

# London Mayor's Housing Strategy

**ACE** response

December 2017





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### Recommendations

Below is a summary of the recommendations included in ACE's consultation response the London Mayor's draft Housing Strategy.

- ACE recommends the Mayor introduces a short-term disruptive model to housing in London, which includes:
  - the Mayor and London boroughs using land that is currently owned by the public sector under their control (i.e. land managed by TfL) to exclusively build affordable homes on over the next five years;
  - the Mayor hosting a roundtable with housing developers who do not have a
    business model aimed at the high end of the residential market to discuss how
    GLA and London boroughs can work together with them to build the housing that
    London needs on land owned by the public sector over the next five years; and
  - the Mayor introducing a range of incentives for London boroughs to design and manage their planning framework in this way and to meet the affordable housing targets set by the Mayor.
- ACE recommends looking at extending current properties to accommodate higher density housing.
- ACE recommends the Mayor expands the remit of the proposed PMO-style
   Infrastructure Coordination Unit to including housing along key transport corridors.
- ACE recommends that some of the smaller sites owned by the public sector could be earmarked specifically for development by SMEs.
- ACE recommends the Mayor continues to lobby Central Government to move National Rail assets to bring them under Transport for London control.
- ACE also recommends the Mayor ensures the strategy is robust and diverse enough to
  ensure its success does not hinge solely on the completion of major infrastructure
  projects, such as Crossrail 2.
- ACE recommends the Mayor should do more to involve the industry in their campaign
  to outline what Londoners, homebuilders and Central Government can do to ensure
  that London's construction industry has access to the skills and people it needs.
- ACE recommends the Mayor investigate how a fast track route or a 'cost recovery' approach to planning permissions in the private sector can create incentives to include affordable housing in developments.



### Housing in London and the Mayor's vision

The strategy provides a good outline of the challenges facing the sector. We see London's housing supply shortage, particularly at the genuinely affordable end, as the biggest issue currently facing the city. This is because the impacts are wide-reaching and the ramifications are severe. By looking at current housing trends in London, it is clear that maintaining the status quo will only see London's housing gap grow and London's success decline.

Despite clearly outlining the scale of London's housing challenges, ACE believes the strategy's policies are not hard-hitting enough to close London's housing gap. If the Mayor wants to truly address the challenge facing housing in London, he must directly lead a short-term disruption to the market in London in conjunction with the other long-term policies outlined in the strategy. ACE has provided a view on what the Mayor's short-term disruption to housing in London should look like in the next chapter of this submission.

The Mayor has an important role to play in closing the housing gap through the powers directly available to him and by taking responsibility to successfully drive and lobby the changes required at other levels of government and throughout industry. Anything less than a sharp reversal of current trends and a closing of the housing gap over the next five years should be viewed as a failure.

Lastly, the Mayor's approach to addressing London's housing shortage must have multipartisan support in order to be successful, across the political spectrum, at all levels of government, with the community and throughout industry. Appropriate housing for all Londoners is too big an issue for failure and all stakeholders must have a buy-in into how we respond to the challenge. Multipartisan support means multipartisan responsibility, and this reduces the risk of a long-term response being derailed by shorter-term political cycles.

#### **Vision**

ACE supports the Mayor's vision in the strategy. Addressing the housing shortage requires the right mix of housing stock with no compromise on 'good growth'. ACE also agrees with the Mayor's view that only by meeting London's housing needs can London become a city that truly thrives.

The Mayor rightly points out that the development of housing across London must be enabled and underpinned by supporting infrastructure. An effective approach to investing in new and



existing infrastructure will help unlock areas appropriate for housing developments, hopefully resulting in a substantial increase in the supply of new homes across London.

ACE believes it is positive that there has been a clear shift in attitudes towards homebuilding in London. The significant growth over the past decade in people who support local homebuilding in London demonstrates the strategy's vision of increasing the housing stock is palatable to most Londoners. It also perhaps demonstrates that more people are starting to feel the pinch of the housing shortage in London and a new approach is desperately required.

Lastly, ACE believes the strategy must not lose sight of the basic notion on why housing is important to people and communities. Having somewhere appropriate to live that is safe and secure is a key element of the 'hierarchy of needs', and we limit a person's quality of life and ability to contribute to society if we are unable to provide appropriate housing. The strategy should include this concept as a first principle.

