London Housing Strategy: Just Space workshop

Date: 31 March 2017
Time: 13:00 – 17:00
Location: City Hall
Room: 4.7W

GLA: Jamie Ratcliff (Assistant Director - Programme, Policy and Services); James Clark (Housing Policy Manager)

Just Space: Robert Taylor (Camden Federation of Private Tenants); Jacob Wills (Radical Housing Network); Ilinca Diaconescu (London Gypsy and Traveller Unit); Pat Turnbull (London Tenants Federation); Mama D (Community Food Growers Network and The Ubele Initiative); Leslie Barson (London Community Neighbourhood Cooperative); Samir Jeraj (Race Equality Foundation); Danny Elliott (Age UK London); Michael Edwards (Just Space UCL); Richard Lee (Just Space Coordinator)

1. Introductions
A full workshop note will be put on the Just Space website (this note).

2. London Housing Strategy Overview
James Clark (Housing Manager) (Slides are available). Producing a London Housing Strategy (LHS) is a statutory duty on the Mayor of London. It must include an assessment of housing conditions and needs, the Mayor’s proposals and what other bodies should do. It must contain spending proposals for 2015-21 (usually as an appendix). Local Authorities have to be in general conformity with the LHS.

The GLA started writing the LHS just before Christmas 2016 and are now in informal stakeholder engagement mode. The draft Strategy will be published in August 2017 for 3 months public consultation, with the Impact Assessment (covering equalities, community safety and policing, and health inequalities i.e. not a full Integrated Impact Assessment) consulted on at the same time. After a few months revising the Strategy the LHS then has to be approved by the London Assembly and the Secretary of State. The aim is to adopt in Spring 2018.

There are 5 priorities – increasing housing supply; much more of housing to be genuinely affordable; homes to be inclusive and attractive places to live; Private Rented Sector (which will have greater focus than previously); homelessness.

A lot of the housing policies will be delivered through the London Plan.

JS Will the LHS incorporate the SHMA (housing needs) and SHLAA (land availability)?
GLA These will be referred to in the LHS, though they are mainly to support the London Plan.

JS Will you manage demand as well as increase supply, as it’s demand that has got out of hand?
GLA We support rebalance of the UK economy, and taking the pressure off London, but this probably won’t go in the LHS.

JS Where will Housing Associations fit in the Strategy? How they manage themselves and their relationship with their tenants. There is concern that they lack accountability. They are a strategic partner and arguably the Mayor should have regulatory powers over the HAs as well as funding powers (which has been proposed by a London Assembly investigation)

GLA There is no formal duty on Housing Associations to take account of the Strategy, in the same way as Local Authorities must. But more than 90% of our Affordable Housing Programme funds go to Housing Associations, so we have levers, and Housing Associations will feature in all 5 chapters.

3. Process for engagement
Richard Lee (Just Space Coordinator): How do we give more life and detail to the framework for engagement? A lot of interested people were unable to attend the November 2016 workshop. The Supreme Court judgment set out public duties to engage prior to formal public consultation, so it is not satisfactory if Londoners (especially those from organised groups) don’t have opportunities to shape and have input into the LHS as it develops.

There is a full record of the November 2016 workshop, so it is important to give feedback on how the GLA have responded, if not today then soon.

How after today can we continue to work with you, especially on issues where we are supportive, so we can really feel we have shaped these policies?

The Integrated Impact Assessment is not an open and accessible process and we want opportunities to input as the IIA goes along and the sharing of an iteration so we can see how policy has changed in response to an impact assessment.

GLA We can’t do more pre-consultation events with a broad group like this one, but there will be more discussion on specific issues and we are doing other pre-consultation activities which may include some of you. We can’t engage with every Londoner at pre-consultation - that’s for the public consultation.

We have considered carefully the full notes from the Housing Workshop 21 November 2016, and the written comments made on A City for All Londoners have been summarised for us to read. We have used a template process for writing the Strategy through which policy officers have been encouraged to take into account the November workshop.

We will not publish the Impact Assessment until we have a settled policy position, and some policies will only be finalised a few days before publication. We are not doing an Environmental Impact Assessment – we will rely on the London Plan.
JS The IIA claims to be iterative, allowing you to adjust the policies, but it seems that actually it doesn’t.

GLA The person writing the policy is also responsible for doing the impact assessment on that policy, so it is not an external process.

JS Will the equalities framework be used?
GLA Yes, but with more detail. We will ask some of the same questions that are in the London Plan Scoping Report.

