

## ***From Community-Led Plan 2018***

*It has become clear that London does not contain enough housing that people can afford to live in and that this is having serious social and economic consequences, including for the health of the city. Dark, cold, insecure, overcrowded, cramped and unaffordable housing is linked to worsening physical and mental health conditions and premature death. Meanwhile, Londoners living on council and housing association estates find themselves threatened by regeneration schemes which demolish their not-for-profit rented homes, with serious implications for health and wellbeing.*

*Good housing is one of the most fundamental determinants of good health. Households that are adequately housed in secure homes at costs they can afford require fewer and less expensive medical interventions. The London Plan should make clear links between housing, health and wellbeing and to achieve this we propose the policies outlined here.*

### **Caring for Existing Homes**

It is essential to maintain and refurbish existing homes, not knock them down. Given the material loss of social housing, it should be a high priority that existing social rented homes are protected and this requires changes to the current model of estate regeneration.

Of particular importance are high levels of fuel poverty; the UK has one of the least energy-efficient housing stocks in Western Europe\*. The solution is for the Mayor to designate home energy efficiency as an infrastructure priority. Retrofitting on a large scale would provide jobs and consequent economic benefit, and reduce energy consumption and environmental degradation.

### **Quality of New Homes**

New homes should be delivered with full consideration of longevity and durability of construction. The health of residents should guide design, avoiding the negative impact of dark homes and outside spaces and providing sufficient communal areas. The GLA has permitted developments far above levels agreed in the density matrix, yet there has been no analysis of the effects on health and wellbeing of people living in them or affected by them.

The emphasis placed on access to public transport within the density matrix brings with it the danger that we lose sight of the higher goal whereby people can satisfy their daily needs of work, shopping and recreation within walking distance and only have to rely on mechanised transport for more occasional needs — the ‘walkable city’ concept.

Density levels should be sensitive to the needs of all communities and all communities, including all household sizes and incomes, must have the facility to live in London.

### **Not-for-Profit Rented Homes**

The misleading term ‘affordable housing’ should no longer be used. Apart from not-for-profit, social-rented housing, all other forms of what is described as ‘affordable’ housing, whether ‘affordable’ rent, shared ownership, or purchased with a mortgage, are actually unaffordable to the great majority of London’s residents.

The London Plan should set a separate target for not-for-profit (social) rented homes that genuinely reflects evidence of need. Local Authorities and other public bodies, particularly Transport for London, remain massive landowners and public land should be prioritised for not-for profit rented homes.

### **Participation in London Wide Housing Policy**

The Mayor has a duty to enable a wider range of Londoners to participate in making decisions on housing policy: engagement strategies need to recognise the tenants of 800,000 social rented homes in London, the growing numbers of private renters in the capital, connect with community-led housing schemes and be inclusive of groups such as Age UK and the London Gypsy and Traveller Unit that represent Londoners with particular housing needs.

Each group needs their own structure, focusing on their own specific issues, but as well as working in parallel it is important that there is an overarching Housing Forum for London that sits at a strategic level and is inclusive of all groups.

### **Community-Led Housing Policy**

Alternative forms of housing are distinguished by a community-led approach to housing production, ownership and/or management. They include housing co-operatives, community land trusts, community self build, co-housing, tenant management organisations and community led housing associations (right to transfer). They help build strong and sustainable communities at a human scale, provide mutual support, have the potential to limit property speculation and for all these reasons they should be scaled up.

Local Authorities are required to maintain registers and allocate land for self build. The definition should be widened to include all community forms of housing and the GLA should maintain a register compiled from information supplied by the Boroughs that will show levels of interest and demand from across London.

Boroughs often lack expertise on community-led forms of housing. The Mayor will provide a knowledge bank so that Boroughs develop an understanding of the economics of alternative models of housing and their linkage with neighbourhood development. This will involve the use of information from umbrella organisations such as national co-housing and Community Land Trust networks.

### **Private Rented Sector**

The private rented sector (PRS) has been growing rapidly in London and is predicted to grow as much as another 50% by 2025. Buying a home is not a realistic option for the vast

majority of renters and policymakers now need to come to terms with the private rented sector as a permanent home for a significant proportion of the capital's residents, and make sure that it becomes "fit for purpose" now and in the future.

The British private rented sector is the least regulated in the rich world in terms of physical standards, health and safety, security from arbitrary eviction, protection from rent escalation and redress for aggrieved tenants.

According to the English Housing Survey, there are 2.7 million people in the private rented sector in London, more than 40% of whom are in poverty. Many private renters are in work but rising rents take up increasing proportions of wages leading to rising in-work poverty and claims for Local Housing Allowance. 6–12 month tenancies are not fit for purpose for families, incurring costs of moving and stress.

Evictions are also alarmingly high. According to Shelter 22,376 private renting households in England were evicted in the last 12 months — almost double the number in the same period 5 years ago. Instability, population churn and displacement to Outer London Boroughs and beyond are likely to skew the social fabric of London away from the vibrant diversity that London celebrates, weaken local identification and make it harder for tenants to organise as tenants or local community members.

