

Trust for London comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

Trust for London is an independent charitable foundation, founded in 1891. Our mission is to tackle poverty and inequality in the capital. We achieve this by funding a wide range of charitable activity including groups working on the ground, advocacy and policy work and research. Annually we make grants of over £8m per annum. Our response draws on the work we have funded and our commitment to a fairer and more equal London.

We welcome the opportunity to contribute to the development of the new London Plan and supports its 'Good Growth' approach. The planning system was designed to help provide a good home, for everyone, in a healthy, thriving place. But in the last few decades something has gone badly wrong. Instead of having people's welfare as its priority the planning system too often puts wider economic growth above the specific needs of communities. Our particular focus is on low income households, who we feel have been marginalised and their voices too often dismissed. There is a pressing imperative given the decline in public trust to ensure the planning system listens, is responsive and delivers to all of London's communities, including those on low incomes and those facing disadvantage.

One further point we would like to make relates to Brexit and the uncertain economic and demographic consequences. The Mayor should undertake an interim review of the London Plan post-Brexit to take account of updated economic and demographic forecasts.

Page: Policy GG1 Building strong and inclusive communities

Section: GG1

Amend B and add in bold:

provide access to good quality, **accessible and affordable** services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.

Affordability is a key concern. Our research on Minimum Income Standards in London found that 39% of Londoners cannot afford a decent standard of living, which includes their ability to participate in society. <https://www.trustforlondon.org.uk/publications/minimum-income-standard-london-2017/>

Page: Policy GG1 Building strong and inclusive communities

Section: GG1

Add new bullet:

- Seek to ensure greater public participation in planning decisions especially in areas that are socially excluded, and identify resources to enable this.

Page: [Policy GG3 Creating a healthy city](#)

Section: [GG3](#)

Overall we welcome the commitment to health made by the Mayor. We would add that there should be explicit reference here to improving air quality.

There is ample evidence about the negative effects of air pollution and the impact this is having on Londoner's health, including work we have funded: <https://www.trustforlondon.org.uk/publications/air-how-solve-londons-air-quality-crisis-part-2/>

Page: [Policy GG4 Delivering the homes Londoners need](#)

Section: [GG4](#)

We are generally supportive of the Mayor's commitments on housing. We would like to see more explicitly va commitment to low cost rented housing.

Amend B. Add to end of sentence: Of this 50 per cent, half should be available for low cost rent.

We would also add a new point F, which makes commitments to better use of existing stock to meet the needs of low and middle income Londoners.

Page: [Policy GG5 Growing a good economy](#)

Section: [GG5](#)

Amend D. Add to end of sentence: Infrastructure to meet the needs of all Londoners, including those on low incomes and those with access issues.

Page: [Policy SD5 Offices, other strategic functions and residential development in the CAZ](#)

Section: [SD5](#)

The Plan should allow a more balanced approach to housing in or near the CAZ, to allow more of those with low-paid jobs in the CAZ to live nearby. About 1 in 6 low-paid jobs in London are in the central area, at a job density four times that of the all-London average. Just under half of all low paid jobs in London are in Inner London. The higher cost of commuting (relative to earnings) for those doing low-paid work means that it is in their interests to live as close to work as possible. Given the higher job densities in central and inner areas, maximising the number of low-cost rented homes (social rent/London Affordable rent) within or close to the CAZ is also an effective way of supporting the Mayor's goal for 80 per cent of trips to be walk, cycle, or public transport by 2041. While a balance must be struck between competing uses, we believe greater emphasis is needed in relation to affordable residential homes.

Page: [Policy D1 London's form and characteristics](#)

Section: [D1](#)

We welcome the overall commitment to high-quality homes, particularly where this promotes social mixing and inclusion.

Page: [Policy D2 Delivering good design](#)

Section: [D2](#)

Support - We welcome the commitment to high-quality design. From our work supporting community groups to get involved with housing and regeneration campaigns, we recommend:

- Design should take into account local preferences and what types of design are popular. Research by Create Streets highlights that approaches that appeal to architects and designers do not necessarily match those that appeal to local communities.
- High-tech visualisation approaches must be one component of accessible consultations and not a substitute for face-to-face work to engage local people. Again, technology can act as a barrier to engagement for people on low incomes.
- Approaches to design that ensure consistent high-quality homes are welcome. These should also take cost into account: the cost of high-spec design should not contribute to reduced affordability of housing.
- The initial evaluation (A) should ensure that homes are in neighbourhoods that achieve minimum standards of [insert following bullets into A Initial evaluation]:
 - Safety and security (Shelter Living Home Standard
http://www.shelter.org.uk/__data/assets/pdf_file/0011/1287848/living_home_standard_full_report.pdf)
 - Walking distance from primary and secondary schools, a neighbourhood shop, public open spaces and community hubs (University of York Minimum Acceptable Space Standard research
<https://www.york.ac.uk/media/chp/documents/2013/MAPS%20report.pdf> p20)
 - Within a 20-minute bus ride of supermarkets and hospitals.

