

London Tenants Federation

10.04.14

Response to consultation on the Further Alterations to the London Plan

Introduction

The London Tenants Federation (LTF) is an umbrella organisation. It brings together (mostly) borough- and London-wide federations and organisations of tenants of social housing providers. Its membership also includes the London Federation of Housing Co-operatives and the National Federation of Tenant Management Organisations. A number of its member organisations involve both council and housing association tenants and a few (a minority) are also involving some private tenants.

LTF aims to facilitate a consensus voice for tenants on strategic regional housing, planning and community related issues. LTF has had representation on the Mayor's Housing Forum since 2005 and its members have attended, by invitation, all Examinations in Public relating to the London Plan, since 2007.

LTF has strong links with other community and voluntary sector organisations in London that also have an interest in housing, planning and community related issues.

Chapter 1 – a growing population

Paragraph 1.45: LTF fears that continued 'growth' (now seemingly positioned at the heart of the purpose of planning in London) will continue to add to, rather than address the capital's high levels of deprivation (a key issue for the London Plan – mentioned 27 times).

Despite apparent economic growth since the recession, poverty (after housing costs) remains stubbornly higher than the rest of England – 28% compared to 21% (according to Trust for London's most recent report)¹. This figure has increased slightly since years 2000/1 – 2005/6. Poverty here is defined as having income of less than 60% of the national median. The median income fell 3.8% between 2007/08 and 2011/12. The percentage of households in in-work poverty has increased. 57% of children and adults living in poverty in London are from working families.

To provide alterations to the London Plan that are based on more of the same - global / overseas employers, developer and investors vision (promoted in the Mayor's 2020 Vision) would suggest that seeking to 'unblock the barriers to development that London needs' is simply about satisfying the needs of the top end by income and class at the expense of the bottom end of Londoners by both income and class. Seemingly, while the international

¹ <http://www.londonspovertyprofile.org.uk/publications/>

superrich flee from their own crisis-led countries, to add to London's property markets, London's levels of poverty can't but continue to increase with increasing housing unaffordability. The prices of market homes (to buy and rent) are intrinsically linked with those of so-called 'affordable' housing.

Policy 2.4 The 2012 games and their legacy

- LTF objects to the deletion of 'partners' in section A of the policy.

The legacy is supposed to benefit a much wider area than the boundaries of the London Legacy Development Corporation. The Mayor should continue to work with the boroughs to implement this policy and to benefit existing poorer communities of the Growth Boroughs.

- For the same reason LTF proposes that in section A of the policy, (in relation to convergence – referenced 17), there should also be a reference to the Growth Boroughs Convergence Action Plan. There should also be a glossary definition of convergence that is clear in its focus on increasing opportunities and raising levels of income, education and health for existing communities – not displacing them with wealthier communities.

LTF raised concern at the EiP of the DRLP in 2010 that legacy and convergence must mean benefit in terms of health, income and housing for existing deprived communities in the growth boroughs (then Olympic boroughs).

It is concerned that despite the policy highlighting that "it will sustain existing stable communities and promote local economic investment to create job opportunities driven by community engagement", there is evidence that gentrification and displacement of existing communities (both residents and small businesses) – even those adjacent to the Olympic Park - continues to be a threat.

LTF has worked with Just Space in projects funded by Antipode an international geography magazine and Trust for London (aimed at supporting groups to engage in influencing large scale developments in their communities) that are of relevance.

This has included supporting resident and local businesses to develop a Community Plan on the Carpenters Estate – with the potential to go on to develop a neighbourhood plan (in face of plans by Newham Council to demolish existing homes and to continue displacement of existing residents and local businesses).

Through our work we carried out interviews with –

- a majority of existing residents
- displaced residents who were provided with inadequate support and incorrect information when moving from the Carpenters Estate; some of who are in worse conditions than they were previously and
- local businesses including small construction firms who have been in the area for decades and who were told by Newham council that they were 'dirty businesses' and that they wanted instead to encourage 'high tech' businesses into the area.

Our Trust for London work has supported local tenant and community groups in responding to consultation on the LLDC's developing Local Plan and groups in responding to the Royal

Borough of Greenwich's Core Strategy consultation and in attending the EiP (in December 2013).

Community groups often understand the Olympics to have been just to be the Games and often say 'what legacy?' Unfortunately in policy terms (outside the LLDC area) seemingly so do boroughs. Greenwich Core Strategy (EiP) for example mentions the Olympics only in terms of the Games not the wider legacy.

We would be very happy to produce a briefing note to provide more detail on this.

- Regarding new proposed policy 2.4 text (section B) - **'It should plan for Stratford development as a Metropolitan Centre, strategic transport hub and strategic growth in office, retail academic and leisure facilities'**. This would seem to be at odds with the existing text of the last two sentences of paragraph 2.18 and last of paragraph 2.19A.

The text of these paragraphs is much more sensitive to the diversity and deprivation in this part of the capital. It suggests that investment in east London might provide lessons and approaches that can be provided to other strategic regeneration projects. The new policy in section B of Policy 2.4 is a status quo – top down, big retail and office growth approach – that completely lacks sensitivity and fails to provide innovative lessons and approaches for future projects.

- Regarding the proposed **replacement of 'will' with 'should'.....also consider social, community and cultural requirements'** (also policy B) – should be rejected and the existing 'will' should remain.

'Will' is a direction; 'should' expresses an opinion or suggestion. 'Should' implies that it is less likely to occur.

- Section C should include an additional point **that development in the growth boroughs should ensure benefit to existing deprived communities and sustain existing local businesses and services.**

Policy 2.2 – London and wider metropolitan area

- LTF is particularly concerned that paragraph 2.12 provides discrepancies between population and job growth, while the 2011 London Plan forecasted equal rates of population and job growth. It is unacceptable to prepare for increases in population that is unmatched by increases in jobs.

Policy 2.13 Opportunity and intensification areas

- LTF opposes the addition of the new sentence at the end of paragraph 2.61 'The Mayor expects both types of area to make particularly significant contributions towards meeting housing needs'.