#### **Priorities**

The vision's five priorities (building homes for Londoners, delivering genuinely affordable homes, high quality homes and inclusive neighbourhoods, a fairer deal for private renters and leaseholders and tackling homelessness and helping rough sleepers) are will do much to improve London's housing supply shortage, however the Mayor can do more.

ACE believes a standalone priority on 'developing the infrastructure required for London's homes' would be a valuable sixth priority, similar to how the Mayor's draft Transport Strategy focused on 'new homes and jobs'. Infrastructure and housing in London are intrinsically linked, and a standalone section on infrastructure (including social infrastructure) would help provide greater clarity on how infrastructure projects can help unlock areas for housing development. ACE believes this would highlight the importance of infrastructure in addressing London's housing shortage and would help the Mayor reinforce the case for funding for game-changing infrastructure projects, such as Crossrail 2, by also presenting their merits in a housing context.



### A disruptive model to housing in London

To create a sharp turnaround of current trends in London's housing market, ACE recommends the Mayor introduces a short-term disruptive model to housing in London. This model should focus on what is actionable over the next five years and how the Mayor, in partnership with London boroughs, can build momentum and demonstrate how other stakeholders can close London's housing gap.

The Mayor, London boroughs and Central Government must look at what they can do directly to create more affordable homes in London. With the London Land Commission estimating between 25-40% of land is owned by the public sector,<sup>1</sup> there is a real opportunity for the governments to partner with likeminded organisations to use some of this land to significantly increase the number of affordable homes in London. A focus on significantly increasing the number of affordable homes over the next five years could also be supported by decisions under planning frameworks, encouraging new entrants in the housing market and promoting the use of modern constructions practices.

### GLA and London boroughs need to be delivery vehicles leading the way

The scale of problems relating to London's housing supply shortage, particularly for affordable housing, means a drastic change is required. While London has been aware of its housing challenges for some time, the measures taken have had limited success. ACE therefore believes a bold solution with GLA and London boroughs leading from the front is the only way the Mayor will achieve the changes he desires.

ACE recommends the Mayor and London boroughs use land that is currently owned by the public sector under their control (i.e. land managed by TfL) to exclusively build affordable homes on over the next five years. The Mayor should view the development of homes on public sector land as necessary for addressing the shortage of affordable housing, as opposed to an opportunity to capitalise on high land value which inevitably results in housing at the high end.

ACE believes there would be a good partnership between the Mayor and London boroughs (who have plenty of land) and developers who do not have a business model of building developments aimed at the high end of the market. ACE recommends the Mayor hosts a roundtable with these types of developers to discuss how GLA and London boroughs can work

<sup>&</sup>lt;sup>1</sup> https://www.ft.com/content/c2635fc4-c1fd-11e5-993a-d18bf6826744



together with them to build the housing that London needs on land owned by the public sector over the next five years. The 'Brick by Brick' approach in the London Borough of Croydon is one example of how the Mayor can introduce an innovative approach to building more affordable homes in London.

The Mayor and London boroughs should promote modern construction practices, such as precision manufacturing and offsite construction, when developing housing on public sector land. These capabilities already exist in the industry but are not currently available at a wider scale. If the Mayor and London boroughs can provide a pipeline of housing projects that will use these technologies, this will encourage industry to expand skills and capabilities in this space. The wider benefits of this approach is these technologies will also become more readily available to private sector developers, potentially reducing construction costs and making the inclusion of affordable housing in these developments more financially viable.

#### Managing a planning framework that deliver more affordable houses

Planning frameworks should be viewed as an important tool for the Mayor and London boroughs to deliver more affordable housing. Over the next five years, ACE believes the Mayor and London boroughs should make all planning decisions based on a proposed development's ability to help solve London's shortage of affordable homes.

The Mayor and London boroughs should consider a short-term freeze or commit to a significant reduction in planning approvals for developments that include housing at the high end. At the moment, London has enough luxury apartments and projects currently under development will see this number grow significantly. The high land value in London is driving these types of developments, at the cost of affordable homes, and the Mayor and London boroughs must use their powers under the planning framework to address this market failure.

Furthermore, the Mayor and London boroughs should design their planning application review process in a way that fast tracks approvals for private sector developments committing to delivering a high proportion of affordable homes. This approach will encourage developers to think in innovative ways about how they can deliver the clear objectives of the Mayor and London boroughs.

