

## draft London Housing Strategy 2017 [[link](#)]

### Response from Just Space

This document follows the sequence (and numbering) of the GLA draft chapters and sections (numbered §4.2 etc) and policies (numbered P2.5 etc)..

#### **Who we are; our engagement in the process so far**

Just Space is a 10-year-old network of local and London-wide community organisations which came together to give each other mutual support in the challenging process of participating in the democratic scrutiny of London planning and government. Since the adoption of the last London Plan in 2015 and the Inspector's declaration that it really was not fit for purpose and must urgently be replaced with a new plan, Just Space has been working on its own ***Community-led London Plan***, early and later versions of which can be downloaded at [JustSpace.org.uk](http://JustSpace.org.uk) During the preparation of this draft Strategy Just Space has taken part in a number of meetings with officers at City Hall and has been glad that the new GLA regime has fostered this engagement. However it appears that few of our carefully grounded proposals have found their way into the Strategy.

#### **Summary**

The Mayor expresses many fine ambitions and Just Space groups agree with most of them. However the detail of what is actually proposed is, in most cases, inadequate or could actually worsen the crisis which everyone agrees confronts London. Just Space has proposals below which would strengthen the strategy. We do not consider that the strategy can be finalised until the London Plan is finalised.

It is a widely held view among Just Space groups that London is being rapidly transformed to meet the needs of elites in the 'global city' framework and doing so at the expense of the diversity and community which we — and seemingly the Mayor — value so much and at the expense of the real economy. Comments on the Strategy are made in the spirit of wanting to re-balance these power relationships.

## §1 About this document – the Housing Strategy

### Is it valid?

We do not consider that this document is valid for the following two reasons:

a. relationship with its evidence base

The document is supposed to be based on evidence, included in the Strategy (§1.2). Two key elements of the evidence on which it is based have not been published yet and will appear only when the draft London Plan is published, a few days before these consultations close. The two key documents are:

The 2017 **Strategic Housing Market Assessment** (SHMA) which is the latest assessment of needs and demands for housing in London by people at various income levels. The GLA has been very good in including Just Space groups in preparatory meetings and we have made strong representations about how it should be done [\[link\]](#) but we have no idea whether the final study will prove adequate and no-one can evaluate the Strategy until the SHMA is available.

The 2017 **Strategic Housing Land Availability Assessment** (SHLAA) is the same. Just Space made very strong representations [\[link\]](#) that it should not assume any further losses of industrial/workspace land or any council estate “regeneration” unless and until they had been agreed by all concerned in proper procedures. Again, no-one can evaluate the Strategy until the SHLAA is available.

b. The relationship with **the London Plan** itself is unacceptable. If the Housing Strategy is adopted, with or without modifications, it will pre-determine many key issues in the London Plan — in particular on the balance of priorities, densities and land availability— so either this consultation is invalid (if the issues can be re-opened at the LP stage) or the LP consultation will be invalid (if the key decisions on housing will have been pre-determined). Similar problems arise with all the Mayor’s other strategies and we recommend that none of them be finalised until after the Inspector has reported on the London Plan EiP

The introductory chapter is otherwise broadly acceptable.

We have been pressing for many years for City Hall strategies to be available also in popular forms / formats. The “easy read” version of the 2017 LHS, however, is condescending and essentially infantile. What is required are statements in plain concise language which capture the complex detail of the key analysis and proposals. More John Crace than Janet and John.

## **§2 Housing in London and the Mayor’s vision**

Chapter 2 is essentially the GLA’s analysis of what is wrong. It is not an acceptable analysis and that is why so many of the proposals are inadequate or dangerous. The essence of the GLA position is that “The origins of London’s housing shortage can be traced to a failure over decades to provide the homes that people working in London’s growing economy require.” (§2.2) and this way of seeing the crisis leads to the Mayor’s obsession with getting as much housing built as possible, raising densities and prioritising this as being much more important than what kind of housing is built, at what prices and for whom. This interpretation (again in §2.27) down-plays the shrinkage of the social housing stock and the massive expansion of credit to drive up prices, the dramatic growth of income and wealth inequality, the surges of local and global speculative investment and falling real wages for much of the population. All these things have contributed to the London housing crisis and the impoverishment of so many Londoners. Policies to eliminate or manage them are essential because more and more of us are exposed to the market to determine what housing we can get (if any) and we confront it on increasingly unequal terms. Solving the problem through building more would take many many decades to bring market rents and prices down (even if developers continued to build homes while prices fell), and so much of what gets built is snapped up by the wealthy that the benefits for low- and middle-income Londoners are minimal **or adverse**.

