

Chapter 4 Housing

It is a widely held view among Just Space groups that London is being rapidly transformed to meet the needs of elites in the ‘global city’ framework and doing so at the expense of the diversity and community which we — and seemingly the Mayor in his “Good Growth” approach in Chapter 1 of the draft Plan— value so much and at the expense of low- and moderate-income Londoners and with costs to the real economy. Comments on the housing policies in the draft new London Plan are made in the spirit of wanting to re-balance these power relationships in pursuit of Good Growth.

The GLA’s analysis of what is wrong is a mistaken interpretation of the evidence. It is not an acceptable analysis and that is why so many of the proposals are inadequate or dangerous. The essence of the GLA position is that “The origins of London’s housing shortage can be traced to a failure over decades to provide the homes that people working in London’s growing economy require” (draft Housing Strategy §2.2) and this way of seeing the crisis leads to the Mayor’s obsession with getting as much housing built as possible, raising densities and prioritising this as being much more important than what kind of housing is built, at what prices and for whom.

This interpretation down-plays the shrinkage of the social housing stock and the massive expansion of credit to drive up prices, the dramatic growth of income and wealth inequality, the surges of local and global speculative investment and falling real wages for much of the population. All these things have contributed to the London housing crisis and the impoverishment of so many Londoners. Policies to eliminate or manage these forces are essential because more and more of us are exposed to the market to determine what housing we can get (if any) and we confront it on increasingly unequal terms. Solving the problem through building more would take many many decades to bring market rents and especially prices down (even if developers continued to build homes while prices fell, which is hard to believe), and so much of what gets built is snapped up by the wealthy so the benefits for low- and middle-income Londoners are minimal **or adverse**.

Just Space and member groups [have commented](#) on this broad range of issues in responses to the Mayor’s draft Housing Strategy of 2017. Our response to the housing **policies** of the draft new London Plan are limited to those aspects of the problem which can be influenced by land use and related policies, though text references to some non-planning actions are relevant too

Policy H1 Increasing housing supply and its associated text is a clear statement of the GLA mis-interpretation of the evidence. Its emphasis is entirely on maximising total supply of dwellings. Left until later are questions of stemming losses of the dwindling stocks of social-rented and lower rent homes, of the affordability of what gets built and how the needs of London’s diverse communities will be met are left until later or omitted, as also is the

treatment of London's severe backlog of unmet need for social and low-rent homes.

We support the view of the Highbury expert group on Housing Delivery in [its response](#):

"We consider that the Strategic Housing Market Assessment [SHMA] has underestimated the annual housing requirement for the 10-year period – the estimate of 66,000 homes a year. This is mainly because the assumption of the timescale to meet the social housing backlog has been amended from the 10 year assumption in the 2008 Plan (and the 20-year assumption in the 2015 Plan) to an assumption that the backlog will only be met over 25 years. As the backlog is primarily in relation to the unmet need for low cost rented homes, this new methodology also depresses the proportion of the 10-year requirement which is for low cost rented housing."

And

"...that the estimate derived from the Strategic Land Availability Assessment (SHLAA) that London has a capacity for 65,000 new homes a year for the 10-year plan period is based on assumptions for increased development densities which are higher than those consistent with pre-existing plan policy on sustainable residential quality and will not provide for the range of building types and bedroom size mixes needed to meet the housing requirements assessed in the SHMA. Our primary concern is that development at the assumed densities will not provide sufficient family size homes."

We are also profoundly alarmed by three other features of the SHLAA:

- (i) that it presupposes a great deal (the exact amount is unstated) of "estate regeneration", a process which the [London Assembly has shown](#) to have **reduced** the stock of social housing over the last decade. While we welcome the Mayor's recent commitment in response to consultations that ballots will be required before certain schemes involving demolition can proceed, we are very doubtful whether much net gain of socially-useful (good) growth in supply can be counted upon in this timescale.
- (ii) The proposals for housing densification on non-designated industrial land, high streets and town centres will cause severe losses of jobs and services in localities across London. Our representations on this issue are at Policy E1-E4 below
- (iii) There is a heavy reliance on small sites. This has much to commend it but would tend to produce only or mainly dwellings for the open market and thus not help meet the backlog of need nor the top priority current needs. Only if the London Plan were to impose a strict requirement for social housing contributions from small-site schemes would this source of supply be a valid contribution to good growth.