Page: [Policy D3 Inclusive design](#)

Section: [3.3.5](#)

We welcome the commitment to dignity of all residents. Given the prominence of lift costs in discussions about viability, this should not be used as an excuse to deliver less affordable housing.

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.12](#)

A clear, simple guidance document is to be welcomed. The Mayor needs to provide clarity on the hierarchy of decision making and priorities within the Plan – is everything listed in the different chapters required? At the moment the design section reads like an admirable wish list, but it's not clear how it should be prioritised. We would be concerned if trade-offs were made in favour of 'nice to have' design elements, at the expense of delivery, affordability or access.

Page: [Policy D4 Housing quality and standards](#)

Section: [D4](#)

We welcome the commitment to high-quality housing for all and to not differentiating between different housing tenures.

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.8](#)

We support this proposal; so-called 'poor doors' do little to promote mixed, integrated communities.

We are aware from Christine Whitehead of London School of Economics (Interview January 2017) of a possible technical issue in relation to service charge rules currently driving separate entrances. As we understood it from her, differentials in service charge rates are not allowed between affordable and market housing, and cross subsidy is not allowed - which has contributed to the creation of separate entrances. We would encourage the Mayor to work with central Government to explore such technicalities and ensure there are no unintended consequences (e.g. unaffordable service charges) as a result of this desirable change.

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.9](#)

We support the proposal to discourage gated developments. The evidence does not support the proposition that gated communities contribute to reduced crime and improved safety. Instead, a UN-Habitat report has noted:

“[S]ignificant impacts of gating are seen in the real and potential spatial and social fragmentation of cities, leading to the diminished use and availability of public space and increased socioeconomic polarization.” It notes that counter-intuitively, fear of crime and crime on public streets can actually increase as higher income people abandon public streets and use private security services in place of relying on the police. (CityLab 2012: <https://www.citylab.com/equity/2012/04/do-gated-communities-threaten-society/1737/>)

We welcome this:

- In recent years, the proportion of new build homes (excluding conversions) that are wheelchair accessible was 9%, and 81% Lifetime Homes. (Source: Housing in London 2017)
- Altogether there are around 200,000 households in London who require a home adaptation because of the disability of a household member. Of these, around 25,000 households (12%) say they are attempting to move somewhere more suitable to cope with a disability. Around 8,500 of these are on a social housing waiting list, of whom around 3,400 are not currently already in social housing. (London Strategic Housing Market Assessment 2017)

However, we believe there should be a target that a large number of these 'wheelchair user dwellings' are affordable too. With disabled people in London more likely to be low paid (37 per cent of disabled workers are low paid compared with 27 per cent of non-disabled workers), and people with a disabled adult in the family more likely to be in poverty than those without (35 per cent compared with 25 per cent) it is necessary for housing to be provided to meet a range of income brackets including those suitable for people on a low income. Data from London's Poverty Profile <https://www.trustforlondon.org.uk/data/disability-and-poverty/>

Page: [Policy D5 Accessible housing](#)

Section: [3.5.3](#)

We welcome this. Disabled users are similar to other residents in seeking choice, and being distributed across tenures, including high-income owner occupiers, families and those of working age. They therefore should be treated as potential consumers for a range of types of home. (Source: LSE 2016, “No Place Like An Accessible Home”). <http://www.lse.ac.uk/business-and-consultancy/consulting/assets/documents/No-Place-Like-an-Accessible-Home.pdf>

Page: [Policy D5 Accessible housing](#)

Section: [3.5.6](#)

We would be concerned about the potential for the ‘affordability of service charges’ criterion to become a loophole. Further clarification should be provided on the circumstances this is expected to apply.