§2.10 and 2.13 The treatment of Housing Benefit / LHA is inadequate because it does not mention the very serious impact of caps on these benefits, and on total benefits. These are major contributions to poverty, to homelessness and to the exclusion of lower-income people from large parts of —hitherto mixed— London

and the omission of this factor is a serious shortcoming. The Mayor has no powers over social security but he is rightly willing to lobby government on many issues and this should be one of them.

2.17 The GLA account of the London housing system makes it sound as though the displacement to the provinces of Londoners who can't afford to stay is somehow beneficial to the places they move to. That view is rose-tinted. In fact this process lead to higher bids for housing in the receiving areas and thus exports London's crisis to the South East region and beyond as locally-employed people fail to compete with London commuters.

§2.24 The reference to the Grenfell Tower fire is wholly inadequate: the disaster did not simply highlight safety issues —though those are massive— but also the failures of society to devote adequate resources to low- and middle-income people's housing or to accord them effective control over their housing conditions. A much stronger response from the Mayor is called for, on resources, regulation and self-management.

### **§3 Building homes for Londoners**

§3.2 Agreed that London's over-reliance on developers' housing for private sale has produced an unbalanced supply and that most of the homes built are not affordable to most Londoners. But the account of **why** is misleading and ignores the role of land prices (§3.3). Development cost differences don't explain the high price of new homes in London: it's the sum of profits and payments to landowners which is exceptional and which has squeezed out the margin within which S106 social housing and other social gains could and should (and to a degree used to be) secured. Ignoring the land values issue leads to mistaken policies and obscures the crucial importance of getting land values down, or at least arresting their increase.

Interventions which tend to raise house/land prices (as Help to Buy clearly does) need to be studiously avoided or —where the government is responsible— opposed. The suggestion that the Mayor should use some of his available budget to subsidise “mid-market homes for sale” §3.7 is wrong because it could have an upward effect on prices, it avoids the top priority needs (for lower-income housing to be supported) and becomes a gift to the lucky beneficiaries in a most unfair,

unjust way.

POLICY P3.1 A (i) Brownfield Land. The focus on “brownfield land “ should be heavily qualified for London because a great deal of the land now being pressed into use for new housing is not the abandoned industrial land conjured up by the term ‘brown’. Too much of it is land actually in use for industrial and other productive purposes or represents people’s homes, now that government has declared that council estates are brownfield land. So much of the land being built upon causes major losses to the economy and society of London and to its communities. Elsewhere the Mayor acknowledges some of this damage but he must be clear about it in policy.

P3.1 A (ii) The reference to Green Belt should also say “Metropolitan Open Land” because this is now subject to serious attrition and a clear Mayoral policy, both here and in the London Plan, would help to defend it.

P3.1 A (ii) Just Space and its Economy and Planning Group strongly support proposals for more co-location of housing with employment uses of most kinds. We played a contributory role in the GLA report [High Streets for All](#), recently commissioned by the Mayor and are very active in support of retaining jobs and workspace outside the CAZ. However space must be protected for the smelly or noisy activities on which the city depends and where many working class jobs are located: co-location must not lead to their closure.

In relation to changes of use, the Mayor should close the loop where building developers can change the use of a building from commercial use (i.e. have to pay business rates for an empty building) into residential (only liable for council tax). They can then leave the properties empty for years. In these circumstances, the change of use should ONLY come into effect for a particular unit once a new tenant takes occupation.

In relation to CPOs we are pleased to see the Mayor pressing for more extensive and simpler acquisitions §3.49. However he should be pressing for reform of the Land Compensation Act 1961 to enable local authorities to acquire at Existing Use Value (plus a possible 10%). At the very least he should be campaigning for what Shelter called “Real Market Value”, i.e. what the land would be worth if all planning policy requirements (for CIL, social housing, density etc) were fully met.