In one sense London's failure to meet its entire needs within its boundary does not matter. The Mayor needs to pretend that this is possible to satisfy the requirements of the NPPF. But London's housing pressures have been spilling out to regions near and far for decades and will undoubtedly continue to do so, further propelled by Crossrail 1 and (if it is built) Crossrail 2.

But it does matter for two reasons: (i) the cost and environmental impact of all that extra travel is **bad growth** by any standard, and borne by people in all income groups, and (ii) the massive pressure exerted by the targets are a grave threat to good growth in London in the ways outlined above.

Finally we should add that there must be doubts about the demographic assumptions. In particular projected growth is almost the same as net international in-migration which must be in doubt in the light of brexit. The other demographic problem is that the projection of household size (which yields the dwelling requirement) presumes that average household size will revert to its steady decline. We submit that continuing affordability problems and static or falling real incomes for much of the population makes this unlikely. Much lower growth assumptions for population and household numbers should have been explored and should now be explored before the Plan is approved.

Accordingly much of this Policy is misguided. It flies in the face of the evidence and is thus unsound. It should be recast to encourage boroughs to explore local and sub-regional needs in consultation with their diverse communities, and to secure target levels of social and low-rent homes including an appropriate range of sizes and adopt policies which help to dampen speculative pressure on land prices. See our comments on density (Policy D6) and Affordability (H5-7). We shall be glad to propose detailed changes.

The Mayor should certainly be leading London in calling for a great expansion of publicly-funded housing supply including greater funding for community-led schemes. The timescale of the Plan spans a number of national governments and should, so far as the law permits, indicate the longer-term possibilities for which the Mayor should be getting prepared.

We welcome the proposal to develop housing above single-storey retail parks and above car parks.

Policy H1 (B 2a) the new suggestion in, for “**incremental intensification**” (4.2.5) which identifies “sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary”... for optimizing housing delivery potential on such sites as small housing sites, brownfield sites, strategic industrial land, surplus public sector and utility sites, low density commercial and retail uses etc. Maps 4.2 and 4.3 represent a spatial pattern of development which should be considered as part of Chapter 2 and therefore the maps and

discussion of them should be there, or referred to there.

PROPOSAL: MAP 4.3 (and 4.2 showing PTAL levels) should be presented and discussed in Chapter 2

H2 Small sites

Boroughs are encouraged to support development on small sites, with presumption in favour of the development, and are given a target for small sites averaging about one third of their overall housing target.

So this is a significant change, and yet the small sites will only deliver market housing; affordable housing “should only be required through off-site contributions” (H2 H) and boroughs “should be capable of securing cash in lieu” (4.2.12). They could contribute social rented housing elsewhere, but this is much harder to monitor and will inevitably be low in number.

A further concern is the existing use of this land, and the amount of green and social infrastructure that risks being lost.

More attractive is small sites’ capacity for community led housing, including self build, housing co-ops, co-housing and community land trusts. To realise this potential, the policy for small sites must include specific initiatives such as maintaining a register of available land (a register that is fully accessible to community builders, neighbourhood forums and other community interests) and access to cheap loans. Targets should be set for community led housing.

Policy H2 D 2) proposes a presumption in favour of incremental developments – conversions, extensions, redevelopment, infill – and **Policy H2 E** requires any planning and design considerations to be outweighed by “the benefits of additional housing provision” and the requirement to prove “an unacceptable level of harm”, which is an onerous as well as variable and subjective assessment. These safeguards to neighbouring developments from the negative effects of intensification are only notional; the provisions in the Policy to protect impact on neighbouring properties are vague and unlikely to carry much weight in a planning determination. The list of safeguards in Policy H2E is incomplete compared to text 4.2.5-9, and these should be directly referred to in the Policy.

Whereas concerns and safeguards regarding negative impacts of regeneration (of estates) and potential loss of affordable housing are guarded against in the Better Homes for Londoners SPG and implied in SD10 through §2.10.3, the impact of this proposed major intensification of uses across much of London is not referred to and has not been evaluated at all.

Equalities considerations are not present in any discussion of this policy. The IIA notes that it is unknown whether this policy H2 might have negative effects on objectives 1 “To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing

the diverse needs to the population”, and 2 “To ensure London has socially integrated communities which are strong, resilient and free of prejudice”.

