low-cost rented homes.

In a survey carried out by *The Guardian* in November 2012 found that London local authorities were already placing homeless families outside the capital or had secured or were considering temporary accommodation outside London for future use.² These included: Kensington & Chelsea (which had moved families to Manchester and Slough); Waltham Forest (which had acquired housing in Luton, Margate and Harlow); Brent (which had relocated households to Hastings); and Tower Hamlets (which had relocated a handful of families to Northampton).

In November 2013, *Inside Housing* reported that London boroughs had more than doubled the number of homeless families they are placing outside the capital. They

² <http://www.theguardian.com/society/2012/nov/04/london-boroughs-housing-familiesoutside-capital>

said that 789 households had been housed in 69 local authorities outside London as far away as Manchester, Birmingham, Swansea and Accrington.³ In October 2013 *The Guardian* reported that young mothers were being evicted from a hostel in Newham to be rehoused some 200 miles away.⁴

There is also evidence of displacement occurring in large redevelopment schemes relating to both tenants and leaseholders.

We believe there is insufficient evidence in the LHS to support increased targets for intermediate housing. The 2004 Housing Needs Survey found that only an additional 7% of households who could not afford market housing could actually afford intermediate housing. The 2008 SHMA found a surplus of intermediate homes. The cost of intermediate housing is likely to be similar to affordable rents but necessarily requires the surety of regular income, which is increasingly difficult to guarantee, particularly at the lower income end.

Shelter's *Forgotten Households* report, found that the average household income of those accessing part-rent part-buy homes in London was over £33,000 and for those accessing shared equity products (where part of the cost of a home is funded by a shared equity loan repayable on the sale of the property) was over £40,000.

The SHMA 2013 identifies that the median full-time earnings in London have fallen in real terms for three years and are currently at £653 per week (£33,956 per annum). This of course fails to address median household income levels (including those on benefits and working part-time) which might provide a clearer picture of what households can afford in terms of housing in London. In 2010 the GLA assessed the equivalised median household income in inner London to be £31,379 and for outer London £30,507.⁵

When this is compared with the cost of 'affordable rent' accommodation in London, it shows clearly that actual need cannot be met without increasing benefit support and levels of housing benefit paid in London.

Affordable rents in the capital are simply not affordable to the majority of Londoners. The Mayor must acknowledge this.

According to the 2013 SHMA, average, affordable rents have been delivered at almost 70% in London (rather than 65% as originally suggested by the London Mayor). On average this would require a household income of more than £40,000, if the household did not have access to housing benefit.

³ <http://www.insidehousing.co.uk/tenancies/londoners-housed-outside-capital-doubles/6529299.article>

⁴ <http://www.theguardian.com/society/2013/oct/14/young-single-mothers-focus-e15-newham-rehoused>

⁵ GLA Intelligence Social Exclusion Report, 2010

The LHS is silent on the housing needs of particular groups, for example young people. Their needs and all the protected characteristic groups should be reviewed through an Equality Impact Assessment and plans to address their needs should be incorporated into the final strategy.

Recommendations

The Mayor must:

- Ensure that there is transparency around homeless households being placed outside their boroughs and outside London. Quarterly reports should be produced giving London-wide and borough figures.
- Produce quarterly reports on intermediate housing sales including cost of the properties sold and levels of monthly mortgage, rent, and service charge costs.
- Produce detailed analysis of the time period it might take to reduce market house prices in London, if at all, by delivering more market homes; what kind of levels of market delivery might be required to produce any reduced house prices; and what happens in the meantime to address the serious need relating to households not able to meet the cost of buying or renting market homes.
- Develop proposals for a significant programme of low-cost rented homes (with rents that are no higher than social rents) to genuinely meet housing need in London.
- Commission a detailed SHMA to take into account the impact of welfare reform in London across all protected characteristic groups.
- Immediately carry out an Equality Impact Assessment on the LHS, with the support of the VCS and utilising the expertise within the Mayor's Housing and Equalities Standing Group.

Housing for older Londoners

We welcome the proposed provision of older people's housing to deliver a range of products in mixed tenure developments, the re-iteration of the importance of the Lifetime Homes standard and the aspiration to create Lifetime Neighbourhoods.

However, the need for an adequate supply of sheltered housing (especially in the light of the sale and re-development of existing sheltered housing schemes) is not addressed in the strategy. Neither is the need to develop a range of policies to address under-occupation of family sized homes by older people across all tenures (beyond a review of equity release products).

We are also concerned about how well the needs of the largest section of older people who do continue to live in their own homes are being addressed in terms of care, health and welfare needs. Especially since many organisations are seeing a reduction in revenue funding for support projects to older and vulnerable people.

Recommendations

The Mayor must:

- Develop a target for specialist supported housing for older people (including sheltered housing and extra care housing, for example) should be included in the strategy.
- Develop a range of choices across all tenures to enable older households (including older homeowners who are ‘asset rich but income poor’) to downsize if they wish.
- Commit to developing a more detailed strategic document on the housing, health and care needs of older people in London, which will account for the different experiences of older people who share one or more of the protected characteristics.

Disabled households

There is scant mention in the draft LHS of the housing needs of disabled people, especially with reference to the genuine affordability of suitably adapted homes where the person concerned is low waged or unable to work because of their disability or ill health.

Disabled people are three times more likely to be workless than other member of the community, are likely to be on lower incomes and have been more badly effected by welfare changes particularly relating to care costs and the bedroom tax: 72% of households affected by the bedroom tax have at least one household member who is disabled. Disabled peoples’ housing needs are best catered for through delivery of accessible, secure and genuinely low cost rented homes.

The Mayor proposes £30m for special housing schemes for older and disabled people. While it is clear that there are increasing numbers of older people living in London, disabled people who are under the age of 65 would rather be in accessible general needs housing. There is no mention in the draft LHS of the key role the London Accessible Housing Register could play in enabling disabled people to find appropriate homes.

We are also concerned about the accessibility of the smaller and micro-homes that are proposed in the draft strategy.

We feel that the target for 10% wheelchair accessible homes is inadequate to meet need, when taking into consideration that there are 1.4 million disabled in London and there is an increasingly older population.

Recommendations

We propose that the Mayor:

- Promote the use of the London Accessible Housing Register in the London Housing Strategy.
- Carry out a new assessment of need for wheelchair accessible homes, particularly in the light of London's growing older population.

Alleviating overcrowding

The strategy contains an aspiration to reduce the level of severe overcrowding in 'affordable rented' housing by 2016. (p34) However there is no reference to tackling overcrowding in other tenures, for example the private-rented sector. The proposal to promote smaller homes for affordable rent when the evidence of need for family homes is so high is very concerning.