## §4 Delivering genuinely affordable homes

§4.5 The account of shrinkage of the social rented stock concentrates on Right to Buy, ignoring losses through estate clearances, sales by councils and housing associations and the “conversion” of social to higher rents. These other losses have been very serious and only the “conversion” issue is dealt with in policy (and that inadequately).

### P4.1 Genuinely Affordable Homes

P4.1A (ii) The Mayor’s decision to refuse further conversion from social rents is welcome but our understanding is that he can only implement that in the few cases where his financial support is sought for new schemes. Conversion needs to be halted urgently across the whole social stock and for that the Mayor would need to press for additional powers for himself and/or the regulator. (also in §4.20).

Comments on the detailed categories of rents proposed follow. Just Space groups are profoundly dissatisfied with all the categories and with the proposed distribution of effort between the categories.

“**London Living Rent**” is proposed as a form of temporary renting aimed at middle income households with expectations of being able to pay rents at 33% of local average household incomes **and** simultaneously save a deposit to buy. These tenancies would last for 10 years (p 102) or ‘at least 3 years’ (page 103) after which, by implication, tenants not able and willing to proceed to full or partial ownership would have to leave. Just Space regards this tenure package as a very low priority, serving only households with incomes of up to £60,000 p.a. Those households who cannot or will not buy at the end of their term must not be at risk of eviction. We note that only a minority of tenants in the “rent to Buy” scheme have opted to buy.

There are also proposals to expand the programme of **shared ownership** which is described as “successful”. It is aimed at households with incomes up to £90,000 p.a. and this is a low priority compared with meeting serious housing need and relieving homelessness. It would be wrong for the Mayor to invest public money (§4.25) in what amounts to free gifts to this income group. There are strong criticisms of the whole shared-ownership system including the

difficulties which participants have in selling their partial “ownerships”. In reality they remain essentially tenants unless and until they have ‘staircased’ to 100% ownership.

Notwithstanding these criticisms, we support the proposal to establish a charter on service charges for such tenancies (§4.26 and P4.1C(ii)) so long as they exist.

Policy 4.1A (i) “**London Affordable Rent**” homes would be let at levels which the Mayor describes as “based on social rent levels”. The London tenants Federation has pointed out, however, that these rents are actually well above average social rents: “ they are ‘capped’ formula rent levels, exclusive of service charges. This is the highest amount of rent that a council or housing association may currently charge for social-rented homes. Rents at this level are quite a lot higher than average social-rents in London. According to the latest available data from DCLG (2015/16) the average London council rent in was £107.93 and the average London Private Registered Provider rent was £125.27. If service charges are added then gross levels are often as high as 50% of market rents. “As average social-rented household incomes in London are only £17,500 this is a significant hike in rent levels.” (LTF 2016).

Now that the Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) have been released (December 2017), it is possible to shed light on the Mayor’s proposed MIX of tenure types and rent levels. We are grateful to Duncan Bowie for permission to quote his computation:

*SHMA gives requirement as 66,000 pa:*

*35% market*

*18% intermediate*

*47% low cost rent*

*Targets based on 65,000pa capacity from SHLAA:*

*50% market*

*15% intermediate*

*15% low cost rent*

*20% to be agreed with borough split between intermediate and low cost rent*

*so even if all boroughs agreed 20% of final category as low cost rent (which is highly unlikely) to reach 35% low cost rent, targets will over-provide for market housing and underprovide for low cost rent (by 12%). If split of 'local 20%' is 50/50 between two 'affordable' categories, we will overprovide for market AND intermediate housing and only deliver 25% low cost rent against 47% requirement. Not a very satisfactory position , especially since delivering the overall 65,000 annual capacity is somewhat*

unlikely.

*There is also no evidence that the 35% affordable housing requirement on private sites + 50% on public land/ sites with grant and 60% on partnership sites will add up to 50% affordable housing London-wide.*

Threshold strategy §4.31-4.36. We understand the appeal of the Mayor's "threshold" approach which offers a fast track to approval to schemes which offer at least 35% "affordable" floorspace. We are surprised to see that it is defined only in the text, not in Policy. We have two criticisms of the current proposal:

- (i) that the starting level of the threshold (35%) should be clearly described as an interim level which will rise in annual steps to 50% by, say, the end of the Mayoral term. The purpose of all this being to lower landowner and developer expectations gradually without adding uncertainties for the markets and for valuation.
- (ii) That there should be a much stronger focus on **social rent and less emphasis on LLR and SO** (as explained just above).

