

## Summary of discussions at draft London Housing Strategy consultation workshops – 4 and 13 October 2017

As part of the consultation on the draft London Housing Strategy, two consultation workshops were held on 4 and 13 October 2017 at City Hall. The aim of the workshops was to bring together a wide range of stakeholders to discuss the proposals contained in the draft London Housing Strategy. The workshops were intended to support attendees in the development of their written responses to the consultation.

Workshop attendees were allocated to discussion tables, each focussed on a different policy area of the strategy. Each attendee had the opportunity to sit on three different tables, giving them an opportunity to share their views on a variety of policies and proposals in the strategy.

It was suggested that attendees consider the following questions during the discussions:

- Do you think the draft proposals on this topic outlined in the draft LHS go far enough in meeting London’s housing challenges?
- Are there specific proposals that you strongly support (or do not support)?
- How else can the Mayor tackle the issues relating to [specific discussion topic]?
- How could your organisation best support (and be supported by) the Mayor to achieve these objectives?

Below are summaries of the key points made on each of the discussion tables, bringing together all the feedback gathered during the discussion sessions across the two workshops.

<b>Table 1: Identifying and bringing forward more land for housing:</b> proposals to assemble more land, more quickly to deliver housing ( <i>Policy 3.1</i> )
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### Topics under discussion

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Through the London Housing Strategy and London Plan, the Mayor proposes to support and proactively intervene to increase the land available for housing by:

- Setting clear housing targets for councils.
- Protecting the Green Belt, and instead strongly support development on brownfield land and in town centres, and making the best use of land by supporting higher-density development and co-location of different types of development.
- Promoting development of small sites through the London Plan, including by setting local authority development targets for such sites. This will enable more homes to be built in areas within walking distance of town centres and public transport, while protecting and enhancing the appeal of London’s suburbs.
- Exploring incentives to encourage development of inefficiently-used land, such as surface car-parks and low-density retail centres, and faster build-out rates.
- Putting in place additional staff and resources so City Hall can identify land for housing and support councils and housing associations to bring forward new homes on these sites.
- Where necessary, directly intervening to bring this land forward for development. City Hall plans to allocate an initial £250 million revolving fund to support this, and the draft Strategy sets out that that the Mayor will:
  - support other partners – particularly housing associations – to gain access to land opportunities;

- directly co-ordinate and support delivery around key sites; and
- where necessary, step in to proactively assemble land for development and/or to de-risk sites.
- Using public land under the Mayor’s control to deliver new housing. GLA’s land bank will deliver more than 50,000 homes in the coming years, and TfL will bring forward land for 10,000 homes.
- Requiring councils to have a clear plan to bring their appropriate landholdings forward to deliver new homes
- Calling on other public landowners to lead by example to bring forward more land for housing, including homes for key workers where appropriate, and support this through a newly-procured London Development Panel.
- As a last resort, supporting public sector agencies to make full use of their compulsory purchase powers to bring forward development, or using the Mayor’s own powers to do so where necessary.
- Calling for more devolved powers to assemble land, including through improvements to the compulsory purchase process, and to bring more Government-owned land to the market.

## **Summary of feedback**

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### **Green Belt**

- Strong support for reclassifying low-amenity, well-connected Green Belt sites for housing, particularly given increasing housing need. Such sites do not fit the public perception of Green Belt land and their redevelopment could increase and enhance green space for Londoners. However, recognised that this was not politically tenable.
- Some representatives also cautioned that this may lead to urban sprawl and that an objective assessment of the value of specific Green Belt sites would be challenging.

### **Intensifying land use**

- Widespread support for intensification of existing land to deliver housing and other uses. Several attendees noted that London is not densely developed compared to other world cities, and most felt there was scope for more intensive use of land across London. But most representatives caveated this support in some way, for example:
  - Homes delivered should be genuinely affordable. Concern that expensive homes will be purchased as investments and not occupied.
  - Development should be accompanied / enabled by transport infrastructure improvements. Some attendees felt that the potential of major transport infrastructure improvements (e.g. HS2 and Crossrail) to deliver housing had not been maximised.
  - Development should be accompanied by social infrastructure. Some representatives felt this was not sufficiently emphasised in the draft Strategy, and that this provision needs to be masterplanned by the public sector.
  - Land should be used to accommodate a range of uses to meet London’s needs. Concerns were raised by a few attendees that more intensive use of land for housing may prejudice adjacent industrial land uses.
  - Some representatives highlighted the importance of proper planning to ensure intensification was in keeping with the local area. This might require site-specific plans.
  - Intensification should not mean a deterioration in design quality or space standards.
- However, a number of attendees commented that intensification has previously been focussed on cheaper and more deprived areas (and particularly town centres), and that:

- This is causing loss of retail and commercial space, to the detriment of the community (although some attendees felt that certain town centres needed a smaller, improved high street and more homes to support it).
- These areas are more likely to have transient residents, and communities are less engaged in the planning process, and less able to challenge planning applications.
- To be a fair policy, intensification must take place in all areas of London.
- Some supported meanwhile use of sites whilst more comprehensive redevelopment plans are being put in place.
- Several attendees commented that some local authority planning departments / committees would be reluctant to accept higher densities. There was some limited support for stronger policy to intensify use of suburban sites.
- Some attendees felt that more transparency on land ownership would be critical to enabling a more intensive use of land. GLA would need to facilitate this.
- Some attendees felt that the draft Strategy could take a stronger line on land-banking – and the Mayor’s proactive approach to acquiring land could be one way to tackle this.
- Some attendees felt that the more intensive use of land could be better linked to community housebuilding in the draft Strategy.
- A couple of attendees commented that building at high density is not always viable in Outer London.

### **Small sites**

- Widespread support for a planning presumption in favour of small site development and specific small site targets in the London Plan. This will help to diversify homebuilding.
- Widespread agreement that local planning authorities needed to increase their capacity and streamline processes to support small builders:
  - Support for making more planning advice and design guidance available to small builders – the procurement of which by individual small builders can be financially prohibitive. Some representatives felt that this could be achieved by increasing planning fees.
  - Some representatives felt local planning authorities had conflicting expectations of what should be delivered on small sites. Trying to meet all these expectations can undermine viability.
- Concern during one discussion session that local authorities are land-banking small sites, and this was delaying development of the sites. The strategy should explicitly deal with this.
- A couple of attendees requested further evidence in the strategy to demonstrate the link between supporting small builders and development of small sites.

### **Public land**

- Support for mixed use development of public land - this could deliver housing, business/commercial space and social infrastructure, whilst still delivering operational requirements.
- Support for 50% affordable housing delivery on public land (providing it is genuinely affordable), although some highlighted that meeting this requirement would be challenging in the context of other financial pressures on public landowners.
- Agreement that requirements for public landowners to achieve best consideration can hinder disposal of public land to deliver affordable housing.
- Publishing good practice on how public landowners use their sites to deliver housing would be useful.
- Attendees across many of the sessions felt that government departments could take more action to bring forward land for housing.

### **Proactive approach to bringing forward sites**

- Widespread support for the Mayor taking a more proactive approach, along with some limited support for the Mayor to go further and directly deliver homes
- Most sessions agreed the Mayor should adopt a long-term approach in acquiring and preparing land so to not compete with the market and to capture land value uplift (which may not be possible in the short-term).
- In the meantime, some commented that these sites could accommodate homes on a meanwhile basis.
- Some support across most of the sessions for ensuring land acquired by the Mayor remains in public ownership and, for example, developed or leased out for housing.
- Concern that private developers would not deliver sufficient genuinely affordable homes, and that they would benefit from long term uplift in land prices.

### **Compulsory purchase**

- Widespread support for the Mayor to use his compulsory purchase powers to bring forward land, and to encourage local authorities to do the same (including through a centre of expertise).
- Some representatives highlighted their support for compulsory purchase reform, including:
  - A simplified, less time-consuming process;
  - Compensation calculated according to existing use value, allowing uplift to be used for community gain.

<b>Table 2: Diversifying the homebuilding industry:</b> proposals to support a wider group of organisations to build homes. ( <i>Policy 3.3</i> )
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### **Topics under discussion**

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The Mayor proposes to increase and accelerate the number of homes delivered in London by diversifying the homebuilding industry and will do this by:

- Putting in place a package of support to expand the purpose-built private rented ('Build to Rent') sector, including through planning guidance.
- Promoting longer tenancies and stable rent increases in Build to Rent developments, and supporting delivery of rented homes at a range of discounted levels, including London Living Rent.
- Promoting development of small sites through the London Plan and making it easier and quicker to bring small sites to the market, including through the Small Sites, Small Builders programme (which will be piloted on TfL land).
- Changing the way that Mayoral Community Infrastructure Levy (MCIL) is levied so that small- and medium-sized builders can pay less up front.
- Supporting councils to build new council homes by providing investment and lobbying for Government reforms.
- Funding and supporting housing associations with ambitious development programmes, including through 'strategic partnerships' with housing associations.
- Calling on Government to remove the barriers that are limiting council and housing association housebuilding efforts, including calling for a long-term rent settlement.

### **Summary of feedback**

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#### **Overall feedback**

- Widespread agreement that the only way to increase supply statistically is to have a greater variety of developers and a greater variety of business models. So we need councils, housing associations, small builders, community groups and Build to Rent to all do more. The best way to attract new entrants is to reduce the burden of entry by making the processes of land acquisition, finance and planning as simple, transparent and consistent as possible. The threshold approach to affordable housing in the SPG is a good example of this.

### **Small and medium builders**

- Small sites are a challenge so freeing those up would be positive. They are a challenge because each site is unique and often constrained, because the planning process is usually lengthy and complex and because small builders are more at risk of going out of business. Many smaller contractors do not have the expertise or experience to participate in complex procurement processes, for example those required by OJEU, so something to help with that would be very beneficial.
- The big problem is the loss of SME builders since the 2008 crash. That means we also need to be realistic about how quickly they will be able to scale back up again. In some cases, working with community groups may actually be more effective.
- Need more clarity on what counts as a 'small' site or builder.
- It would help to get residents on board if any required construction or utilities work could be co-ordinated, which doesn't happen at the moment.
- Small schemes are all different and often complex, so need extra help, like a lower rate of CIL.
- Extra costs of policies like the internal air quality assessment demanded by the Environment Strategy have a particularly big impact on small builders. Some of the upfront costs of small affordable housing schemes could be offset by upfront grant payment
- Would be helpful to have a land matching service to match up small housing associations with parcels of public land.