We welcome the commitment to improving delivery, and recognise that this requires buy-in for higher density construction, particularly in parts of outer London. The approach is pragmatic, and acknowledges that, as LSE's 2016 report for the GLA showed (figure shown in Michael Edwards' blog <https://michaeledwards.org.uk/category/uncategorized/>), much building has significantly exceeded the guidance. We would encourage the Mayor to work together with boroughs to consistently apply design reviews to high-density developments, to ensure:

- Minimum standards are achieved in terms of access to community amenities (including spaces for the third sector, shops, green spaces, schools and health services), in line with the findings of the Minimum Acceptable Place Standards (University of York 2013 <https://www.york.ac.uk/media/chp/documents/2013/MAPS%20report.pdf>) and Living Home Standards research (Shelter 2016 http://www.shelter.org.uk/__data/assets/pdf_file/0011/1287848/living_home_standard_full_report.pdf) and
- Developers are discouraged from bidding up land prices in the expectation of building at high densities..

We agree with B1 that the density of development proposals should be based on, and linked to the provision of future planned levels of infrastructure rather than existing levels. But it is important that resources are identified for such infrastructure at the planning stage.

Meanwhile, meaningful community engagement – in the form of pushes for up-to-date Local Plans, Neighbourhood Plans where appropriate (especially in lower income communities), and support for other efforts to engage communities in place-making – is fundamental to communities feeling comfortable with this level of building on their doorstep.

Page: [Policy D7 Public realm](#)

Section: [D7](#)

We welcome this commitment to making public spaces welcoming to less mobile people. Our support for Kilburn Older Voices Exchange (<http://www.kove.org.uk>) highlighted the importance of benches on high streets for older people, as well as accessible and frequent pedestrian crossings. Our support for Housing Justice's UK Common Rights project (<http://www.24housing.co.uk/yournews/homeless-people-being-denied-basic-human-rights/>) highlighted the significance of fresh drinking water for homeless people's human rights.

NB these standards should be applied consistently across the whole of London where development and regeneration is taking place. London's international centres such as Oxford Street should be accessible and inclusive, and policies around active transport should not act to the detriment of those who are less mobile.

Page: [Policy D9 Basement development](#)

Section: [3.9.3](#)

In relation to basements we would wish to ensure appropriate damp proofing, ventilation and drainage measures are in place for any basements to be used as residential accommodation. A lot of basement-level private rented properties suffer from persistent damp, some of which is due to design faults.

Page: [Policy H1 Increasing housing supply](#)

Section: [H1](#)

The Plan does not fully recognise that to enable ‘Good Growth’ in London, a proportion of London’s housing needs will need to be met outside Greater London, including in new and expanded settlements in the South East and beyond.

Page: [Policy H1 Increasing housing supply](#)

Section: [H1](#)

We welcome the ambition to increase housing supply, and recognise the importance of boosting delivery, particularly of genuinely affordable, rented housing. We value the efforts to ensure the housing market delivers the homes London needs. We call on the Mayor, local boroughs and central Government to work together to give consistent messages and promote investment in London housing, particularly in the context of uncertainty. There is the risk of an economic downturn, which can be expected to affect those on low incomes worst of all, particularly if it leads to stalled housing investment.

At present a large number of London Boroughs are missing up-to-date Local Plans, at a time when there is a need to build trust and buy-in around regeneration, possibly making it harder to get widespread support for Plans. In the context of Central Government’s push for development – we welcome the Mayor’s push to get an aligned, pan-London approach to Local Plans.

Page: [Policy H1 Increasing housing supply](#)

Section: [4.1.4](#)

We are supportive of the development of Build to Rent as a sector, and have funded the work of Future of London to understand how it is being implemented in London. We have also supported work applying innovative methods of construction, in meanwhile uses, investing in the Y:Cube development in South West London and an RSA roundtable on Temporary Accommodation profiling the work of Place Ladywell in Lewisham. We welcome the spread of such methods, while urging the sector to apply innovation to deliver rented homes for those on low- and middle incomes.

Page: [Policy H1 Increasing housing supply](#)

Section: [4.1.6](#)

We welcome the Mayor's efforts to ensure that more affordable housing is made available to Londoners to live in as homes, rather than being treated as investment opportunities for people overseas or, indeed, for wealthy Londoners. The primary purpose of housing must be as homes. In particular we note the efforts to increase transparency and discourage the investment of corrupt wealth in the London housing market. Transparency International's research, funded by the Trust, found £4.2bn in London property bought by politicians and public officials with suspicious wealth. (<https://www.ft.com/content/dfe411bc-203c-11e7-b7d3-163f5a7f229c>)

Page: [Policy H2 Small sites](#)

Section: [H2](#)

We welcome the Mayor's policy on small sites and the encouragement for a wider range of developers to participate in building the homes London needs. For us, this includes community-led housing projects which can contribute to lower-cost housing and innovative solutions to housing need in parts of London.