### **Policy 4.3: Protection of London's Affordable homes**

**D** *"The Mayor will act to ensure any affordable homes that are demolished are replaced like for like. This will include:*

- i. new funding and planning requirements for affordable homes demolished as part of estate regeneration projects to be replaced on a like for like basis; and*
- ii. calling on Government to fund any financial gap that arises when ensuring social housing is replaced like for like, including following demolition in cases where buildings cannot be made safe through improvements, or where other improvements cannot be made without compromising a building's safety." (p. 119)*

*§ 4.69 "following the tragedy of the Grenfell Tower fire, it is essential to make sure all high-rise blocks are made safe for their residents. Where buildings cannot be made safe through improvements, or where other improvements cannot be made without compromising a building's safety, the Mayor has said they could be demolished and replaced. In these cases, the Mayor is calling on Government to fund any financial gap that arises when ensuring all the social housing is replaced like for like." (p. 125)*

The replacement of social and affordable housing that Policy 4.3D proposes should be more specific than 'replaced on a like for like basis'. It should ensure

that social housing tenants whose homes are demolished are rehoused with the *exact same* (or better) rent, tenancy, perpetuity, space and in the same area. The policy should also ensure that the landlord does not change from the local authority to another housing provider (housing association, Special Purpose Vehicle or private developer) unless this is approved by a binding ballot among the tenants and residents, just as the law has long required for Stock Transfers.

In addition to this, the policy should ensure that estate regeneration schemes do not only replace the existing social and affordable housing, but also provide new homes on social rents for low-income households and new affordable homes for middle-income households in addition to the existing ones.

Policy 4.3.D.ii, combined with paragraph §4.69, suggest incentivizing the demolition of social housing tower blocks. The Grenfell fire should not be used to justify the erroneous view that high-rise tower blocks are unsafe. They are not intrinsically unsafe. There should in each case be an independent technical evaluation of the safety of the building, which looks at whether refurbishment works can make the building safe or demolition is the only option. When refurbishment is still possible, demolition can only happen if approved by a binding ballot among the tenants and residents.

The term “regeneration” is repeatedly used in the draft Housing Strategy to refer to demolition and redevelopment schemes. This is a misuse of the term, since regeneration implies working with the existing people and situation (i.e. refurbishment of homes, improving community and public spaces, introducing new uses and facilities, and building new infill housing). Demolition and redevelopment should not be called ‘regeneration’, it should be called ‘demolition and redevelopment’.

The Mayor should also be lobbying government to harmonise the VAT rate between new building and refurbishment to remove a wholly damaging bias in favour of demolition and replacement.

Missing Policy: despite the critique of the disastrous effects in London of the Right to Buy, the Mayor fails to commit himself to lobbying for it’s abolition. He should do so.

## **§5 High quality homes and inclusive neighbourhoods**

### **Policy 5.2: Meeting London's diverse housing needs**

#### POLICY 5.2: MEETING LONDON'S DIVERSE HOUSING NEEDS

New and existing homes should meet Londoners' diverse housing needs.

The Mayor will work with councils, housing associations, Government and others to ensure that:  
London's homes and neighbourhoods support London's diverse housing needs; and  
Londoners who need it are provided with support so that they can live independently.

Generally the Mayor should undertake positive engagement and participation with all Londoners – everybody, but in particular people who live differently from the norm such as canal and river boat dwellers and Gypsies and Travellers, etc. This prompts the question, does the Mayor really know the true diversity of Londoners. For example, the canal and river boat dwellers are not mentioned in the draft LHS even though recent legislation, the Housing and Planning Act 2016 has added these to the statutorily required housing needs assessment. (*Section 124 of the Housing and Planning Act adds to duties under Section 8 of Housing Act 1985 on the periodic review of housing needs: now included is the duty to consider the needs of people residing in caravans and places on inland waterways where houseboats can be moored*).

