Response to consultation on the Draft New London Plan from Haringey Defend Council Housing

15 October 2026

Who we are

Haringey Defend Council Housing is a local campaign group, active since 1998, working with and alongside others on housing and planning issues. This included stopping area demolition and social cleansing plans under the Haringey Development Vehicle (HDV). This had a national impact in pushing back such socially-regressive schemes. We have contested excessive rent and service charges, with rent reductions including a maximum of £140 pw when 'affordable' rents were reverted to Council Social Formula Rent. We successfully campaigned for demolition ballots, when Tottenham Labour Party raised the issue at Labour Party Conference in 2017. We used the council scrutiny system to expose defective child yield estimates. Above all and throughout our work, we have campaigned for government direct investment in new and existing council housing, and in the facilities that local communities need.

Chapter One

Good Growth Objectives

Add a new para 1.7, and renumber subsequent paragraphs accordingly.

“It is recognised that the Mayor’s statutory obligations in the public sector equality duty as set out in section 149 of the Equality Act 2010 require the Mayor to have due regard to advancing equality of opportunity between people who share a protected characteristic and people who do not share that characteristic. It is recognised that simply providing benefits to people with protected characteristics is not enough; instead the Mayor will examine the proportionate change in well-being between people without protected characteristics, compared to those who do have protected characteristics.”

Rationale:

Equality Impact Assessments (EqIAs) have typically taken benefits to groups with protected characteristics as evidence of ‘advancing equality of opportunity’, when development opens up greater benefits to those who do not share that protected characteristic. For example, where the plan (or specific site proposals under the plan) delivers only a small minority of new homes without requirements for deposits and advance rent payments, when applicant households without savings or in debt disproportionately share protected characteristics.

Managing adverse impacts

In the first section of paragraph1.19, replace the final two sentences with:

“While the Plan has identified capacity to meet the government housing figure, a range of important (and currently insurmountable) factors constrain the timescale for its delivery, and increase the danger that growth under this plan would be socially harmful. These risks include:”

Add a new first bullet point:

“The plan whether intentionally or by default may continue or accelerate the current process of state-led gentrification and social cleansing, with forever

price increases driving out poorer people and those with low or inconsistent incomes, and low savings, no savings or in debt, from this once much more affordable city."

Add a new final bullet point:

"There is a danger of the damaging consequences of construction activity for residents continuing unabated, with no meaningful requirement for any specific numerical limits for noise, dust and vibration arising from building and demolition sites."

Rationale:

Potential downsides for residents must be fully acknowledged.

Chapter 3 Delivering the homes and neighbourhoods Londoners need

Rationale:

The Mayor's policy in the current London Plan required the 'reprovison of all affordable housing floorspace when council and social housing estates were demolished. However, in accordance with the National Planning Policy Framework until its revision in August 2026, the usual expectation was that demolished council, social and affordable housing vanished from consideration when calculating the tenure requirements for redevelopment.

The relevant wording was renumbered several times. It appeared in the final iteration of the NPPF as Clause 65 and footnote 30:

"To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount - Equivalent to the existing gross floorspace of the existing buildings."

This text has now been removed from the NPPF. Applying affordable housing policies to the net impact of the scheme is a limited measure which will slightly reduce the negative impact of demolition schemes.

Refurbish, don't demolish

Add a new paragraph 3.35, and renumber subsequent paragraphs.

Local planning authorities should set targets for refurbishing existing homes, and seek to meet affordable housing requirements as far as possible by repurposing unaffordable market homes to Social Formula Rent through acquisitions and buy-backs.

Rationale:

Acquisition programmes are much quicker and much more cost effective, come without the displacement effects of demolition and redevelopment, and also help to save the environment.

HN3 Delivering affordable housing

Plan-making – A

Under 'Plan-making authorities should', reword point (1) to read "maximise the delivery of genuinely affordable housing so that 56% of net new housing should be Social Formula Rent, and10% should be other forms of affordable

housing." Reword subsequent paragraphs and tables to apply this requirement without exception, for all sites of 10 or more dwellings.

Rationale:

The Draft Plan states that this policy aims "to deliver affordable housing to contribute to meeting London's need as set out in London's SHMA", but this is NOT the case with the existing low targets for affordability.

The SHMA addendum based on the 55,800 annual numerical target shows that that 66% of net new housing should be 'affordable'. As there are 31,300 net new low cost rent homes required annually for the households in the greatest need, these homes should all be delivered as a priority; and as a proportion of the target this amount to 56%. The remainder of the 66% 'affordable' homes should be delivered as intermediate affordable.

Paragraph 3.48

Amend to read "All housing formerly referred to as 'low cost rent' must be delivered as Social Formula Rent housing, and the use of the term 'low cost rent' will be discontinued. The Mayor's preferred affordable housing tenures are set out below.

Social Formula Rent."

Rationale:

"Affordable" rent is not affordable – and especially not in London. The Shelter report 'A Capital in Crisis' by Cecil Sagoe and others (2020) showed that London Affordable Rent was not affordable for lower income working families based on rent at 30% of household incomes, according to the UN

standard. This report takes no account of service charge costs. Taking those into account would mean that these rents were even less affordable.

https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/report_a_capital_in_crisis

Comparative figures for Council Social Rent and Council "London Affordable Rent" tenancies in Haringey showed that for two beds, LAR was £83.66 pw higher (+62.33%) at £217.89 pw compared to £134.23 pw; and service charges of +£26.66 pw would be additional for new LAR tenancies.

www.whatdotheyknow.com/request/average_social_rent_and_affordab

Well done to the Mayor for listening to past objections and taking "London Affordable Rent" off the list of preferred affordable housing rent regimes. Now we need to ban unaffordable rent from the London Plan, and roll that out to all London boroughs.