To encourage changes outside the Mayor's direct responsibilities, ACE recommends the Mayor introduces a range of incentives for London boroughs to design and manage their planning framework in this way and to meet the affordable housing targets set by the Mayor.



### A long-term approach to building more homes

#### Increasing the supply of land for new homes

ACE agrees that the need to diversify the range of development models, sites and types of homes are critical, and central to this is looking at who builds them, how and where they are built.

Currently, around 80% of new homes that are built in London are affordable to just 8% of London households. This disparity highlights the need for a package of actions that can deal with the sources of the problem, including unlocking the supply of land, investing to support the delivery of houses, and diversifying and increasing the capacity of the homebuilding industry. ACE stresses it has become critical to act now and a failure to do so risks the situation deteriorating further. The approach must take a long-term view to solving the crisis, and consider the impact that the construction of these homes will have on London in the future.

The need to increase the availability of land on which to build new homes is critical to solving the capital's housing problem, and making better use of this land will be ever more important as the city continues to grow. Providing clear targets on housing supply will help establish a basis for the rest of the policy to work in and give London boroughs direction. To ensure housing targets set for London boroughs are not arbitrary numbers, creating an incentive scheme for meeting targets would be beneficial, and would help embed the mindsight that not hitting these targets makes boroughs complicit in London's housing crisis.

ACE supports the shift to an increased emphasis on higher density developments. Increased co-location of sites is one way this can be achieved, and this combines well with the development of other infrastructure projects. Over station developments are an example of how higher density developments can be achieved through other infrastructure projects.

ACE also recommends looking at extending current properties to accommodate higher density housing. It is important to not just consider land as dirt, but the space extending above it, and this will help to make better use of London's existing land.

ACE notes the Mayor could do more to synchronise efforts between London boroughs with regard to housing. The Mayor's proposed PMO-style Infrastructure Coordination Unit is a good means to achieve this, however, ACE recommends that the unit needs to have its remit



expanded to include housing. This will make the unit far more comprehensive as well as helping to solve London's housing problems from a higher level.

ACE agrees the public sector should lead by example with releasing land for the development of housing; with GLA working in conjunction with the NHS, the Ministry of Defence, Metropolitan Police and other public sector landowners. Releasing land can be of benefit for those public sector bodies who could utilise the revenue to provide extra services. ACE recommends that some of the smaller sites owned by the public sector could be earmarked specifically for development by SMEs. This would help to combat the problem that many smaller developers face being that there are not enough small sights available due to land allocation restrictions

Additionally, ACE recommends the Mayor continues to lobby Central Government to move National Rail assets to bring them under Transport for London control. GLA could strengthen the case for a transfer of Network Rail infrastructure assets to Transport for London by demonstrating how it could maximise affordable housing developments around these sites.

#### Investment to support housing delivery

ACE strongly agrees on the principle that transport connections, utilities and other forms of infrastructure are critical to enable the development of homes. ACE stresses that decisions about infrastructure investment must be undertaken with the consideration about how it will unlock housing developments in an area, particularly now that the Government has placed increased emphasis on increasing productivity. The strategy must consider ways in which access to funding will improve the rate at which houses can be built, as well as how stalled developments can be put back on track.

ACE recognises that investment in infrastructure needs to be prioritised in areas where they can provide housing developments in tandem with commercial or industrial areas. Emphasis should be placed on the areas where infrastructure can act as a 'connector' for housing to be built in areas that have not traditionally been considered. This will help to maximise the economic benefits that surrounding infrastructure projects can provide, whilst also creating places that are attractive to live in.

ACE also recommends the Mayor's Housing Strategy is robust and diverse enough to ensure its success does not hinge solely on the completion of major infrastructure projects, such as Crossrail 2.



#### Diversifying the homebuilding industry

ACE agrees there is a need to diversify the homebuilding industry and we see this as an opportunity to incorporate new players, designs and construction practices in the sector. It is crucial, however, that the quality and design of these buildings must not be compromised as a result of changes to the industry.

ACE recognises the need to diversify who can access homes in London, as well as who builds them; the need to build homes at a range of rent levels is vital to ensure private renters have access to a variety of homes suitable to their needs and financial circumstances. Genuinely affordable homes are vital in helping first-time buyers get onto the property ladder as well as easing pressure on the rest of the market. To achieve this, new development in London will require a coalition of SMEs and large-scale developers, each playing to their strengths, to meet London's nuanced housing needs.