London First's research into housing delivery in outer London has shown the importance of increasing the contribution of boroughs in zones 5 and 6 to housing targets, which the small sites policy will be crucial to deliver. (<http://www.londonfirst.co.uk/outer-boroughs-failing-to-build-as-london-falls-deeper-into-housing-crisis/>)

Page: [Policy H2 Small sites](#)

Section: [4.2.9](#)

We recognise the need for flexibility to enable building in 'built-up' areas. We would encourage the Mayor to apply this policy in light of his commitment to improving air quality and creating a London National Park. This could mean:

- Requiring boroughs to work with developers to identify specific replacement green spaces (as in Policy 4.5 on delivery of off-site and cash in lieu affordable housing).
- Collecting and publishing monitoring data on green cover, including small spaces and ideally monitoring changes in quality.
- Commissioning an evaluation after an appropriate period on the impact of this policy on access to green space and air quality, particularly in light of the Minimum Acceptable Place Standards identified by researchers from the University of York (<https://www.york.ac.uk/media/chp/documents/2013/MAPS%20report.pdf>)

Page: [Policy H2 Small sites](#)

Section: [4.2.10](#)

We agree and support the Mayor's efforts to boost community-led housing in the capital, where these support mixed and inclusive communities, and which also contribute to affordable housing. Add affordability to this point.

Page: [Policy H2 Small sites](#)

Section: [4.2.13](#)

We would support the closure of this loophole. Cash in lieu payments increased more than ten times between 2011 and 2014, to £250m per year, more than five times the level before the financial crisis. (<https://www.ft.com/content/a9ccf5d4-d2fa-11e5-8887-98e7feb46f27>)

There is some evidence that boroughs, particularly in central London, are using cash in lieu payments to fund regeneration of existing homes (see for example: <https://www.thebureauinvestigates.com/stories/2013-12-19/london-councils-sit-on-millions-meant-for-building-cheaper-homes>) and also anecdotal evidence that boroughs feel unable to spend such cash within their borough boundaries. (Interview with Christine Whitehead, London School of Economics, January 2017), meaning it accumulates while developments with little or no affordable housing proceed.

The Mayor should actively monitor and report on how cash in lieu payments are being used for these smaller sites.

Page: [Policy H3 Monitoring housing targets](#)

Section: [H3](#)

Add to policy:

The number and proportion of homes that are Social Rent or London Affordable Rent as well as the proportion of market rent at which these are set should be monitored and published by borough and by development.

The number and proportion of homes that are London Living Rent and London Shared ownership should be monitored and published by borough and also by development.

Page: [Policy H3 Monitoring housing targets](#)

Section: [4.3.3](#)

We found this policy opaque and difficult to understand. It should be made clearer to whom it applies and what the impact could be on delivery.

Page: [Policy H4 Meanwhile use](#)

Section: [H4](#)

Support -

Trust for London supports innovative meanwhile use of land, having invested in YMCA South West London's Y:Cube modular development of homes for young people, as well as an RSA workshop on Temporary Accommodation which highlighted the innovation of Place Ladywell, by the same architects. Future of London has conducted site visits to a number of innovative meanwhile developments and we would encourage local authorities to learn the lessons from their work.

Page: [Policy H5 Delivering affordable housing](#)

Section: [H5](#)

We broadly support this policy, and would encourage an even greater emphasis on homes for affordable rent within the overall policy, given the prevalence of need here.

Evidence from the London Poverty Profile shows that high housing costs push around 1 million additional Londoners into poverty. Over three quarters of those living below a Minimum Income Standard for London are in rented accommodation; for working-age, single Londoners, rent accounts for 50% of income in inner London, and even 40% in outer London, making it essentially impossible to save for a deposit. (Source: <https://www.trustforlondon.org.uk/publications/minimum-income-standard-london-2017/>)

For those on low incomes, buying a home – even through shared ownership – is not a realistic aspiration, and the priority should be to provide genuinely affordable rented homes. There has been genuine concern about what affordable means and at times the term 'affordable' has taken on an Orwellian dimension. We welcome greater clarity on affordability. We acknowledge that housing supply needs to meet the needs of those who are on low, middle and high incomes. But affordable homes should be within the means of those on low and middle incomes. We would therefore question shared ownership being within the affordable definition given this is not a realistic option for this group, especially those with families and in Inner London.

We agree that affordable housing should be provided on site and is inclusive and mixed by tenure and household income.