The 2013 SHMA makes assumptions that levels of under-occupancy and overcrowding will be addressed in the 'social' sector, while no clear analysis has been carried out about households living in under-occupied homes. This is necessary because not all households that are living in under-occupied homes will want or need to leave their existing homes (even those in the social-rented sector who are impacted by the bedroom tax). Some who are dependent on housing benefit to meet the cost of their homes are still eligible to claim full housing benefit, including pensioners.

The draft LHS does not set out how reducing overcrowding in all tenures will be achieved, despite the fact that London has the most overcrowded households in any region, with an estimated 255,000 across all tenures. Further, there are widespread concerns that cuts to benefits will increase the problem, by forcing more households to live in overcrowded homes in the social- and private-rented sector.

The need for green, play and community spaces is extremely important particularly where there is high density and families are living in overcrowded conditions.

Recommendations

The Mayor must:

- Carry out a full review of under-occupancy and overcrowding in London. The report should provide a breakdown of tenure, occupancy and realistic assessments of households that are likely to move from under-occupied homes in the social housing sector.
- Develop tenure-sensitive policies to tackle overcrowding across all tenures, including the private-rented sector.
- Reconsider the policy of building smaller affordable rent homes at the expense of building family-sized homes, particularly given the lack of evidence to demonstrate that there will be sufficient numbers of family-sized homes released through tackling under-occupancy.
- Ensure protection of existing green play and community amenity spaces and for adequate to be provided in all new developments.

Tackling rough sleeping

We welcome the Mayor's continued commitment to ensuring that no one new to the streets sleeps rough for a second night and that no one lives on the streets of London.

We are disappointed that the Mayor's Rough Sleeping Group has yet to find a way to successfully engage with the VCS groups that are key partners in delivering this policy. We commend the work of sub-regional delivery boards such as the East London Delivery Board in bringing all the necessary partners to the table (including faith-based and non-commissioned services) and in promoting joint working.

A key policy which is absent from the strategy is anything to address the housing needs of people moving off the street and into homes (especially those under 35 who can only access Local Housing Allowance at the Shared Accommodation Rate). There does not seem to be a product in the strategy to address the housing needs of younger single Londoners who are working in low wage jobs or who are struggling to enter the employment market. In addition there is no mention of support for vulnerable people moving off the street who have some distance to travel before they are work-ready.

Recommendations

The Mayor must:

- Encourage other sub-regions to adopt the East London Delivery Board's model of joint working.
- Develop a policy to address the need for genuinely affordable housing for low and unwaged Londoners under the age of 35.
- Develop a policy to address the housing needs of vulnerable former rough sleepers.

Addressing statutory homelessness

The impact of failures to deliver homes to meet actual need is demonstrated in increases in levels of homelessness and households being placed in bed and breakfast accommodation by London local authorities.

The number of households in temporary accommodation is rising again in London. There was an increase of 3% between 2010 and 2013, with nearly three quarters of all households in temporary accommodation in the country placed there by London local authorities. There has been a 7% rise in the use of bed and breakfast accommodation in the past year. An issue still not adequately considered is also the displacement from London of low income households.

Policies are needed to provide an adequate housing safety net for households in priority need without resorting to bed and breakfast accommodation.

Recommendations

The Mayor must:

- Ensure that there is an adequate housing safety net for households who are homeless and in priority need.
- Seek to ensure that homeless London households are not placed out of London.

Domestic violence

Domestic violence is a significant cause of homelessness. Survivors of domestic violence and their children often have to leave their homes because of violence, and although some may move in with relatives, or find accommodation elsewhere, these solutions are often unsustainable for more than a short period. They may also have to move several times.

Despite this, and despite the fact that the Mayor's Strategy on Violence Against Women and Girls proposed that it is integrated into plans to tackle a range of other issues, including housing,⁶ the draft LHS does not mention domestic violence.

Local authorities should accept as homeless someone who has experienced or been threatened with domestic violence.⁷ Official statistics show that 12 to 13% of homelessness acceptances in England relate to domestic violence.⁸ Other research also shows that some 22% of families owed the main homelessness duty reported they were homeless because of a violent relationship breakdown, and twice that number (41%) had experienced domestic violence as an adult.⁹

Recent research by St Mungo's found that 39% of their female clients who had slept rough were made homeless due to domestic violence.¹⁰ Securing suitable and affordable housing to allow move on from supported housing (like refuge services) in London has been a policy problem for many years.¹¹

Local authorities can now design their own housing allocation policies, though they must still give reasonable preference to those defined by the Government as being in housing need; this includes people who require urgent re-housing as a result of domestic violence.¹² Local authorities may exclude people who do not have a local connection with the area. However such a rule can disadvantage survivors of domestic violence as many survivors may have to move to another locality to be safe. The Government's own research found that 70% of referrals to refuge services in England were from outside of the local area, so it is problematic to see refuge provision as existing for 'local' need.¹³

Higher rents in the private sector could lead to previously homeless people facing rent arrears and subsequently potentially (intentional) homelessness¹⁴ and greater exposure to the total household benefit cap. This may also mean that more survivors may have to move from temporary accommodation such as a refuge service into the private rented sector which is more expensive than social housing especially in London.

Women's Aid's response to the second Mayoral strategy on Violence Against Women and Girls 2013-2017 noted that cuts to domestic abuse services across London has a serious impact on women and their children escaping violence as

⁶ The way forward: A call for action to end violence against women, April 2009 p23

⁷ See Homelessness Code of Guidance for Local Authorities 2006

⁸ Table 774, households accepted as owed a main homelessness duty, by reason for loss of last settled home, 1998-2012: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

⁹ Please, N et al, 2008, *Statutory Homelessness in England: the experience of families and 16-17 year olds*, London: Communities and Local Government

¹⁰ http://www.mungos.org/homelessness/publications/latest_publications_and_research/1624_no-more-homelessness-through-the-eyes-of-recent-rough-sleepers

¹¹ See footnote 6, page 89

¹² Guidance para 4.13

¹³ Quilgars, D and Pleace, N, 2010, 'Meeting the needs of households at risk of domestic violence in England', University of York, CLG, p74-75

¹⁴ See footnote 6, page 136

many women who exit domestic abuse situations will have nowhere to go for safe accommodation and have limited, or no, practical and emotional support.

Recommendations

The Mayor must:

- Integrate into the LHS plans and objectives from the Strategy on Violence Against Women and Girls.
- Ensure that London boroughs do not include survivors of domestic violence in any local connection rule.
- Develop a pan-London strategy to ensure that survivors fleeing domestic violence can access safe accommodation elsewhere in London if they choose.

Gypsy and Travellers

Housing provision for the Gypsy and Traveller community in London is not being addressed or has been removed as a strategic issue. It has been excluded from wider housing provision mechanisms such as this strategy, the SHMA and the Strategic Housing Land Availability Assessment. The lack of pitch targets in the London Plan and a failure of local authorities to co-ordinate their planning strategies continue to have a disproportionate negative impact on the Gypsy and Traveller community.