This is superfluous; clearly the nature of Opportunity and Intensification Areas is about delivery of large number of homes and jobs.

- LTF opposes the following new sentence - ‘To ensure that housing output is optimised, **employment capacities should, if necessary, be reviewed in the light of strategic local employment projections**’ in paragraph 2.62.

What does ‘if necessary’ mean? As highlighted above re policy 2.2 above it is unacceptable that the Mayor is plans for population growth that is at a higher than employment growth.

- LTF is also concerned that new text in paragraph 2.62 actively promotes higher housing densities – when we are only just seeing the numbers of schemes approved at higher than the density matrix levels really coming down (AMR 2014). Given that Opportunity and Intensification Areas will provide a high level of London’s new homes it would seem that in policy terms this represents a return to a ‘maximising’ rather than ‘optimising’ housing density.

LTF feels this alteration this may also compromise other policies in the London Plan – including around lifetime neighbourhoods and need for family sized homes. It is clear that not all opportunity areas are wide open spaces of derelict land. The 2011 London Plan already provides for large development areas to define their own character. However we feel this should not occur as a matter of direction. Many OAs and IAs have existing homes and places of employment, and character which we feel by practice should be considered even where larger residential areas are planned. LTF feels that too often existing businesses and communities (generally poorer sections of the community) are ignored and/or are displaced to make room for higher density housing (mostly for wealthier communities). This necessarily has detrimental impact on the health and well-being particularly of elderly and vulnerable households.

We would welcome the opportunity to provide a briefing note on this detailing specific examples occurring including in Newham, Greenwich, Southwark and Hammersmith & Fulham.

LTF feels it is inappropriate to add new Opportunity Areas and Intensification Areas to the London Plan without full discussion not just with the boroughs but also with existing communities and local businesses for whom there may be significant (and potentially) detrimental impact over very long periods of time.

- LTF proposes that it is crucial that the London Plan include a section on community involvement in the defining of opportunity and intensification area; in drawing up development frameworks and in the monitoring of deliver targets of opportunity and intensification areas.

London’s housing requirements

New sections of text highlight that London’s population is likely to increase significantly more than was anticipated in the past. However uncertainty as to the actual scale and nature of the increase is also highlighted.

This is contrary to the NPPF which is clear that Local planning authorities should have a clear understanding of housing needs in their area and that they should:

- *prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
 - *meets household and population projections, taking account of migration and demographic change;*
 - *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
 - *caters for housing demand and the scale of housing supply necessary to meet this demand;*

The SHMA's uncertainty around population and household numbers is mentioned nine times. Since the London Household Survey, a bespoke survey with a large sample, is now out of date, the GLA has used the English Housing Survey interviewing a sample survey of around 16,000 households a year. A single year from this contains only 2,000 cases from London which is not enough to give reasonably precise estimates when disaggregated on issues such as tenure and household type (and highlighted as such in the SHMA).

LTF's concerns about the 2013 SHMA (in addition to general uncertainty around increases in population and households) are as follows:

- (i) It ignores the impact of failures year on year to meet London Plan targets for social-rented homes and the impact of this on displacement of lower income households from London.

The Bureau of Investigative Journalism reported in May 2013² that councils had moved 32,643 households to new areas outside London since 2009 (seemingly including benefit caps – see next bullet point).

- (ii) It ignores the impact of welfare reform and resultant impact in terms of displacement of households from London. The GLA was aware of the changes that were to occur at the time of the EiP of the DRLP in 2010 and is remiss in having failed to address this. Below is just a selection of references to press articles on this issue (there are many more available). It seems incredible that the GLA suggests they don't have sufficient evidence to address this issue.

In July 2012 the Evening Standard³ reported that Croydon, Richmond, Kingston and Sutton have announced a joint plan to buy 150 homes outside London to house homeless families (with Yorkshire, Hull and St Leonards-on-Sea being considered), since the national Local Housing Allowance caps have made many private rented homes inaccessible in the capital. This follows shortly after Newham Council wrote to around 1,000 housing associations, as far away as Stoke-on-Trent, requesting their help to house 500 families from the borough in immediate housing need.

In April 2014 the Guardian reported that London boroughs were planning to move housing benefit claimants outside the capital as a result of LHA caps. It reported

² <https://www.thebureauinvestigates.com/2013/05/19/forced-exodus-londons-homeless-pushed-to-suburbs/>

³ <http://www.standard.co.uk/news/london/londons-homeless-face-being-sent-to-yorkshire-7909364.html>

that Hillingdon, Croydon and Westminster were placing families in Berkshire and that Newham was planning to move 500 families to Stoke on Trent.⁴

In a survey carried out by the Guardian in November 2012⁵, London boroughs said that they were already placing homeless families outside the capital or had secured or were considering temp accommodation outside London for future use. These included LB Kensington & Chelsea, which have moved a minority of homeless families to Manchester and Slough; Waltham Forest, which has acquired housing in Luton, Margate and Harlow; Brent, which has relocated households to Hastings; and Tower Hamlets, which has relocated a handful of families to Northampton.

In May 2013, the Bureau of Investigative Journalism (same reference as above re section (i) highlighted that Newham had moved 3,831 households including nearly 1,000 in the past 12 months outside its borders. It was reported that many others are also rehousing homeless households in accommodation outside their boroughs including Southwark (3,167), Kensington & Chelsea (2,739) and Wandsworth (2,691)

In November 2013, Inside Housing⁶ reported that London boroughs had more than double the number of homeless families they are placing outside the capital. They said that 789 households had been housed in 69 local authorities outside London as far flung as Manchester, Birmingham, Swansea and Accrington.