### **Community-led housing**

- There is a similar problem with community-led schemes, as the process of acquiring land and navigating the planning system is complex and lengthy.
- The Mayor should earmark a specific proportion of his affordable homes budget for community-led schemes, and fund a proper centre of expertise and training rather than a 'hub' which doesn't add much.
- There may be some value to community groups partnering with small housing associations.

### **Precision manufactured homes / offsite manufacture**

- Offsite manufacture benefits most from economies of scale on large schemes, but has worked on smaller sites (e.g. a few dozen units) when there is a single developer applying standard designs across several different sites. This could work on a larger scale if the GLA was able to package up sites and create a consistent profile of demand for off-site units.

### **Build to Rent**

- The strategy is right to promote Build to Rent (BtR), which could drive up standards in the rest of the sector over time. Tenants want stable tenancies and certain rent increases, while BtR investors want consistent income streams. So it seems like a good match, and BtR provides other benefits like the ability to ride out recessions. The problem is that BtR is currently a relatively luxury product for now – the challenge is to make it affordable to more people (as well as providing more dedicated affordable housing within BtR, which is a

separate issue). Softer measures like being able to redecorate would also help people see BtR as a longer-term option.

- The planning pathway in the SPG is fairly simple to understand, but different boroughs still approach some aspects differently, such as how clawback calculations are included in the Section 106 agreement.
- BtR works well with offsite manufacture, but design standards can be a challenge as they don't reflect the amount of communal space that BtR developers want to include. There should be different design standards for BtR homes, which should be less concerned about things like dual aspect when dealing with small units in a building with a lot of communal space. Currently some BtR developers are able to negotiate flexibility with some boroughs, but it is inconsistent and unpredictable, which doesn't give investors the certainty they need.
- BtR is acceptable in the short term because the design quality and management standards are higher than the mainstream rented sector – that is, it only looks good in comparison to something bad. But rents are too high for the vast majority of people to accumulate any savings, which in the long term will store up huge problems for renters.
- Historically the private sector has never built enough, but BtR has already had a very positive impact.

### **Social landlords**

- We should look at other ways to fund affordable housing, learning from examples like the Low Income Housing Tax Credit in the US.
- Rent certainty is a big barrier to housing associations investing more.
- Small housing associations can't take on the risk of development themselves, so there needs to be more partnerships between large and small associations to enable them to get involved.
- The threshold approach to affordable housing seems mostly aimed at big developers and registered providers.
- Raising the borrowing cap is key to getting councils building more.
- When councils 'built' homes in the 1960s and 1970s they were actually mostly using contractors. Their skills lie in commissioning homes rather than designing and building homes themselves.

<p><b>Table 3: Improving the skills, capacity and building methods of the industry:</b> proposals to address the construction skills gap and increase the proportion of London's homes built with precision-manufactured components. (<i>Policy 3.4</i>)</p>
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### **Topics under discussion**

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The Mayor wants to ensure there are enough people in the construction industry with the right skills and using modern construction methods to deliver the housing London need. He proposes to do this by:

- Leading a publicity campaign to highlight what Londoners, homebuilders and Government can do to deliver the skills and people to build the homes that London needs. It will encourage many more Londoners to take up a career in construction targeted at those currently under-represented in the construction work force including young people, women and those from a Black, Asian and minority ethnic background.
- Making the case for urgent certainty over EU nationals' rights to continue working in the capital.
- Working with partners to improve access to local construction apprenticeship schemes.

- Establishing a Construction Academy Scheme to ensure there are enough people with the construction skills that London needs.
- Lobbying for more control by London government over its skills system.
- Promoting more modern and precision construction methods, including through the Affordable Homes Programme. These methods can be quicker, more cost-efficient and safer to build, and will be an essential part of tackling the housing crisis.

## Summary of feedback

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### Precision manufactured homes

- There was a range of views about the role and value of the sector, with some caution about its capacity to deliver at scale, alongside a strong belief that it's essential to increasing supply.
- There have already been some positive experiences of delivering precision manufactured homes (PMH), for example the Accord Partnership in Redditch which has been community-led and sets a good example of the process being successfully managed. Whilst the product is successful there is still ultimately a lack of land for homes.
- Using PMH will still require skilled operative to do elements of the work but the skills profile is changing. One of the key advantages of PMH is that the units can be transported overnight and then constructed in the daytime.
- PMH has the opportunity to create a high-quality product more quickly but the market is unpredictable and there have been difficulties securing the cultural change away from traditional building methods to PMH techniques. The link between skilled workers and PMH is not being made explicitly so people do not know that this might be available to them as a career choice.
- Location of PMH factories could be outside of London to support the wider national economy and to create jobs outside of the capital.
- A cultural resistance pervades in relation to PMH because of the belief that it will not be cheaper/quicker in the long run. Possibly this is because manufacturers are not passing on the benefits to customers and are making bigger margins instead of enabling customers to make savings.
- Recognition that the GLA has been supportive of PMH initiatives but that this needs to move from "one-off" schemes to being the method of choice for developers.
- There is a misconception that a critical mass is needed to make it financially viable. But there is some benefit of standardisation/interchangeability of components so that developers are not "locked in" with a single supplier.
- It is important to create good places and good products; the Victorian terrace shows that replicability is possible and acceptable but that the variation in façade and exterior is more important than internal variation. External variation is easier and more cost-efficient to achieve and it creates a better place overall. By creating a basic shell option, internal flexibility and personalisation can be achieved, in an efficient manner.
- Mortgaging PMH products can be more difficult and more standardisation might help to improve this as it will become a more "mainstream" product rather than each PMH scheme being a one off.
- Planning should take an earlier role in the process to require PMH because it cannot be retrofitted in the design process.
- While RPs are starting their own factories to have control over the process, some questioned whether this the most efficient method in the long term, as well as asking what could be done to support them and make them feel confident.
- There was a question as to whether the Mayor should be placing large orders for PMH homes or should use policy mechanisms to nudge the sector into making more of a change.

- PMH is not an all or nothing model: some elements of PMH, such as offsite assembly of plumbing and electrics, can help speed up delivery of traditionally built homes.
- Concern that the many small firms in the PMH sector don't necessarily have capacity to seek AHP/Innovation Fund support, meaning that the Mayor needs to find a way to support them as well as the bigger players.
- Procurement can be difficult with PMH and where LAs do seek to procure PMH, their procurement models may result in the cheapest and most familiar construction methods winning tenders. Procurement models need to be reviewed and "value" defined more broadly. Suggestion that there may be a role for a London-wide framework agreement to support this.
- Support for assurance of good quality PMH units. Suggestion that testing and comparing different types of PMH home might help counter the stigma of modular/public association of PMH with prefabs and help clarify what consumers want.
- Recognition that PMH could help reduce defects in construction.
- Observation that lifetime maintenance and relocation costs need to be taken into account when considering this model.
- Comment that HAs often have little influence on construction methods on sites, so can't promote PMH easily for these units.
- The GLA's role might usefully include supporting demand aggregation, networking opportunities, some standardisation and dealing with risk and metrics.
- The Mayor could support PMH by offering higher grant rates, expecting its use on public land.

### **Promotion of a career in construction**

- There needs to be greater promotion of the construction sector as a career opportunity; from the outside it is not perceived to be diverse and this should be addressed to publicise the full range of jobs that support construction and highlight the role of digital technologies in modern construction. Additionally, more information around the longevity of jobs in the sector and the potential to move and progress a career is not understood.
- Any promotion should highlight some of the exciting and challenging opportunities of designing and delivering homes, particularly affordable housing, conversions and the adaptations an ageing population needs (as well as new developments), suitable for London.
- Any drive to recruit people should focus on those who are currently underrepresented in the sector.
- Careers that are seen as unskilled have a poor image but there are many skilled roles that could be more actively promoted within schools and colleges.
- There is a concern over job security and the intermittent nature of the work, but there are opportunities within the PMH sector for people to work more consistently and in a safer working environment, the factory setting may also be more suitable for flexible working and make the sector more attractive to women joining the market.
- There was some discussion around whether there is a perceived age limit on working in construction. When undertaking a physical trade that some people may struggle to work past 40 but with PMH this should be extended because the physical toll would be lessened. There is also the opportunity for people to retrain and to find other career routes through the sector.
- The industry needs to promote the benefits of a career in construction to young people at an early stage in their education. At present industry doesn't promote itself very well in educational establishments and needs to be more sophisticated in its approach to school children. There is a gap between the interest that young children show in construction and how things work and then the translation into job opportunities. Vocational training



opportunities need to be improved, along with ensuring that work experience opportunities are available for those showing an early interest in a career.

- Training apprentices can be expensive for SMEs and there is a risk that they do not stay with the company. The network of learning centres has disintegrated and there is a need to work with schools to link them with apprenticeships.
- Construction work could be perceived to be part of the gig economy because of the flexibility of the employment and the opportunity for workers to choose and move between sites. But the stop/start nature of the work will deter some and the varying location of work can also be a barrier to joining the work force.

### **Construction skills training delivery**

- Individual borough employment initiatives are not realistic because very few people live and work in the same borough and many must travel to work. Section 106 obligations are also difficult to enforce and demonstrate the genuine benefits from because they are based on starts. Instead we need to look at sustained employment targets. There are too many initiatives and if there is to be another it needs to be holistic and overarching for London.
- Previously local employment agencies helped to support people into construction work on a practical basis but these have been lost through cuts in funding. Other positive schemes include Notting Hill's to get unemployed people back into work.
- One participant raised the question of whether it was the Mayor's role to intervene in the construction sector.
- Discussions on construction training provision highlighted that training needs to:
  - be progressive (not repetitive)
  - offer refreshers
  - incorporate practical experience and qualifications, as it does in other European countries
  - try and counter the devaluation of practical skills, as a growing proportion of young people have been encouraged to go to university (scope to learn from Germany)
  - include apprenticeships, which can be helpful in raising the prestige of practical careers
  - encourage smaller firms to play their part in apprenticeships
  - be accessible to those who don't have relatives or friends in the industry
  - include young people not in education, employment or training (NEETs)
  - encourage those learning to achieve a holistic understanding of building design, since problems can result from many of those involved in (parts of) development lacking this
  - extend to the supply chain, as skills shortages there have significant adverse impacts on delivery of homes
  - dovetail with Smart Construction work on performance improvements
  - include conservation apprenticeships
  - complement and bring coordination to existing provision
  - be based on an understanding of how effective (or not) Section 106 is in delivering training
  - encourage long term commitment, as the vulnerability of the industry to economic downturns can discourage firms from taking apprentices
  - ensure apprentices secure a breadth of experience
- Discussions of skills gaps and sector capacity should include the need for fire safety/building control inspectors.