The draft LHS does not recognise the accommodation needs of Gypsies and Travellers in London and policy that was included in the previous versions of the strategy has been removed, without justification.

The 2014 Integrated Impact Assessment makes no mention of the Gypsy and Traveller community, despite the fact that the earlier version of 2009 identified a range of issues and made policy recommendations for a more inclusive and fair strategy to address their needs. These recommendations were not implemented.

As Gypsy and Travellers are not recognised as a group with specific and acute housing needs and they continue to be denied access to culturally appropriate accommodation. This is unacceptable given the Mayor's housing duties to address the needs of all Londoners. Over 80% of Gypsies and Travellers in London currently live in housing that is unsuitable to them and affects their health, well-being, family life and identity.

This exclusion is compounded by the failure to include Traveller Pitch Funding among the other housing funding proposals post-2015. A funding strategy supported

by the GLA is essential to provide resources and coordination of Traveller site provision to London local authorities.

Recommendations

The Mayor must:

- Include a section on Gypsy and Travellers in the LHS.
- Take a strategic lead in addressing the evidenced accommodation needs of Gypsy and Travellers.
- Provide strategic support to the boroughs in identifying land for Gypsy and Traveller pitches.

Welfare reform

Changes to the welfare benefits system are having an enormous impact in London. This impact will continue to be felt, and will likely worsen, over coming years.

For example, data from the Department for Work and Pensions DWP shows that the over 15,000 London households have been affected by the total household benefit cap to date. This represents 47% of all households affected by benefit cap across Great Britain. Eighteen of the top 20 local authorities with the highest number of households affected by the benefit cap are in London.¹⁵

The benefit cap is just one element of welfare reform. Other reforms such as changes to Local Housing Allowance, the under-occupancy penalty or 'bedroom tax', and reduction in Councils Tax Benefit are all affecting low income households in London. Further major reform is to come including the roll out of Universal Credit.

Various commentators (including for example the Institute of Fiscal Studies¹⁶), have predicted the cumulative impact of these changes in London (and in the context of wider economic pressures, such as the tight labour market) to be increased child poverty, involuntary migration of families, increased overcrowding, rent arrears, and household debt.

Given the scale of this impact, the disproportionate impact London as compared to the rest of the country, and the fact that these changes directly impact on housing affordability, it is incredible that welfare reform is not addressed in the LHS.

Reductions in help with rent through welfare reforms will have a disproportionate impact on Londoners who are already vulnerable. We have discussed the disproportionate impact of the bedroom tax on disabled households above. It could also have a significant impact on domestic violence survivors: families who have settled in a new home following a period in temporary accommodation such as a refuge service may be under pressure to move again because they are deemed to be under-occupying, creating further disruption and distress. Discretionary Housing Payments are unlikely to be adequate as no payment can be guaranteed nor is it likely to be sufficient to meet the needs of a stay in refuge services. The risk is that the benefit cap could result in survivors either not leaving a violent relationship (because of concerns that refuge costs will not be covered) or returning to a violent relationship when finances become difficult.

A survey by the Chartered Institute of Housing of the impact of the benefit cap in Haringey also uncovered "several reports" of women choosing to stay with violent

¹⁵ <https://www.gov.uk/government/publications/benefit-cap-number-of-households-capped-to-december-2013>

¹⁶ <http://www.ifs.org.uk/publications/7054>

partners who had a job, because they believed that if they took the children and left the family home they would be subject to the benefit cap.¹⁷

Recommendations

The Mayor must:

- Develop housing policies to address to impact of welfare reform on housing need and affordability in London, including offering a strategic pan-London perspective.
- Develop policies to monitor the impact of welfare reform on London's housing need and affordability over time.
- Include in the LHS Equality Impact Assessment an assessment of the impact of welfare reform on protected characteristic groups in London.

¹⁷ <http://www.theguardian.com/society/2013/oct/23/benefit-cap-failing-achieve-aims>.

Existing homes

While we are pleased that the Mayor is likely to receive £145 million, for 2015/16, to bring social homes to a decent standard, we are concerned that there is insufficient political will and funding to protect existing homes, particularly in the social-housing sector.

We are concerned that the implied increases in rental costs in the private-rented sector of bringing homes to a decent standard militates against having both good quality and affordable rents in this sector.

Social housing tenants often complain that the quality of the decent homes work carried out to their homes has been quite poor and that the decent homes standard has neither properly addressed their, nor environmental, priorities. One example relates to the installation of new bathrooms and kitchens, where tenants have not been given options to have showers rather than baths and in some instances showers have been removed and replaced with baths.

Ten years ago, Mel Cairns, the chair of the Health and Housing Group, which represents health and housing consultants in private practice told the Office of the Deputy Prime Minister select committee's decent homes inquiry that the 'decent homes standard is so full of holes that it fails the test of being a minimum standard'. He said 'an overcrowded fire-trap infested with cockroaches, rats, mice and bedbugs could achieve the standard' and that many landlords including councils and housing associations had been able to evade their responsibilities to provide reasonable housing. He said 'we have better standards for kennels and catteries than we do for housing'.

There is concern amongst social tenant organisations that general management, maintenance and repairs of social housing are not sufficient to keep homes at a 'decent' standard.

There is an urgent need for an up-to-date assessment of the impact of Decent Homes works on the costs of on-going management maintenance and repairs and an assessment of on-going needs. The Housing Revenue Account review of 2007 highlighted in its own research that management, maintenance and repairs of council homes was nationally underfunded by £2.25 billion a year. The most comprehensive assessment of the cost adequately managing and maintaining council homes was carried out by the Building Research Establishment in 2003.

Local authorities are still selling social-rented homes at auction because they have insufficient funding to bring some homes to decent standard, or in some instances that 'the homes are too expensive to heat', particularly street properties. Many local authority street property homes were converted into smaller flats in the 1970s and

1980s. Such homes could be converted to provide family-sized homes and be bought up to a decent standard if the Mayor saw this to be a priority.

Far too many social housing estates are being demolished when they are structurally sound and could be refurbished. In some boroughs, perfectly good social-rented homes are left empty for years while boroughs move towards unnecessary redevelopment. One example is the Carpenter's Estate in Newham where some 300 social-rented homes have been left empty for some years while the cost of placing homeless households in homes in the private-rented sector or in bed and breakfast outside London would have paid several times over for their refurbishment.

Demolition and rebuild of social housing estates generally results not only in a loss of social-rented homes but also constitutes a higher environmental cost than refurbishment, if embodied carbon is included in environmental assessments.