Absent from this planned large scale (incremental) housing development are any policy requirements for participation from local communities in planning developments; requirements to replace like for like housing; requirements to protect tenancies or the right to return or to remain in the neighbourhood are entirely missing from these policies. Concerns regarding displacement long relevant to council housing estates might be expected to become more generalized: “In some cases, regeneration will include the loss and replacement of homes and it is important that any such scheme is delivered with existing and new residents and communities in mind. This is particularly pertinent for estate regeneration...” (4.10.3).

However, where redevelopments are piecemeal, site by site, and targeted at currently privately owned property, what will be the impacts, what will be the safeguards? This is likely to intensify the challenges of regular displacement, poor maintenance and insecurity faced by families in the private-rented sector; displacement of children from schools and neighbourhoods; loss of family housing replaced by smaller more profitable units. Section 2.10.6, for example, would be relevant to this intensification plan, as London’s neighbourhoods are “home to many established and varied communities” (p. 94). It could well be that this process will impact differentially on vulnerable communities, black and ethnic minority neighbourhoods – adequate protections and review of likely impacts of these developments is required prior to implementation. None of these obvious concerns are raised in the IIA (p. 139) which instead points to the need for (a) “further detail on the accompanying physical and social infrastructure, in addition to transport, that could help to mitigate adverse impacts of high density development” and (b) a spurious concern for conflict between Opportunity Areas and small sites for physical space – spurious because OAPFS and local plans will guide development in OAs. The IIA is not fit for purpose.

This ad hoc new policy is very far from being sound in terms of its ability to assess or provide evidence of its likely implications or impacts, and has potentially severe equalities implications.

Policy H2 F 5 suggest delete *non-self-contained housing schemes* from the list of exceptions because co-housing and other innovative forms of community-led housing could be ideal in some such cases.

Policy H2 H (affordable housing contributions: revise (i) to remove the borough discretion and (ii) to encourage boroughs to seek on-site provision where they can.

Policy H3 Monitoring housing targets

We support this policy but suggest that gross losses and gains of dwellings be monitored as well as net gains; square metres of loss and gain should also be

monitored.

H5 Delivering affordable housing

The key problem underlying the affordability crisis affecting Londoners is the price of land and the Mayor's priority should be to do all he can to slow land price (and that means house price) escalation. In our chapter on [Land Reform](#) (draft) for the next Community-led Plan¹ we have proposed the following:

The Mayor should be

- a. Lowering land price expectations by
 - (i) Enforcing upper density limits without flexibility
 - (ii) Enforcing his 35% affordability threshold without flexibility
 - (iii) Specifying the date at which 35% will become 50%
 - (iv) Making his definitions of "affordable" housing much more affordable, relating them to local incomes, not local market rents
 - (v) Applying his requirement of no net loss of social housing equally across all renewal schemes over which he has any planning or financial leverage
 - (vi) Require that TfL and other Mayoral-family lands that are disposed of for housing development are used substantially for social housing or other social purposes

These proposals are reflected and extended in the following:

H5 A starts by setting the 50% target proportion of 'affordable' homes in new schemes (in effect a target for sub-market housing at a range of 'affordability' levels). However this is not based on the evidence of the SHMA, which assesses the requirement over the 10-year period at 65% of the total requirement of 66,000 homes a year. As stated above, we consider that both these figures are underestimates. Government planning guidance as in the National Planning Policy Framework and subsequent detailed planning guidance, requires each Planning Authority to meet the full housing needs within its area. **The targets in the plan should therefore be amended to be consistent with the SHMA. This also applies to the targets for different types of sub-market housing and to targets in relation to the bedroom size mix of new homes. The target for low cost rented housing should be 70% of the 'affordable' housing target, with the target for intermediate housing being 30% of the 'affordable' housing target. A target that at least 30% of new homes should have 3 or more bedrooms should also be set.**

H5 B says "*Affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional*

¹ **Land Reform** download from JustSpace.org.uk/history

circumstances.

We propose the deletion of “...and mixed by tenure and household income...” because (i) most council estates in London are already quite mixed among long-standing residents, leaseholders and private tenants, (ii) this ‘social mix’ argument has long been used as a pretext to uproot what are perceived as working class communities and insert richer people, but rarely to insert working class communities into rich areas and (iii) we find it condescending and offensive when the argument is made that poor people need richer people to provide leadership or aspiration.