### **Further feedback**

- Promotion of smaller builders needs to be more thought through – there should be initiatives to keep the small builders afloat during the periods of economic downturn, not facilitate them being set up in periods of economic growth. Otherwise there is simply a cycle of boom and bust for the smaller builders which is negative for the wider economy and for individuals working in the sector.
- Community building is broadening the appeal and understanding of construction and will enable more grassroots activity. Are there opportunities for young people working in construction to have a share in the homes that they are building?

**Table 4: Working towards half of new homes built being genuinely affordable:** proposals to significantly increase the number of affordable homes built in London, including ensuring that the planning system delivers more genuinely affordable homes and bringing forward more public land to deliver affordable homes. (*Policy 4.2, related policies 4.1 & 4.3*)

### Topics under discussion

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The Mayor wants to significantly increase the number of new affordable homes built in London should be significantly increased and has a long term target for half of new homes built in London to be affordable. He proposes to do this by:

- Implementing his new approach to viability (as outlined in recently published Supplementary Planning Guidance):
  - Encouraging landowners and developers to assume that a minimum of 35 per cent of all new homes on individual development sites should be affordable, with the viability of schemes proposing to deliver fewer affordable homes than this subject to detailed scrutiny, supported by a new expert team at City Hall
  - The Mayor’s long term target is for 50 per cent of new homes to be affordable, and he will use funding and other measures to deliver a higher proportion of affordable homes.
- Investing a record settlement of £3.15billion to support delivery of 90,000 affordable home starts by 2021.
- Prioritising the delivery of affordable homes on publicly-owned land. The Mayor expects that public landowners should deliver an average of 50 per cent affordable homes on the land that they bring forward, as he has committed to do for land under his control.

### Genuinely affordable homes

Supported by a series of clear affordability tests, the Mayor wants to ensure that new affordable homes are genuinely affordable to Londoners. He proposes to do this by:

- Delivering low cost rented homes at around social rent levels (**London Affordable Rent**), allocated to Londoners on low incomes according to need. The Mayor will also refuse to authorise any further conversions of social rented homes to higher rents.
- Supporting Londoners on middle incomes who do not have enough savings to access mainstream or affordable home ownership by investing in **London Living Rent** homes and other types of intermediate rented homes. These homes will generally be affordable to households with incomes below £60,000.
- Increasing the number of affordable homes for sale, including through shared ownership (**London Shared Ownership**). All of these homes will be genuinely affordable to households with incomes below £90,000.

### Protecting London’s affordable homes

Given the overwhelming need for more affordable homes, London's existing affordable homes should be protected and utilised as efficiently as possible. The Mayor proposes to do this by:

- Using the Housing Moves and Seaside and Country Homes schemes to ensure that social tenants who wish to move can do so quickly, freeing up larger homes and enabling Londoners to be closer to work opportunities.
- Strongly opposing the Government's 'Pay to Stay' policy and the 'Bedroom Tax'.
- Calling on Government for reform to ensure that homes sold through Right to Buy are replaced on a like-for-like basis, and oppose plans to force councils to sell their higher-value homes.
- Ensuring affordable homes demolished as part of estate regeneration projects are replaced on a like-for-like basis.

## **Summary of feedback**

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### **Working towards half of new homes built being genuinely affordable**

- Many participants broadly saw the London Housing Strategy as a move in the right direction in terms of meeting London's housing challenges. In particular, there was recognition that the focus on affordable housing, as demonstrated through the 35% threshold in the new SPG, represented a positive change in policy direction and could be further built on through progress towards the strategic 50% affordable housing target. The 35% should very much be seen as the starting point for significantly increasing levels of affordable housing delivery, rather than the end point.
- Some participants proposed a blanket 35% affordable housing threshold, removing the concept of viability altogether. These same participants believed that even with the policy proposals of the London Housing Strategy, it will be too difficult for councils and the GLA to enforce this.
- Some participants, whilst acknowledging the need to have a lower transitional figure, were concerned about 'locking in' a 35% affordable housing target in private developments, as this may prevent higher percentages being achieved.
- Some participants were also concerned that to meet the 35% affordable housing threshold, design/space may be compromised to minimise costs.
- One participant believed that the threshold of 35% will slow land supply, and may lead to private developers looking outside of London for opportunities. In addition, messages from the Mayor and councils on housing delivery are not always consistent and this can cause some confusion and lack of clarity for developers.
- A number of participants highlighted that an adequate level of staffing in the GLA's viability team will be essential in terms of ensuring the new SPG is applied effectively.
- There was a suggestion that the Mayor should lobby to have a different NPPF for London (a 'LPPF'), in order to allow for a different, London-specific approach to viability. One participant thought seeking to remove the words 'subject to viability' from NPPF would be a big help.
- Some participants believed the GLA should aim for more than 50% on GLA Group owned land –to balance out lower percentages participants believed would be achieved on developer-led schemes. Other participants queried what approach would be taken to ensure that the 50% target on Mayoral land would be achieved.
- With grant-funded projects hard to deliver in areas with exceptionally high value areas, one participant felt it was necessary to assess whether 50% affordable housing provision on public land is going to be viable.

- Some participants questioned how the ambition for 50% affordable housing to be built on public land interrelates with best consideration rules.
- One participant believed that public Mayoral support for community-led housing's role on a specific publicly held site would be useful. However, another pointed out that the public body involved had other objectives to be met, which needed to be considered.
- Some participants expressed concerns about public land disposal – and suggested that instead it should be kept in public ownership through partnerships with housing associations and community land trusts. However, others saw different approaches to public land as part of meeting London's housing need.
- Concerns raised by some participants that the draft London Housing Strategy relies too heavily on the private sector and does not take into account or support the role that councils should play in terms of building homes.
- One participant suggested that ranking boroughs by the percentage of affordable housing being delivered in Annual Monitoring Reports would assist transparency and incentivise greater affordable housing delivery.
- A number of participants saw changing new best consideration rules (i.e. a new definition of 'value' which isn't just Market Value) as key to meeting London's housing challenges, while another participant believed that seeking reform to Compulsory Purchase Orders (to limit to existing use value +X%) could be a gamechanger, especially in terms of affordable housing delivery.
- There was some confusion amongst participants concerning whether the LHS was diverging from recommendations of the Planning and Viability SPG released in Summer 2017, and whether the LHS was giving a different policy direction. A number of participants highlighted the need to ensure that all the Mayor's policy in this area is fully aligned and communicated in a coherent way.
- There was some discussion as to the extent to which the proposals would deliver the changes that Londoners need, particularly with regards to affordability. In particular, there was some discussion about the extent to which a fundamental shift in housing affordability in London requires a completely new approach.

### **Genuinely affordable homes**

- Many participants questioned the definition of 'genuinely affordable' in the London Housing Strategy. For instance, many participants felt that the Shared Ownership household income threshold of £90,000 could not be described as genuinely affordable. Some participants believed there was a need to shift capital investment in affordable housing away from this product. Some participants also questioned the extent to which London Living Rent could be considered genuinely affordable.
- Some participants also felt that introducing more categories of affordable homes may create more confusion and be unhelpful.
- Some participants requested greater clarity on the difference between London Affordable Rent and Affordable Rent which can be let at 80% of Market Value.
- The uncertainty about the extent to which these housing options are genuinely affordable meant that some participants saw the 35% affordable housing threshold in the SPG as a less notable achievement.
- Some participants wanted to see a percentage split between Shared Ownership and LLR in the London Affordable Homes Programme.
- Some participants felt that moving from 50% genuinely affordable to 50% Social Rent was essential in order to meet London's housing challenges, as well as suggesting that the Mayor should set a 'social rent first' public objective. Some participants felt that London Affordable Rent levels do not go far enough to mitigate against the impact of a lack of commitment to a significant programme of council home building.

- Some believed that if 35% affordable housing is provided on a developer-led scheme, only the third of this proportion which is London Affordable Rent will meet London's need for genuinely affordable homes.
- Some participants wanted greater clarification on how London Affordable Rent differed from the national Affordable Rent and how the benchmarks against social rent levels would be enforced.
- Some participants queried the target of supporting those living in London Living Rent homes into home ownership within ten years, as it is not clear what would happen to those who do not want/are unable to save in order to buy their homes. In addition, there were some queries as to the extent to which residents would be 'moved on' after ten years if they haven't bought their property.
- There were some queries about how many London Living Rent units would be developed, particularly on Build to Rent schemes.
- Many attendees made it clear that they felt more money was needed to build the genuinely affordable homes London needs. They questioned whether the Mayor should consequently be more vocal about stating this in public to lay out the real scale of the challenge. Some of these participants noted that it was important to assess whether this was the best influencing strategy, but regardless it was an option for this document.
- Some participants felt strongly that housing associations were no longer meeting their charitable objectives and were now unable to assist in the delivery of genuinely affordable homes.
- Representatives from cooperatives said that greater access to finance and/or land would assist them in delivering genuinely affordable homes.

### **Protecting London's affordable homes**

- Some residents' association representatives felt that social rent is not the same as council rent. Consequently, on estate regeneration schemes, ensuring like-for-like in terms of provider was important and that transferring from council to housing association was not satisfactory).
- There were also some queries about how like-for-like replacement in estate regeneration schemes would work in practice.