- (iii) It fails to assess how many households might meet the cost of affordable rents in London (assessing only the need for social rented housing). It is the case that in some parts of London affordable rent homes are not covered by benefits.
- (iv) It fails to consider the impact of delivering affordable-rent homes rather than social-rented homes on in-work poverty in London. Failure to consider this implies that the needs of less well-off sections of the community from some parts of London's community can simply be ignored and or if necessary simply be forced out of London.
- (v) The base model on overcrowding assumes that both overcrowding and under occupation are eliminated in affordable housing over a twenty year period. However there is no analysis of the number of households living in under-occupied homes that may remain so (in the social rented sector) – including pensioners and other households that are not dependent on benefits to meet the cost of their homes, or households that are finding ways to meet costs even where the bedroom tax applies. London Councils estimate of housing need (London Councils 'The London Housing Challenge'- 2013)⁷ suggests an annual requirement for 80,900 new homes in London derived from a method that added overcrowded households to the total net housing requirement (which the SHMA does not).

⁴ <http://www.theguardian.com/uk/2012/apr/24/london-exporting-council-tenants>

⁵ <http://www.theguardian.com/society/2012/nov/04/london-boroughs-housing-familiesoutside-capital>

⁶ <http://www.insidehousing.co.uk/tenancies/londoners-housed-outside-capital-doubles/6529299.article>

⁷ <http://www.londoncouncils.gov.uk/news/current/pressdetail.htm?pk=1661>

- (vi) There is no assessment of the needs of older people who wish to stay in their homes but who need adaptations to make their homes adequate to remain in. Given the increases in older people in London and based on past trends that around 90% of older people will continue to prefer living in their current home, there is a significant need to identify improvements that might be needed to the existing housing stock.
- (vii) The SHMA contains no assessment of the potential increase in the need for wheelchair accessible homes for elderly people and disabled people.
- (viii) It contains no specific assessment relating to the need for private rented homes, despite policy 3.8's suggestion that the PRS provides positive and practical support in addressing housing need.
- (ix) There is lack of detailed assessment of needs of private tenants particularly vulnerable tenants.
- (x) The accuracy of the assessment of student accommodation carried out by the Mayor's Academic Forum is questionable.
- (xi) There is no assessment of specific needs for BME, LGBT or gypsy and travellers communities. For gypsy and travellers, the failure to meet evidenced need by bring forward new pitches, the provision of which is a strategic need for London, is compounded by London boroughs returning travellers pitch fund allocations.

LTF feels that the text of paragraph 3.1 and policy 3.1 is, as a result, highly compromised.

Text 3.1 highlights that for the Mayor's vision and objectives including that for a 'strong, secure and accessible neighbourhoods' which provide for all its residents, students, workers and visitors (whatever their background, age or status) will be realised by ensuring that London's people and communities have the homes, opportunities, facilities and opportunities they need to support good and improving quality of life to 2013. Policy 3.1 highlights the need to ensure equal life chances for all and where appropriate to address barriers to particular groups and communities to tackle the huge issue of inequality across London.

The SHMA's proposal that backlog of need will be met over a 20 year period (where previously this has been over a 10 year period and guidance suggests 5 years) and, in addition, the Mayor's failures to address poor delivery of social-rented homes (at only 48% of target - certainly for the years 2007-13) has disproportionate negative impact on low income households and continues to contribute to increasing levels of poverty and deprivation. NB 90% of the target for market housing and 83% of intermediate housing was delivered over this same period of time.

Ongoing loss of social-rented homes An increasingly important issue often highlighted by LTF member organisations is loss of existing social rented homes. This is occurring both through redevelopment / demolition of social housing estates and through the process that (on average) for each new so-called 'affordable'-rent home that is produced, an existing social rented home may be converted to 'affordable'-rent.

Demolition can have significant social and environmental detrimental impact; specifically resulting in less social-rented homes, displacement of existing communities and increasing levels of embodied carbon emissions. LTF assesses (through comparison of gross and net housing delivered in London) that around 5,200 new social rented homes built in 2007-12 were replacements for others demolished.

Displacement, particularly for older and vulnerable residents can have significant detrimental impact on health and well-being.

Higher levels of demolition mean that increasing number of new homes are replacement homes (when actually many could be refurbished) – significantly impacting on net genuinely affordable housing delivered.

The levels of embodied carbon in demolitions are generally ignored in any assessments of CO2 emissions. The UK government pledged to reduce carbon emissions by 80% by 2050. The Centre for Sustainable Development says that in order to meet that target it is necessary to reduce not just the operational carbon emitted (once a building has been constructed), but also the embodied carbon (the processes of material extraction, manufacturing, delivery to site, construction processes, and also demolition and recycling)⁸. At present embodied carbon emitted can be as much as 37 years of operation carbon and this percentage will increase as operational carbon decreases. Faithful and Gould (who have worked with RICS) suggest that the amount of embodied carbon used to make a building can be as high as 65% of the total.

One example of this, where there has been close monitoring by community groups is the demolition of the Heygate Estate in Southwark.

Southwark council publicly gave many reasons for demolition of the estate, but provided no evidence that the buildings were structurally unsound. Some of the reasons they provided were that:

- the bad design of the stairwells on the estate led to crime and anti-social behaviour;
- the heating system kept breaking down;
- the estate had an 'ugly and polluted environment and poor local transport';
- "social housing generates people on low income which generates poor school performances [...]so middle class people stay away"
- the estate was "full of the wrong sort of residents"!

In fact, while the estate was often portrayed as a crime den, its crime rate was less than half the borough average. The council had actually spent 250,000 on upgrading the estate's heating system in 2007, and the estate had a lot of green spaces and 450 trees. Situated at the Elephant & Castle, a key transport hub for trains, tube and buses, poor transport links was clearly not a problem.

Seemingly then the key reason for demolition was simply that the estate's social housing tenants were the 'wrong sort' of residents.

Could the Heygate have been refurbished, rather than demolished? In 1998, Southwark council carried out a stock condition survey of its housing estates which provided estimated costs for maintenance and repairs during the following 30-years. The Heygate came in at a below average figure for the borough; with the estimated cost of maintenance and repairs being at just £21,700 per dwelling over 30 years.