Add a new paragraph 3.49, and renumber subsequent paragraphs.

Reporting

"When reporting progress through the Authority Monitoring Report and through the GLA's Affordable Housing Statistics, the Mayor will fully separate out Social Formula Rent from "Affordable Rent".

Rationale: the GLA is one of the few planning authorities which does not report back on identifiable delivery of Social Formula Rent homes.

Existing Paragraph 3.49

Amend the last bullet point to read:

“Annual housing costs including mortgage, rent and service charge, should be no greater than 30 per cent of net household income based on household income limits.”

Rationale:

30 per cent, not 40 as the Mayor proposes. The United Nations Human Settlements Programme (UN-Habitat) regards unaffordability as a net monthly expenditure on housing costs that exceeds 30 per cent of the total monthly income of the household.

https://unhabitat.org/news/31-oct-2020/addressing-the-housing-affordability-challenge-a-shared-responsibility

HN7 Housing size mix

Replace the existing paragraphs A and B on ‘Plan making’ with the following:

“A Plan-making authorities should take full account of local evidence of need, including that derived through local registers for social and intermediate housing, when [NOT if] preparing local policy or supplementary plans on housing size mix for affordable homes.

“B Social and affordable rent housing applications should consist of at least 40% family sized homes with three or more bedrooms. Intermediate and market housing applications should consist of at least 30% family sized homes with three or more bedrooms.”

Rationale:

The Mayor and local planning authorities have consistently underestimated the number of children in this city, with its very large demographic share of fit and active young adults.

Shockingly, the SHMA Addendum sets an overall net target for family-sized homes of three beds and larger of 0% during the plan period. That is based on the very optimistic aim to deliver 55,800 new homes annually.

Shockingly, market net output is set to be 126% one beds, 22% two beds, and minus 48% family sized homes of three plus beds.

That means that the city's severe overcrowding crisis is set to deepen under this unsound plan. In a largely pluralist and tolerant city, this is a policy which will set communities against one another.

It is noted with concern that there is no policy here to restrict the use of '0 bed' homes, a.k.a. microapartments.

HN8 Housing design

No single aspect homes - No tenure segregation

Under development management, replace paragraph (1) with the following:

"All new homes are to be at least double aspect".

Replace paragraph (3) with the following:

“New housing developments should be fully mixed-tenure, without any distinction by tenure.”

Add a new paragraph (4) and renumber subsequent paragraphs:

“Service charges should be reduced to a minimum by conditions attached to the planning consent, and charges must be capitalised by the property developer.”

Rationale

Tenure segregation is unacceptable. It is driven by short term market advantage rather than by consumer choice. New housing schemes should protect residents from excessive service charges.

Unsoundness of Chapter 2:

The policies in this chapter are not positively prepared, and do not seriously address the task of meeting objectively assessed housing needs, as detailed above. The amendments I have proposed will address those defects to some extent.

Chapter 5 Creating a greener, healthier, and resilient city

Reducing construction and demolition nuisance:

Add a new policy GHR12, managing construction and demolition nuisance**:**

1. Noise, dust and vibration will be controlled on demolition and development sites in line with evidence based environmental health policies.

2. There will be new specific numerical limits to noise levels, which the Mayor will bring forward and finalise during the making of this new iteration of the London Plan.

3. There will be new specific numerical limits to dust levels, which the Mayor will bring forward and finalise during the making of this new iteration of the London Plan.

4. A vibration limit of 1 mm/sec will be applied in line with the *London Good Practice Guide on Noise and Vibration Control for Demolition and Construction*.

5. The Mayor will set out development management arrangements to apply and monitor these limits, sharing all data on actual noise, dust, and vibration levels with residents and the public. There will be a requirement to stop the job as and when the environmental control limits are exceeded.

Rationale:

Excessive nuisance is being caused by construction industry activity which in the new superdense developments is much closer than previously to existing homes. The Good Practice Guide was supported by environmental health teams from several London boroughs, agreed to by the development planners Arup, and has been incorporated in the Local Plans of Islington, Kensington & Chelsea, and possibly other London Boroughs.

https://www.cieh.org/media/1251/london-good-practice-guide-noise-vibration-control-for-demolition-and-construction.pdf

With no meaningful numerical controls at present, unacceptable nuisance is dumped onto neighbouring residents, and then the job is stopped for a bit when people complain, or throw vegetables over the site hoarding when the noise and vibration is too much.

The impact on vulnerable people is not yet being considered – but it is very important that it should be. We deserve much better than this.

The collapse of the frontages of houses at Greenwich this August, with 30 households evacuated from a row of houses built in 1830 situated between two council housing demolition sites that were progressing simultaneously, must make the change, and end the industry's complacency on this matter.

Neither of the construction and demolition management plans for the two redevelopment sites had any restriction on the amounts of vibration which could be inflicted on neighbouring homes.

I have had personal experience with excessive construction vibration control here in Haringey. There was monitoring in place, but only reluctantly was it shared with residents, showing that the maximum vibration level reached 19.59 times the environmental health control limit of 1 mm/sec.

Unsoundness of Chapter 5:

The policies in this chapter are not positively prepared. They do not address the task of meeting the needs of people in regard to the proper control of

construction and development activity. The proposed amendments will address those defects, and I hope that they can be adopted.

Unsoundness based on lack of effectiveness

The policies examined here are ineffective and therefore unsound because the Mayor has failed to drive a proper bargain with developers in the public interest. The consequences of this gross neglect will exacerbate existing social tensions, and may turn communities against one another.

Conclusion

All comments and feedback are welcome.

I wish to speak at the Examination in Public on the topics covered in this submission.

Paul Burnham

Secretary
Haringey Defend Council Housing

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