JS There is a need for real engagement and thinking about what this involves as much as the thinking on the policies. Otherwise, how can you be sure the policies are what Londoners want? Do you not run the risk of this being an officer-led document?
JS Will there be targeted consultation with equality/vulnerable groups as part of the impact assessment?
JS Impact assessments seem separate from the real world if they are based on the judgment of officers and don’t measure actual impacts on Londoners.
JS What about the impact of each policy on others, such as how affordability impacts on homelessness and the impact of housing policy on environment and health?

GLA The Mayor is interested in cumulative impact and a Coordinating Strategies group at City Hall is asking us to think about how housing impacts on other strategies.

GLA We are open to your views on how we do the 3 months public consultation. We have lots of resources at GLA, such as Talk London, and can do workshops and bilateral meetings with specific groups, including vulnerable groups. We will respond to invitations to attend meetings as far as possible.

JS We will be holding larger events before August and can invite you, thereby helping you reach many more people at the shaping stage.
GLA Today is the shaping opportunity. Over the next 2 months we have to write the LHS and it will be difficult to attend meetings.
JS Can we talk about this further?
GLA Yes.

4. Affordable Homes Programme
Jamie Ratcliff (Assistant Director - Programme, Policy and Services) (slides available). The budget is £3.15 billion, but this only covers 10% of building costs. We are bidding for a share of an additional £1.4 billion (national budget) for affordable homes.

By “genuinely affordable rent”, we mean:-
- London affordable rent, which is basically social rent
- London Living Rent based on one third of average local incomes and
- Shared ownership

Most delivery is through Housing Associations (to be an approved provider they must deliver 50% of the new homes in their overall programme as genuinely affordable).
Secondly, there is the threshold of 35% affordable housing from private developers reaching 40% affordable housing with grant top up (a step on the way to 50%).

Thirdly, we have the Innovation Fund for working in new and interesting ways, which includes community led housing and temporary accommodation for homeless people.

Bidding closes on 13th April 2017, with allocations in May, but continuous bidding is available afterwards.

JS Boroughs are not bidding to provide new pitches for Gypsy and Travellers, so what encouragement will you be giving and can we get funding for the refurbishment of existing sites?

GLA Yes, will be pro-active on specialist housing, identifying where gaps are and not waiting for bids to come in. We want to push Gypsy and Traveller provision much more. Deborah Levison is leading on this and will be put in touch with LGT.

JS What guidance is available on what can be funded? Can refurbishment be funded? What about PRS?

GLA We can purchase PRS, refurbish and then count it as part of the new affordable supply. We can’t fund energy efficiency through the Affordable Homes Programme. We have other funds, though small, for this like Renew and Refit. Agree this is a negotiation point with the Government and so needs to be in the LHS.

GLA Met with the Health Strategy team and looking to use public health funds for cold, damp homes given their big impact on health.

JS Concerned that the 2015 – 2021 programme will only provide 10% of the cost of 90,000 homes, so very little affordable housing will be delivered. Would like to know how the negotiation went with the Government, as it doesn’t seem a very good deal.

GLA We feel that the products on offer are affordable. There will be s106 and Local Authority cross-subsidy in addition to the AHP so this isn’t the only money going into affordable housing.

GLA The AHP is not a capital pot to support cladding and the energy efficiency component is energy advice only.

JS Can you pressure central Government on Empty Dwelling Management Orders to bring empty homes into private letting?

GLA Lowest number of empty homes for 30 years. Only 0.6% of the total stock (22,000 in number) are empty for more than 6 months and those left are much harder to bring back into use.

5. Affordable housing and land supply

Michael Edwards (Just Space/ UCL): We have 2 concerns about land supply - existing housing being classed as development sites before any proper procedures have been followed, and the loss of other uses such as services, local jobs, and local economy. Resources should be focussed on needs, but it seems the Mayor’s deal with central Government is similar to that of Boris Johnson, spread thinly to get bigger numbers. The objective test is SHMA which will show where the need lies.
We need to conserve and upgrade the social housing stock we have. The Mayor should lobby for VAT on refurbishment to be abolished. Public land should be used for social housing.

The sale of planning permissions (the TfL development rights auction) is of concern and we would prefer a general property tax.

GLA Land value capture will be in the LHS, but not Land Value Tax. There will be 50% affordable housing on GLA family land coming forward, not 100% because TfL needs to raise £850 million from public land disposal to fund cheaper fares and transport infrastructure.