### **Further feedback**

- There was a strong focus on the extent to which restrictions on how RtB receipts can be spent (i.e. that they cannot be combined with grant) is holding back the delivery of affordable housing by councils. The Mayor has a key role in lobbying central Government for this change.
- Some participants wanted the Mayor and this London Housing Strategy to be more public in arguing for greater devolved powers and grant for affordable housing in London, and that perhaps there should be a dedicated campaign for extra powers and funding, working in tandem with other stakeholders.
- The issue of shared households, and whether the Mayor's affordable housing proposals catered to them was raised. This was seen as a potential target group who could be supported by Mayoral intervention.
- Some participants believed councils could build more on their own land to support affordable housing delivery and suggested that the Mayor should look further at how he could encourage them to build homes on their land. Others suggested that GLA facilitation of the sharing of good practice between councils around development vehicles such as Joint Ventures would be helpful.
- Some participants believed that there was a need to undertake a Green Belt Review.

- Finding and unlocking ways to marry good design and density seen as very important by some participants.
- One participant believed that an expansion in meanwhile use could help house people quickly, in existing properties. They believed that inclusion of this in the strategy would be important to meet London’s housing challenges in the short term.
- One participant believed that the GLA could issue its own ‘housing bonds’ to gather investment for housing investment.
- Some community-led housing representatives saw the LHS as moving in the right direction – but that it needs to promote community-led housing more strongly.
- One participant suggested that the GLA should become a developer and/or registered provider itself, in order to meet London’s housing challenges.
- Some participants expressed concerns regarding the use of public money in partnerships involving private developers.
- Diversifying the housebuilding industry was seen as having positive benefits with regards to supplying affordable housing.
- Some council representatives queried whether there was scope to reverse conversions that have been made by housing associations in council areas, particularly following the announcement that housing associations will be able to increase their rents by CPI +1% from 2020.
- Some participants believed that industrial land in outer boroughs is not as low value as expected– consequently, it may be harder to deliver the densities we want to.
- Some participants were concerned about the continuation of Help to Buy – and they raised queries about whether the Mayor or the London Housing Strategy had a position.
- Many participants asked for clarification regarding terminology and words used in the draft strategy which are not completely clear, for example where something was firm/mandatory (such as 50% on GLA-owned land) that it should be made clear it was so.
- One participant stated that the strategy is short-termist and working within the current model of delivery. There was therefore a need to talk about medium/long term goals, and to speak to all Londoners’ needs
- A number of participants thought that the wording of the draft London Housing Strategy could be clearer in parts. For example, one participant questioned what it means by ‘encourage’ when the LHS ‘encourages’ 50% affordable housing on public sector sites.

<p><b>Table 5: Well designed, safe, good quality, and environmentally sustainable homes:</b> proposals to ensure that new homes are built with a focus on design, quality, safety and sustainability. (<i>Policy 5.1</i>)</p>
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### **Topics under discussion**

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The Mayor wants to ensure that London’s new and existing homes and neighbourhoods are well-designed, good quality and environmentally sustainable. He proposes to do this by:

- Calling on Government to ensure that Building Regulations focus unflinchingly on quality and safety, and bear the costs of making social housing safe in the capital.
- Investigating whether the draft London Plan can strengthen fire safety for tall buildings.
- Bringing together London’s housing design standards into a single planning document, and maintain existing space standards.
- Upholding the quality of development across London, including by appointing 50 Design Advocates.

- Working with boroughs to develop 'Public Practice', to put high-quality planners into hard-pressed planning departments.
- Ensuring new and existing homes meet high environmental standards, contributing to his target for London to be a zero-carbon city by 2050 and supporting incentives for energy efficiency improvements and lower energy bills for Londoners.

## **Summary of feedback**

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### **Overall**

- General acceptance that it is up to the government to review Building Regulations and make resources available for making homes safe in the wake of Grenfell.
- Design and energy standards are difficult to navigate and the strategy's proposals should help to make this process easier.
- Design standards and the Housing SPG should set new/enforceable space standards that shouldn't be flexed (there is a perception that some developers do not have to follow the same rules others do).
- Design standards should not become overly centralised – local people should have proper input.
- The Public Practice initiative will not go far enough to address the lack of resource in boroughs – a longer term capacity-building exercise is required.
- Design advocates may be helpful for some boroughs and community groups, but may be counter-productive if they lead to duplication.
- The main issue with energy efficiency is with London's existing housing stock, rather than new build – councils face a difficult choice with limited resources: invest in new housing to meet demand or improve existing stock.

### **Consolidating housing design standards into a single planning document**

- Some support for bringing together relevant documents in one place – some borough design codes are impractical (a problem compounded by lack of borough resources).
- There is potential for PMH to support quicker delivery in this regard,
- However, there were some concerns that this risks promoting a top-down, single-vision approach which could turn people against development. Devolution is an asset and local people should feed into the design process.
- For example: "Secure by Design" requires electric barriers which are not always necessary, which in turn affects scheme viability. Other solutions, such as improving lighting/visibility may work better.
- Design standards should align with "Building for Life – 12 principles of urban design" which contains a good checklist and is relatively uncontroversial.
- A new "Decent Homes Standard" is required.
- Should be policy recognition for non-traditional C3 use and there is a question about whether space/other standards should apply for temporary accommodation.
- Pattern books/standardised approaches to design should be introduced for new buildings.
- Tall buildings should have an extra set of standards to conform to in relation to wind effects, overheating, and design.
- The GLA should maintain records of specific standards delivered by developers in each development and then publish how different developers do on delivering these standards.
- There should be a requirement that a home must be built to last a minimum period of time.
- 'Quality' is subjective – the GLA should be more prescriptive and define quality in relation to a series of objectives, with a single 'Design Code for London', and parameters in place for specific designs at given locations

## **Improving Building Regulations**

- There was broad support for Government review which needs to be comprehensive.
- Regulations are difficult to penetrate and need to cross-reference to other documents. Also, regulations should not be viewed as the bare minimum – need to push for better quality.
- A plain-English guide to Regulations would be helpful.
- Offsite construction needs to be better taken into account in the Regulations.
- Councils may have better expertise at selecting Building Control Services contractors and should take a greater role in this respect. A recent Survation poll found that  $\frac{3}{4}$  of people support only councils doing building control inspections, demonstrating that there is support for this work to come back in-house at councils. However, this would need to be resourced.
- There is a need for an independent review of fire safety standards and independent redress of issues where tenants complain.

## **Making homes safer**

- Support for calling on Government to make resources available to make homes safe.
- Recognition that that the challenge in London is different to that in the rest of the country.
- However, there was not a unanimous view in favour of sprinklers – some favoured mandating of their installation through the London Plan, but some residents object to the interruption caused by their installation and this resistance can be caused by bad past experiences of how councils and registered providers have carried out major works.
- The whole sector lacks building physics skills and this might be something the Mayor can help address (i.e. through skills role).
- There is concern that modifications are made to and within buildings and these are not covered by the regulations, making buildings unsafe – a “Statutory MOT” for buildings should be introduced equivalent to the regular test for cars.
- There is some concern that increasing the number and rigour of standards may adversely affect the viability of schemes, in particular the proportion of affordable housing that can be delivered.

## **Public Practice**

- Anything that gives boroughs support is helpful and may help them to reduce consultancy costs, but the real issue is the pay differential for planning jobs between the public and private sector which causes councils to lose expertise.
- Support for the proposal, but seen as “scratching at the surface” and concern that one-year placements won’t be enough.
- Clarification requested about whether planners will be invited by boroughs or introduced through “special measures” for poor performance.

## **Design Advocates**

- Design champions might be helpful to support councils that do not have their own design panels or community groups. They should look at a development in its full context when considering particular designs.
- Many local councils already have design panels which are working well – this policy risks creating duplication and moving design input away from local communities.
- Concern that the 50 Advocates won’t give a consistent view and will just become another hurdle for development.

## **Energy efficiency**



- Support for reforming how VAT is charged on home improvements to incentivise homeowners.
- In new builds, heating is not a problem – often homes are too hot – “comfortable living” should be the aim which does not always require lots of insulation.
- Holistic building design should be encouraged, considering issues such as air quality and circulation.
- The main issue with energy efficiency is improving the existing housing stock which involves huge amounts of work and cost – new standards for retrofitting would be helpful to avoid everyone “doing their own thing”. There can also be conflicts between retrofitting priorities and conservation priorities.
- Need a programme of delivery that is consistent in environmental standards between new build and retrofitting over time.
- There is an opportunity to improve how we use Combined Heat and Power (CHP) on site – energy could be captured to charge batteries / electric cars etc.
- Guidance is needed for carbon-offset payments.
- An “idiot’s guide” to environmental standards would be helpful.
- There needs to be a roadmap to the ‘zero-carbon city.’

### **Build to Rent**

- This can be difficult for councils – a PRS block dumped in an area does not create a new community.
- These projects need to be managed carefully, as well as being designed carefully.
- Local involvement key and the Mayor/boroughs need to consider how to work better with local communities to make this work.

### **Equalities considerations**

- The link between health and housing should be clearer in the strategy – a “health and accessibility” section should be included in the design brief.
- Build to Rent design can (and will) be tailored to demand (young professionals etc) but this may impact on the needs of older/disabled people.

### **Additional comments**

- The draft strategy is over 200 pages which is too long for a consultation document.
- There is not enough qualitative research in the strategy – need to feed in what communities really feel about design, for example, to help reduce their anxieties.
- Many colleges do not recognise apprentices in offsite house building, focusing only on traditional methods – the Mayor could use his influence to change this.
- The strategy could focus more on wellbeing: people spend most of their time indoors. (e.g. *Saint Gobain* has looked into putting the occupant at the centre of design.)
- Lighting, feel and noise insulation are important concerns for residents – not just how buildings appear from the outside.