Residents in situations where they are facing large scale redevelopment of their estate face at best displacement in order to keep their existing tenancy rights (including rental costs). This puts greater strain on existing backlogs of need, as well as new need. It also puts huge pressure on the health and well-being of older peoples and vulnerable households, who are at risk of losing existing supportive networks of family and friends.

London Tenants Federation's analysis of Annual Monitoring Reports of the London Plan found that around 5,200 social-rented homes were demolished between 2007 and 2012: the equivalent to a years' worth of new build social-rented homes.¹⁸ It is likely that most of these homes were structurally sound and could have been refurbished at a lower cost than demolition and rebuild and at much reduced embodied carbon emission levels. One example is the Heygate Estate where refurbishment proposals produced by Gensler Architects demonstrated an approximate saving of 40,000 tonnes of CO2 through refurbishment rather than demolition (as well as saving 450 mature trees).¹⁹ Gensler put forward a proposal for refurbishment of the 1,260 council homes on the estate at a cost of £13,955 per dwelling (or £35 million to refurbish the whole estate), while the cost of emptying the estate of existing tenants and leaseholders and progressing it to redevelopment was £65 million. A further £15 million will be spent on demolition and the new scheme will provide only 79 social rented homes: a loss of 1181 social-rented homes.

Anne Power from the London School of Economics argues that there is compelling evidence that estate or tower block refurbishment is both cheaper and less

¹⁸

<http://www.londontenants.org/publications/newsletters/LTF%20Newsletter%2019%20Autumn%202013.pdf>
(p 1 & 2)

¹⁹ <http://heygateestate.wordpress.com/>

damaging to the local environment than demolition and new build in all but the most extreme cases.²⁰

Power provides a list of issues and arguments that are not addressed in arguments for demolition. Embodied carbon (i.e. the carbon dioxide emitted during the whole life-cycle of a building; including during the extraction, manufacturing, transport to site, construction, maintenance, refurbishment, water processing, demolition and recycling) used in destroying existing and in constructing replacement homes is not 'counted' in demolition proposals. Demolition and renovation waste make up about one-third of all landfill. The infrastructure required for new building and its significant energy costs and emissions are not discussed.

Demolition breaks up essential social infrastructure in neighbourhoods which takes decades to build up again. Facilities and meeting places are costly to reinstate once they have been lost, and young people and older people can become very disorientated as demolition is planned and carried out. Government research about social capital identifies a strong relationship between local social networks and individual wellbeing and resilience. There is a need for research that looks at the social and financial costs of breaking up local social networks; in particular the impact on young families, children and older people.

Demolition plans have knock-on effects on schools, shops, health provision, banks and other local services, most of which leave an area before homes are demolished and do not return till long after rebuilding, if at all. This causes hardship to the residents and, if they are older people, can have very negative health impacts. Rebuilding timescales are often slowed by the need to renew infrastructure after demolition. The whole process can take up to 20 years. All in all, it is rare for a demolition plan to deliver replacement housing in less than 10 years.

Power points out that in other European countries, such as Germany, there has been a much greater focus on refurbishing social housing than on demolition.

At a time when no new social rented homes are being built and any new affordable-rent homes that might be at around social-rents will comprise only 10.5% of new homes, it is essential that the Mayor (i) put forward a series of policies that protect existing homes and support refurbishment rather than demolition wherever possible and (ii) ensures sufficient funds to keep homes a good standard.

It is of concern that failure to deliver homes that the majority of London households can afford, has resulted in an increasing number of homeless vulnerable households being housed in the private-rented sector. Given that there is a direct correlation

²⁰ Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability?'(2008), available at <http://www.bis.gov.uk/assets/foresight/docs/energy/energy%20final/power%20paper-section%205.pdf>

between rent levels and housing quality in the private-rented sector, there is fear that more vulnerable households are also living in the poorest conditions of that sector.

Private-rented homes are anyway in a worse condition than other tenures, with about a third failing to meet the Decent Homes standard. The sector is less energy efficient and contains more fire and health risks than other sectors. About 13% have 'excess cold' risks. We have set out some proposals around this in our 'Environment' section.

Recommendations

The Mayor must:

- Commission a new assessment of the quality of Decent Homes works carried out in London's social-rented sector and of the future financial need for ongoing management, maintenance and repairs, to keep homes at a decent standard;
- Work with tenant and environmental groups to produce a London Decent Homes Standard.
- Protect existing social-rented housing estates from demolition except in circumstances where homes are structurally unsound, and commit appropriate funding to support retention of existing social-rented homes.
- Lobby government for the removal of financial incentives that support new build over refurbishment; particularly the removal of VAT on housing refurbishment.

Environmental issues

We are concerned that the draft LHS fails to

- provide sufficient focus on environmental issues relating to both existing and new homes;
- include meaningful targets to support climate change objectives that the UK Government is signed up to;
- provide substance relating to the need for good quality sustainable design; or
- address connections between environmental, social and health issues relating to both new and existing homes.

Addressing insufficient focus on environmental issues

We are pleased that the Mayor is seeking additional funding from the Department of Energy and Climate Change's (DECC) Green Deal Communities Fund, to assist in retrofit existing homes. However, we are extremely worried that the 36% reduction in the Mayor's draft consolidated budget for Development, Enterprise and Environment for 2014/15 (from 2013/14) will result in detrimental impact on environmental issues. We are also very concerned that there was significant delay in delivering the retrofitting programme for 2013/14.

The Royal Institution of Chartered Surveyors' 2013 *Sustainable Construction* report suggests that to meet the 80% carbon emissions target by 2050 (which the UK is signed up to) would require 80% of the building stock (across Europe) to be refurbished; the equivalent of one building every minute for the next 40 years.²¹ The retrofitting of 144,689 homes (between 2013 and 2016) in London will likely only scratch the surface of need.

Housing in the private-rented sector is less energy efficient than other housing sectors; having less insulation, double-glazing and central heating, and it is vital that standards are improved. This is particularly important given that an increasing number of homeless and vulnerable households are now being housed in this sector.

The Mayor's office has consistently failed to meaningfully consider the issue of embodied carbon in relation to delivering new and refurbishing existing homes.

²¹http://www.rics.org/Global/Europe%20publications/Sustainable%20Construction_Realising%20the%20Opportunities%20%28Oct%202013%29.pdf

Embodied carbon (defined above) is as important, if not more so, than operational carbon emissions. The amount of embodied carbon used in a building can be as high as 65%, especially as operational carbon load reduces.

The Centre for Sustainable Development²² suggests that in order to meet the UK's commitment to reduce carbon emissions by 80% by 2050, that is necessary to reduce the carbon emitted through the lifetime of a building.