JS We need the LHS to make a strong statement about public land being to meet social need.

GLA Public land is only a small proportion of total land supply and the need is for the public sector to be more pro-active generally. The GLA is looking at international examples and suggestions are welcome.

JS Supported housing needs to be close to health services to, for example, address mental health problems.

JS On Ministry of Justice land (Holloway prison and other prisons to come) we want 50% social rented housing and other uses such as a women’s building on the Holloway site (given this was a women’s prison) to house services for women in the area and to support families and friends of women who have been moved to prisons further afield.

GLA We have discussions with Ministry of Justice, but no formal role (though the Mayor would like to have more control over MOJ land).

JS Given Brexit and food prices rising, can you support access to affordable food by building food growing provision into housing, supporting food markets and ensuring there are no food deserts. There is a good article by Tim Lang, newly appointed Mayor’s Food Commissioner.

GLA We will talk to the Food Strategy team about this. Can you send the article?

JS Is the aim to dispose of or retain public land?

GLA We want to keep the freeholds.

JS The case of the Hackney Wick site, TfL land unused for 20 years, where the LLDC allocated a Gypsy and Traveller site to fulfil an Olympic Legacy promise and now TfL decides it needs to raise funds from sale of the site. The Mayor through the LHS needs to have a clear position on social and equality considerations being a factor in site allocations and delivery.

GLA Unaware of the Hackney site and asked to be sent details.

JS We had slippage of the term “affordable”, and now slippage in the term “genuinely affordable”. The products we have heard about are not what Londoners can afford. It is such a tiny amount of social rented.

GLA There is a distinction between saying there is a huge need for social rented housing (which is true) and saying the vast majority of Londoners can only afford
social rented housing (which is not true, according to our data). More than half of Londoners can afford shared ownership and there is a big need for market housing too.

6. Community-led Housing

Jamie Ratcliff (Assistant Director - Programme, Policy and Services) (slides available). We are making a strong engagement with the community led housing sector (led by Maja Jorgensen) to identify key barriers and how we can best support a Hub. The Mayor has a budget of £250,000 per year over 3 years to support a Hub and £2.3 million to support community housing build. There is a link with Nationwide and Triodos funding to scale up and also the Government’s community led housing fund of £60 million. We want to do this to channel energy in a very positive way. The Hub is not a GLA Hub, but will sit outside of the GLA as a resource for London and we would like to put it on a sustainable footing.

Advice and support will be provided and we do not want to define the structure and form of the community led housing. The first GLA funding to a community led housing group will be announced soon. The Hub is being worked up and we are keen to involve a wide range of groups, with the Hub to be launched in the summer or autumn 2017.

Leslie Barson (London Community Neighbourhood Cooperative): Community led housing is more democratic, innovative and connected to the local area. However, it is time consuming and there is the burden of administrative aspects, so people have to build their skills. Land is the biggest issue by far and the Hub could just be window dressing if it doesn’t address land. GLA should use its land only for community led housing and take a lead. Then there is the finance. Over 6 years, we have identified land for housing that is all social rented, but we need £6 million, and the one bank we approached are only able to lend us £150,000. We need money now as start up, so will start up money be available out of the £250,000? Then there is access to legal and other advice. We don’t have the connections and we need knowledge about planning to overcome traditional ways of building.

GLA Some GLA land will be more likely to come forward for community led housing eg small sites owned by TfL and the Met Police. Other land is being sought eg we met with bishops who wanted to give church land to community groups rather than Housing Associations. There are various funding sources which we will map and publicise, such as those known by the Community Land Trusts network. We should get a good portion of central Government funds (£2.5 million out of the £250,000 million and we should get more in the next round). We are looking to buy land, get the community group started and buy more land on a rolling basis. The Hub will fund capacity building and share ways to deal with planning.

JS Could there be a small SPG on community led housing to guide the Boroughs?

JS Other faith groups are also making land available eg car park adjoining Sikh temple was given to BME Housing Association.
GLA All developable public land transferred to the GLA in 2012 was disposed of, or contracted to be disposed, by Mayor Boris Johnson. The housing schemes on this land are listed on the GLA website. A lot of TfL land still has potential to come forward.

JS How do other community housing schemes come forward and be on your radar? Then what about communities who haven’t even thought about this.
GLA Community Led Housing will be as broad as possible, inclusive and open. We are very happy for other groups to come to us.