To assist in critically reviewing this policy and the appropriateness of the proposals, their relevance and impact on a number of diverse communities have been assessed as follows..

The housing needs of houseboat dwellers are ignored in assessments; there is no agreed methodology for recognising their needs. They are not provided for in policy or proposals and the housing developments that materialise. In particular, for waterside locations, the houseboats are invariably seen as undesirable features that should be removed in order, ostensibly, to maximise the desirability and value of adjacent new development. Insecurity is prevalent. On the occasions that the presence of moored boats are tolerated, then they are inevitably subjected to displacement in favour of 'high class rental barges' and floating businesses (cafes, bars etc.) to generate additional revenue and facilities for the new development, rather than providing reasonably priced homes.

Securing a degree of permanence of mooring can be hindered by the various and conflicting interests and duties, whether legal, property, operational, administrative or financial, of the Port of London Authority, the Environment Agency, Canal and River Trust Ltd, riparian owners and councils. Most moorings are provided by private companies whose contracts can vary in length from three months to three years. Demand is driving up rents of the frequently reviewed short term agreements which are personal to the individual boat owner rather than to the boat, and sites with more sophisticated services command higher fees. And this impermanence together with rising costs and demand, particularly from those unable to afford built accommodation, has resulted in many poor quality houseboats within London. In addition to the insecurity of mooring are the issues of the inadequacy of services that land based dwellers expect and receive (refuse collection, water, power, sewerage, policing, even protection from adjoining construction nuisances etc.) and ensuring access rights across adjoining land, which if not disputed are subject to frequent rental/license reviews.

Notwithstanding being a continuing and integral part of life in London and elsewhere for generations, gypsy and travellers communities are faced with prejudice, isolation and authorities neglecting their responsibilities to them. Even if they are provided with sites, their facilities are often primitive and increasingly overcrowded as alternative sites and options are closed and younger generations are not able to secure their own homes. Standards comparable to the 'decent homes' or similar requirements for permanent buildings are virtually non-existent. Consequently, it is a constant struggle to endure life in such conditions coupled as they are with the ever present threat of relocation or displacement to make way for what authorities see as 'a more intensive use of the land'. And this dispersal disturbs the close supportive extended family networks that are an essential feature of gypsy and traveller communities. Their presence and right to pursue their cultural heritage and way of life is not respected. The public interest is best served by recognising that meeting their needs will positively contribute to the making of 'diverse, inclusive and integrated neighborhoods' that the Mayor wants.

BME communities are over-represented in the PRS, with retaliatory evictions disproportionate (Shelter report). Local Authorities don't have the capacity or will

to pursue private landlords who are discriminatory and Mayor-led licensing, or Mayoral pressure on Borough 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 disproportionately affecting BME communities.

The Race Equality Strategy and other Equality Strategies should link with the LHS. It is important to tackle the intersection of inequalities between and within groups e.g. 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.

The weak and fluid language of Policy and Proposals needs tightening together with monitoring and scrutiny. For example, 'expecting' boroughs to meet housing needs won't actually result in new sites or improvements for Gypsies and Travellers given the intransigence practiced by boroughs in the past, the lack of strategic oversight and the absence of 'inclusive' planning. The Mayor should be more insistent with Boroughs to ensure that they act to identify and meet needs for diverse needs, including both quantity and quality of gypsy and traveller sites, by supporting the refurbishment of existing sites as well as the provision of new ones. (5.2 A iii). The meeting of diverse and particular needs would be enabled by the ring fencing of an appropriate portion of the 'affordable homes funding', but the first round of bidding met no specialist needs.

It is essential to protect what we have. The proposals, as presently set out, do not build together so as to make likely the achievement of the promise in paragraph 5.30 that "housing options should be available to meet the full range of Londoners' housing needs, ensuring our neighbourhoods remain diverse, inclusive and socially integrated". Indeed, it is often the very planning proposals brought forward or approved by authorities that threaten the homes and neighbourhoods of settled communities or those with relatively tenuous rights to stay. Displacement or disruption to their lives inevitably fragments and disperses cohesive communities and compromises fragile trust and integration. The less

you have, the more marginalised you are, the greater the value of the right to stay; and some communities, particularly those with particular and diverse needs or characteristics, can place much store on that right. It is not an abstract or optional concept, but is strongly and widely held, such that this right to stay is a 'housing need' that should be respected and fulfilled.