### Practicable Measures

The Mayor needs to work out ways to raise standards on security of tenure and rent control. These methods should be designed urgently and implemented by encouragement and the example of pioneering 'good' landlords, pending statutory powers.

5 year tenancies are essential for security and stability, particularly for families, and would give all tenants a stronger bargaining position. This should be the default tenancy and assured shorthold tenancies should be phased out.

ACORN housing campaigners and Generation Rent propose setting a standard that permitted rent increases should be limited to inflation or the growth of median incomes (whichever is lower). The stabilisation of rent increases would discourage churn of tenants required to move due to unaffordability.

There are nearly 57,000 empty homes in London, a proportion of which could be brought into enforced private letting if the procedure for Empty Dwelling Management Orders were simplified and made self-financing for Local Authorities.

There has been a growth in London of large scale PRS development by institutional investors. The Mayor should consider this area of provision and stipulate planning guidance earlier rather than later. Larger institutional landlords could, in ideal conditions, be compatible with better security and conditions and be encouraged to provide family size homes and accommodation for people with disabilities and special needs. On the other hand, private rental housing can fall into the hands of hedge/private equity funds with the

potential for evictions and aggressive rent increases for which preventative measures should be devised.

### Policies Dependent on New Legal Powers

The existing powers of the Mayor are inadequate to deal with the housing crisis. The Mayor should argue for the special circumstances pertaining to London and seek a London Housing Bill to devolve powers from central Government for London-specific housing reform.

Policy 19: Ensure well-maintained, social rented homes of suitable and adequate size for all. Homes should be of high quality and of adequate size—both in terms of usable floor area and number of good sized rooms—to meet each household's needs. Family-sized housing must be prioritised in all new public housing developments

### *from Community led Recovery Plan 2022*

**Policy 20** Simply housing people is not enough. Social housing must be culturally-aware so that people can remain with or further build their community. By culturally-aware, we mean that there should be desired community resources, intentional efforts to keep communities together during refurbishment (and regeneration) projects and that housing for multiple generations is made available to communities that value multi-generational living. Integrated, wrap-around services, which help to build such communities, must be accessible to all those in social housing.

**Policy 21** The affordability crisis in the private rented sector should be addressed. It is widely accepted that in order to be affordable, once housing costs are paid, tenants will still have sufficient money to meet all other material needs. The Government must act to bring rents down so that everyone has a home they can afford to rent where they can live and flourish

**Policy 22** Tenancy reform to support greater rights for private tenants in the shape of open-ended tenancies with few grounds for eviction, which can then lead to rent control, with limited capacity to increase rents, to bring a measure of rent stabilisation. At the same time develop housing alternatives, including Community Land Trusts and Co-operatives, giving residents more control of their housing at a neighbourhood level.

**Policy 23** Improve existing housing via refurbishment and repair not demolition and redevelopment, to ensure community integrity and that neighbourhoods with high concentrations of working-class and ethnic minority communities are protected from displacement, gentrification and social cleansing.

**Policy 24** Requisition all empty homes and offices— commercial properties above shops, unused office spaces in office buildings, Airbnbs and private homes—that have been empty for over X amount of time (to be established) for social housing or community-run cooperatives. Pending new legislation, make extensive use of Empty Dwellings Orders and existing legislation.

## TOWARDS A NEW LONDON PLAN: HOUSING (2.1 – 2.19)

### The current housing/ planning system (relying almost entirely on the speculative housebuilding model) doesn't work because it

- Doesn't deliver desperately needed social housing
- Delivers inappropriate market housing which is
  - Unaffordable to rent or purchase
  - Not enough family housing
  - Often poor quality
- Delivers a limited amount of 'affordable housing' of the wrong kind
- Disrupts local economies i.e. not integrated with communities, stresses existing social facilities (schools, GPs, parks etc) – and often leads to social cleansing
- Focuses the planning process on viability issues, which are not transparent, and undermine confidence in the planning process
- Delivers unnecessary carbon emissions esp through use of high embodied energy materials and demolition of recoverable buildings
- Doesn't tackle backlog of repair and/or poor energy performance homes
- Doesn't provide security for private renters (including both S21 evictions and rising rents)
- Undermines security and community (estate regeneration)
- Undermines economic buoyancy by sucking money out of local economy (into the pockets of rentiers)

### Some simple measures of this failure includes

- Homeless families and children
- Rents/ houseprice inflation
- National/ local govt costs too mop up mess
- Speculative housebuilding model also fails in that
- Exacerbates the financialization of housing
- Leads to focus on viability rather than other social goods or good design
- Slow/low delivery rates
- Contributes to the fantasy that councils can capture land value increases (through estate regeneration)

### The current proposals are more of the same, but worse in terms of

- Unachievable housing targets
- Very narrow objectives ('fix housing crisis', 'deliver sustainable economic growth')

- 'Flexible planning' i.e. housing trumps everything (NPPF para 125(c))
- Relies on funding for transport infrastructure - a poisoned chalice
- Green Belt proposals a red herring
- Need? There is no distinction made between housing demand and housing need

**'Affordable housing' is an endlessly confusing terminology** covering a range of housing which is not available for many people (e.g. those types aimed at those households with £90k or £60k income. The need is for social homes, not all of these other 'housing products')

There has been an **over-delivery of market housing** (on the target in the SHMA) every year since 2017 and all of the years previously back to 2005. Meanwhile, there has been a huge under-delivery of social housing every year.