There is concern that too many homes are being demolished rather than refurbished; consistently pushing up levels of embodied carbon emissions (see also our section on existing homes). Anne Power's article referenced above says that analyses consistently propose that the construction of new homes better reduces carbon emissions than refurbishment of existing homes – but this is only because embodied carbon is generally not considered.²³

Recommendations

The Mayor must:

- Include in the LHS the Mayoral commitment to reduce CO2 emissions by 60% by 2025, with proportionate requirements for the social and private sector and provision of detail on how the target will be achieved.
- Include in the LHS a minimum energy performance standard for the private-rented sector.
- Include in the LHS a more ambitious minimum energy performance standard for the private-rented sector than that already in national legislation (which is a requirement for all homes to be at Energy Performance Certificate (EPC) Band E or above by 2018). Landlords should be prevented from renting out homes that don't comply with standards.
- The homes of all low income households (regardless of tenure) should have a EPC Band C by 2020.

The need for good quality sustainable design

Real, low-energy performance depends on buildings that are well designed, constructed, commissioned, operated/used and maintained. We are concerned that currently too many homes are built to last no more than 25 to 30 years; which may

²² <http://www-csd.eng.cam.ac.uk/themes0/resource-flows-1/embodied-carbon-and-energy-in-buildings-eeeb>

²³ <http://www.bis.gov.uk/assets/foresight/docs/energy/energy%20final/power%20paper-section%205.pdf>

provide benefit the construction industry in terms of work, but is not sustainable development.

There are generally a wide number of sub-contractors involved in building processes, with poor communication between them and a poor overview of the delivery of the whole product. This increases the risks of failings and indeed possible damage to the envelope of a building; at each stage of construction.

Carbon emissions are considered at the design stage but not in post-production (in both construction of new and refurbishment of existing homes). The RICS *Sustainable Construction* report suggests that there is substantial evidence that actual energy consumption in buildings is often twice as much predicted at the design stage.

Loss of green space continues to be an issue raised by community groups. A 2012 BBC report found that 120 acres of parks, playing fields and allotments between 2009 and 2012 had been sold or was currently going under the hammer.²⁴ This demonstrates that there is a need to strengthen policies on loss of green space, particularly with growing demand for space to build homes. Retaining green spaces is beneficial to passive cooling, biodiversity and health. Local green space is particularly important for those on low incomes that are unable to afford to travel to larger parks in London and are unable to afford organised play and sports provision for children and young people.

The proposed increase in delivery of new homes in London requires a full assessment of the additional water needs in the capital and of how greater levels of recycling of rain and grey water may be achieved to support any increased need.

There is much criticism of the proposed new super-sewer justified as being needed because London's sewers not only take waste water from people's homes but also act as London's drainage system. Sustainable urban drainage systems are a cheaper and greener alternative and these must be considered as a priority.

Energy saving should be considered as a priority in both new and existing homes.

Recommendations

The Mayor must:

- Carry out a full assessment of the carbon emissions impact (including embodied carbon emissions) of delivering 42,000 new homes per annum in London and set out how he will ensure full all round low carbon design, construction and operation in all new housing developments.

²⁴ <http://www.bbc.co.uk/news/uk-england-london-17250159>

- Carry out a full assessment of water need in the delivery of 42,000 new homes per annum, the impact on the existing system and proposals for recycling rain and grey water in each new development.
- Carry out an assessment of the impact of building 42,000 new home per anum on the existing heat island effect in London.
- Require that new homes are built to last for at least 125 years, and should be easily maintained and refurbished.
- Ensure that energy emissions assessments at the design stage are delivered 6 to 12 months after the scheme has been completed, and include a post construction energy emissions and efficiency report.
- Make assessments of embodied carbon levels in the construction of new homes. Where demolitions and redevelopments are proposed occur first, these must be included in the assessments.
- Protect existing green spaces and deliver new green spaces; encouraging the use of green walls and roofs, cool pavements and parking areas.
- Include sustainable urban drainage systems in new housing developments.
- Promote of passive solar gain, cooling and ventilation in new homes as well installation of extra insulation and photovoltaic solar panels in existing homes.

Links between environmental, social and health issues

There are strong links between poor environmental standards, fuel and general poverty and health which should be highlight and addressed in the LHS.

In 2012 the London Assembly's report found that more than 560,000 London households are estimated to be in fuel poverty in London and 126.400 in 'severe' fuel poverty.²⁵

Both energy efficiency and energy costs are important issues here, particularly for households with low incomes. Low income households spend more than 7% of their income on home fuel while for high income groups the figure is less than 2%. Given the increasing income polarisation in London and the fact that disposable incomes in the UK have been by and large static for five years, this must be a priority for the Mayor.

We are pleased to see that the Government has announced a new Urban Community Energy Fund and would like to see the Mayor actively promote local

²⁵ <http://www.london.gov.uk/sites/default/files/Fuel%20poverty%20-%20Final%20report.pdf>

community based renewable energy schemes (such as the Repowering London project in Brixton²⁶) in the LHS.

Links between health and poverty are well documented. The impact here is not just on fuel poverty but having a good quality environment in which homes are situated. This is perhaps more important for those on low incomes, who have less income to spend on getting to larger green and leisure spaces in London and who don't have disposable income to spend on children's sports and leisure activities.

Social-housing estates are often situated near busy roads and suffer greatly from the impact of poor air quality. London has the worst air pollution of any UK or European city: 4,300 deaths each year in London are thought to be attributable to long-term exposure to air pollution (the individuals dying, on average, 11 years prematurely).

Recommendations

The Mayor must:

- Promote lifetime and walkable neighbourhoods to encourage reduced transport use and air pollution near new and existing homes; and ensure that social and economic sustainability are closely linked to environmental sustainability.
- Promote community-based energy renewable systems and retrofitting.
- Include a more ambitious target for retrofitting existing homes in the LHS.
- Include policies and targets for reducing fuel poverty in the LHS.
- Highlight that housing development proposals must be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality.
- Seek to establish regional and local Fuel Poverty Hubs to bring together health bodies and wider stakeholders to ensure fuel poverty and the wider socio-economic indicators of health are addressed.

²⁶ <http://www.repowering.org.uk/>

Private Rented Sector

Currently the private rented sector is not fit for purpose as a long-term and secure housing option and it is certainly not the tenure of choice for many people living in it. In fact, it is something many of them wish to escape from.²⁷

London's Poverty Profile 2013 highlights further problems:

- At 39%, the private rented sector now has a larger share of people in poverty than the social rented sector (33%). Ten years ago, more than half of those in poverty lived in social rented accommodation.
- The cost of renting even the cheapest quarter of accommodation in London is double that of the cheapest quarter in the rest of England.²⁸

The welfare reforms are not just confined to those out of work, as they impact on those in low paid, insecure and part-time work.

We are therefore of the opinion that any meaningful housing strategy produced during an economic crisis has to acknowledge, address and propose solutions to these underlying structural issues. The scale of the housing crisis itself is such that only creative and radical thinking and action will begin to solve it.