As the London Tenants Federation has stated:

“The evidence of need for social-rented homes in London is enormous. GLA housing needs assessments have consistently shown that around 50% of homes [need] to be social rented if the backlog of need were to be met over a 10-year period, while only 17% of homes delivered between 2005 and 2015 were social or affordable rent homes. As the backlog of housing need has grown the response from the Mayor’s office has ... [extended] the time period to address the backlog... from 10 to 20 years.” (Source: London Tenants Federation: <http://www.londontenants.org/publications/responses/LTF%20reponse%20to%20draft%20London%20Housing%20Strategy%20Dec%202017.pdf>)

We also encourage the Mayor to communicate his approach to planning with clarity and consistency, aiming to create certainty, to encourage investment and maximise delivery.

Page: [Policy H5 Delivering affordable housing](#)

Section: [4.5.1](#)

We welcome the new estimates of need for London. We note as part of this the importance of providing housing for those on middle incomes. Research we funded by Danny Dorling and Benjamin Hennig (Oxford University) has shown that, over time, London has seen a 28 percentage point decline in the proportion of people who are neither rich nor poor (defined as above the poverty threshold and below the inheritance tax threshold). It has moved from being by far the largest group in 1980 to roughly one in three households in 2010. (<http://www.londonmapper.org.uk/analysis/poverty-and-wealth-1980-2010/>). The disappearance of this group from swathes of London, particularly inner London, undermines the goal of achieving mixed communities.

Page: [Policy H5 Delivering affordable housing](#)

Section: [4.5.2](#)

We welcome the threshold approach to viability, which we hope will reduce the waste of resources going into viability testing, reduce costs, and speed up delivery.

Page: [Policy H5 Delivering affordable housing](#)

Section: [4.5.5](#)

We welcome the clarification that off-site delivery should be an exception with extensive justification, and support London First in seeking a consistent approach for this across the capital. We disagree however with London First's assertion that higher-density developments such as town centres are 'not generally suitable for families' (The Off-Site Rule, London First 2016) and that this justifies off-site provision. Rather, in the context of extensive housing need among families, developers must work to make high-density living family-friendly for a range of tenures. This includes providing adequate social infrastructure for families.

Page: [Policy H5 Delivering affordable housing](#)

Section: [4.5.5](#)

As noted above, cash in lieu has exploded beyond reasonable levels, and this loophole should be closed.

Page: [Policy H5 Delivering affordable housing](#)

Section: [4.5.7](#)

We welcome this clarification and hope that appropriate resources are committed to holding boroughs and developers accountable for their performance on it.

Page: [Policy H6 Threshold approach to applications](#)

Section: [H6](#)

We welcome the broad thrust of the threshold approach, while encouraging a narrower focus on genuinely affordable rented homes for people on low and middle incomes.

The 2017 Strategic Housing Market Assessment (SHMA) has identified that 65 per cent of housing in London needs to be affordable with 18 per cent of these intermediate housing products and 47 per cent low-cost rent. The threshold level of affordable housing set at 35 per cent is therefore barely half what is required and is not specific on low-cost rent.

We would therefore want to see added to B 1, 2 and 3 the percentage which are affordable rent. We would expect this to be significant otherwise there is the danger that a large percentage are shared ownership which we do not believe are affordable for most Londoners. See our other comments in relation to this.

Page: [Policy H6 Threshold approach to applications](#)

Section: [4.6.11](#)

We welcome efforts to reduce the bidding up of land prices. We would encourage this to be backed up by an investment of resources at Mayoral level to make the threat of 'calling in' and reviewing developments fully credible.

Page: [Policy H7 Affordable housing tenure](#)

Section: [H7](#)

We strongly question whether 30% for low cost rented homes is sufficient. This implies many developments could have as little as 10% social rented homes, which could lead to a continuing decline in the amount of social rented homes in London, at a time when waiting lists are growing. We would support a higher threshold, e.g. 50% (ie 17.5% of the total). At present, demolitions mean that the affordable and social rented housing stock is either stagnant or falling in some boroughs, [1] and there is a long way to go to meet need.

We question the inclusion of shared ownership within the definition of 'affordable' housing. £90,000 (the cap for household income for shared ownership) is well above average household median income – even in London's wealthiest ward, Knightsbridge and Belgravia, the average income was 'just' £88,000 in 2013 (https://data.london.gov.uk/apps_and_analysis/gla-household-income-estimates/). It is hard to justify spending public money to subsidise homes for this group. We recommend that the threshold should be much closer to London's average income, e.g. £60,000. We also ask the Mayor to monitor delivery of, and public expenditure on, shared ownership and the distributional impact of public expenditure on such properties. We would be supportive of a greater use of the subsidy for shared ownership being used for low cost rented homes primarily, and for London Living Rent secondary.