<p><b>Table 6: Meeting London’s diverse housing needs:</b> proposals for investing in specialist and supported housing and adopting strict standards for accessibility. (<i>Policy 5.2</i>)</p>
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### **Topics under discussion**

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The Mayor wants to ensure new and existing homes meet Londoners’ diverse needs. He proposes to do this by:

- Ensuring that 10 per cent of new homes be wheelchair accessible and 90 per cent be accessible and adaptable, and make it easier for Londoners to identify these homes.
- Making existing homes more accessible and appropriate to Londoners, including older and disabled people, including by maximising the use of Disabled Facilities Grants and ensuring that social landlords are well-informed about their homes' accessibility.
- Promoting a range of housing options to meet Londoners' diverse needs, including by increasing opportunities for older homeowners to move to accommodation more suited to their needs, funding homes for older, disabled or homeless people, and make the case to Government to fund ongoing revenue costs.
- Meeting the housing needs of Gypsies and Travellers, including by expecting boroughs to plan for the housing needs of this group and by funding new sites and improvements to existing sites.
- Funding new homes that meet specific housing need, which could include housing for specific Black, Asian and minority ethnic (BAME) communities, housing aimed at Londoners who are leaving care or for foster carers, or LGBT+ majority extra care schemes.
- Making the case to Government that the new funding arrangements should meet the support and housing costs of supported housing in London.
- Expecting that all social landlords ensure that their services are LGBT+ inclusive.
- Making housing provision a key part of the strategy for resettling Syrian refugees in the capital.
- Welcoming bids for investment to fund affordable family-sized homes.

## **Summary of feedback**

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### **Young people**

- Need more homes for care leavers and young people experiencing homelessness, and more move-on accommodation for young people moving on from supported accommodation.
- Should develop shared schemes for young people who need a low level of support, rather than push them onto the open market unsupported and without safeguards in place.
- Shared accommodation could also be an option for young people more widely, who can't afford PRS rents or would be pushed into poor quality PRS.
- Young people, particularly those who have been abused or have experience domestic violence, therefore need longer term support as well as housing.
- Need to develop a strategy specifically for housing and young people, looking at different age groups of young people.
- There is a lack of a coherent policy specifically for young people.
- Young people are being priced out of the private rented sector and the concern is, if London is considered too expensive then it will not continue to attract young people to live and work in the city which would have implications for the economy. Key workers such as nurses, teachers, police etc cannot afford to live in London.
- Developers are building a lot of student housing at the expense of individuals that have more complex needs
- Young people that have health issues or complex needs are locked out of the private rented sector, due to landlords not accepting them as tenants or rents being unaffordable. The Mayor should consider how to make use of the planning system to require a percentage of homes being built to be for those with specialist housing needs.

### **Domestic violence**

- The Mayor should lobby for single people experiencing domestic abuse to be a priority need group under the homelessness legislation.

- Women experiencing domestic violence are often placed by boroughs – at risk - into mixed hostels. There is a need for more women-only hostels for this group.
- There was support for the Mayor’s position on lobbying for more revenue funding from DCLG to cover support costs of move-on accommodation.
- Women moving on from refuges, particularly those with no recourse to public funds, need to be recognised as extremely vulnerable and provision needs to be available.
- There is a need for a focused end to end pan-London strategy on housing and VAWG – covering not just homelessness. See the [Domestic Homicide Review](#).
- Participants supported the Mayor’s proposal for a pan-London commissioning approach to provision, as DV victims are often moved out of borough.

### **Data, accountability and community involvement**

- Attendees wanted better data on the needs for different types of specialist and supported housing and for this to be used in policy development - this should include live data from LAs and HAs.
- They also wanted groups representing London’s diverse housing needs – an equalities group - to have a greater role in developing, implementing and monitoring the Mayor’s policies.
- In particular, attendees wanted to see a more detailed analysis of how the funds have been allocated, e.g. how many homes funded are suitable for older people, young people, pitches for caravans and other categories/communities.
- Community groups and civil society should have more involvement in putting bids together, to improve housing delivery.
- More research needs to be commissioned on housing needs of older people.

### **Local connection**

- A pan London approach to supported housing is also required, as the local connection criteria constrains service providers as to where they can housing people and there can be a mismatch between demand and supply within and across boroughs. There is a strategic role for the Mayor to play in this context.
- This is particularly important in the context of the introduction of the Homelessness Reduction Act.

### **Drafting of policy 5.2Aiii**

- Gypsy and Traveller accommodation and housing provision for Syrian refugees should not be bracketed together – they should be separate policies.

### **Houseboats**

- Boat people should be considered more strongly in the LHS. Many have lost the right to vote because they are on the move. Many affordable rents are far too high for this group. For most, the average annual income ranges from £20,000 to 25,000.

### **Integration**

- Housing for diverse groups should not lead to segregation. On the other hand, some groups can end up being dispersed, so the need for some form of community needs to be acknowledged. There can be a real need to support community groups at an early stage in the formation of a community, even if over time the need for them may disappear.

### **Older people**

- Need to focus on the needs of asset rich and cash poor older people. Links to existing community may need to be maintained, so under-occupiers in this group have little incentive to downsize if this means moving to another area.
- We need more options for older owner occupiers who wish to downsize, though many rely on the family home as a form of a pension or for family inheritance. The extent to which we can rely on the market alone to create demand is limited. Need incentives such as equity release schemes, perhaps run by the GLA due to lack of trust in the financial services industry.
- We need stronger tax incentives to incentivise downsizing. For example, no capital gains on primary residence. We could introduce SDLT exemptions on transfer to new, smaller homes, which would be less punitive than a 'bedroom' tax on unoccupied rooms.
- Many older people would like to move home later in life, but cannot find anything suitable for their needs (the need to remain close to children or relatives who can care for them, adapted homes and similar).
- Suitable smaller properties should be available or built to incentivise the elderly to downsize. There is a need to identify what older people want in a smaller property for them to consider downsizing, properties that are generally on offer are not attractive enough. Housing built specifically for the elderly could include easier access to support and services (similar to sheltered housing). It was mentioned that one of the reasons why the elderly may consider downsizing is loneliness, the chance to live within a community and live among people who face similar circumstances would be appealing for some.
- Warden homes on estates were a successful approach allowing older people to move out of their home into sheltered accommodation, with attendant nurses and building managers, on the same estate, retaining ties with their community and maintaining their independence by avoiding having to move into a care home.
- On the other hand, traditional sheltered accommodation is less and less popular and is being converted into standard accommodation. People are living healthier lives for longer so in need of less support except at end of life, where a care home is more suitable.
- Historic models that should be revisited include the two thirds purchase scheme, allowing family members to buy a home in the same scheme. Another example cited was a Metropolitan scheme in Lambeth, where flats for older people and general needs are in the same complex, allowing family members to offer care and support without recourse to paid services or a care home.
- More flexible housing arrangements are needed, to cater for the variety of households that exist in BAME communities. Extended family networks for example can have the main living quarters with a 'granny flat' semi-independent extension.
- Other models include older people sharing with a student who offers light-touch support e.g. preparing meals.
- Marketing materials from developers are mainly aimed at first time buyers/overseas market, more promotion could be done for properties built for the elderly. More information could be made available for those considering downsizing, highlighting what options are available and what services are able to provide support. A lot of information is available online but it is not uncommon among the elderly to not have access to the internet. Information could be shared through agencies and services who work directly with the elderly.
- More could be done to target owner occupiers of ex- local authority flats who often do not know that there are schemes that could help them to downsize their properties. Whereas owner occupiers who brought their council homes through 'right to buy' might know of such schemes, as they tend to have more engagement with their local council as they were previously council tenants.

## **Accessible homes**

- There was strong support for ensuring that 10 percent of new homes be wheelchair accessible and 90 percent be wheelchair accessible and adaptable. This should be applied to all size of dwellings across different tenures.
- The Mayor needs to be more directive about providing wheelchair adapted homes when funding schemes, to reinforce the London Plan requirement.
- Wheelchair adapted homes often allocated to households without a need for these adaptations.
- Councils and Housing Associations should do a stock take of their existing properties to determine what category of homes they have in their portfolio and whether the right categories are allocated to the right individuals based on any specialist housing needs. A stock take would identify gaps in provision.

### **Disabled facilities grant**

- There was support for the proposal to raise the limit to £45,000, particularly for families with disabled children needing to extend their home.
- Potential to reform the Disabled Facilities Grants (DFGs) by removing certain barriers of assessment so that more people are eligible for the grant. The criteria of assessment for DFGs could be reviewed to see if the grant could be more inclusive.
- The LHS could do more to ringfence the funding for DFGs and the GLA could lobby for more funding to increase the grant from £30k - £45k.
- DFGs for homes in the private rented sector are very low. Home Improvement Agencies don't get permission from landlords to carry out improvement works. Enforcement through licensing could regulate the market to ensure that properties are up to standard.

### **LGBT+**

- LGBT and equalities needs more of a focus. Often it is not about housing need but how these groups are treated by LAs, HAs and similar, and the support services needed to accompany housing delivery to assist with maintaining a tenancy, needed for these groups, often vulnerable as a result of their protected characteristic. For example, digital inclusion, support for Carers, Adult Social Services, as these services are facing cuts across LAs in London.

### **Shared accommodation**

- There is scope for more shared accommodation (affordable rented or owned) with friends for young people, and the Mayor could look to extend Build to Rent to cover this type of accommodation. More funding could be used to support shared accommodation e.g. a version of LLR for young people to share accommodation. The type of product needs to be more flexible. For example, deliver accommodation with communal kitchens and self-contained units. This is delivered widely at market rates but not in the affordable range. This model may lend itself to the Innovation Fund.
- Some saw it as necessary to put in place effective safeguarding in relation to such schemes (shared and self-contained accommodation for young people), but not all agreed with the concept of shared accommodation or micro homes, seeing them as a race to the bottom in terms of standards.
- Shared accommodation run by charitable organisation has existed since the 1980s, and has proved self-sufficient in financial terms. This concept should be extended and adapted to address diverse housing needs/wider categories.

### **Supported housing**

- People who move to supported housing often have complex needs. More could be done by local authorities in identifying those who need specialist support. This could be done through better partnership working and linking in with other professionals and agencies. GLA could do more in consulting with services who provide specialist support.
- The Mayor should do more to get local authorities to bid for capital funding to provide for the homeless and vulnerable etc. More could be done to support local authorities to ensure that services that are put in place are sustainable in the long term.
- In some cases local residents do not want to live near hostel accommodation and this can present challenges for those wanting to provide this kind of housing.
- It is important to recognise and protect what we already have or there is a risk that we will lose capacity. A lot of supported housing is being lost because of the lack of revenue funding, due to cuts to local authority budgets.
- Need ring-fenced revenue funding so that we can deliver supported and specialist housing.
- Revenue funding for supported housing could be devolved to the Mayor for the supply of new housing to help facilitate new schemes.