Recommendation

The Mayor must:

- Use his influence to encourage and support local authorities to do more to help the growing number of private tenants by:
 - Take action against landlords and use local press to ensure that the deterrent effect of enforcement action is realised,
 - Carrying out proactive, multi-agency inspections of private rented properties, and
 - Ensuring that tenants are aware of and have access to local advice, support and services.
- Clarify how exactly he will 'support the establishment of new (tenant representative) groups' as stated in his Housing Covenant, and he will actively engage with the newly formed local private tenants groups and the newly established London Private Tenants Forum

²⁷ http://england.shelter.org.uk/_data/assets/pdf_file/0005/656708/Growing_up_renting.pdf

²⁸ <http://www.londonpovertyprofile.org.uk/key-facts/>

Policies: Increasing the supply of new homes

The LHS proposes that developers will be encouraged to provide private rented homes on schemes with more than one phase, to deliver at least 5,000 homes per annum across London (p 2). These homes will be covenanted for long-term private rented usage for at least fifteen years.

There is no explanation of why private rented homes should only be covenanted for fifteen years. It appears to be an arbitrary and short figure and is not long enough.

Recommendation

The Mayor must:

- Consider a longer term covenant or a covenant in perpetuity for homes intended for long-term private rented usage.

Recognising the importance of the private rented sector

The LHS proposes that the London Rental Standard will be implemented, with a target to accredit 100,000 landlords and agents by 2016 (p 20).

We are not convinced that self-regulation works in a dysfunctional rental market where demand far outstrips supply. Most renters simply do not have enough consumer power to be able to choose between an accredited and non-accredited landlord or agent. It is the most vulnerable and disadvantaged people who suffer the most at the hands of unscrupulous and unprofessional landlords and agents.

We cannot see how the extremely ambitious target of 100,000 landlords and agents accredited by 2016 will be achieved in such a market, when the badge of accreditation confers no business advantage whatsoever.

The LHS proposes that the GLA will work with boroughs to optimise enforcement action against rogue landlords and to understand the operation of the housing health and safety rating system. (p 21) There is no detail or explanation of how the Mayor will work with the boroughs on this extremely important issue.²⁹

The LHS mentions that the GLA is seeking to offer its employees interest-free loans of up to £5,000 towards private rental deposits, and will promote this initiative to London's employers. (p 23) While we acknowledge that the GLA will be offering an interest free loan to its staff and will try and influence London's employers to do

²⁹ <http://www.cfpt.org.uk/newsletters/summerautumn07.pdf>

likewise, for most people on low incomes or on zero-hour contracts this option is simply not available to them.

The LHS proposes that major employers in the capital will be encouraged to invest in subsidised housing products to reduce the costs of renting for their employees. (p 24) There is no detail on what 'subsidised housing products' are being proposed here. If they are only offered to employees of the 'major employers' in the capital then they would only benefit a very small number of people and exclude those in some of the most serious housing need, such as those people on low incomes and/or benefits. Also, what happens to these housing products if an employee ceases to work for such an employer?

Recommendations

The Mayor must:

- Gather together a wider range of stakeholders than just local authorities to look at how the Housing health and safety rating system (HHSRS) works. It is a very subjective and people don't understand how this operates.
- Develop simple, clear and enforceable minimum property standards.
- Commission independent London-wide research into retaliatory eviction. This has been dismissed as not a significant issue, but a wide variety of renter and other groups see this problem occurring on a daily basis.
- Set up a pan-London deposit/rent in advance bond scheme to assist those on all Londoners on low incomes to move.

Towards a London rental policy

The LHS proposes that the GLA will explore how longer tenancies can be promoted, within the framework of the assured short hold tenancy regime. (p 22) It proposes that private sector landlords should consider the use of longer tenancies, tied in with greater certainty over rents, where this is viable. (p 29) These proposals are both very vague. We cannot see how this will be achieved in a dysfunctional rental market where insecurity of tenure, short-term tenancies and high rents are the most significant issues.

Recommendation

The Mayor must:

- Conduct a comprehensive review involving a wide variety of stakeholders into different models of rent stabilisation such as those used in Germany and other

countries with strong and successful economies.

Policies: Increasing development capacity

The LHS proposes that The GLA will encourage institutional investment in London's PRS, including through its own landholdings (p 49). New developments are being promoted at the top end of the market and the 'Build-to-Rent' policy is using public money to subsidise the development of properties that are unaffordable to the vast majority of Londoners. This ignores the fundamental basis of the housing crisis in London for those on middle and low incomes: unaffordability.

Recommendations

The Mayor must:

- Publish information on the financial benefits to Londoners of using public funds to encourage and support build-to-let developments.
- Stipulate in the form of covenants that homes offered in these developments are on Assured rather than Assured Shorthold tenancies. This increased security of tenure would encourage the growth of long-term, stable communities and help to combat the perennial problem of 'churn' in the private rented sector, which undermines social cohesion.
- Stipulate that all such developments on publicly owned land would have a certain percentage of homes available at LHA level.

Employment

Living near jobs

London needs sufficient genuinely affordable housing for its workers, including those on low incomes, or the city will fail. People must be able to afford to live near their jobs: for their own sake and for the sake of the London economy and social cohesion and 'liveability'.

At present, instability, insecurity, transience, homelessness are all enormous barriers to employment (and are being worsened through welfare reforms). These housing related barriers impact more on London communities who also face labour market inequalities, for example London's Black, Asian and minority ethnic households are disproportionately likely to become homeless³⁰

London's labour market and economy will never function to its potential while these problems persist. However, as discussed elsewhere in the section on London's diverse housing need, we do not believe LHS proposals will not do enough for the many thousands London households on low incomes.

The benefits of closely located homes and employment opportunities are clear, in both reducing travel costs but also reducing the time spent travelling between home, childcare/schooling, work and services and shops. In order for housing proposals to allow Londoners to need to live within a reasonable distance of their job, childcare and transport costs must also be factored in.

The LHS is concerned with the diverging relationship between house prices and average incomes. Yet its proposals all focus on increasing housing supply. Housing affordability can also be addressed through raising incomes (e.g through raising household earnings through the London Living Wage or a London Minimum Wage; and increasing productivity in low-wage sectors to support wage increases), and addressing costs of living, for example by reducing childcare costs.

Recommendation

The Mayor must:

- Demonstrate how the proposals in the LHS align with and contribute to the priorities and commitments made in other Mayoral strategies, in particular the London Plan, the Economic Development Strategy, the Jobs and Growth Plan, and the Health Inequalities Strategy.

³⁰ LHS Evidence Base , p 25

Maximising employment and skills opportunities from home construction

Any significant increase in home building in London will present enormous employment, skills, and business development opportunities for Londoners, both in construction and related industries. Mechanisms such as section 106 and Community Infrastructure Levy will be key to maximising these opportunities.