In 2012, Gensler Architects made a submission to the Building Trust International HOME competition to design homes that could be delivered at a cost of £20,000). They proposed a refurbishment of the 1,260 council homes on the Heygate Estate at a cost of only £13,955 per

⁸ <http://www-csd.eng.cam.ac.uk/themes0/resource-flows-1/embodied-carbon-and-energy-in-buildings-eeeb>

dwelling; £35m to refurbish the whole estate. The refurbishment proposal scheme would also have saved 40,000 tonnes of CO2.

The cost of emptying the estate of existing tenants and leaseholders and progressing its redevelopment has been £65m. A further £15m will be spent on its total demolition. The new scheme for the Heygate will provide only 79 social -rented homes, resulting in a loss of 1181.

Given that London is 'part of a global and national housing market as well as having its own local and acute housing need', LTF feels it important for impact of this in London should be considered nationally; at the very least in areas surrounding London, to ensure that the needs of all households and communities in London are addressed equitably and that sustainable communities and lifetime neighbourhoods can properly be delivered.

A further example is that of the West Hendon Estate in Barnet.

West Hendon Estate initially had 680 flats situated on 10.5 acres of land with a children's playground, a community centre and green spaces adjacent to the Welsh Harp Reservoir. The 680 homes will be demolished (100 already have been) and replaced with 2,171 new homes, including 21 buildings of up to 20 storeys high.

The proposals for this have been around for more than 12 years. Initially all social housing tenants were told that they would get a like for like home (a pledge on this was distributed to each household).

However since 2003 many of the new lettings on the estate have been allocated to non-secure tenants and as time has gone by there have been reductions in the numbers of new social-homes that might be developed – down to 230. Now 'affordable' homes are talked about rather than social rented. It is suggested that there are some 252 non-secure tenant letting on the estate.

No evidence has ever been provided that the homes could not be refurbished. Residents suggest that there has been a deliberate policy of not carrying out the repairs and maintenance on the estate, which tenants and residents are paying for in rents and service charges.

Additionally the Welsh Harp is of special scientific interest with 170 hectares of open water, marshes, trees and grassland, providing a valuable habitat for wildlife. Some of the high rise flats are to be built on the edge of the Welsh Harp and there are fears that shade from the tower blocks and noise pollution will scare away wildlife. Whilst some alterations have been made in the design process local community groups are still far from content that this is anything but massive over-development that is detrimental to the existing community and the local environment.

LTF proposes that

- The GLA 2013 SHMA is not fit for purpose;
- It is necessary to commission a new London Household Survey to inform a SHMA that is sufficiently informed on the range of housing needs to provide a clear understanding of housing requirement in London and to meet NPPF requirements. A survey and SHMA should be carried out over the next two years.
- Ongoing poor delivery of social-rented homes must be critically assessed to ensure delivery of homes that are needed in London.
- The Mayor should enter into discussion with Government, areas neighbouring London and communities in London to consider how the increasing population of London, which is potentially much greater than the GLA currently suggests, can be

addressed while at the same time achieving fair and equitable delivery of all types of homes and lifetime neighbourhoods.

- A full and properly evidenced review of the London Plan should be carried out in 2017/18
- The impact of loss of perfectly good social-rented homes in London through demolition and not being replaced (as social rented homes) is detrimental to lower income household and strategic policy should focus addressing this. There should be a presumption in favour of refurbishment rather than demolition of existing social rented homes and no loss of social rented homes in any redevelopment. (Please also see our comments regarding policy 3.14)

Policy 3.3 Increasing Housing Supply

- LTF opposes the new housing targets and proposes that they remain for the present time as they are until an adequate and more certain assessment of need has been made.
- LTF opposes other alterations to this policy which we feel are a crude approach to increasing supply of homes.

LTF fears that alterations directing increased supply in Town Centres, Opportunity and Intensification Areas, and renewal of existing residential areas (particularly or especially where there is good public transport accessibility) is a crude blanket approach to areas that are all quite different in respect of transport accessibility and local character. This is neither a properly planned approach nor likely to result in deliver of sustainable development. The existing policy in the London Plan and the Housing SPG provides a more sensitive approach.

Given that the new proposed targets are on average almost double the annual delivery of homes – certainly for the four years of 2009-13, LTF feels justified in fearing that the alterations will result in: delivery of fewer family sized homes, higher levels of density than is appropriate, far more exclusive development and far fewer affordable housing than are desperately needed in London.

Policy 3.2 Improving health and addressing health inequalities

- LTF feels that the inclusion of Health Impact Assessment –in paragraph 3.8 is a welcome addition to the London Plan. However it feels that **‘where a development of plan is anticipated to have significant implications for people’s health and well-being’** is rather too vague. LTF members suggest that all large scale developments and demolitions have implications for people’s health and well-being. LTF proposes that the paragraph should require that **‘In all large scale developments or plans including demolitions, HIA’s will be carried outto identify opportunities for minimising harms.** As already highlighted elsewhere, LTF is particularly concerned about regeneration and redevelopment plans that result in displacement of social housing residents. This can mean: loss of family and friend networks; people having to move from an area and or homes where they have lived all or most of their lives; having to move into homes with higher rents and having to settle children into new schools. The impact on health and well-being can be significant, but is often not taken into account.
- LTF also proposes that the Plan should include text saying that **the Mayor, with the NHS, will provide guidance on HIA’s that will be consulted on (in the near future).**

3.7 – Large Residential developments

- **LTF objects to the alterations to the policy section B and paragraph 3.42 (with the exception of ‘a good quality public realm (Policy 7.5))**

Most of LTF’s comments regarding Policy 3.3 also apply here. At the EiP of the DRLP LTF members argued for a more complex density matrix to ensure that family housing is still included in higher density schemes and that appropriate higher levels of green space and social & community infrastructure is delivered. The GLA advised that most of LTF’s concerns would be addressed in the Housing SPG.