### **Alternative models of owning/renting**

- Alternative models of home ownership should be investigated, for example group ownership and others, more suited to young people or groups of people sharing a similar ethos. At present most lenders will consider the incomes of a maximum of two buyers when calculating eligibility for a mortgage.

### **Additional comments**

- Children's Services, Adult Social Care and Housing sometimes have contradictory approaches to families at risk of homelessness or homeless.
- The Mayor appears to focus his partnerships on the private sector and housing associations and should work more closely with boroughs.

<p><b>Table 7: Involving Londoners in homebuilding:</b> proposals to promote community-led housing, increase transparency in London's housing market and address concerns about empty homes, overseas buyers, and the impacts of estate regeneration. (<i>Policy 5.3</i>)</p>
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### **Topics for discussion**

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The Mayor wants to work with partners to deliver new homes that involve communities and earn their support. He proposes to do this by:

- Funding self-build and community-led housing projects and a Community-Led Housing Hub to support, advise and build capacity of community-led housing groups.
- Considering, and discussing with major homebuilders, steps to make more new homes available to Londoners before anyone else, with any measures particularly focusing on homes sold for prices that Londoners, especially first time buyers, are more likely to be able to afford.
- Minimising the number of empty properties in the capital by encouraging councils to levy the Council Tax empty property premium and calling on Government to increase this premium.
- Lobbying Government to make it quicker for tenants to complain to the Housing Ombudsman, and lower the bar at which the Social Housing Regulator will investigate complaints.

- Calling for a ‘Commissioner for Social Housing Residents’, modelled on the Children’s Commissioner, to give residents an independent voice at the heart of Government
- Expecting social landlords to implement the Good Practice Guide to Estate Regeneration, which will be published shortly and which sets the standards that the Mayor expects to apply to any estate regeneration scheme in London. As well as involving residents in decisions, this will include commitments to ensuring no net loss of affordable housing, a right of return for social tenants and a fair deal for leaseholders. The Mayor will take this into account when making decisions on whether councils and housing associations are eligible for GLA funding for new schemes.

## **Summary of feedback**

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### **Estate Regeneration**

#### *Overall*

- Some attendees felt that estate regeneration can lead to ‘social cleansing’, with the stated aim of creating mixed communities. However, it was also noted that many estates are already formed of existing mixed communities.
- There was also recognition that estate regeneration is complex and takes a number of years which is invariably under estimated.
- There was concern that developers would not sign up to or adhere to the Mayor’s good practice guide.
- Some participants felt that the key is to avoid building homes in isolation but instead as part of sustainable communities which offers a bit of everything.
- There was some discussion about the principles of estate regeneration and these included the need to ensure there is no loss in tenure rights (in particular that social rent homes should be protected) and that there should be recognition that people’s homes are at stake in these schemes, rather than just ‘properties’.

#### *Consultation and engagement*

- Recognition that real consultation and engagement takes a considerable length of time and needs to start as early in the process as possible.
- All stakeholder groups need to work more successfully together as consultation often comes across as a tick box exercise.
- Consultation process is important and any resident involvement should be representative of the communities in question.
- Council tenants must have a say and throughout the process.
- Residents tend to feel it is ‘being done to them’ and better engagement would give councils more cooperation from residents
- It was suggested that having an independent group to scrutinise the process and level of consultation and engagement undertaken could help to ensure consistency, as each party tends to hold differing views on the level of consultation undertaken.
- One borough undertook a detailed questionnaire on how people feel about their home, environment and future aspirations. The borough thought this gave a more rounded view and helped to inform the options available.
- Must be open and transparent with full resident engagement. Not just about consultation, even if the process takes longer
- Residents involved in commissioning and co-design.
- Co-design work should happen prior to developer involvement so they are clear on resident aspirations and avoid developer enforcing a different design.

- Significant changes to agree plans, e.g. a change in developer, should be referred to the residents.
- All financial data supporting options appraisals should be disclosed to residents.
- Right of return needs to happen without service charge increases.
- It can take time for residents to build confidence because of being oversold a product and loss of affordable housing.
- Tenure blind developments help.
- Request that access to viability assessments is available early.
- Some participants expressed concern that affordable housing is always lost and there are too few good examples of great developments.
- The principle development agreement should be accessed by residents. It was felt that views of residents living in temporary accommodation are not considered as important as those with secured tenancies. There needs to be consistent policies.
- Recognised that thorough consultations can prove costly but generally felt that's the only way of getting things right. Extra funding must be provided to meet this need.

### *Ballots*

- There were a wide variety of views expressed with regards to ballots, with some in full support of them as the best way of ensuring that residents' voices are heard and ensuring that the decision-making process is democratic and helps develop trust between the landlord and the residents.
- Others suggested that as ballots only capture a particular moment in time and can reduce complex decisions to binary options, they are not necessarily that helpful in terms of ensuring the best outcomes for particular estates for understanding the nuances of residents' views.
- In order for ballots to be useful, they should be undertaken alongside full engagement so residents fully understand the weight of their decision, as well as being accompanied by clear facts explaining genuine offers to enable residents to respond appropriately.

### **Community-led Housing**

- Supporting schemes on public land would help promote an increase in community-led housing (CLH) delivery.
- Achieving value for money in CLH can sometimes be an issue.
- Land values are high so more funding for this approach would be beneficial.
- Councils are unable to find revenue funding for CLH.
- Suggestion that GLA uses land it owns to support CLH and then benefits from revenue.

### **Transparency in viability**

- The viability information that developers provide to their investors should be the same as that used for GLA assessments, so nothing is hidden

### **Further feedback**

- Suggestion that a simple 'idiot's guide' to planning jargon etc. would help to make the process more broadly accessible to all residents. However, there were concerns raised that too many local planning departments are under resourced and thus unable to adequately challenge planning applications.
- Some held the view that communities are generally supportive of large increase in homes if affordable, but others expressed concerns that too many social homes are knocked down and replaced with private housing. Some participants highlighted the reason for some resident opposition to development as being the lack of resident access to the new homes



and a lack of understanding and consideration of the needs of local people by developers, as well as a perceived focus on high density and high-rise living which is unpopular amongst many residents.

- However a number of participants expressed the view that London is at capacity in terms of housing and so any additional homes need to be built outside of London
- A number of participants highlighted the need for properly planned infrastructure to support the development of a significant number of new homes.
- There were some concerns raised that housing allocations policies are not working for local people and that local authorities should look to be flexible where possible to meet local needs.
- There was support for the Housing Ombudsman being given real power.
- There was some support for self-build as a good idea, but concern that it will not significantly address housing need and will attract and benefit the few.

<p><b>Table 8: A fairer deal for private renters:</b> proposals to improve the quality of private renting and ensure a more secure, stable and affordable private rented sector. (<i>Policies 6.1 and 6.2</i>)</p>
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## **Topics under discussion**

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### **Improving standards for private renters**

The Mayor wants to ensure private renters benefit from decent property standards and management practices across the sector. He proposes to do this by:

- Supporting greater collaboration between London boroughs through a new London Boroughs' Private Rented Sector Partnership, and encouraging them to make best use of their new enforcement powers
- Opposing Government's Right to Rent policy, which creates additional costs and delays for landlords and opens the door to discrimination against tenants
- Strongly supporting well-designed and operated property licensing schemes, and call on Government to devolve powers over these schemes.
- Calling for powers to implement a light touch landlord registration scheme to enable councils to better target their enforcement activities.
- Introducing a London-wide public database to 'name and shame' landlords and letting agents who have broken the law or incurred civil penalties.

### **Improving affordability and security for private renters**

The Mayor wants to improve the affordability and security of private renting for Londoners. He proposes to do this by:

- Considering reforms that enhance security of tenure for renters, reduce discrimination, and improve the evictions process and dispute resolution, while ensuring landlords retain their right to gain possession of the property for legitimate reasons. The Mayor will work with partners to explore a new deal – a London Model – for tenants and landlords, which will focus on how to:
  - increase security of tenure to support a more stable, family-friendly private rented sector;
  - properly regulate property standards; and

- introduce a light-touch registration scheme for landlords.
- Supporting the proposed ban on letting agent fees, and lobbying Government to ensure its enforcement is properly resourced.
- Urging Government to comprehensively review the financial support available to private renters on low and middle incomes, and work with employers to widen access to Tenancy Deposit Loan schemes to help renters manage the upfront costs of renting.
- Calling for proper resourcing of the First-tier Tribunal system so it becomes a check and balance when landlords increase rents.

## Summary of feedback

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### Improving standards

- The establishment of landlord registration and property licensing schemes was generally welcomed by attendees. However, attendees raised the following concerns in relation to such schemes:
  - With enforcement and regulation, there is always the risk that landlords will be driven underground.
  - Good landlords may sign up to a property licensing schemes, but the bad ones may not.
  - Landlords may evade registration or choose not to sign up to a licensing scheme. If they do sign up to one or both of these schemes, then they may not comply with the rules anyway. Therefore, there needs to be an effective system in place whereby significant sanctions can be brought on landlords who do not comply.
  - Landlords would expect accountability to be clearly evidenced in relation to how their licensing fees are being spent.
  - The bigger landlords would be in a better financial position to meet the standards of a property licensing scheme, whereas smaller landlords may not be able to afford this. This may deter smaller landlords from signing up to a property licensing scheme. This may mean that big investors or pension funds end up investing in more rental properties, as opposed to smaller landlords.
  - Without rent controls in place, landlords who spend more to bring properties up to the standards of a property licensing scheme may also raise rents to do so, which would impact on affordability.
  - With regards to ‘naming and shaming’ rogue landlords, the point was made that it is often the people who have the most reason to complain that don’t because they are scared of the potential repercussions. This may create a false illusion of enforcement.
  - If London clamps down on rogue landlords, there is a risk that they may move away from the capital to other cities across the UK. Perhaps the database should be shared with local authorities outside of London.
  - The challenge with increasing enforcement action is that those families in homes that do not meet the required standards can be evicted and then need to find housing elsewhere.
- Good landlords should be given incentives, as the majority of landlords are fine so getting them to support the motion should be a priority. Or those good landlords could receive some sort of recognition for their work, for example good landlords could be registered onto a website so renters are aware of those operating with high standards.
- Housing and Planning Act 2016 provided some helpful additional enforcement powers for local authorities, but accessing revenue funding for officers is still a challenge. The GLA needs to be clear about how it intends to resolve the resourcing issues that local authorities face when trying to help combat bad landlords. Central Government may have a role in providing this funding.
- Letting agents aren’t really bothered whether they are shamed on a website as the housing demand is still there and people will still turn to them.

