

	Just space policy proposal	LHS	LHS Page	Content	Comment
Caring for existing homes	Supporting maintenance and enhancement of the condition and quality of London's existing homes. Ensuring that new homes are additional to existing stock rather than replacements. Designating energy efficiency as an infrastructure priority and using infrastructure funds to deliver stable, long-term investment to implement a locally-led programme for the upgrade of all existing London homes to B and C on an Energy Performance Certificate.	Y	p.134	"London's homes will have to become better insulated, and obtain more of their heat and power from renewable sources in order to enhance their resilience to future climate changes." "outlined in more detail in the Mayor's draft London Environment Strategy and the forthcoming draft London Plan."	Mentioned but without the specific JS requirements
	Boroughs should develop policies and proposals to reduce environmental impact, particularly lifetime and embodied carbon emissions, through the sustainable retrofitting of existing homes. In particular they should: – Prioritise adaptations to the homes of older residents, and fuel-poor and vulnerable households. – Identify synergies between new developments and existing homes. – Though retrofitting of energy and water efficiency measures, decentralised energy and renewable energy options. – Make the link with public health programmes (for example, a boiler on prescription programme for those most vulnerable). – Include minimum energy efficiency standards as a condition of licensing in the private rented sector. – Encourage energy rights initiatives and community based energy projects.	Y/N	p.139	Para 5.24: "Through his flagship Energy for Londoners (EFL) programme, the Mayor will develop and deliver a world-class domestic energy efficiency programme. This will provide support to Londoners and organisations to increase the energy efficiency of their homes, create awareness to encourage action, and accelerate the next generation of retrofitting through testing new methods of construction and technology. Further details are set out in the Mayor's draft London Environment Strategy."	Mentioned but without the specific JS requirements // Check with Environment Strategy
	Refurbishment options for existing council or housing association estates should include proposals to retain, enhance or deliver green and garden spaces, play and youth provision and community space and buildings.	N		Policy 5.3B proposes a "working group" on social infrastructure.	greenery in general seems to be absent from LHS // Check with Environment Strategy, but press for it to be covered here. Social infrastructure studies need resident inputs.
	Any replacement of not-for-profit rented homes should be carried out on the basis of like for like in terms of tenure, rental level and size.	Y	p.119	Policy 4.3 D: "new funding and planning requirements for affordable homes demolished as part of estate regeneration projects to be replaced on a like for like basis"	Good, but JS version more precise.
	Proposed regeneration of council or housing association estates should require comprehensive, independent analysis of social, environmental (including embodied carbon) and economic benefits of all proposed options and a ballot of tenants and leaseholders. Options should always include refurbishment.	Y but...	p.149, 159-160	Policy 5.3 E: "implementing the Mayor's Good Practice Guide to resident engagement in estate regeneration projects." Section "Involving Residents in Estate Regeneration" - points from 5.72 to 5.75	Very weak compared with JS demands. JS and other made strong objections to draft of Good Practice Guide on estate regeneration - see JS web site. Securing residents' consent crucial - and more so after Grenfell
	Incorporating social, health and wellbeing indicators of existing residents into decision-making around regeneration schemes. Routinely monitoring residents post-regeneration, tracking those displaced. Preparing the model in collaboration with community, tenant and voluntary sector groups, and commissioning an analysis of the impact of housing displacement on health and wellbeing.	Y but...	p.149, 159-160	Mayor's Good Practice Guide on Estate Regeneration discusses this in detail	no mention of the post-regeneration or displacement monitoring in the LHS - cross-check with comments on GPG; longitudinal studies crucial and should be in Housing Strategy.
	The Mayor should commission analysis and monitoring of the relationship between income, poor housing, health and wellbeing.	N			The closest the Mayor comes to these issues is Para 7.16: "improving the data that is collected on why and how people end up sleeping rough."
	There should be ongoing monitoring of poor health and wellbeing as a result of overcrowding.	N			
new homes	New homes should be built to last a minimum of 125 years. The design and construction should ensure adaptability so that retrofitting and rearrangement of internal spaces can occur.	N			Missing
	New homes should be energy positive.	Y but...	p.133	Policy 5.1: "London's new and existing homes and neighbourhoods should be well- designed, safe, good quality, and environmentally sustainable."	big words (sustainable, energy-efficient), but not much actual content look for more info about this in other policies; JS version a precise commitment
	All homes should be built to lifetime homes standards.	N	p.135	Mentioned in section 5: High quality homes and inclusive neighbourhoods "Good minimum space standards are important to maintain"	no direct mention of the 16 standards, but some of the principles are mentioned in various sections of the LHS. Weak and imprecise.
	Communal meeting spaces and green and play space with good natural light should be integral to the design of new housing blocks and estates.	N			greenery in general seems to be absent from LHS; community facilities missing.