LTF members are now concerned that the new direction around higher density development will conflict with the Housing SPG. There is fear that in cases where large development is planned in areas that have strong local character such as in Charlton Riverside opportunity area and West Hendon Estate, there will be no longer be an option to respect local character, as was implicit in the previous policy text. Instead this will be replaced with a requirement that new large developments will define their own character though accommodating higher density.

Policy 3.8

Private rented sector

- LTF is concerned about the lack of evidence base for Policy 3.8 B (a1) to state that the Private Rented Sector is addressing housing need or increasing housing delivery. There is no analysis in the SHMA of which household the private sector is actually affordable to (particularly taking into account LHA caps) and the problems suffered by households that have been placed in the private rented sector but actually can only genuinely afford social-rented homes. The alteration should be rejected.

Without doubt more private housing has been delivered in London over a number of years. Growth has occurred partly at either ends of the PRS market – at one end as a result of increasing unaffordability of homes for purchase and at the other as a result of failures to deliver sufficient social-rented homes. At neither end could it be suggested that the PRS is housing of choice.

The increased use of the PRS has likely contributed to the increases in in-work poverty.

The general short-term / transient nature of the private rented sector is particularly harsh on households from the lower end (by income) that have children. Having to regularly change homes and schools has detrimental impact on children’s education and social networks.

LTF has further concerns about

- (i) Increasing levels of overcrowding in the private-rented sector (now at 13%)⁹ which are unlikely to be resolved without adequate investment and delivery of social-rented homes,
- (ii) (ii) Private rental hikes - Despite claims from the Government that welfare reform – particularly relating to Local Housing Allowance would reduce private rents in London, private rents have continued to rise. Private rents are double the UK average (Guardian article Jan 2014)¹⁰ The Evening Standard reported in September 2013¹¹ that the value of rent paid in London rose by 1.9% over the year August 2012-13 (double the rate of increase elsewhere in southern England). There were increases in the number of claims for repossession by private and social landlords in London in the 12 months to June 2013 (rising to 50,220) and increases in actual repossessions by court officials (14,380) (GLA London Housing Market Report Nov 2013)¹²
- (iii) Displacement from London – (please see comments and references in our bullet points (i) and (ii) relating to our concerns about the SHMA – London’s Housing Requirements)

Despite the many years of London Mayors promoting institutional private renting, it seems that while this may be desirable for some (in terms of better managed PRS homes and longer tenancies), it would seem this has so far been unsuccessful in benefitting households over than those at the top end of the sector.

The Resolution Foundation’s *‘Building Homes for Generation Rent, Can institutional investment meet the challenge’*¹³ published in October 2013, three years after DCLG’s *‘Review of the barriers to institutional investment’*, highlights that despite Government focus on increasing institutional renting, “to date the number of schemes that have secured institutional investment is small and generally focused on the young professional or higher income rental markets in London.” The Resolution Foundations report says that institutional renting may provide opportunities for those shut out from buying, but that it is no substitute for an adequate supply of social and affordable housing.”

- LTF has some worries about the reference to the DCLG report, for example, the recommendation relating to possible ‘waiving of affordable housing requirements’ in private rental schemes. There is also some concern that some boroughs will find it acceptable to include private-rented rather than social or affordable homes where developers are crying ‘unviability’. LTF would like text included to prevent this occurring.

LTF’s view is that the private rented sector generally requires much better regulation. It fears that at the bottom and larger end of the PRS, homes are likely to be in poor condition and that residents are more likely to suffer issues such as fuel poverty and ill health. The

⁹ Section 1.6 London Housing Strategy 2014

<http://www.london.gov.uk/sites/default/files/Housing%20Strategy%20March%202014.pdf>

¹⁰ <http://www.theguardian.com/money/2014/jan/27/renting-london-costs-twice-elsewhere>

¹¹ <http://www.standard.co.uk/news/london/london-rent-price-rises-faster-than-anywhere-else-in-uk-8839180.html>

¹² <http://data.london.gov.uk/housingmarket>

¹³ http://www.resolutionfoundation.org/media/media/downloads/Building_homes_for_generation_rent.pdf

worst examples are the beds in sheds, garages, commercial walk in freezers..... , people sleeping in kitchens and in homes without a roof and with live wires exposed – as highlighted in a presentation by a principle environmental health practitioner (in Newham)¹⁴ Some 39% of the housing stock in Newham is now private-rented.

In order to address deprivation in London, it is larger often poorly regulated end of the private sector that requires the attention of strategic policy rather than the smaller top professional end, where it is likely that renters are anyway living in good conditions and able to access longer tenancies.

Older peoples housing

LTF is particularly concerned about the failure to fully assess the practicality of older social housing tenants and leaseholders remaining in their homes where this is desired and the difficulties of older people accessing more suitable homes in their neighbourhood (where their existing home no longer meets their needs).

LTF members feel it essential that older people that have strong ties to their locality – with friends, family and other support networks and involvement / engagement in the community activities and decision making - are able to stay within their neighbourhoods. Clearly this is an essential part of creating lifetime neighbourhoods but fear that too often this not occurring. As mentioned in relation to other policy areas, we are very concerned about the impact of social housing demolitions and displacement of older people – away from their existing support networks. A specific example of where this is occurring is in Woolwich, were 1060 social rented homes of three estates – Connaught, Morris Walk, Maryon Road and Grove and are to be demolished and replaced by 1500 homes (375 affordable rent, 130 intermediate and 975 for sale); a huge loss of social rented homes. Tenants of Morris Walk were told (around 10 years ago) that the concrete of the blocks had reached the end of its life, while the Greenwich Industrial History Society says that structurally the estate is 'in good fettle'. Originally tenants were told that they had a right to return but were later this was retracted. Many remaining residents are elderly with support networks in the area and while now resigned to the fact that they will have to move, are necessarily very anxious about their displacement from their homes and community and concerned that a more sustainable approach of refurbishment should have occurred. .