Mayor must review the use of these measures by boroughs to ensure opportunity are maximised and well-targeted at those who will benefit most from them, especially previously unemployed people who are long-term local residents. Well designed and robust interventions are required to achieve this. Even with all the investment and legacy programmes developed around the 2012 Games, there is a strong sense that the legacy has not yet deliver in terms of employment and skills outcomes for East Londoners.³¹ Similarly, interventions are needed to maximise opportunities for London SMEs both in small scale construction projects and in supply chains.

Scrutiny on these social outcomes must be improved. It is easy, for example, to inflate construction jobs statistics because of the short-term contracts and churn characteristic of the construction labour market. Rigorous reporting on key measures such as how many net new jobs have been filled by previously unemployed Londoners.

Local employment initiatives must also be supported by coordinated delivery of skills training, work experience, etc to support people to access these opportunities.

Recommendations

The Mayor must:

- Bring together boroughs and stakeholders to review outcomes from s 106 and CIL in London to evaluate whether greater benefit could be achieved for local and disadvantaged Londoners. – these deals must be ambitious and robustly scrutinised
- Collate information on boroughs' use s106 and CIL to increase public accountability and transparency, allow sharing of best practice, and identify areas for improvement.
- Use influence to improve pay, working conditions, progression opportunities, and equal opportunities, in construction and related workforces to have a real impact on lifting families out of poverty (including in-work poverty).

³¹ <http://www.parliament.uk/business/committees/committees-a-z/lords-select/olympic-paralympic-legacy/news/olympic-report-18november13/>

Prioritising paid workers

The LHS proposes that local authorities and other affordable housing providers should give greater priority to working households for lettings. Similarly, the Mayor's Housing Covenant seeks to prioritise the needs of working Londoners, seeing them as the group that contribute to the city.

We are very uncomfortable with this approach, that ignores the economic contribution of non-working Londoners, for example in caring for older people, disabled people, and young children; and through volunteer activities and in their communities. GLA research has established the considerable economic contribution of older Londoners through care to other adults (£4.7 billion per annum), childcare (£600 million per annum), and volunteering (£800 million per annum).³²

These proposals are also highly impractical as workers in low paid employment are more to 'churn' in and out of work.

We believe LHS proposals should be concerned with meeting housing need in London, not with the employment status of individuals.

Recommendations

The Mayor must:

- Remove the reference to giving priority to working households.
- Commission research to better understand and support the economic contribution of Londoners who are not in paid work, including volunteers.

³²

<http://www.london.gov.uk/sites/default/files/The%20Economic%20Contribution%20of%20Older%20Londoners%20Final%20Version.pdf>

Planning Issues: Opportunity Areas and Housing Zones,

Opportunity Areas are London's main reservoirs of brownfield sites where there should be a net increase in 'genuinely affordable' and liveable homes. The draft LHS proposes more homes to be delivered than previously in these areas. Assuming that the LHS will be kept in step with the draft Further Alterations to the London Plan, then the Opportunity Area total target of 300,000 additional homes represents an increase by 25% over the 2011 London Plan. Furthermore, GLA Planners view this as a minimum target, yet have only minimally increased the geographical extent of Opportunity Areas.

No additional planning measures have been proposed to ensure that these homes can be delivered without eroding housing and liveability standards or generating additional negative environmental impacts. Ensuring new homes are 'lifetime homes' will be of little relevance if they are not in 'lifetime neighbourhoods', served by local shops and services, with access to community facilities, green spaces and employment space.

Housing Zones have been advanced as a delivery mechanism to realise the full housing potential of Opportunity Areas, but even at the launch of the draft Further Alterations to the London Plan, no additional information was forthcoming on Housing Zones. Strategy, policy, plans and proposals should not be based on assessments and mechanisms that are not available, scrutinised or proven.

The LHS assumes jobs growth will be concentrated in the Central Activities Zone and is reliant on a number of proposed relaxations in existing strategic planning policy that protects employment land outside of the Central Activities Zone, particularly in Outer London, in town centres, Strategic Industrial Land and Opportunity Areas.

In London, housing (especially at the higher densities the LHS suggests are needed) out-bids employment uses in most places. Combined with relaxations in national planning regulations allowing the conversion of office or retail to housing, the LHS would create the risk of a significant loss of employment space within London. Studies (by UCL and LSE, for example) reveal that suburban town centres make important, but under-reported, contributions to affordable workspace, local employment and the local economy. Local economies are critical to local residents and cumulatively to London's economy.

GLA Planners at presentations on the draft Further Alterations to the London Plan explained that an important element of the high density, mixed-use, town centre renewal approach is dependent on delivery mechanisms yet to be drafted or

accepted. Once again, strategy should not be based on assessments and mechanisms that are not available, scrutinised or proven.

Targets set by the London Plan for release of industrial land have already been exceeded. Services and activities that are essential and benefit the whole London economy take place in industrial land, including repair and distribution services, as well as creative and high-tech start-ups.

Once a part of employment land is released for housing, environmental complaints and development pressures lead to the gradual housing encroachment of adjoining industrial sites, as evident in Greenwich and elsewhere.

These proposals of the LHS risk eradicating businesses that provide employment for Londoners and failing to create the required “lifetime neighbourhoods”. They will undermine local economies, facilitate the pricing out of employment uses and the reinforcing of the dominance of the Central Activities Zone, generating additional transport demand, and working against the achievement of sustainable development objectives of national and GLA planning policy.

Recommendations

The Mayor must:

- Ensure that Opportunity Area and Housing Zone planning proposals do not see quality and lifetime neighbourhoods compromised in haste to deliver homes; and that the necessary components of lifetime neighbourhoods, such as schools, shops, green space, etc. are secured.
- Ensure that policy and delivery mechanism proposals should be first published, consulted on, scrutinised and proven before strategy is composed that is based on them.
- Safeguard employment land and ensure that local businesses and employers are not be displaced for housing development.

Financial mechanisms and alternative housing providers

Whilst the devolving of tax and the London Housing Bank are interesting ideas, more work is needed to make these new finance mechanisms available to alternative providers.

Delivery of a wide choice of homes will support sustainable communities and be consistent with the Mayor's new housing powers under the Localism Act. Yet the LHS gives only weak support for self-build, community land trusts and housing co-operatives.

Community Land Trusts

Using his new housing powers, we expected the Mayor to instigate a programme of work to identify and overcome barriers to developing community-led housing. The Mayor has commissioned a Community Land Trust development, St Clement's in Tower Hamlets, where the freehold of the land will be held in trust by the community. However this is not referenced in the LHS, nor is there a programme for a network of Community Land Trusts across the capital.