Quality of	Developing new more sophisticated density matrix that combines housing, social and community infrastructure, taking into account income, financial accessibility to transport, proximity of accessible sport and leisure, community, youth and safe play facilities, levels of overcrowding and preservation of local character.	N	p.37, 50, 69	Para 2.28 "design-led density" Para 3.66: "The Healthy Streets Approach will underpin the Mayor's approach to linking transport investment decisions with housing delivery"	Widely rumoured that draft London Plan (due out 29 Nov) will delete density matrix, and favour this "design-led" density policy. JS proposal to specify the matrix better and then enforce it properly is much more likely to keep land prices down. Important point to stress.
	The Mayor's design team should review all major schemes from the point of view of good design and their advice should steer the GLA officers' response.	Y	p.133, 136	Policy 5.1 A: "updating and consolidating London's housing design standards into a single new planning document, including examples of well-designed high density development, and maintaining London's space standards" "The Mayor [...] has appointed 50 Mayor's Design Advocates to support his Good Growth by Design programme."	sounds as if only in relation to future decisions, not as a review of existing places
Not-for-profit rented homes	The London Plan should make clear to what extent, through reference to housing costs and incomes, the housing needs of households with less than median income levels will be addressed.	N	p.89-101	POLICY 4.1: "GENUINELY AFFORDABLE" HOMES & 4.2	The draft LHS says it supports access to affordable housing of low income groups but its detailed proposals are mainly aimed at helping people on middle incomes.
	As most of the current London Plan 'affordable housing' products are not affordable to the majority of households in London, the term should be removed in any Mayoral or borough planning documents.	N	p.101	"The Mayor does not consider 80 per cent of market rents to be genuinely affordable in most parts of London."	The draft LHS gives the term 'genuinely affordable housing' as an alternative to the current definition but the new rent categories introduced will be unaffordable to many Londoners. Priorities wrong.
	Assessments of the requirement for not-for-profit rented homes should be carried out and included in the London Plan.	Y, but inadequate	p.178; 212	Para 6.36	The draft LHS does include reference to carrying out capacity assessments, and publically available information. However capacity and needs assessments will not be published until London Plan emerges in late November so the evidence for affordability is not yet available. Decisions premature on this, therefore.
	Not-for-profit rented homes are deemed as including community-led housing, which takes many forms, as well as social rented housing for which rents are ring fenced to cover the running costs of existing homes (management, maintenance and repairs).	N		JS concept not mentioned or used.	
	To meet existing need and to address London's backlog of need over a five year period a target of 30,000 not-for-profit rented homes per annum would need to be set.	N		No numerical targets proposed for social or "affordable" homes. Some targets for %	Targets for output at various rent levels cannot be set until SHMA published. The proposed % shares for various kinds of "affordable" are wrongly targetted.
	Targets should be set for three, four and five bedroom homes.	N			No reference to specific targets in the LHS
	Targets should be set for reducing overcrowded homes.	Y but...	p.120	Para 4.55 - also look at 4.3	Reference to overcrowding, but in terms of unlawful activity rather than a social or health problem. In principle this should cover all tenures.
	Public land should be held for not-for-profit rented homes (including community housing), providing the land for free as a community asset transfer or long lease. This applies to all public bodies, including Local Authorities, NHS, TfL, Network Rail and Housing Zones.	N	p. 54	Public land - 3.35. Policies 3.1 and 3.2	Reference to public land, but in terms of 'TfL's Best Value' policy and delivering affordable housing rather than not-for-profit housing. Much weaker statements for NHS and other non-GLA public land.
icipation in London wide public policy	The Mayor will convene a Housing Forum that will ensure tenant engagement and input is at the heart of the housing strategy for London, its remit including policy, delivery and monitoring functions and with a full representation of council tenants, housing association tenants, community-led housing tenants, private renters and voluntary and community sector groups representing those with particular housing needs.	Y/N	p.157-160	Para 5.66: "residents' voices must be at the heart of decision-making by councils and housing associations" - it is mentioned in the context of Grenfell Tower, as a safety concern, not necessarily as a London-wide commitment to tenants' engagement - also in the context of more effective dealing with complaints - Good Practice Guide for Estate Regeneration (estate-specific) and p.150, Para 5.44 (general engagement) - policy 5.2 on diversities.	This treatment very unsatisfactory in light of JS submissions. And post-Grenfell there must be a complete re-think of tenant and resident engagement on estates and across the board of housing policy and delivery.
	The Mayor should provide a grant funding programme to support the activity of tenants groups, renters groups and other community groups at local, Borough and London-wide levels. This could include the resourcing of a London Private Renters Forum, the existing London Tenants Federation and a London wide Community-Led Housing Network to input into policy making at the GLA.	Y/N	p.15, 151-152	Para 10: "the Mayor is funding a new Community- Led Housing Hub for London" "to provide learning, sharing and partnership brokering opportunities for communities wishing to develop their own homes"	Nothing on the resourcing of representative bodies. The "hub" proposal is welcome but deals ONLY with community-led housing.