Policy H6 Threshold approach to applications

We support the basic concept of the threshold as an incentive on developers to bring forward more affordable homes.

The 35% threshold should be raised now to 50% and amplified to include the requirement that 70% of that ‘affordable’ housing must be low cost rental.

A second-best alternative would be for the Mayor to fix in the Plan a firm date (perhaps 2020) when the threshold would move to 50%, with a further increase possible thereafter. This would both help to dampen land speculation and encourage applicants to develop sooner rather than later.

Policy H7 Affordable housing tenure

We have always opposed, and continue to oppose the use of “affordable” defined relative to market rents. The word only has meaning when defined relative to incomes and the Mayor should make it clear that he will move to such an approach just as soon as government regulation permits. In the mean time social rent and London Affordable Rent are the categories which should have priority in planning to satisfy the most urgent needs identified in the SHMA. No public funds should be allocated to London Living Rent or Shared Ownership schemes. See our comment on H5 A above.

Policy H8 Monitoring of affordable housing

This is welcome. We would add a new subsection E requiring the monitoring of gains (and losses) of dwellings in each rental category as part of the monitoring process and requiring the Mayor to work with boroughs to ensure that agreed rental levels and tenure mixes are sustained in the long run by providers. This would be reflected in KPIs and the Annual Monitoring Report.

H10 Estate regeneration

A key planning objective should be to retain the existing stock of affordable/social rented housing and where there is estate regeneration this must result in a **net increase** of social rented housing, not simply “no net loss”.

Providing that the social/low rent and affordable housing criteria for the Threshold Approach H6 are tightened up as we propose at H6 above, we can see no reason why these schemes, if they meet this net-addition criterion as well, should have to go through the Viability Tested Route.

There is no recognition in this policy that the “regeneration” of London’s council housing estates has been an approach that has failed thousands of Londoners, depriving them of their homes and communities and replacing their homes with houses well beyond their means. Unless regeneration is community-led, with ownership and control over the process, the term is without meaning: what is happening is merely property development.

In all instances of estate regeneration, a systematic analysis of the total social, economic and environmental costs of demolition and redevelopment should be assessed compared to refurbishment of existing and some sensitive infill where supported by existing residents (as determined via a ballot). The principles of the circular economy must be observed in these analyses (see §3.1.11 in Design Chapter and our proposed additional policy there).

Policy should also refer explicitly to the potential for tenant-led / resident-led regeneration initiatives and to the need for resident participation in all estate regeneration schemes.

Policy H11 Ensuring the best use of stock

This is welcome but should be stronger.

Relevant powers lie mostly outside the planning system but should be referred to in the text. Local Authorities should be encouraged to make use of Empty Dwelling Management Orders and the Mayor should provide advice and support on this.

The Mayor should be much more active in monitoring and evaluating holiday and short-term letting and in working with other cities around the world on controlling the growth of this phenomenon.

H12 Housing mix

The presumption in this policy that there will be less family housing in central and urban locations, and therefore lower levels of social rented homes here, will only increase London’s spatial inequality.

H12 A6 the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in more central or urban locations

Re-word: H12 A6 the nature and location of the site. A mix of dwelling sizes, including family homes, at all rent levels is needed in all parts of London. Within each borough some locations will be more suitable for one and two bed units than others.

Proposed delete

H12 C Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.

The text argument in support of this policy makes much of the fact that there is no way to ensure that family-size homes are occupied by families. While that is clearly true, we should stress (i) that sharing groups of adults are a perfectly legitimate kind of household, (ii) that if family-sized units are available in the open-market stock then they are likely to be used by families for part of the building's lifetime at least and (iii) controls over size mix can be very important in the places where profitability considerations would otherwise encourage developers to focus only on small units. Boroughs which have sustained such policies have many contented leaseholder families who would otherwise have been unable to meet their needs in those localities.

H13 Build to Rent

The introduction of discount market rent further confuses and dilutes the need for genuine social rented homes. No evidence is presented about how large scale private rented developments meet housing need. Of further concern is that build-to-rent might be the target of vulture investments when blocks change hands. The role of the Mayor in monitoring and scrutinising build-to-rent needs to be made clear.