We challenge the weak/fluid language of policy. Expecting that things will happen doesn't overcome intransigence/ injustice. Tighter monitoring and scrutiny will help with this. The Mayor needs to be tougher with Boroughs to ensure that they deal adequately with these issues. The delay in publishing the SHMA (see page 1 of this response) where such studies of needs of distinct groups of Londoners are reported makes it impossible to assess the adequacy of policy proposals here.

### **Policy 5.3 Community Support for Homebuilding**

#### **A**

"Working with councils and others, the Mayor will support Londoners to be involved in planning and delivering new homes. This will include:

- i. supporting the expansion of community-led housing schemes through a new Community-Led Housing Hub for London; and
- ii. investing in community-led housing schemes and lobbying Government for a share of the national Community Housing Fund."

#### **E**

The Mayor will improve protections for Londoners living in social housing, including those affected by estate regeneration projects, and ensure their views are properly heard and acted upon. This will include:

- i. calling on Government to implement a package of reforms to support better regulation and rights for those living in social housing, including appointing an independent Commissioner for Social Housing Residents; and
- ii. implementing the Mayor's Good Practice Guide to resident engagement in estate regeneration projects.

§ 5.74

“Estate regeneration schemes will be led by the landlord, who will almost always be a council or housing association.”

Policy 5.3A proposes a ‘Community-Led Housing Hub for London’. While we appreciate the initiative, we have a few concerns:

There is no involvement of community groups in the process of creating of the Hub. Given that it aims to be a ‘Community-Led Housing Hub’, the process of creating the Hub must involve community groups, grassroots organisations and networks that are proposing community-led initiatives.

It is not clear who is going to chair the Hub and whether community groups and grassroots organisation will participate in the decision-making of the Hub. As discussed above, a ‘Community-Led Housing Hub’ should be community-led.

If the Hub and the process of creating it were community-led, it would easier to determine which are the needs that the Hub should cover. The needs that the Hub should cover ought to include:

- Supporting communities and CLTs etc that want to get ownership (or long lease) of land in London.
- Supporting communities on obtaining loans for buying the land or assets. Guide communities to apply to low interest loans.
- Ensuring that SHLAA data and data for smaller sites is available in an open-access map form.
- The Hub needs expertise on viability assessments.
- The Community-led Housing Hub will initially be funded by public funds. However, it is expected that it will eventually be self-sustained without public funds. This kind of initiative, which aim to ensure more public participation and involvement in planning, should secure permanent public funding for functioning and not depend on private investment.
- The draft London Housing Strategy does not mention neighbourhood planning, community right to build orders, or other planning frameworks included in the Localism Act 2011 that give power to communities to make decisions about future developments in their area. There should be an explicit reference on how the Hub will provide support for community groups who

want to use the planning tools available in the Localism Act 2011.

In addition to this, overall, there is a general concern that the Hub exclusively addresses the needs of CLTs and other community organizations that want to carry out new housing developments in small sites, while it does not consider the possibility of tenants and residents in social housing estates wanting to carry out community-led regenerations. According to paragraph §5.74, social housing regeneration will be led by local authorities or housing association with only a consultation and engagement process. As was discussed in the meeting between Just Space and the GLA regarding the housing strategy on the 31/03/2017, the Community-Led Housing Hub should also support communities living in social housing estates who want to lead a regeneration process that implies refurbishing and retrofitting the existing homes, improving the public spaces and community facilities, and building new homes with an infill strategy. As the GLA suggested in the meeting with Just Space, the Community-led Housing Hub Should be incorporated in the Good Practice Guide. The draft version of the Good Practice Guide did not mention the Hub.

This concern about the lack of inclusion of estate regeneration in the Hub comes also from Policy 5.3E. The title of the policy (Community Support for Homebuilding) is contradictory with its content. Policy 5.3E does not aim to support communities to lead or co-produce the regeneration process of their estate, but it provides guidelines (through referencing the Good Practice Guide) for local authorities and housing associations on how to involve the residents in the process. As noted above, paragraph §5.74 states that “estate regeneration schemes will be led by the landlord, who will almost always be a council or housing association” and does not consider the possibility of communities leading (or co-producing with the local authority or housing association) a regeneration process. Policy 5.3E should address how the Hub will support *community-led* estate regeneration.