- Scotland is currently using a method of registration for property agents which could be used in London.
- The Mayor should be clear about what he is doing to address the impact of AirBnB on housing supply.
- It can be difficult for local authorities to know who lives on a particular estate, as landlords are not informing the council of who is living in the homes. It is important that this information is shared for safety reasons.
- Can 'Rogue landlords' not just be called criminal landlords to intimidate any landlords that may consider not working ethically?
- There needs to be clearer way for tenants to report their landlords for unlawful behaviour, but it is not easy to do this at present and the lengthy process often puts people off.
- There was support for the Mayor opposing the Right to Rent, and it was agreed that there is some potential to change this policy in Central Government.
- Attendees made the following suggestions for how the Mayor could work differently with partners to fulfil his housing ambitions in relation to Policy 6.1:
  - There is a greater need for intelligence and open data, which can be accessed by private renters and/or authorities operating landlord registration and property licensing schemes. Suggestions were made about different data sources that could be utilised to improve this intelligence. For example, the EPC register has lots of data that could be used to give tenants a better argument for improving standards. Data from tenancy deposit schemes could be used to see how much deposit money landlords return to tenants. The latter could, therefore, be used to identify whether landlords are at fault. DCLG also has a wealth of relevant data that is not currently open to the public.
  - There could be a requirement for registered landlords to be linked to a licensed property.
  - There could be a mechanism whereby good landlords who are signed up to a property licensing scheme are rewarded or incentivised for their good conduct. For example, such landlords could pay a smaller licencing fee. However, the need to keep licensing fee administration to a minimum and not to over complicate it was also recognised. In addition, there was a question over how good or bad conduct by landlords could be evidenced.

### **Improving affordability**

- Given that the need for deposits can cause issues for those on benefits, there was a question as to whether this will be covered in the London Housing Strategy.
- Many participants highlighted that rent levels in London are a significant concern. There was some discussion about the different options for implementing rent control as a way to tackle this challenge. However, some participants highlighted that rent controls could have a negative impact on London's housing supply and there was some question as to what evidence is available to demonstrate how rent controls will help London's private renters. For example, there were concerns that it might lead to landlords investing less in maintaining and improving their properties.
- Many participants highlighted the need to ensure better security in the PRS and longer tenancies. More security for longer term tenures needs to be established. This is especially needed for older people and families with children who are living in the PRS.
- There was support for the proposals in the LHS to work with mortgage lenders to ensure that Buy to Let mortgage clauses do not prevent landlords from offering longer tenancies or renting to those in receipt of welfare benefits. Such mortgage clauses were recognised as being a barrier to security of tenure, especially when there are landlords who would prefer to let their properties for longer periods but are unable to.
- Stakeholders made the following suggestions for how the Mayor could work differently with partners to fulfil his housing ambitions in relation to Policy 6.2:

- Setting a London Living Rent, whereby landlords can charge more rent if they want to, but would have to pay tax on the rent increase.
- Helping local authorities to bring more landlords on board to provide more council properties for rent.
- Taking a similar approach to the Rent Act 1977.
- Provide support or funding to organisations, such as the London Renters Union or similar organisations, to represent the rights and interests of private renters. Often such organisations don't have the resources to do this work. There is an opportunity for these organisations to work with the GLA through a register of landlords, through which the former could get in contact with private renters to ask if there is anything they need help with.

**Table 9: A fairer deal for leaseholders:** proposals for reforming and improving leasehold. (Policy 6.3)

### Topics under discussion

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The Mayor wants to work with Government and others to support reform of leasehold and measures to improve leaseholders' experiences. He proposes to do this by:

- Calling for wholesale reform of the leasehold tenure, including a long-term shift towards fairer tenures in order to improve the experiences of a significant and growing number of London's homeowners.
- Supporting statutory regulation of residential managing agents.
- Ensuring London's leaseholders have access to high quality, accessible information on their rights and obligations, by calling on Government to fully fund LEASE's delivery of high quality, independent advice to leaseholders, as well as producing a 'How to Lease' guide for London leaseholders, setting out basic information on rights and responsibilities.
- Publishing a London Charter for service charges in shared ownership homes.
- Setting a clear expectation that resident leaseholders affected by estate regeneration projects should be offered a fair deal as compensation for their homes.

### Summary of feedback

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#### Reform of the leasehold tenure

- Many participants were broadly supportive of leasehold reform, but all agree more detail was needed on the proposals, for example in terms of what is meant by 'wholesale reform'. However, there was some question of the extent to which the Mayor has adequate powers in this area to effect significant change.
- Some participants felt that leasehold is an anachronistic tenure and we should move away from it - managing a building collectively needs a form of ownership that is fit for purpose.
- Some were supportive of commonhold as an alternative, but others felt this tenure is untested, that it is unclear how it would work in practice (for example in developments which also include leasehold) and might not work with complex developments and amenities. There is also no momentum currently behind a shift to commonhold.
- There was a suggestion of looking at how commonhold could be supported more widely, for example through the planning system.
- However, there was some concern that making amendments to existing legislation would not be enough and that more fundamental reform is needed.

- There was a suggestion that ground rents, in particular their costs and escalation, should be addressed more fully by the Mayor. This could be easy to address if ground rent is separated out from the lease. However, some other participants questioned how significant the issue of extortionate ground rent actually is.
- Suggestion that leaseholders should make use of ways to seek redress for abuse of freehold – but also comments that this is expensive and hard to do.
- Need to make leasehold and tenancy agreements clearer. The average person does not read a lease or if they do does not fully understand the implications and the detail it may contain, they just sign it. More work needs to be done to make these legal documents intelligible.

### **Statutory regulation of residential managing agents**

- There was broad support for managing agents to have some form of regulation, but participants expressed a need for more detail in the following areas:
  - What would this regulation be aiming to achieve?
  - How would it be enforced? Who would enforce it?
  - Who would cover the costs?
  - How will it be monitored?
- There were concerns that under the present system, managing agents are often focused on making money and often don't have the skills required to offer a high quality service – it is very difficult to find a residential management company that delivers a service of the required standard. In addition, concerns were also raised around procurement and the quality of works done – residents do not always have the experience or resource to actively scrutinise quotes for works and the associated bills, and the lack of skills in this area amongst some managing agents means that residents often do not get value for money.
- Suggestion that it's better to have one managing agent for the whole estate – more efficient, could lower service charges
- There was also a suggestion that residents need to have a greater say in cases where managing agents are not performing properly and that the regulation of agents could support this.
- There can be a conflict of interest in situations where the managing agent appears to be a 'friend' of the freeholder/landlord.
- A third party should be an independent arbiter to mediate between the landlord, managing agent and leaseholders in cases of dispute.

### **Ensuring London's leaseholders have access to high quality, accessible information on their rights and obligations**

- Most participants agreed leaseholders needed to be given clear information at the point of sale, for example to understand the implications of service charges. Many also felt that there need to be adequate safeguards in place so that the leasehold system is not left open to abuse.
- There was broad agreement that the advice available to leaseholders, for example through LEASE and through any potential 'how to lease' guide, needs to be publicised as widely as possible to ensure that it has the impact required. There was also a question as to whether LEASE could offer a London-specific service.
- Some participants felt it was leaseholders' own responsibility to ensure they know their rights and obligations.
- Some participants highlighted the need to make sure major works costs are transparent and to ensure that contractors keep costs under control (perhaps there could be guidelines for

how contractors should manage costs). Leaseholders also need support to fully understand quotes received for works and the implications for what they will be paying through their service charge.

- There were some concerns that a number of right to buy leases bought in the 1980s are now dropping below 80 years and so this is making these properties much more difficult to sell and more expensive to extend the lease. This can particularly affect older residents who wish to downsize or move to supported housing, many of whom do not have the resources to fund lease extension or a housing move.

### **London Charter for service charges in shared ownership homes**

- There was broad support for the Shared Ownership Charter for service charges, particularly given that managing agents are often private sector companies rather than housing associations. Some participants also supported the proposal to roll this out to other tenures.
- However, the Charter will need to be enforced, for example through planning.
- Some participants highlighted the concern that leaseholders in the private sector have even less support, made worse by the power imbalance between a developer-landlord and leaseholder-occupier.
- There was also some discussion of the reasons for higher service charges in some types of development. For example in mixed tenure development when affordable housing is delivered through s106, service charges can be higher than if all the homes were owned by a registered provider. In addition, in private developments VAT is payable on additional service (e.g. concierges, gyms), while it wouldn't be payable on equivalent services in council-owned housing schemes. There was a proposal that there should be an option for leaseholders to opt out of these additional charges.
- A number of participants felt that it is important that service charges are transparent and that there is potentially a role for the regulation of these charges (the Charter could be one way of delivering this).
- One participant suggested that the Charter could also require annual and cyclical costs planned further down the line, and these should be included in a budget statement on the back of the lease.
- A number of participants highlighted the complexity of shared ownership as a form of leasehold and suggested that more work could be done to help shared owners fully understand their position, rights and responsibilities.

### **Setting a clear expectation that resident leaseholders affected by estate regeneration projects should be offered a fair deal as compensation for their homes.**

- A number of participants were very supportive of the proposals to safeguard the interests of leaseholders affected by estate regeneration.
- There were some questions about the definition of fairness, in terms of what it means and for whom, as well as support for the need to distinguish between resident and non-resident leaseholders. There is a need to balance diverse interests, needs and situations in regeneration schemes and residents need more of a say.
- Some participants also questioned the extent to which fairness is easy to deliver in the context of regeneration schemes aiming to increase the overall numbers of homes. Some felt that these schemes mainly benefit developers, rather than ordinary Londoners.
- A number of mechanisms for supporting a fair deal were identified, including ballots, residents' associations and ensuring that residents are involved in regeneration plans from an early stage. There was an acknowledgement that estate regeneration is complex and involves managing a range of different needs, but some participants expressed concerns that leaseholders will always lose out through regeneration schemes, for example because

they are unable to pass on their homes to their children or can no longer live in the same area.