Standards of good property management, and by extension licensing schemes, should be applied to all private rented homes so that all private renters benefit from better conditions.

H13 B 7) the scheme offers rent certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked

Add at the end: and never exceeding CPI.

We consider this essential since a 'formula' could say anything. (We have in mind the formula –now discredited— in some residential leaseholds whereby ground rents were set to double every ten years.)

The subsection **H13 C** dealing with the Fast Track / Threshold approach needs to be amended in conformity with our suggested revisions to H6.

We are wholly opposed to public funds being used to support this type of housing, except for the social rent element in the affordable component of schemes.

POLICY H14 Supported and specialised accommodation...

...recognises that the provision of supported and specialised accommodation will need to address the needs of some groups on a multi-borough or pan-London level. However, this has not been the case under the previous London

Plans, despite assurances at previous Examinations in Public. This London Plan should specifically mention the housing, care and support needs of LGBT people, and perhaps other specific groups not yet mentioned in the policy. For example, the representations made by canal and river boat dwellers (a growing population) at “A City for All Londoners” have not found their way into the London Plan.

There is a need to strategically provide housing for our communities in all parts of the capital. We need more emergency housing, short and long term supported housing and move-on accommodation – including shared spaces for those who wish to live in LGBT-affirmative housing which is not available for many LGBT people, especially for older members of our communities.

H 15 Specialist older persons' housing

We support the proposal of AgeUK that this text should be moved into policy to give it more weight:

§ 4.15.2. Boroughs and applicants should recognise the important role that new, non-specialist residential developments play in providing suitable and attractive accommodation options for older Londoners, particularly developments in or close to town centres, near to relevant facilities and in areas well-served by public transport.

And to insert **and non-specialist** into the title of the policy.

We support the extremely thoughtful and (naturally) well-informed detailed proposals of AgeUK on the draft housing policies generally. In particular their emphasis on the potential contribution of the ground floors of conversions for those who seek non-segregated but accessible flats as they get older.

H16 Gypsies and Travellers

A table needs to be inserted in the London Plan based on the Borough targets in the Gypsy and Traveller Accommodation Topic Paper. Most important is to frontload targets for the first 5 years of the new London Plan and, to ensure these targets are met, Boroughs must prepare delivery-focused Local Plans which

- a) allocate a sufficient range and number of sites
- b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period
- c) enable the delivery of new pitches in Opportunity Areas and Housing Zones, working closely with the GLA.
- d) enable the inclusion of pitches as part of larger residential/mixed use development schemes

The Mayor will work with Boroughs and GT communities to undertake a London wide GTANA within the first 5 years of this plan, to form the basis of targets for years 6-15.

Audits of existing pitches and sites must be undertaken in close collaboration with site residents. The Mayor should produce guidance for undertaking such audits and do so in close collaboration with Gypsy and Traveller communities and their support organisations.

The GLA and boroughs must prioritise the safeguarding of existing sites. No replacement should be allowed without securing like for like accommodation in the same neighbourhood.

H17 Student accommodation

There are 2 distinct student housing markets – those run by the Universities offering lower rents and those run by the private sector charging higher rents. The rents charged by private providers are excessively high, ranging from £179 - £449 per week.

The evidence shows that affordability is an issue for the majority of students, including international students. There needs to be a remodeling of student accommodation, so that affordable rents below £168 per week are the norm (and ideally well below this). This can be helped by:-

- A definition of affordability for students, whereby when the rent is paid there is enough left from student maintenance loans and grants to cover the student's other costs. The 30% of net income that is a target for social rent and intermediate housing calculations should be applied to students. This way the definition is based on student means rather than the market rent.
- The Boroughs and GLA assisting the Universities with land assembly, to avoid scenarios where only high rent private sector schemes are coming forward.
- Placing a requirement on providers to deliver a fixed amount of affordable student accommodation; setting this target at 50% would correspond with what is expected of general needs housing schemes.

The body of 'students' is by no means homogeneous and the GLA should familiarise itself with some of the distinct needs of groups within the student body. For example, to achieve the aim of mixed and inclusive neighbourhoods the London Plan should address the specific needs of LGBT student communities. New student accommodation is being developed in Stockton for transgender students and similar initiatives should be on offer in London.