GLA Housing co-ops are sometimes sitting on resources and should unlock their asset.

JS Could council tenants propose community housing schemes as an alternative to demolition?
GLA Yes and community led housing could be incorporated into the Estate Regeneration guidance.

JS There is huge interest and we could be working together on this a lot more. We will be interested to know who is involved.
GLA Register with us if you are interested in the Hub.

7. Inclusive/sustainable neighbourhoods

Ilinca Diaconescu (London Gypsies and Travellers): Just Space would like a policy in the LHS that supports a broad definition of lifetime neighbourhoods and includes social and green infrastructure, local economy and services and amenities alongside housing, all of which people need to live in a neighbourhood. We want a policy to ensure new housing doesn’t displace other key uses, like workspace or community space. On existing housing, this should be given proper attention (by retrofit etc) to balance the huge attention given to creating new communities.

Gypsy and Traveller accommodation must be seen as a housing need and not some sort of peculiar land use category. We would like to see good practice guidance on how to look across Gypsies and Travellers in different diverse situations – on site, in social or PRS housing, in temporary or emergency housing, or on encampments.

Samir Jeraj (Race Equality Foundation): BME communities are over-represented in the PRS, with disproportionate retaliatory evictions (Shelter report). Local Authorities don’t have the capacity or will to pursue private landlords who are discriminatory and Mayor-led licensing could address this.

Secure housing is an important enabler for accessing mental health services which disproportionately affects BME people. The Mayor also needs to ensure provision of supported housing for those leaving the criminal justice system, also disproportionate for BME communities.

The Race Equality Strategy and other Equality Strategies should link with the LHS. It is important to tackle inequalities between and within groups eg Stonewall is a Housing Association with LGBT tenants, the majority of whom are also BME.

BME Housing Associations face particular challenges competing with the larger Housing Associations which needs to be addressed by the Mayor.
Danny Elliott (Age UK London): The numbers of older Londoners dying from cold in the winter of 2014-15 was at the highest level since 1999/2000. 33% of older Londoners would like to move to a more appropriate sized home, but there are lots of barriers such as affordability and lack of options in their neighbourhood so they can remain in their community. If they were able to move, this would make available larger homes to others so that making housing age-friendly would be a contribution to addressing the housing crisis.

Energy efficiency and adaptable standards are important. Many older people live in homes of poor quality, physically inaccessible and difficult to keep warm. Housing older Londoners requires genuinely affordable, quality housing and effective links between housing support, social care and health services so they can live independently in their own homes for as long as they wish. Age UK London have 5 proposals:

• Ensure a range of suitable, accessible and genuinely affordable housing options in all London Boroughs
• Continue to fund programmes to make homes energy efficient and to benefit older people in fuel poverty
• All new homes to have the best achievable standards of accessibility and adaptability, including wheelchair accessible housing
• Realistic targets for for good quality, affordable specialist housing for older people in all tenures
• Ensure information on housing choices is available to all older people across London (not just online).

All these issues were picked up by the Mayor in his manifesto, so we are looking for their inclusion in the LHS.

GLA All of these issues you have talked about will have prominence in the LHS. We will link you to GLA officers who are working on the particular policies.

We can use a lot of your text on older persons. We are probably covering everything already except information and advice and we need to think about this. On BME you didn’t mention Right to Rent, which has discriminatory impacts on migrants. We want to do a lot of these things that are cross-cutting (housing, health and education etc). To fit more uses together there has to be denser development. What innovations could we look at for Gypsy and Traveller provision? We recognise we need to do more on Gypsies and Travellers and will link you to a person who is doing research on this.

JS What about other needs that were raised at the Housing Workshop (November 2016), such as Bargee travellers and concerns over whether the new housing products were meeting family housing needs.

GLA We will come back on Bargees after reading the workshop notes. Family housing will be covered in detail, mainly in the London Plan. Building lots of smaller homes does help families by freeing up other homes suitable for them. Insecurity of tenure for families in PRS has grown: 1 in 3 PRS households have children.
JS How will you care for existing homes, including the approach to estate regeneration?
GLA We want to say things about existing homes, but we don’t have the powers to do much. The LHS will reflect what goes in the final guidance on estate regeneration.