ACE agrees with the need to provide a package of support to small and medium sized builders to help them develop, particularly smaller sites, more quickly. Smaller enterprises often have the advantage of being more versatile and able to respond quickly compared to larger developers. One of the crucial ways that SME's suffer is from a lack of access to finance at the start of the construction process despite possessing land assets. This is an area where guaranteed finance schemes would help SMEs' gain access to finance from banks.

ACE supports the Mayor's call for greater cooperation between London boroughs and housing associations of all sizes to allow developers to reach their full potential. In addition to the proposals, ACE recognises that there is an opportunity for housing associations to be more involved in the development of homes.

#### Increasing the capacity of industry

ACE acknowledges the construction skills gap and the need to develop increasingly modern methods of building houses must be addressed. This will impact the entire construction supply chain and allow houses to be built more quickly and efficiently, whilst simultaneously equipping workers with the skills necessary for construction in the 21st Century. However, ACE stresses there is also a skills shortage at the design end of the supply chain.

ACE agrees there needs to be an increase in the number of people pursuing a career in construction. This is an area where ACE has been active in highlighting the importance of various groups within the construction and engineering sector through its work on the recently



released Construction Manifesto. ACE recommends the Mayor should do more to involve the industry in their campaign to outline what Londoners, homebuilders and Central Government can do to ensure that London's construction industry has access to the skills and people it needs.

ACE supports the concept of precision manufacturing homes and recognises their ability to help the construction industry significantly improve its capacity, as well as potentially offering greater consistency and cost efficiencies. ACE notes that offsite construction is currently being hindered by a lack of confidence in the pipeline; the initial investment required to establish precision manufacturing factories currently is too high and represents too much risk. The industry currently has the tools and capacity to make off site construction a success, however, due to a lack of confidence and clarity in the supply chain, these practises haven't been implemented on a wide enough scale.

Additionally, ACE would like to see a greater emphasis placed on the uptake of emerging digital technologies which would allow for further efficiencies, as well as helping to future proof new developments. ACE would like to see the costs that can be recouped as a result of these kinds of efficiency savings in the construction sector, are retained and used to further the development of housing and the surrounding infrastructure.

#### Delivering genuinely affordable homes in the long term

ACE strongly agrees that London needs more affordable housing, particularly for people on low and middle incomes. London depends on people of many different backgrounds and means, and an unaffordable housing market is locking out people who are desperately required to deliver important services for the city.

The need to deliver more affordable housing in London is highlighted by GLA's analysis on affordable homes as a percentage of net conventional approvals in London since 2004-05. Here we see a drop to 15% in 2015-16 from over 30% in 2005-06, the lowest level since records began.

ACE believes the Mayor's efforts to deliver more genuinely affordable housing in London cannot sacrifice the need for these homes to be of high quality and conducive to the life of London's communities. Affordable housing needs to be seen as an investment, and spending more upfront to build sustainable, well designed and inclusive homes will reduce costs over the life of a house, positively contribute to environmental objectives and provide a social value to residents and the community. The Mayor must avoid overseeing the development of cheap,



poor quality and sub-standard housing for Londoners, as this provides an inadequate solution to the housing supply shortage, particularly with land available for development in equally short supply.

#### Genuinely affordable homes

The Mayor's policy of supporting the development of new genuinely affordable homes by investing in projects meeting certain criteria is positive. It is clear the reason why there has been a steady decrease in new affordable homes in London is because the financial incentive of building higher value homes with higher returns has been too great. ACE therefore believes that any financial incentive to develop the right mix of housing at the affordable end is needed.

However, ACE notes the Mayor's criteria for investing in housing under the Affordable Homes Programme does not include the quality of the development. Whilst this is partly covered by the planning framework and building controls, ACE believes projects supported by the Mayor should promote better practice in the design of housing, and encourage innovation in how houses are built and function. It is crucial that the Mayor must not lose sight of the fact that, ultimately, any new homes must form the foundations of pleasant and liveable communities.