Parti	The Mayor will encourage Boroughs to work closely with Tenants and Residents Associations and borough-wide Tenants Federations or tenants organisations to work in collaboration with Housing Associations around engagement of their tenants to recognise renters groups and to put in place consultative forums for private renters at Borough level.	Y/N	p.173-174	Point 6.24: "new database bringing together information to 'name and shame' landlords and letting agents [...]. This will help potential tenants make informed decisions" - only a broad consultation measure - no mention of borough-level collaboration or Housing Associations	Very weak; proposals only relate to private renting, and very limited at that.
Community-led housing policy	The Mayor will maintain a London wide register of available land for community-led forms of housing and ensure: – The register is fully accessible to community builders, neighbourhood forums and other community interests – The register includes data on interest and demand for community-led housing, and how the sites on the register are allocated.	Y	p.148-149; 150-152	Community-Led Housing Hub; policy 5.3; BOX 10: A NEW COMMUNITY-LED HOUSING HUB FOR LONDON	The draft LHS discusses the creation of a 'community-led housing hub' to interface community needs and to help deliver community-based housing.
	The Mayor will make available a package of support for community forms of housing that includes: – Promote supportive financial institutions offering low cost loans. – Local Authorities to identify land and do the appropriate checks. – No requirement to tender to be the developer (EU regulations exemption). – Community builders to be exempt from CiL and S106 they will provide community amenities/community benefit as a matter of course. – GLA fund for a mentors programme, capacity building of community builders, expertise for feasibility or pre-feasibility studies, partnering with smaller housing associations. – A knowledge bank to develop Borough understanding and retain the expertise of community-led housing groups.	Y	p. 105; p.148-152; p.98; p.77	AFFORDABLE HOME OWNERSHIP; Community-Led Housing Hub; POLICY 4.1: GENUINELY AFFORDABLE HOMES; BOX 3: SMALL SITES, SMALL BUILDERS; REVERSING THE DECLINE OF SMALL- AND MEDIUM- SIZED BUILDERS	The draft LHS includes some of the aims of Just Sapce such as creating expertise, capacity building in reference to the growth of small-sized builders. However, no reference to section 106 agreements and other regulation.
Private rented sector	The Mayor to provide support for Borough-run social letting agencies and landlord licensing schemes which should encourage landlords to offer longer term tenancies for private tenants in homes that are both energy efficient and meet decent home standards.	Y but...	p. 167	POLICY 6.1: IMPROVING STANDARDS FOR PRIVATE RENTERS; Policy 6.1 outlines the proposal for collaborative approaches to the private rented sector, and improving standards, but no reference to longer-term tenancies.	Fails to call for legislative changes to enforce licensing.
	The Mayor should develop rent stabilisation methods for regulating changes in rents at the end of assured shorthold tenancies.	N			No reference to rent controls or rent stabilisation approaches.
	The Mayor to simplify and improve the policy on Empty Dwelling Management Orders. This policy permits Boroughs to municipalise the management of empty properties for compulsory private rental.	N	p. 149	5.3: COMMUNITY SUPPORT FOR HOMEBUILDING (D)	No reference to Empty Dwelling Management Orders, but some reference made to 'empty homes'.
	The Mayor to commission research into large scale PRS development and produce detailed planning guidance.	Y but...	p. 137	BOX 9: PUBLIC PRACTICE // Policy 3.3A	Proposed scheme for building planning capacity, but no reference to planning guidance in relation to the private rented sector. No proposals to regulate "build to rent".
	The Mayor to support a Private Renters' Knowledge Bank which would develop Borough and voluntary sector understanding and retain the expertise of private renter advice and support groups	Y but...	p. 173	6.25: Improving landlord regulation;	Reference to broader issues of rental sector capacity and awareness, though not specifically to a Private Renters' Knowledge Bank
	The Mayor to seek devolved powers to introduce city wide rent control, based on a range of rent control methods on which research and development should now begin.	N		Policy 6.2 on PRS affordability and security	No reference to rent controls or rent stabilisation approaches; a focus on marketised or alternative approaches.
	Repeal of Section 21 'no-fault' eviction should be urgently sought by the Mayor in his negotiations with government over devolved powers.	N	p. 177	6.32: 'no fault' eviction	Policy to deal with no fault evictions is very weak. Repeal of S21 essential.
	The Mayor to seek powers so that landlord licensing can be made mandatory across London with a commitment to ethical lettings, regulation of informal housing, minimum energy efficiency and anti-discrimination standards.	Y	p. 175-178	TOWARDS A NEW MODEL OF TENANCY REGULATION;POLICY 6.2: IMPROVING AFFORDABILITY AND SECURITY FOR PRIVATE RENTERS	Broader references to ethical standards and regulation.
The Mayor to devise measures to regulate institutional ownership of housing for private rent (build-to-rent or existing buildings).	Y	p. 166; p. 73	6.7 Build to Rent; BOX 2: THE POTENTIAL OF BUILD TO RENT TO SUPPORT ADDITIONAL HOUSING DELIVERY	Reference to build-to-rent as a clear priority in the LHS.	