JS Part of the purpose of the LHS is a pitch to central Government for more powers and resources. What about a Housing Devolution Bill?
GLA We will cover devolution powers in the LHS, setting out what we need from Government to deliver our plan.
JS Some housing products are aimed at a very narrow demographic. A case is the Athletes Village site at the Olympic Park where the take up of the housing was by a mono highly professional demographic, with no sense of any other community living here. A mix of people is needed.
GLA Is it that we need to change the marketing of new housing? Give us your ideas.

8. Private rented sector
Robert Taylor (Camden Federation of Private Tenants); The Mayor probably won’t get devolved powers on PRS, so he needs to work more with the Boroughs (who have the enforcement powers) encouraging them to think a lot more about PRS. Eg an audit of Borough services to private renters, as in a lot of Boroughs there are limited resources. A stand alone Borough PRS Strategy, so it is not an after thought. Multi-agency approaches with police and fire service. Social lettings agencies are the way forward, charging those who can afford it so the poorer have the services for free. There could be a GLA supported Hub for best practice in licensing, with a sub-regional approach to licensing to avoid competition between Boroughs.

Jacob Wills (Radical Housing Network) Devolved powers would be essential for rent caps/ rent stabilisation. Can you let us know what work is being done on this? The GLA Living Rent product must provide security of tenure (assured, not shorthold) and should be available to Housing Benefit claimants. Need to pay more attention to the lower income end (most private landlords won’t take people on housing benefit) which should be a protected characteristic and discrimination on that basis opposed by the Mayor. The Mayor to give support against retaliatory evictions.

Deportation of homeless EU nationals with active Borough involvement – the GLA could get Boroughs to stop this practice.

Licensing should be adapted to help control rents and address repairs and it should be a tenant-centred licensing process. At the moment, the landlord loses their license and the tenant gets evicted, which is not a tenant-centred approach. There could be a grace period or the Borough takes on the license. Other issues are housing rights for temporary tenants in estate regeneration and the Mayor to lobby to scrap section 21 no fault eviction.

GLA So far we have looked at LHA cases not covering rent, but we could look at landlord discrimination too. We are looking at lessons from the Scottish reforms on permanent tenancy and living rent in the Scottish context. What is your view on these?
JS It is positive as the policies are in place and we can concentrate on enforcement. Have a look at the Living Rent campaign group in Scotland. Note that we are launching a Private Renters Union later this year in London.

GLA We would like to have communication about this.

GLA You are probably right to be sceptical about what we can get from central Government on PRS. On landlord licensing, Newham have done a huge number of landlord prosecutions due to their licensing system, which does raise why other Boroughs cannot do the same. Mayoral landlord licensing is our top ask on the devolution of powers and we are keen to provide additional help to Local Authorities and share information and good practice so as to achieve more enforcement. We have a Partnership Forum (like a Hub) with the Boroughs on PRS.

GLA We need case studies of the effectiveness of social letting agencies. The impetus had been rip off letting agents’ fees, but now the Government has banned these what is the gap the social letting agencies are trying to fill? One Borough launched a social letting agency and only 2 signed up. Why would landlords go with this service?

JS Because it’s a better service. We get a lot of complaints about poor quality services from letting agents, so its not only the fees. If run by a different organisation, this could boost standards.

GLA It is unlikely we will say anything about rent control but we will on security of tenure. So we would like your analysis of the strengths and weaknesses of the Scottish model. London Living Rent doesn’t work for those on HB; it is London Affordable Rent which could help.

GLA EU nationals who are rough sleepers can often have health problems which makes deportation in their own interest, where there are no other options.

JS But this is not being done on a case by case basis, which is why legal cases are being won. We will share the Guardian article on this, which claims GLA contracts with night shelters includes referring people to the Home Office. What are the outcomes for those who are deported is a crucial issue? Once a person has been deported you don’t know if they have been able to access health support.

GLA We can give you contact with the GLA person responsible for this area.

JS Age UK London has been running a project on older persons and PRS (finishes October) which finds a huge increase in the numbers of older persons who are in PRS and nearly homeless. 146,000 PRS households have at least 1 person over 50 years of age and this will increase hugely over the next 10 years. Our research gives more evidence to your arguments in “Older Londoners and the London Plan”. The older person moving around every 6 months can be devastating to their health.