#### Increasing delivery of affordable homes

The Mayor's goal of half of new homes on publicly owned land being affordable currently does not go far enough to solve the crisis that London is in. A longer-term target closer to 75% after five years would encourage a long-lasting change, and will require support and coordination from all levels of government for this policy to be more than a bold aspiration.

ACE supports the Mayor's four elements to increasing investment in genuinely affordable homes. The challenge will be ensuring this proposal sufficiently stimulates the affordable housing market in London for the private sector to meet the gap between what the proposal will achieve, and the number of affordable homes required.

ACE is particularly supportive of the Mayor's commitment to supporting new models of delivering affordable housing. We believe this approach should be embedded in all elements of the strategy, because looking at how we build, maintain and operate housing and identifying opportunities for innovation will be critical for finding the game-changer required to ensure the development of affordable housing is competitive on the open market.



ACE also recommends the Mayor investigate how a similar fast track route or a 'cost recovery' approach to planning permissions in the private sector, can create incentives to include affordable housing in developments.

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

The standards of existing affordable housing in London must be improved, particularly in regard to their energy efficiency. As many affordable homes in London are private rentals, landlords currently benefit little from improving the energy efficiency of these houses when any cost saving will be to the tenant. To address this concern, ACE agrees that the Mayor should investigate incentives for landlords to improve the energy efficiency of private rentals or work with other levels of government to lobby an increase in minimum standards, as discussed later in the strategy.

ACE supports the Mayor's proposals that affordable homes sold under the Right to Buy scheme or are demolished, should be replaced locally on a like for like basis. There is also merit in these proposals including targets of replacing these affordable homes on a 2 for 1 or a 1.5 for 1 ratio, noting the strategy's premise that the gap in affordable housing in London needs to be reduced and not simply maintained. A more ambitious approach which aims for a net increase in affordable homes from the turnover of existing stock will ensure the Mayor is able to tackle the housing supply shortage in London on multiple fronts.



### Good quality homes and strong communities

ACE strongly supports the Mayor's ambitions in the high-quality homes and inclusive neighbourhoods part of the strategy. ACE is an advocate for how infrastructure and the built environment adds social value to an individual and their community, and this social value leads to positive outcomes and economic benefits when designed well. ACE believes there is a strong case behind focusing on the quality of our built environment and the lifetime costs of assets, as opposed to simply the upfront costs. Investing in sustainable buildings with longer lifespans, that positively contribute to the surrounding environment, can improve how a community functions and can result in a more productive economy with happier people. The Mayor must not sacrifice this mind-set in pursuit of delivering an easier solution to London's housing supply shortage.

#### Well-designed, safe and good quality homes

ACE is very supportive of the strategy's policy on well-designed, safe and good quality homes, and we are passionate about its benefits to housing in London. ACE's members help improve communities on a daily basis by designing safe, good quality and sustainable buildings and supporting infrastructure. The end state of this policy is a city that continues to be a great place to live and work.

ACE is pleased to see the commitment to work with London boroughs and industry to support well-designed, safe, good quality and environmentally sustainable new homes and neighbourhoods and believe it is positive that the Mayor sees the benefit of working with industry to build better homes. ACE finds the Mayor's commitment to update and consolidate London's housing design standards positive, however this must involve an extensive consultation process harnessing the expertise of industry, including the consulting engineering sector. ACE members are also in a good position to provide technical knowledge to support the Mayor's intention of including examples of well-designed high-density developments in these standards, particularly with the global reach of some member companies.

ACE agrees with the need for the Mayor to work with stakeholders to also improve the quality and standard of existing homes, particularly to improve fire safety standards and energy efficiency. To ensure this results in tangible outcomes, ACE believes the Mayor should include targets and incentives for strengthening the fire safety and energy efficiency of existing



homes in London. These targets should align to current broader environmental objectives, such as the need for most homes to have an emissions footprint close to zero by 2050.

ACE recommends that the mayor undertakes a review of the current public housing stock, ensuring that it can be brought into line to meet new, higher standards of public housing. It may be necessary to retrofit current homes or, where necessary, demolish them to improve the efficiency and overall standard of homes in London.

Lastly, ACE supports the strategy's 'Good Growth by Design' approach. Investing time and efforts into improving how houses are built can allow London to become a leader in new and innovative practices. Particularly with the need for more higher density buildings in London, new housing must be designed in a way that complements our communities and the surrounding environment. While the commitment to develop a Public Practice to support local councils with capabilities to deliver homes through the 'Good Growth by Design' approach is positive, ACE also believes the Mayor must look into creating financial incentives for local councils to follow this approach.