- One participant raised a concern that leasehold homes were not being replaced on a like for like basis through estate regeneration schemes, as some leaseholders were being offered affordable homes as a replacement and some are unable to afford the costs of these.
- Some participants felt leaseholders have already received a subsidy from the public in buying their home at a discount, and shouldn't receive further subsidies/compensation.
- While the needs of leaseholders need to be taken into account, the viability of a scheme could also be affected by these considerations.
- A number of participants raised the issue of compulsory purchase and the associated valuation process and highlighted the need for a more transparent and independent evaluation process, including an option for an appeals process if things go wrong. There was some support for the Mayor to take a role in overseeing a more transparent and consistent approach in this area. However, one participant highlighted the fact that surveyors and valuers are independent professionals and so there was already some professional regulation in place.

### **Other comments**

- A number of participants highlighted the link between building homes at higher densities and the increase in leasehold properties in London. This means that service charges are becoming a bigger issue and will continue to be so given the continued demand for higher density development and the associated increase in costs (e.g. lift maintenance). Other participants highlighted that increasing densities is not the only way of increasing the number of new homes – there are other options, for example use of other building designs and layouts.
- One participant suggested that there is the potential to involve residents' associations in residential management.
- A number of residents raised concerns about the affordability of shared ownership and shared equity homes.
- One participant raised the option of making more use of sinking funds to enable leaseholders to avoid one off major works bill shocks, such as estate roof repairs.
- One participant highlighted the need to say more about leases for sheltered and retirement housing, as such housing is not all outside of London.
- For older and former council home leaseholders, the tenure mix does not always allow them to downsize and stay local, so they cannot move. An example of how to deal with this situation is to create mixed tenure developments to allow such leaseholders to buy a shared equity sheltered home, in the same development, if that is what is needed.
- One participant raised the issue of some local authorities no longer having the resources to provide a breakdown of service charges when requested by leaseholders.
- A number of participants raised the issue of the difference between resident and non-resident leaseholders, and that contacting non-resident leaseholders can become very difficult. There was a suggestion that the Mayor should create a charter to make it easier for non-resident leaseholders to be contacted, for example to agree major works to communal areas.
- Some participants felt there is a lack of understanding among housing associations, boroughs and leaseholders about leaseholder issues, for example how processes should work, how they should be consulted, what the freeholders' obligations to leaseholders are.

**Table 10: Tackling homelessness and helping rough sleepers:** proposals for preventing homelessness, supporting homeless Londoners into accommodation and helping rough sleepers off the streets. (*Policies 7.1 and 7.2*)

## **Topics under discussion**

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### **Preventing and addressing homelessness**

The Mayor wants to work with Government, local authorities and charities to make preventing homelessness a priority and support those who are homeless into sustainable accommodation. He proposes to do this by:

- Supporting local authorities to implement their new homelessness prevention duties under the Homelessness Reduction Act (with effect from spring 2018), and calling on Government to meet its commitment to fully cover the costs they incur in doing so.
- Tackling the root causes of homelessness by increasing the supply of affordable homes and calling on Government to review the welfare reform measures that have fueled the increase in homelessness, particularly in London.
- Tackling youth homelessness, including by investing in specialist accommodation for those at risk.
- Improving the housing options that councils can offer homeless households, including by working with councils to establish how they can secure more and better accommodation for homeless people – both by collaborating more closely when procuring private rented accommodation and by using the Innovation Fund to support the development of quality accommodation for homeless households.
- Expecting councils to meet their obligations to inform other local authorities when they place homeless households in their areas, and make sure these households get the advice and support they need.
- Helping those facing homelessness because of domestic abuse, including by funding new refuges.
- Urging Government to make clear to councils their obligations to homeless veterans.

### **Supporting rough sleepers off the streets**

The Mayor wants to lead and coordinate work to develop new approaches to supporting rough sleepers off London's streets. He proposes to do this by:

- Leading the No Nights Sleeping Rough Taskforce, which brings local authorities, charities and Government together for this purpose, and invest £8.5 million a year in the pan-London services already commissioned.
- Developing new services to identify and assist more rough sleepers, including by supporting the development of innovative services.
- Promoting opportunities for Londoners to help rough sleepers.
- Investing up to £30 million to support the development and refurbishment of London's hostels and supporting optimum use of these bed-spaces, including by investing £50 million to develop housing for people ready to move on from hostels.
- Making the case to Government that the new funding arrangements should meet the support and housing costs of supported housing in London.

## **Summary of feedback**

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## Tackling homelessness

- There was broad support for all the policies in this area, in particular for the emphasis on tackling the root causes of homelessness.
- However, a number of participants raised concerns about the lack of funding for local authorities to deliver their services (in the context of increasing demand) and that this means that local authorities are unable to invest in more preventative services when they are occupied with addressing acute need. Some felt that there is not enough recognition of this in the strategy.
- The strategy doesn't mention the wider resourcing issues associated with the Homelessness Reduction Act, for example the shortage of preventative skills amongst staff and access to appropriate housing. Participants were also unclear as to what it would mean for the Mayor to support boroughs in implementing the Homelessness Reduction Act.
- There was some confusion around the policy about expecting boroughs to notify the "receiving" local authority when placing people out of borough. Some felt that it is not clear what the GLA's role would be, given that the NOTIFY system already exists – although one participant commented that the Mayor's intervention to get the NOTIFY system up to speed could be helpful.
- One participant was strongly opposed to the practice of boroughs placing homeless households out of borough and felt that the Mayor should take a stronger line on this practice.
- Some participants expressed support for affordable homes funding to go into shared accommodation, both for young people without support needs who struggle to access housing and for those who may be ready to move on for supported accommodation. Sharing is now the norm among young Londoners and, if registered providers developed it, this would improve quality, management and affordability. However, a number of participants expressed the view that the sheer number of different affordable housing products is the cause of some confusion.
- Participants highlighted the need for a more consistent and coordinated service offer to homeless applicants, particularly in the context of the Homelessness Reduction Act. There may be a role for the Mayor in encouraging boroughs to adopt this, although political differences between boroughs may make that challenging.
- There is a need for more security on revenue funding streams for supported accommodation in order for partners to invest long term. The Mayor's stance on this could be clearer/stronger.
- Some participants requested more detail on the investment in specialist accommodation for young people, in particular as some felt the amounts of money for supported and move on accommodation within the AHP are insufficient. In addition, some participants highlighted the need for sufficient revenue funding for capital investment in move-on from refuges and hostels to be viable.
- There was some support for the Mayor to play a stronger role in assessing the London-wide need and potentially commissioning supported accommodation, particularly for groups who are smaller and where the need is not sufficient in one borough to commission such a service – e.g., young people who identify as LGBT+, victims of domestic abuse. This is particularly important because local connection requirements for local authority-commissioned services is cutting off options for some of these groups.
- One participant suggested that the strategy should refer to "all forms of violence against women and girls" instead of "domestic abuse"
- The strategy needs to link up between PRS and homelessness, particularly on the issue of licensing and temporary accommodation, where boroughs can experience a conflict of interests. There was some support for temporary accommodation being licensed, although not all participants agreed with this approach.

- There was some disagreement amongst participants around the merits of modular schemes, such as Ladywell. One housing association representative was very sceptical that demountable schemes can be good quality, but there was support from others, with recognition the approach makes use of land that would otherwise go unused for several years as well as meeting a pressing need.
- A number of participants supported the inclusion of a specific section on hidden homelessness, setting out what the Mayor will do to help this group. As part of this, some highlighted that women are not acknowledged enough as being part of the hidden homeless (e.g. sleeping in cars, sofa surfing). This group, including victims of VAWG, can experience difficulties due to complex immigration status. The strategy could usefully include proposals on how to ensure this group has a window of opportunity and appropriate support for resolving their status.
- Some participants highlighted the need to acknowledge the specific risks for older people (e.g. increasing number of older ex-prisoners, increasing number in the private rented sector who may face homelessness when they retire).
- Some participants felt that the strategy should focus more on welfare reform, particularly housing benefit changes for 18-25 year olds. Some participants felt that the Mayor should call for a halt in the roll out of universal credit and that opposition to the LHA freeze should be made more prominent.
- There was broad support for a more coordinated approach to the procurement of temporary accommodation.
- Some participants felt that the strategy needs to provide more information on the links between hospital discharge and homelessness, and should set out how boroughs should provide services for this.

### **Helping rough sleepers**

- Some participants highlighted the need for the first step of getting someone off the streets to be complemented by a set of policies around how to keep them off the streets
- There was some feedback that strategy should make reference to Housing First model, given the Government interest in this area.
- Some concerns were raised about the lack of acknowledgement of immigration issues for rough sleepers and there is a need for assurances that data will not be shared with the Home Office and that those with complex immigration status will receive support to resolve their status.
- A number of participants felt that the strategy does not have enough focus on outer London boroughs' experience of tackling rough sleeping. The number of rough sleepers has increased steeply in some of these boroughs, yet they lack the resources that many Inner London boroughs have.
- There was emphasis on the need for the strategy to be clearer that the hostel clearing house differs from RSI clearing house (and that it may benefit from a different name), as well as about how it would operate.
- There was a suggestion that the Mayor needs to take a view on what sorts of hostels are more effective (as there is some evidence to suggest that larger hostels are damaging) in determining what sorts of hostels he will capital fund.
- No recourse to public funds is a huge issue, which does not get appropriate attention in the strategy, alongside a lack of acknowledgement of complex immigration issues in relation to homelessness.
- Some felt that there should be a better spread of rough sleeping services (all rough-sleeping services rather than just those commissioned by GLA) across a whole borough, rather than clustered in poorer areas

- Some felt that the GLA should be thinking about more innovative solutions to rough sleeping
- A number of participants felt that the Mayor should be supporting more informal rough sleeping services, particularly those offered through religious groups