[1] **Top and Bottom London Boroughs for Social Rented Housing Delivery (2015/6)**

Borough: SR delivered

Greenwich: 409

Havering: 371

Tower Hamlets: 303

Newham: 190

Lewisham: 157

Wandsworth: 141

Sutton: -35

Enfield: -37

Southwark: -165

Harrow: -213

Bexley: -583



Page: [Policy H7 Affordable housing tenure](#)

Section: [4.7.3](#)

We welcome the Mayor's commitment to making affordable housing understandable, and to applying a definition that is meaningful for Londoners in the context of constrained public subsidy. We welcome the push to talk about affordable rents as being closer to social rents, and the design and implementation of a Living Rent linked to incomes as an intermediate product for middle income Londoners. The latter is relevant given the decline of middle-income households particularly in Inner London. See earlier comment citing evidence by Dorling/Hennig (Oxford University).

With that in mind, we want to push on behalf of the stakeholders we represent as an anti-poverty charity. For example, London Tenants Federation points out that London Affordable Rent is on average 42% higher than current average prevailing social rents, and makes up 45% of the average income of those in social housing. We understand this point of view that such a rent is less than 'affordable'.

In relation to the Living Rent: an affordable rent is typically felt to be around one third of income. We would therefore discourage the Mayor from applying the 'living rent' brand name to any rent that costs more than one third of the £60,000 household income threshold (or £1,6667/pcm). We do not feel subsidy should be used for rents above this level.

Page: [Policy H7 Affordable housing tenure](#)

Section: [4.7.5](#)

On Living Rent: We ask the Mayor to limit the badge of 'Living Rent' to rents below £1,667/pcm, and to promote delivery in areas of London where it will make a difference to Londoners on middle incomes. Otherwise the top end of Living Rent would cost more than 1/3 of household income for even those at the maximum threshold, £60,000 per year.

Even with this change, those on median incomes in London would find that they cannot afford the London Living Rent in a number of geographic areas of the capital. (Source: London Tenants Federation: [http://www.londontenants.org/publications/briefings/Briefing%20-%20Genuinely%20affordable%20housing%20\(FF\).pdf](http://www.londontenants.org/publications/briefings/Briefing%20-%20Genuinely%20affordable%20housing%20(FF).pdf));

we accept though that it is difficult to achieve the level of subsidy that would be needed to address this.

Page: [Policy H7 Affordable housing tenure](#)

Section: [4.7.6](#)

£90,000 (the household income cap for this product) is more than double London's median household income, meaning that the state proposes to subsidise people in the top 10% of London's earners, or (alternatively) the average resident of Knightsbridge and Belgravia. We are unconvinced this is an equitable use of public money. We therefore support less subsidy being used for shared ownership and primarily for use in parts of London which will genuinely support low and middle income families. This is more likely to be parts of Outer London.

Page: [Policy H7 Affordable housing tenure](#)

Section: [4.7.8](#)

We agree that maximum income thresholds should apply to the application of public funds to 'affordable' housing. Our concern is that the state plans to subsidise home ownership for high-income Londoners, and that the Living Rent product needs adjustment to make it most relevant for people on middle incomes. As stated earlier there is significant finery around the term affordability and we would strongly urge the Mayor to improve clarity on this.

Page: [Policy H7 Affordable housing tenure](#)

Section: [4.7.9](#)

Work by London Citizens and Savills for Joseph Rowntree Foundation has identified support for a definition of one third or less of net household income. We encourage the Mayor to hold the line on this, as an important step towards rebuilding trust in policy definitions of affordability. A new definition, that is higher than one being advocated by research, is not helpful.

Page: [Policy H7 Affordable housing tenure](#)

Section: [4.7.13](#)

We are concerned in case such 'affordable' developments are all intermediate housing or shared ownership, which could be highly profitable and not deliver any genuinely affordable homes. We understand that this could be useful for building the market for London Living Rent, but question whether it is meeting need. We would be supportive of this measure if the majority of homes were low cost rented homes.

Page: [Policy H8 Monitoring of affordable housing](#)

Section: [H8](#)

We believe proposals for monitoring in the Plan are a strength, and welcome the emphasis on accountability.