In this context the Right to Transfer should also be mentioned since it was created precisely to enable residents to transfer control of their estates to a housing association of their choice.

Policy 5.3E also proposes the Government appoint an independent Commissioner for Social Housing Residents at national level. **Just Space**

**opposes this policy because (i) it has not been developed through discussion with social housing tenants and (ii) the need is for structures which give a real voice to tenants and (iii) London conditions are so distinct from other regions that London would require its own Commissioner on Housing Rights.**

**In Policy 5.3E the Mayor should encourage social landlords to facilitate tenant engagement (which has been bit-by-bit dismantled by social landlords –with the majority of them now selecting tenants to be on boards or forums, with no remit to canvass the views of others nor to feed back to them). This should provide tenants with the power to speak for themselves at the local level – through democratic and accountable tenants associations and for them to be able to support one another at the local borough or landlord level through independent networking / formal tenants structures (like tenants federations, tenants councils etc).**

**Some tenants’ representatives have also argued that the Mayor should support local authority housing committees being re-established, which tenants may speak at and be co-opted members of.**

**In Policy 5.3E the Mayor should champion tenants voice and tenants rights by supporting a Stakeholders Housing Forum at City Hall 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 such as Age UK London and London Gypsies and Travellers.**

**In its [response](#) to the Mayor’s draft Good Practice Guide for Estate Regeneration Just Space and its members insisted that the requirement for a ballot majority of residents must be obtained before a decision is made to demolish homes on an estate. The Mayor’s manifesto commitment on this issue must be expressed in the Good Practice Guide and in Policy. It is a litmus test of the Mayor’s serious commitment to empowering Londoners and the Grenfell disaster heightens everyone’s expectations. The counter argument that things are complicated and don’t easily reduce to yes/no decisions is not a valid objection to ballots because one purpose of ballots is to ensure that regeneration schemes, with all their**

**complications, are talked through transparently and fully with residents to the point where a preferred scheme has at least 50% support. Note also that, for someone threatened with eviction, the decision IS a yes/no issue.**

The draft London Housing Strategy is not clear enough on how the Good Practice Guide for Estate Regeneration is going to be implemented and to what extent it is statutory. Policy 5.3E.ii says it will implement “the Mayor’s Good Practice Guide to resident engagement in estate regeneration projects”, but it does not say how nor establish mechanisms for implementing it. Paragraph 4.68 says “The Mayor will consider compliance with his Good Practice Guide when decisions are made about GLA funding”, but this is rather vague and excludes schemes which do not involve GLA funding. The introduction of the draft Good Practice Guide says “The Mayor will furthermore seek to incorporate relevant parts of the final Guide into his new London Housing Strategy”. However, there are not sufficient links between the draft Good Practice Guide and the draft Housing Strategy, particularly on how the Guide will be implemented and, as discussed previously, how the Guide connects with the ‘Community-Led Housing Hub’.

Community groups should have priority access to empty council buildings and land before the private sector. This could be facilitated by the Community Housing Hub.

Housing Co-operatives / Community Groups should receive 100% relief of business rates in empty commercial buildings when they provide meanwhile housing in London.

There should be government help for community groups who want to take over empty buildings and cash incentives for building owners who agree to such schemes. This could be a proportion of the rent collected from tenants.

The Mayor should sign up to a target of 2000 new community-led homes to be started during his time in office

## **§6 A fairer deal for private renters and leaseholders**

The Mayor is right to work with Boroughs on landlord licensing, encouraging all Boroughs to be as active as the best, incentivising this and drawing attention to the fact that the work can be self-financing from fees and penalties.

Because boroughs vary in their commitment to, and resourcing of PRS work, it is important that key tenant rights can **also** be enforced by tenants themselves, with access to legal and environmental health expertise as necessary to make this a reality. Independent support services to tenants are thus crucial and need resourcing.