GLA The LHS won’t cover immigration policy or access to benefits. However, we have other initiatives:- Local Authorities incentivising landlords to have those on benefits; a project considering whether Local Authorities and the GLA can procure PRS for those on benefits and bring the costs down. Overall, we aim to provide a novel package of support for PRS in the LHS.
9. Involvement of a wide range of Londoners in delivery
Pat Turnbull (London Tenants Federation): There used to be a Mayor’s Housing Forum and there needs to be a similar body now, and also a Communities Housing Board to discuss Estate Regeneration. The Mayor should provide some resources for tenants and residents groups out of the £3.15 billion, including for Borough Tenants Federations which have practically died because Boroughs say they can’t afford to fund them. If tenants can’t get together to discuss what is going on and to organise, the situation is going to get worse as tenants will not be able to defend existing housing.

GLA We can’t spend the housing budget on this. We will feed back to the Mayor’s Office to say there is demand for a Housing Forum. However, the previous Mayor’s Housing Forum was seen as too large and a talking shop. What do you want to get out of it? Why is it useful for you? Which forums do you know of that work well? Couldn’t a community organisation like Just Space facilitate this?

JS The community engagement sub-group, to the Mayor’s Housing Forum, worked very well before and generated a useful report on Housing Associations stepping up to the mark, which perhaps we could revisit. The GLA has Forums for engaging with many other sections of the population, so why not with tenants and residents groups? It leaves a big gap at City Hall on citizen engagement on housing issues.

GLA What numbers would you be thinking of? Would it be a roundtable or an assembly?
JS It would allow on-going discussions with the kind of groups that have met with you today.
GLA We’ll report back that a housing forum that is a tighter meeting and encourages the networking of community groups would be valuable.

10. Other issues that need to be included in the LHS
Mama D (Community Food Growers Network and The Ubele Initiative): Are the policies future proofed? With more people working from home, the new homes need to be designed for working and living being in the same space. Is there “trends data” that can be included in the LHS to ensure new homes built now will be fit for purpose in 50 or 100 years time.
The overlap of ethnicity and age is one example of intersectional issues. What does lifetime neighbourhoods mean for the LHS for example local employment and building communities as well as the broader food issues raised earlier. Will co-housing be considered under the Community Hub?

We are interested in how homes connect with all other issues, so want to be sure that the LHS is not only about shelter but amenities too. In estate regeneration we see the need to re-equip estates so they are relevant for the whole age spectrum and the knock-on effects of displacement on health. So for us it is about integrating issues, and could there be ways in which there are more formal channels to ensure a cross-sectoral approach which the community can input into.
Just Space represents a coalition of community organisations and networks so we reach the thousands and together with all the conversations we have makes Just Space a rich space for engagement, which you cannot reach by conventional public consultations.

GLA We have formal meeting groups of everyone responsible for the Mayor’s Strategies, where we make formal links with all the other strategies and there are also formal meetings of the Deputy Mayors responsible for each Strategy. Tell us your ideas for the public consultation on the LHS and if there are richer and more meaningful ways to do it we are very open to consider them. Yes to future-proofing, to homes not housing. Good space standards are critical to allow you to use homes in different ways in the future. There is no size restriction on who can be part of the Community Housing Hub and cohousing is part of it.

JS When you come together cross-sectorally inside the GLA things will come up through discussion and we would like a way to be part of this conversation and to respond.

JS The scoping study for the London Plan shows the population forecast has reduced, but the number of homes needed has gone up. Why is this? It suggests that GLA is expecting household size to resume its former shrinkage & more 1-bed homes are being proposed.

GLA We will put you in touch with the GLA demographics team.

JS The Deputy Mayors for Planning and Housing attended the property fair MIPIM at Cannes and for us this gave the message “London is for sale”. But why not attend the European Coalition of Housing Rights so the GLA can learn from the experiences of tenants groups across Europe, including those collaborating with their municipalities. There is much to learn from European case studies eg Zürich co-ops, Barcelona’s approach.

GLA We are interested in international learning and will look at any case studies you provide.

JS There is a proliferation of special development vehicles where the risks seem severe and it would be useful to have GLA guidance for the Boroughs. “Buy to leave” also needs to be included.

GLA Our research on Buy to Leave and foreign investors is out soon. We do not want to see homes built that are not used.

JS Parks, schools and estates are being designated as brownfield. Could this be addressed?

GLA Send us examples where you feel “brownfield” is being misused.

JS Will you consider what came out of the Tom Copley Conference and LSE research on Airbnb, as this is making PRS even more short term. Who is living in “beds in sheds” (which is very precarious and insecure) and what pathways can the LHS offer into safe housing?
GLA We held a conference on Airbnb and have written to Airbnb and all short term letting agencies.

Ends