This is disappointing because these are low cost homes and more Community Land Trusts would mean an increase in housing delivery compared with the conventional Housing Association model. Since the Community Land Trust model puts profits back to benefit the wider community, there is also a stronger likelihood that social infrastructure will be delivered.

We have been encouraged by recent statements by the Mayor:

The Mayor's responsibilities for public sector land in the capital provide opportunities to safeguard the use and value of sites for the benefit of the community in the long term. When disposing of GLA Group land holdings for residential development, consideration should be given to the freehold of the site being held in trust by a community land trust to prevent exploitation of the site in the future for private gain. A further possible option is for sites to be managed as a single community, without regard to tenure, to ensure that the resident community is actively engaged in the management and maintenance of the new development. (Draft Revised LHS 2011)

I have promoted community-led development in my London Housing Strategy, and ensured through the HCA London Board, which I chair, that a Community Land Trust is delivered on the former St Clements hospital site in Tower Hamlets. The land will be held in trust by the community and some of the

housing held within a CLT. We firmly believe therefore that creating a network of CLTs across London is the most creative and transparent use of public assets owned by the GLA (Boris Johnson, Building a Better London, 2008, p. 13). I am also promoting a CLT on the Olympic Park with proposals invited for a CLT as part of the Chobham Manor development. (2012 My Progress Report to Londoners)

The new Mayoral Development Corporation for the Olympic Legacy will also continue the process to create a CLT within the Chobham Manor site on the Olympic Park. I will require developers to set out their community development credentials as part of the application process for the new London Development Panel. (Taking Greater London Forward: Mayoral Manifesto 2012)

What has happened to these innovative ideas? There is an issue of ensuring Community Land Trust homes remain affordable in perpetuity and this can be supported by including Community Land Trust homes in the list of Affordable Housing products.

The East London Community Land Trust at St Clements also has the innovation of linking home ownership to earnings by setting a maximum of 33% gross income for mortgage, ground rent and service charges. Those buying a Community Land Trust home will have money left over for food, energy, holidays, etc.

Recommendations:

The Mayor must:

- Advocate Community Land Trust as an affordable and sustainable housing model.
- Include in the LHS reference the East London Community Land Trust at St Clements in Tower Hamlets.
- Support to a network of Community Land Trusts across the capital, starting with a Community Land Trust within the Chobham Manor site on the Olympic Park.

Support for smaller builders

We support the encouragement to new smaller builders to enter the house building industry (4.15). This can be linked to Unblocking stalled sites (4.16) if it means much more focus on smaller sites. When big sites stall because large developers adjust their holdings and withdraw from the market, this has a huge impact on the LHS.

Smaller sites can be more resilient but the smaller builders are undercapitalised and need priority access to GLA support mechanisms ahead of the bigger players.

Housing co-operatives and other resident controlled organisations such as Tenant Management Organisations, many of whom are registered providers, are a hidden success story in London. Run by their tenants and residents they have delivered exemplary housing services for over 30 years.

Although small in terms of housing units managed and owned sector in London housing co-operatives are a vibrant and outperforming both local authorities and other registered housing providers in terms of efficiency, resident satisfaction and engagement. They foster a spirit of self-reliance and independence amongst their residents by encouraging participation in the running of their organisations. Indeed by participating, many co-operative members acquired employable skills and experience to enter London's workforce. Resident involvement is a very cost-effective and efficient method of getting people back into work by providing them with skills that are actually relevant and employers actually want.

Through prudent management many resident-led organisations are both asset and cash rich and have little debt. However, they have been prevented from engaging in development by a housing development regime which overwhelmingly favouring the big housing developers.

Smaller residential social landlords and co-operatives cannot compete, in part because preferential loan arrangements are reserved for major RSLs and the private sector. Empty homes represent a tremendous resource to sustain and expand their stock but few of these properties are finding their way to co-operatives and smaller RSLs.

The experiences we hear from co-operatives is that councils hoard empty stock in anticipation of high-end development and refuse to discuss short life occupancy. Private landlords want high (market) rates for property in severe need of refurbishment, despite social need, putting it out of reach of co-operatives. This has meant cooperatives lose GLA monies itemised for private sector empties.

As part of the London Housing Bank initiative we would like the Mayor to investigate the viability of local land and property banks for non-profit housing providers. The price of land is, of course, crucial for community led development, and the LHS needs to be open about what constraints are possible on land pricing.

Recommendations

The Mayor must:

- Facilitate access to subsidies and credit finance to smaller RSLs and housing co-operatives on the same terms as larger organisations.
- Support and promote resident management and collective ownership of low-cost rented homes across the social housing sector

New financial mechanisms

The LHS is full of different ideas about financing. We think it is good for the LHS to be creative and bold and have a big repertoire of possible mechanisms to suit different situations.

Recommendations:

In the spirit of including a wide range of financial mechanisms, we would like to see the LHS refer to the following ideas:

- To encourage local authorities and housing associations to provide more favourable rates to housing co-operatives in statutory lease negotiations and market sale, and for the inclusion of co-operatives in housing association development plans and local authority empty property work.
- To lobby central government for legislative controls to curb the owners of empty property from seeking the full market rental value, when empty properties generally need much refurbishment and hence expenditure. We also seek a ring-fencing of quotas of empty property for the non-profit sector.

Community self-build

Community self-build has a huge potential and chimes with the Mayor's policy direction, so we would like to see the LHS focus more on their delivery.

Recommendations:

We would like to see the LHS include the following measures:

- local authorities to create community self-build and community build waiting lists to ascertain demand as well as lists of land available for self-build development.
- local authorities to use commuted funds to support community self-build and small builders.

- Mayor to devolve the administration of self-build funds to local authorities or VCS organisations (community groups report difficulties accessing self-build grant money held by the Mayor).
- The LHS should make reference to, and provide details of, the 'Build Your Own Home – The London Way initiative', funding for older persons housing, Traveller Pitch Funds, and other Targeted Funding Stream monies.

Supporters

These organisations have contributed to and endorse this response:

- 4in10
- Age UK London
- Camden Federation of Private Tenants
- Child Poverty Action Group
- Digs (Hackney Renters)
- Energy Solutions
- Friends of the Earth
- Hayes Community Development Forum
- Her Centre
- Homeless Link
- Housing Justice
- Inclusion London
- Just Space
- London Federation of Co-operative Housing
- London For All
- London Forum of Amenity and Civic Societies.
- London Gypsy and Travellers Unit
- London Tenants Federation
- London Voluntary Service Council
- National Community Land Trust Network
- National Federation of Tenant Management Organisations
- NextDoorPlus Project
- Race Equality Foundation
- The Regents Network
- Stonewall Housing
- Sustainable Hackney
- Westminster Citizens Advice Bureau
- Women's Aid
- Zaccheus 2000 Trust (Z2K)