Registering/licensing landlords, premises and letting agents with actual scrutiny of the people and the premises is crucial; merely naming “rogue” landlords is not nearly good enough because it is crucial to raise standards and re-balance power in the whole sector.

Landlords should be ‘fit and proper persons’ (as in Scottish law) and bad behaviour (not only bad premises and leases) should lead to their de-licensing,.

The Mayor should push for (ideally, and at least in the medium term) open-ended PRS leases (or at least a 3-5 year norm) with a minimum notice period for tenants; landlords able to terminate only on legally-defined grounds, as in Scotland and most European countries. This of course must include the ending of §21 eviction which is used to get rid of those who assert their rights.

Logically such improvements in security of tenure would be much weakened if rent levels and increases remain uncontrolled because landlords could simply price-out those tenants they could not evict. Just Space called in the Community-led Plan for the Mayor to start research on rent control and regulation measures in readiness for a more sympathetic government. His failure to consider this topic is a major failing of the Strategy and at least a research commitment should be added.

A strong Mayoral line on security and rents would not only help existing PRS tenants, but would also send the right signals to the embryo Build-to-Rent sector, discouraging excessively greedy investors and making it less likely that these assets — tenanted private blocks— will fall into the hands of private wealth and ‘vulture’ funds as has happened in Germany and occasionally here already.

The GLA needs to be mindful that a growing proportion of PRS tenants are elderly people, many of whom are deeply concerned about the insecurity and possible rent escalations they face (see AgeUK London evidence).

Just Space and some of its component groups are impressed by the possibilities of the “London Model” for regulating the PRS and would like to work with City Hall on developing the idea.

Given the Mayor’s stated opposition to “Right to Rent” we urge him to use his influence via the newly formed London Boroughs’ Private rented Sector Partnership to make sure that local authorities focus their efforts and resources solely on property licensing and do not get distracted into assisting/combining this with border control activities that are the responsibility of other agencies.

Policy 6.3 B iii is inadequate. A priority in estate regeneration or other schemes involving CPOs is for improved compensation or re-housing of (resident) leaseholders to enable them to stay in their localities and be no worse off. Better rights for them would increase the cost of schemes involving displacement but we would welcome this as tending to re-balance the refurbishment/demolition decision in favour of refurbishment.

### **§7 Tackling homelessness more sympathetically and helping rough sleepers**

We welcome the fact that the Mayor acknowledges the scale of homelessness in London and the measures he outlines in chapter 7 to alleviate it. We welcome his pledges to lobby for a fairer system and more resources.

However, with the extension of universal credit to all 32 boroughs the homeless crisis is about to plunge to a new nadir. We call on the Mayor and London councils to redouble their efforts to tackle this issue. There are not enough resources to deal with the problem already and it is unlikely, given the current national regime, that any extra resources will become available quickly. Therefore we call on the Mayor in addition to the measures outlined in his plan and in conjunction with boroughs, the NHS and voluntary organisations to manage the inevitable increase in homelessness and rough sleeping including by providing mail drop addresses for homeless people, making available more hygiene facilities, providing food, utilising any spare space for daytime shelter and more temporary accommodation, especially in the winter.

The mayor should take the lead in coordinating a pan-London response to this looming catastrophe. It is a true emergency to which the Mayor should respond with emergency measures. There would be strong public support.

If successive governments had wanted to **maximise** homelessness they would have adopted just the policies and practices which we are suffering under now: shrinking the social housing sector through Right to Buy, “estate regeneration” and “conversion”; depending more and more on unregulated, debt-fuelled markets while income and wealth inequalities grow; cutting and capping benefits and paying UC in arrears which triggers evictions. Some borough and GLA practices contribute too. The longer-term answers would mostly lie in chapters 1-6, if they were toughened-up.

Closure of hostels, domestic violence (DV) refuges and similar services has exacerbated the homelessness problem and the Mayor should devote more thought and resources to this aspect of the crisis.

The Mayor should discourage Boroughs and charities working “with” the homeless from colluding in the deportation of street sleepers with EU citizenship. The argument that many have health problems which could be better-treated in their countries of origin is not a justification but a sham. They could be offered the option of re-patriation, or indeed of treatment here. “London is Open” should not cease to apply if a person becomes homeless.