#### Community support for homebuilding

The Mayor's policy to work with partners to encourage housing delivery that involves communities and earns support from Londoners is an important element of the strategy. ACE believes genuine engagement to support the development of housing and supporting infrastructure is the best approach to ensure projects are meeting the needs of the community. There is also a clear link between engaging with the community to shape a development, community support and pride in the outcome, and a development that is fit-for-purpose.

ACE therefore supports the Mayor's proposal to develop a new community-led Housing Hub for London to improve community involvement in housing schemes. ACE believes this hub could also provide resources to private developers on best practice community engagement for housing developments. To this end, ACE believes there should be an additional proposal in this policy focused on encouraging developers and the broader construction sector in increase their engagement with the community.

Lastly, ACE agrees with the Mayor's proposal to work with stakeholders to ensure new housing developments are matched with the provision of new infrastructure (including social infrastructure).





# A better deal for private rents and leaseholders

London is currently home to two million private renters and more than half a million leaseholders. Over the past two decades, the number of private renters has increased dramatically as has the amount of time that people are spending in private rented accommodation, with only a third of private renters expecting to buy a home within the next five years.

ACE acknowledges that there is a link between securing better arrangements for private renters and leaseholders and getting these people onto the property market. If there are people trapped in a perpetual rent cycle who are unable to save money to put a deposit down on a house, the consequence is that it suppresses the number of people who can access new homes, let alone existing ones. Improving conditions for those who rent will ultimately enable more people to be able to buy and own their own homes, thereby generating more demand for housing.

ACE also accepts that giving renters and leaseholders more security in their contracts as well as making rented homes more affordable, allows residents to commit to an area for a longer time. Knowing that they are secure in a rented property, tenants are able remain in a specific job or commit their children to schools. Increased renting security diminishes the problems associated with frequently moving tenancy, and helps families establish roots and connections within an area. Increased security for renters allows for greater foresight by infrastructure developers, as it results in a more consistent, sustained stream of people relying on infrastructure services. This is particularly important as more people are living in rented accommodation for longer periods.



## **Confronting London's homelessness problem**

ACE acknowledges that homelessness has roots in many differing social factors, such as domestic abuse or fleeing conflict in another country. However, the root cause of homelessness lies in the lack of provision of social housing, with four in ten cases of homelessness coming as a result of the termination of private sector tenancies in 2016-17.

ACE agrees that the Mayor should work with local councils to address the causes of homelessness, with particular emphasis on increasing the number of affordable homes as this is the primary cause of the problem. In addition, making renting a more affordable option generally, as well as reviewing the funding regime for temporary accommodation, will help to reduce the number of homeless people.

Homelessness is a symptom of the problems with the current housing market; any plan to improve housing availability will have homelessness as a measure of success. It will be necessary to ensure that the proposals outlined earlier in the plan can complement the proposals to address homelessness, helping to ensure that an effective solution is formed.



### **About ACE**

As the leading business association in the sector, ACE represents the interests of professional consultancy and engineering companies large and small in the UK. Many of our member companies have gained international recognition and acclaim and employ over 250,000 staff worldwide.

ACE members are at the heart of delivering, maintaining and upgrading our buildings, structures and infrastructure. They provide specialist services to a diverse range of sectors including water, transportation, housing and energy.

The ACE membership acts as the bridge between consultants, engineers and the wider construction sector who make an estimated contribution of £15bn to the nation's economy with the wider construction market contributing a further £90bn.

ACE's powerful representation and lobbying to government, major clients, the media and other key stakeholders, enables it to promote the critical contribution that engineers and consultants make to the nation's developing infrastructure.

Through our publications, market intelligence, events and networking, business guidance and personal contact, we provide a cohesive approach and direction for our members and the wider industry. In recognising the dynamics of our industry, we support and encourage our members in all aspects of their business, helping them to optimise performance and embrace opportunity.

Our fundamental purposes are to promote the worth of our industry and to give voice to our members. We do so with passion and vision, support and commitment, integrity and professionalism.

This response to the London Mayor's Housing Strategy was prepared through ACE's London and South-East Region Group.

#### **Further information**

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