Page: [Policy H10 Redevelopment of existing housing and estate regeneration](#)

Section: [H10](#)

Support -

We welcome the Mayor's approach to Estate regeneration, and his commitment to both 'like for like' home replacement and ballots for residents.

The Mayor needs to define what is meant by 'quality' here, to avoid inadvertently creating loopholes.

We recognise the need, at present, to address estate demolition being seen as 'easy pickings.' However, there is a view that many of the regeneration projects with the highest potential financial return have now been delivered and those remaining may be challenging or higher cost (Source: interview with Mairead Carroll, National Housing Federation, January 2017). We would therefore be concerned if the Mayor inadvertently created a significant cost barrier to investment in regeneration as compared with other forms of property development. The impact of the Viability Tested route on investment in estate regeneration should be monitored, and in particular whether expenditure on such Viability Tests is well directed to increasing delivery of affordable housing.

Page: [Policy H10 Redevelopment of existing housing and estate regeneration](#)

Section: [4.10.3](#)

Support -

We welcome this reminder of the importance of engaging with residents and communities as an integral part of estate regeneration. We would encourage reinforcement here of the importance of informing and involving private rented sector tenants as well as social tenants and leaseholders.

Page: [Policy H10 Redevelopment of existing housing and estate regeneration](#)

Section: [4.10.5](#)

While we welcome the desire to allow flexibility to promote investment, developers must set programmes in areas that are meaningful to local people. Too large an area could reduce trust and buy-in. We encourage early and widespread engagement in line with the Mayor's Good Practice Guide on Estate Regeneration, to promote appropriate areas and acceptable trade-offs.

Page: [Policy H11 Ensuring the best use of stock](#)

Section: [H11](#)

Support -

We welcome this. We have committed to support research on approaches to 'buy to leave' by Empty Homes, which would deliver research on good practice from around the world in the next 12 months.

Page: [Policy H12 Housing size mix](#)

Section: [4.12.7](#)

We welcome the preservation of high-quality HMOs and their role in providing shared housing for student groups and vulnerable and insecurely housed people. We are however aware of concern in some outer London communities (e.g. in Hanwell and parts of Brent) that large numbers of family homes are being converted to poor-quality HMOs, including unlicensed ones, some of which breach planning regulations. We support the work of JustLife on Unsupported Temporary Accommodation, which highlights the negative impact poor-quality private hostels can have on residents, and it is exploring the potential for a new Temporary Accommodation Board model, bringing together stakeholders to ensure good practice in such properties in London. We are also, now, supporting research into this part of London's market commissioned by Cambridge House's Safer Renting project, and encourage the Mayor and boroughs to take note of the findings.

Page: [Policy H13 Build to Rent](#)

Section: [H13](#)

We welcome broadly the development and encouragement of the Build to Rent sector. That said, we would encourage the Mayor to seek provision of social and Affordable Rented housing as part of Build to Rent developments. Future of London's 2017 report on Build to Rent showed that the sector is providing high-quality accommodation, but it is largely being provided at high rent levels that make it not relevant for Londoners on low and middle incomes. This is a missed opportunity and a gap in the market, particularly on public land.

Page: [Policy H14 Supported and specialised accommodation](#)

Section: [H14](#)

We welcome the Mayor's interest in supported and specialised accommodation, particularly the types of accommodation mentioned here. We believe there is a need for a London-wide need assessment for these types of accommodation, to understand priorities for investment, and where London-wide specialist commissioning and provision would be more appropriate. We at Trust for London have invested in support for specialist LGBT and older LGBT people's housing, as well as specialist support for victims of domestic violence, forced marriages and other forms of abuse. It is possible that this and other 'niche' groups could benefit from a London-wide approach. We note the lack of detail in this section in contrast to other sections, e.g. on older people.

Page: [Policy H16 Gypsy and Traveller accommodation](#)

Section: [H16](#)

We welcome the inclusion of this section, as a long-term supporter of London Gypsies & Travellers. We would ask whether the Mayor should include an element of accountability here, to ensure that Boroughs follow through on this policy. Over the eight years of the last London Plan, fewer than 10 new pitches were provided across all of London, despite the identified need for more than 800.

Page: [Policy H15 Specialist older persons housing](#)

Section: [H15](#)

We note there is no mention of particular sub-groups here e.g. older LGBT people, where specialist, niche accommodation might be appropriate. We have supported Tonic Housing which is developing a model for this group.

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [5.1.1](#)

We welcome the inclusion of community facilities in the definition of social infrastructure. We would hope this includes physical space for civil society organisations and activities including offices and storage as well as public spaces.