LTF members continue to raise concerns at LTF meetings that council owned specialist / sheltered housing is being sold in their boroughs and that insufficient funds have been allocated to ensure existing can be properly refurbished to good standards.

As part of carrying out a full and adequate SHMA, LTF proposes that there is need to

- Assess the practicalities and adaptations that may be required in order for older people to remain in their homes as the majority desire.
- Carry out a full review of existing specialist housing stock and funding that needs to be made available to bring all that stock up to a good condition.

LTF also feels that the Mayor should commit (in the Plan) to

¹⁴ <http://www.cieh.org/assets/0/72/998/1022/1060/91290/37997842-d2c7-471e-a947-e504ea516068.pdf>

- Carrying out research into the health impact of displacement of older people associated with demolition and refurbishment schemes
- Developing a detailed strategic document on the housing, health and care needs of older people in London, which will account for the different experiences of older people who share one or more of the protected characteristics.

Specialist student housing

LTF members generally support more dispersed distribution of future provision of student housing. The problems of overdevelopment in the four boroughs highlighted has had negative impact on communities – taking up valuable land desperately needed for affordable housing, changing the types of shops and amenities provided in some areas and at times the monopolising desperately needed facilities (such as games pitches) that have been specifically designed for local young people from very low income families.

LTF questions whether the purpose built student accommodation that is being delivered really does pass affordability tests and whether it genuinely meets many student needs.

LTF also questions the independence of the Mayors Academic Forum as an adequate source of detailed information on student housing needs.

LTF proposes that

- A full and adequate SHMA should carry out an independent analysis of specialist student housing need.
- The Mayor should encourage boroughs to bring forward policies to manage levels of student accommodation to avoid over-development in specific neighbourhoods - contrary to needs of communities and development of lifetime neighbourhoods.

Custom Build

LTF is disappointed that the Mayor has not included mention of other community based housing in policy 3.8 – particularly co-operatives, TMOs and Community Land Trusts - along with his support for 'custom build'. LTF members raised concerns about this at the Revised Early Minor Alterations to the London Plan and were advised that further / later changes would include more.

Housing co-operatives and other resident controlled organisations such as Tenant Management Organisations, many of whom are registered providers, are a hidden success story in London. Run by their tenants and residents they have delivered exemplary housing services for over 30 years. The Mayor should formally recognise this in policy 3.8.

LTF notes that the Mayor has made a number of statements over the last few years that highlight his support for the development of Community Land Trusts in London. It is important that this is translated into strategic policy in the London Plan.

In the Draft Revised London Housing in 2011^[1] he said - *The Mayor's responsibilities for public sector land in the capital provide opportunities to safeguard the use and value of sites for the benefit of the community in the long term. When disposing of GLA Group land holdings for residential development, consideration should be given to the freehold of the site being held in trust by a community land trust to prevent exploitation of the site in the future for private gain. A further possible option is for sites to be managed as a single*

^[1] <https://www.london.gov.uk/sites/default/files/London%20Housing%20Strategy%20Dec11.pdf>

community, without regard to tenure, to ensure that the resident community is actively engaged in the management and maintenance of the new development.

In his 2012 'My Progress Report to Londoners' he talked of creating a network of CLTs across London and in his 'Taking Greater London Forward: mayoral Manifesto 2012' said that the LLDC would continue to process to create a CLT within the Chobham Manor site on the Olympic site.

It is surprising that the text of policy 3.8 does not mention that group self-build could have the potential to deliver larger numbers in higher-cost areas, especially with supportive systems of finance, planning and construction (as noted in the SHMA). LTF member TMOs, co-operative organisations are keen to engage in meaningful discussion with the Mayor on this.

LTF and other voluntary and community sector groups have previously argued (in responses to consultations on the London Housing Strategy) that a proportion of the public land in London including that under the Mayor's control should be handed over to community-led organisations specifically to deliver low cost homes to assist in making up for the ongoing failures to deliver sufficiently genuinely affordable homes in London. Necessarily part of this could be self-build. This would be of far greater value than allowing developers to make excessive profits in squeezing out affordable homes from developments on prime land in London.

- LTF proposes an amendment to the new text – **'The Mayor is keen to work with local communities and other partners to expand the concept of self-build on a greater scale'** – to **'The Mayor is keen to work with community-based organisations including TMOs, Co-operatives and Community Land Trusts, and other partners to expand the concept of group self-build to expand the concept of self-build on a greater scale'**
- In terms delivering choice (particularly relating to affordable homes) policy 3.8 should specifically mention TMOs Co-operatives and CLTs.
- Policy 3.8 should encourage boroughs to create waiting lists for community build and self-build
- The policy should commit the Mayor with the boroughs to identifying land available for self-build and other community-based housing development
- It should encourage the boroughs should use commuted funds to support community-based small builders.

Policy 3.10 – Definition of Affordable Housing

Affordable for whom?

On almost every occasion of commenting on alterations to the London Plan, LTF has highlighted the problem of definitions of affordable housing that have nothing to do with what might be genuinely affordable to households with incomes below the median income level or without access to housing benefit.

This has become a lot more serious since the introduction of affordable rent homes.

- I. The average private rent (VOA – March 2013) in London was an average £1,250 per month or £15,000 per year. We presume that there are no additional service charges that are added to this. It is of note that the GLA's *'Focus on London 2010: Income*

*and Spending*¹⁵ found that 16% of households in London had an equivalised income of less than £15,000 a year.

- II. At 69% of market rent (The SHMA notes this was the average in London for affordable rents in 2012/13) annual rent would be £10,350 per annum or weekly rent £199 per week (including service charges)
- III. Assuming 25% of a household's income was spent on rent, this would require a household income of £41,400 to meet the cost. The GLA's *'Focus on London 2010: Income and Spending'* assessed the unequivalised household median income level in London to be £29,363 and an equivalised household median income to be £26,518.
- IV. The SHMA says that average England private rents (VOA March 2013) were £585 per month, which is £7,020 per annum or £135 per week.
- V. The SHMA says that average affordable rents in London (without service charges) were £160 per week. If we compare this with bullet point (ii) we have to assume that average service charge were £39 per week
- VI. Assuming that social housing tenants are, on average, paying a similar amount in service charges it is likely that the £105 per week social rent highlighted in the SHMA might actually be £144 per week once service charges are included.
- VII. Thus average England private rents would seem to be lower at £135 per week than average social rents in London (including service charges).