**After decades of over-providing, do we need any more market housing?** The idea that market housing is in itself a public good (because there has been insufficient supply) is a myth based on a fallacy: but this myth/fallacy is being used to 'trump' other public goods (environmental, residential amenity, design, heritage etc) or considerations of harm (NPPF 125(c)).

**Unnecessary market housing is not neutral** and generates a number of harms: it is a waste of the scarce resource of land and is a missed opportunity to develop something socially useful; it contributes to the underdevelopment of social rented housing (by appropriating land on which social housing could be built) and so drives up costs to councils, who have to accommodate their homeless in costly PRS; it can have a socio-economic negative impact (gentrification/social cleansing) and, in a housing crisis, empty or under-occupied development has a profound negative impact on the local economy and the community, such as school closures; and it generates huge carbon emissions in building unnecessary market flats.

It also underpins **viability testing**: if a scheme is unviable because of affordable housing requirements placed upon it, then nothing would be delivered if that requirement is insisted upon; and, given the assumption that the delivery of any market housing is a public good, it would be better to approve a viable/deliverable scheme with less than the required proportion of affordable housing, or even no affordable housing at all, than nothing whatsoever being delivered.

**The speculative housebuilding model is not going to deliver the social housing needed, and therefore govt investment in the critical infrastructure of social housing is necessary, to go to councils and HAs to develop or purchase housing**

**The narrative is we must build the housing that people need i.e. social rent housing**

The lack of social housing delivery simply encourages the development of a private rented sector (PRS) which can raise rents to whatever levels people are able and willing to bear (over 50% of household income)

**Refurbishment** suffers from the disadvantage over demolition/ rebuild that it incurs VAT. Current policies on **reducing carbon emissions** could be stronger: the 'Be lean/ clean/ green' approach (Policy SI2) is toothless and unenforceable. As the M&S Oxford St and 72 Upper Ground cases showed, the circular economy and Whole Life-Cycle Carbon Assessment policies are fundamentally down to the developer to determine how far to consider retention/ refurbishment, if at all.

**Family-sized housing** is not prescribed in the LP (Policy H10), the issue is delegated to boroughs, based on local need – but experience is that its always breached and not enforced, albeit less with social housing.

**Student accommodation** is a problem: it is profitable, with more people accommodated per sq ft, and is encouraged by lower CIL charges and less regulation and/or lower standards; it is a high-cost rip-off for students; it is used for 2/5ths of year as visitor accommodation; it uses up vital sites. The TLP questions this (2.18) – we need to support their scepticism. This also applies to co-living, HMOs (and PRS?) many of which are owned by international private equity with no interest in community benefit etc – and they are trying to move into social housing (HT)

**Estate regeneration** destroys communities and local economies. It demolishes sound, appropriately dense estates in favour of high-density by building on much-needed open space. It is an expensive way of, at best, replacing social housing, by selling off large tracts of public land. Estates earmarked for estate regeneration have multiple empty flats, sometimes for many years. The LP must redefine brownfield so that it doesn't include housing estates. Retrofitting is good for economy, planet and people. We need to create a skilled retrofit workforce and industry (Green New Deal?) but this is currently being abused (example of PM)

**Rent regulation** is essential to tackle unaffordability of rental (and reduce houseprices according to Bano). Currently we have "a property market with an economy attached" – although there will be problems since inner London has been gentrified and incomes are

higher. See Mayor's [Blueprint](#) – see especially 2.64 – 66. If we believed his ambitions in 2019, no reason that they have gone

Supporting **co-operative housebuilding**, but has to be fully mutual, not a Community Land Trust model – there are plenty of examples where this gone wrong (e.g. Coin St Community Builders). There should be no separation of ownership of land and buildings. Public land could be used for this – e.g. the sites of closing schools, NHS sites which used to be worker provision and are now rented out by the week as executive flats, but govt needs to allow councils to widen their definition of Best Value and Best Consideration. This can be a major form of housing e.g. 25% of homes in Berlin are fully mutual co-op homes. JH: But in TLP the CLT model is proposed (does it? Where?) that is surely better than other models like the shared ownership model?

Public land should be used exclusively for public housing (social rent). The problem with entertaining any other model such as intermediate housing or key worker housing or low-cost rent housing is that developers will always play off any alternative to social housing against social housing.

**Empty homes:** we need to match people to homes – there are more empty council homes in Southwark than in the whole of NW England! LK proposes allowing empty homes to be used for social rent and get a tax break when the owner sells.

**Airbn'b:** regulation required as happened recently in Barcelona and Madrid (re 'tourist licences')

Decent Homes Standards

Rising prices are bad for you – but half of householders are owner occupiers and believe that they are benefiting from the current arrangements

The London housing market is the central laundromat of the Western world!



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