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [5.1.8](#)

We welcome the recommendation that social infrastructure should be easily accessible by walking, cycling and public transport. Walking access particularly reflects the views of members of the public in the Minimum Acceptable Place Standards discussions facilitated by University of York and University of Loughborough (<https://www.york.ac.uk/media/chp/documents/2013/MAPS%20report.pdf>)

We welcome the suggestion of allowing civil society groups to use unused or underused facilities. However, their needs - including for affordable and accessible office space - also needs to be considered in new developments too.

Page: [Policy S3 Education and childcare facilities](#)

Section: [5.3.2](#)

We welcome the explicit inclusion of school-age childcare in this section, as particularly relevant to allowing parents (primarily mothers) to gain and sustain paid employment. The London Child Poverty Commission, instigated by the first Mayor, found that low employment levels of 2nd earners was a significant factor in London having much higher levels of child poverty than the rest of the country. Affordable, accessible and quality childcare is critical to addressing this issue, as well as increased flexible employment.

Page: [Policy S3 Education and childcare facilities](#)

Section: [5.3.3](#)

We welcome the acknowledgement of the scale of what is required from boroughs by way of additional childcare places. We would add that it is important for boroughs to consider the provision of flexible childcare including unusual hours which is particularly relevant to London's changing employment patterns.

We would also like local authorities to consider whether they can support parents in developing childcare co-operatives. Trust for London is funding a pilot development of a parent-led childcare co-operative suitable for low-income parents, being developed by New Economics Foundation in partnership with Family & Childcare Trust and Peabody.

Page: [Policy S3 Education and childcare facilities](#)

Section: [5.3.4](#)

We welcome the proposal to plan for childcare facilities within new developments. We would like to add that planners and developers should consider incorporating childcare facilities within change of use or upgrades of existing developments. Peabody Housing is offering NEF a space to develop the parent-led childcare co-operative mentioned in our comments on 5.3.3.

Page: [Policy S3 Education and childcare facilities](#)

Section: [5.3.9](#)

We agree that further education is important and that planning for it crosses borough boundaries. We suggest that consideration of priority sites for FE provision addresses areas where there are relatively low levels of qualifications at age 19 and/or the adult population more generally (mapped by borough in our London's Poverty Profile at <https://www.trustforlondon.org.uk/data/19-year-old-qualifications-borough/> and <https://www.trustforlondon.org.uk/data/adult-qualifications-borough/>)

Page: [Policy S3 Education and childcare facilities](#)

Section: [5.3.12](#)

We welcome the recommendation for schools and college facilities to be designed with shared used in mind including childcare and community activities. Civil society organisations we fund report that availability of space for community activities is shrinking as well as costs rising. Therefore an emphasis on affordability within this is vital.

The design of appropriate facilities will depend on proper consultation including of local civil society organisations, who may also bring voices of people that are not usually heard.

Page: [Policy S4 Play and informal recreation](#)

Section: [S4](#)

We support the commitment to play and informal recreation. Under B there should be an emphasis on free provision given the very high numbers of children living in low-income households in the capital.

Page: [Policy S6 Public toilets](#)

Section: [5.6.6](#)

We welcome the recommendation for "changing places" toilets alongside disabled toilets and family/babycare facilities.

Page: [Policy S7 Burial space](#)

Section: [5.7.1](#)

We welcome the acknowledgement of the particular challenges of travel to burial spaces for low-income Londoners. In addition, the lack of burial space in some areas contributes to high funeral costs which has a major impact on low-income Londoners (More information from our grantee Quaker Social Action at www.fairfuneralscampaign.org.uk)

Page: [Policy SI1 Improving air quality](#)

Section: [SI1](#)

We strongly support the Plan's commitment to improving air quality and that development should not lead to further deterioration. There is also a need to take account of the construction phase of development and air quality impacts this has, particularly in relation to long term developments. We are concerned about potential loopholes point 6 could result in.

Page: [Policy SI1 Improving air quality](#)

Section: [9.1.1](#)

There is conclusive evidence relating to the damaging impact of poor air quality, especially on the poorest Londoners
<https://www.trustforlondon.org.uk/publications/air-how-solve-londons-air-quality-crisis-part-2/>

There is also strong support for action on this issue as evidenced by polling funded by Clientearth and Trust for London
<https://www.standard.co.uk/news/london/london-parents-see-toxic-air-as-the-biggest-health-threat-to-their-children-a3208221.html>