LTF proposes:

- The Mayor must address the issue of genuine affordability in London and provide a definition of affordability in the London Plan that is meaningful particularly for those whose income level is below the median level.
- The Mayor must address the impact of what's happening at the top end of the market, which LTF suggests has far greater impact on overall house prices than the number of market homes delivered. As is highlighted already the key issue of poor delivery of homes (compare to targets and need) is the failure to deliver genuinely affordable homes – not market homes. Targets for market homes are generally set at a higher level than evidenced need – taking up where targets set for social housing are set at targets lower than evidenced need. NB for the years 2007-13, 90% of the target for net market homes was delivered, 83% of target for net intermediate homes but only 48% of the target for net social rented homes was delivered.

In November 2013, the Financial Times¹⁶ reported that London's housing market faces an oversupply of high-value homes for rent as developers rush to build schemes that soak up a wave of foreign investment into the capital. In the report, Savills said that more than £7bn of international cash was spent on high-end London homes last year, while just 20% of purchasers of prime property in the capital are from the UK and two-thirds are investors rather than owner-occupiers. The Smith Institute's 2012 report *London for Sale* said anecdotal evidence suggests that many of these top-end luxury homes are also being left empty. At the grass roots level it is

¹⁵ <http://data.london.gov.uk/documents/FocusOnLondon2010-income-and-spending.pdf>

¹⁶ Financial Times – London prime rental market faces saturation as developers rush in

<http://www.ft.com/cms/s/0/989fecbc-4639-11e3-9487-00144feabdc0.html#axzz2t6YtSCXc>

often suggested that the lights are never on in more than 25% of flats in luxury blocks.

- Regarding-so called affordable rents, the Mayor must address the ridiculousness of applying a national policy to London where any relationship to market prices means double the national average. The Mayor proposed that average affordable rents in London would be 65% market rents – when what has been produced (highlighted in the SHMA) was on average 69%. Neither 65% nor 69% are reasonable in London. All it does is create greater hardship, increase in work poverty and levels of deprivation in the capital.

Policy 3.11 - Affordable housing targets

There are less social-rented homes in London now than there were ten years ago. LTF is particularly concerned about the on-going loss of social rented homes (through demolitions) and the conversion of existing social-rented homes to affordable rents.

Again - for the years 2007-2013 combined, 90% of the London Plan target for market housing has been delivered, 83% of the intermediate housing target has been delivered but only 48% of the target for social rented homes has been delivered.

LTF objects to households with incomes of up to 80,000 being able to access subsidised housing at the expense of those who have less than median incomes. Those earning 80,000 a year are within London's top earners. Given the seriousness of need for genuinely affordable homes in London this is totally unreasonable.

- LTF supports the increased target for affordable homes, (applied to the existing London Plan overall housing targets). This would bring the target for affordable homes up to 52%. We propose that this should be split 12% intermediate and 40% social rent – to compensate for the ongoing failures to deliver social-rented homes and to address need more equitably.

Policy 3.12 – Negotiating affordable housing on individual private residential and mixed use scheme.

Paragraph 3.71 The issue of provision of affordable homes in developments is incredibly important. Key problem here appears to be that: (i) developers often claim that schemes are not viable where London Plan or borough targets for affordable homes are applied (ii) boroughs and the Mayor easily accede to developers' arguments (iii) there is no public scrutiny of developer viability assessments (iv) NPPF practice guidance provides encouragement for developers to appeal where scheme are rejected specifically on the basis of sec 106 affordable housing requirements.

Examples:

- Greenwich Peninsula is an example of a variation of a section 106 agreement which was agreed - by Greenwich and the London Mayor (in August 2013), which has resulted in four of eleven plots on the Peninsula having no requirement for affordable housing and in a reduction of the original target - 38% affordable housing for the eleven plots - to 21%. This is a huge development providing 3,100 new homes. A

reduction from 38% to 21% results in 527 (or 403 if assessed by habitable rooms) less affordable homes. The scheme (at that time a joint venture between Knight Dragon and Quintain Estates) is not in the sole ownership of Knight Dragon. Knight Dragon is investment vehicle owned by Dr Henry Cheng Kar-Shun (Hong Kong billionaire).

- In the case of the Royal Borough of Greenwich Core Strategy – developers argued for insertion of ‘where viable’ in relation to targets were being set (which were agreed by the borough and inspector).
- The draft White City Opportunity Area Planning Framework – highlighted the developer’s viability assessment that only 17% of homes could be affordable. The focus on the London Plan 40% affordable housing target was only included after this was raised in responses to consultation.

LTF is unconvinced that the additional supporting text - ‘developers should provide development appraisals to demonstrate that each scheme maximises affordable housing output’, will make a great deal of difference unless there is additional guidance and effective scrutiny and monitoring of decisions made by the Mayor and the boroughs.

The NPPF provides clear direction on sustainable development – this should be paramount. Viability effectively means developers profit margins. It is unacceptable that there is no public scrutiny of this, particularly when it is very clear that at a time of austerity and everyone else is required to pull in their belts, developers in London are continuing to make very high profits.

Paragraph 3.17 should

- highlight that given both serious need for affordable homes and decades of failures to deliver sufficient numbers of social rented homes, that development appraisals that contain less than London Plan targets for affordable homes will not meet sustainable development requirements;
- require that developer development appraisals are open to public scrutiny;
- require the Mayor and the boroughs to routinely carry out independent viability assessments on public land and to consider whether, to ensure a catch up on delivery of genuinely affordable homes, they might secure the land for community-based organisations’ developments and group self-build.

Policy 3.14 Existing Housing

LTF is concerned about the ongoing loss of social rented homes (as highlighted already) through:

- I. demolition (LTF assesses around 5,200 new social rented homes built between 2007-12 were replacements for others demolished) and
- II. in the delivery of new affordable rent homes (on average for each new affordable rent home delivered in London an existing social-rented homes is converted to affordable rent).

Redevelopments can result in huge losses of social rented homes. A few examples follow - Ferrier Estate, Kidbrooke, Greenwich – The estate had 1,900 social rented homes. The land that the Ferrier Estate stood on was sold to Berkeley Homes. 4,000 new homes will

replace the Ferrier Estate; only 740 will be social rented. This represents a total loss of 1160 social-rented homes.

Heygate Estate, Southwark – The Heygate had 1,260 homes. Genslet Architects made a submission to the Building Trust International HOME competition to design homes that could be delivered at a cost of £20,000. They proposed refurbishment of the home on the Heygate Estate at a cost of £13,955 per dwelling – or £35m for the whole estate. The refurbishment would also have saved 40,000 tonnes of CO2. The cost of emptying the estate of existing tenants and leaseholders was £65m plus £15m on demolition. The new Heygate scheme will provide only 79 social rented homes – a loss of 1181.

Woodberry Down Estate – The estate had 1,981 council homes. These are being replaced by around 4,600 new homes. The loss of social-rented homes is likely to be 651 (even if at best 70% of the 1900 new ‘affordable homes’ are social rented).

Anne Power from the LSE consistently highlights that in other European countries, such as Germany there has been much greater focus on refurbishing social housing than on demolition.

- **On the basis of retaining as many social-rented homes as possible (when very few are currently being delivered), LTF proposes that as a matter of urgency the London Plan Policy 3.14 require that no further social-rent estate demolitions occur unless it can be demonstrated that the homes are structurally unsound.**

Paragraph 3.84 suggests that the number of empty homes has fallen in London. At the same time there has been an increased interest by national and regional press about the number of luxury homes in London that are either empty all the time or for much of the time.

The Smith Institute’s 2012 report *London for Sale* revealed that 65% of central London market homes are being brought by overseas investors. Other analyses suggest this percentage could actually be as high as 75%. The Smith Institute report said that anecdotal evidence suggests that many of these homes are being left empty. While the GLA says this is not the case, again there is a lack of evidence. Anecdotal evidence from grass roots tenant and other community groups suggests that the lights are never on in more than 25% of flats in luxury blocks. LTF proposes that the London Plan commits the Mayor to

- **Commission research into luxury homes that are being left empty all the time, being used as a personal hotel (rather than a home), or being left empty more often than it is being used.**

Regarding Chapter 4 – LTF supports the response made by Just Space. A number of its members have contributed to discussions that have led to its response on this chapter.

Policy 5.2 – Minimising carbon dioxide emissions

Given the London Plan proposals for such high levels of new house building LTF feels that the Mayor is remiss in not making a full assessment of the impact on carbon emissions in the capital as a result – notably in terms of embodied carbon.

LTF adds to this its concern that too many social housing estates are being demolished to facilitate large scale developments of unaffordable homes and loss of social rented, when existing homes might easily and more cheaply be refurbished and keep embodied carbon emissions to a minimum.

The following is already highlighted in the LTF response to consultation – relating to housing supply -:

The UK government pledged to reduce carbon emissions by 80% by 2050. The Centre for Sustainable Development says that in order to meet that target it is necessary to reduce not just the operational carbon emitted (once a building has been constructed), but also the embodied carbon (the processes of material extraction, manufacturing, delivery to site, construction processes, and also demolition and recycling). At present embodied carbon emitted can be as much as 37 years of operation carbon and this will increase as operational carbon is decreased. Faithful and Gould (who have worked with RICS) suggest that the amount of embodied carbon used to make a building can be as high as 65%. This figure will obviously increase as operational carbon is decreased with Government's 'zero carbon' strategy.

LTF has both environmental and social concerns about this with regard to demolition of social housing. At least 5,200 social rented homes were demolished in London from 2007-12 – NB this only includes those demolished where new build has already taken place.

Anne Power, London School of Economics highlights in her 'Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability?' (2008), that there is compelling evidence that estate refurbishment is both cheaper and less damaging to the environment than demolition. She suggests that the reason for redevelopments assessments being able to demonstrate a clear environmental benefit (in the new build) is that embodied carbon is not counted in demolition proposals. She also highlights that demolition and renovation waste make up about one-third of all landfill.

We propose that

- Policy 5.2 should set a target to reduced embodied carbon emissions.
- Policy 5.2 should include a presumption in favour of refurbishment where it is demonstrated that a better level of combined operational and embodied carbon emissions can be achieved.

Policy 7.1 Lifetime Neighbourhoods

London Tenants Federation developed its own 'tenants' definition of a Lifetime Neighbourhood at a conference on the London Plan (prior to the EiP of the Draft Replacement London Plan). LTF members were interviewed about its definition by researchers who produce the DCLG Lifetime Neighbourhood Report (2011¹⁷)

The report notes different examples of definitions from across the country and highlights particularly the LTF's example which it highlights raises the important distinction between residents engagement and empowerment.

LTF members proposed at the EiP of the Draft Replacement London Plan that policy 7.1 should be renamed Lifetime Neighbourhoods (rather than Building London's Neighbourhoods and Communities) and is very pleased that this has now occurred.

LTF is also generally supportive of the text changes to the policy.

¹⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf

However there are two key issues that LTF members feel still need to be addressed: access to 'affordable' homes, infrastructure and services and empowerment and engagement of community members.

LTF proposes that

- section 2 of paragraph 7.4A be amended to: **“as far as possible, can have a choice of accessible and affordable homes, infrastructure and services, places to spend leisure time and to work**”
- section 3 of paragraph 7.4A be amended to **“belong to a cohesive community which fosters social interaction, empowerment and engagement in decision-making”**

Yours sincerely

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