LONDON
TENANTS
FEDERATION.

Draft London Plan 2026

Response to Consultation by London Tenants Federation

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The Draft London Plan 2026 is a somewhat amended and streamlined version of the previous London Plan. It seems appropriate, therefore, before dealing with the details of the proposed Plan, to ask what the achievements or failures were of the previous Plan.

London Tenants Federation believes the priority of the Plan should be to provide housing that meets the needs of most Londoners in terms of affordability, security and quality. These needs can only be met by the provision of social rented housing. All other forms of housing, including other so-called 'affordable' forms, are too expensive for the great majority of working Londoners, let alone those on any form of benefit. However, as the annual reports on the London Plan have shown, very little social rented housing has been built in the past five years. On the other hand, every year the projected number of market housing units has been exceeded.

This has resulted in the well-publicised London housing crisis, with too many homeless households in temporary accommodation, and London boroughs faced with unsustainable costs to house them in expensive and unsuitable private rented properties, often outside their borough and even outside London.

The current draft Plan, should therefore be judged as to whether it will improve this situation.

Those submitting responses are asked to comment on the Plan's soundness, under four headings. We would like to suggest that the Plan is not justified. 'Justified' means 'the Plan is the most appropriate strategy when considered against reasonable alternatives, supported by proportionate evidence.' It is not "positively prepared" as it has not objectively assessed the needs of particular groups. It will not be "effective" as it will not deliver its strategic aims. It is not "consistent with national policy" and it "fails statutory legal requirements" such as the Public Sector Equality Duty.

London Tenants Federation wishes to take part in the Examination in Public of the Draft London Plan. We believe our perspective as an organisation of social rent tenants of councils and housing associations,

and leaseholders, will be an important essential contribution to the consideration of the Plan.

These are our responses to particular sections of the Plan.

Chapter 1 – Overview of the Plan and Good Growth objectives

1.7- Good Growth includes that growth should be 'socially inclusive'. We do not believe that the proposals in the Plan comply with this requirement.

1.9 and 1.12 - the government has set the housing need for London at 84,884 per year. The Draft Plan sets the target at 558,000 over the ten-year period. We agree with the evidence in the Plan (for example **1.20**) that the government's target is unachievable, and that the figure proposed in the Plan is more realistic. However, we are concerned that given the current climate, this figure is likely to force council planning bodies, and the Mayor of London, to attempt to meet these targets by approving developments very largely consisting of market housing, as has been the case in recent years. Precious London land is therefore used up in producing housing which does not meet the needs of the majority of Londoners.

1.19 – we agree with this point: 'If targets are set in the London Plan beyond what is reasonably achievable for local planning authorities (LPAs), this would weaken the plan-led approach.'

1.22–we would agree with this paragraph if its emphasis were on the importance of 'social rented housing'. We do agree that: 'Given the scale of housing need, significant increases in funding for affordable housing grant must be made available to bolster supply in both the 10 year and the longer-term period.'

Chapter 2 – Making best use of land and achieving Good Growth

MBUL2 – Optimising the use of land and site capacity

Table 2.1 Optimisation Framework

We are concerned that, driven by the high overall target for homes to be built, 'optimisation' in the Plan equals achieving maximum possible density in particular boroughs. We are in danger of creating an unliveable, brutal London, with densely packed neighbourhoods. We recommend that the framework should set an upper density limit as well as minimum densities equally across all London boroughs.

Chapter 3 – Delivering the homes and neighbourhoods Londoners need

HN1 Increasing London's housing stock

3.7–the Plan states: 'The evidence is clear that affordable housing need in London is high… Delivering at a rate of ca 56,000 homes a year would mean that London's affordable housing need is 60 per cent of overall supply… the Mayor remains committed to a strategic target for London for 50% of homes to be genuinely affordable over the longer-term plan period…' The Plan should have policies which back up this strategic policy now, not over the longer term. This need is urgent and cannot continue to be kicked into the long grass. Remember that the 2017 SHMA stated that 78 per cent of the back log of need was for social rented housing. Delivery since then has not diminished but probably increased that backlog.

HN2– Protecting and reshaping housing

London Tenants Federation is strongly critical of what is described as 'estate regeneration'. These schemes rarely if ever result in an increase in social rented accommodation, and in most cases result in losses, at times considerable. They result in much denser developments usually consisting mainly of expensive market housing. They can go on for 30 years and more, with the resulting ongoing disruption to the lives of those living on the estates. The new homes are not necessarily of better quality than the homes demolished, but they are far more expensive. Councils and housing associations are tempted to embark on these schemes to avoid the necessary upkeep or refurbishment of their social rented homes as central government has imposed cuts since 2010, which has left councils without the necessary funds to fully maintain their existing homes. The negative environmental impact of demolition and reconstruction as opposed to upkeep and refurbishment must also be considered.

We are concerned that given the high, overall target, for housebuilding, the targets allocated to boroughs particularly in inner London, and the shortage of undeveloped land, councils will once again look to their estates to provide these additional homes.Under the Equality Impact Assessment, we believe that this is discriminatory as those of particular protected characteristics in inner London will be disproportionately disadvantaged.

To turn to the specific proposals in the Plan, we recognise that various provisions and safeguards are included in this section, for example **A**,

'Development proposals for the loss of self-contained housing should be resisted, unless..' followed by a range of conditions, and **C(2)** 'weigh up the potential benefits of demolition and replacement against wider social and environmental impacts…' However, we remain concerned that the balance of power remains strongly with landlords, who provide residents with information that suits their intentions. So to respond to **3.27** 'To secure Mayoral funding, strategic schemes involving demolition of affordable homes will be required (unless exempt) to demonstrate residents' support via a vote in favour of plans.'

We are concerned that landlords are known to persuade their tenants to vote for demolition by falsely stating that their homes cannot be repaired or refurbished, allowing the condition of their homes to continue to be run down, and painting a positive picture of the process while concealing the negative reality. Most residents have no previous knowledge or experience of estate regeneration with which to challenge landlords' or developers misleading claims.

We are also concerned at **3.29**: 'Where estate redevelopment is taking place as part of a wider programme, it may be acceptable for affordable housing reprovision on individual estates to vary.'

We would like this specific point to be removed, as it will be used by landlords as a get-out clause. We would also insist that more social rent units should be provided than the original number of social rented homes on any estate, and if they need to be larger by habitable room, this should be at the expense of any other tenure of housing and not at the expense of the number of social rent units.

But to repeat, we are strongly critical of estate regeneration as a policy for reasons stated above and do not consider any attempts at mitigation will fundamentally change its negative effect.

Therefore, we would like to propose a rewritten Policy HN2 drawing upon *The Alternative Good Practice Guide to Estate Regeneration* produced by Estate Watch. Our proposals for this policy include:

1. Residents will be given alternative options to vote for in the estate ballot, with refurbishment always included as an option
2. A funding scheme for retrofit and repair of existing homes will incentivise local authorities and housing associations to choose retrofit over demolition and redevelopment
3. Co-design principles will treat estate residents and tenants and residents associations as partners, central to the process and involved in joint decision making from the very beginning

4. A robust options appraisal process must include a whole life carbon assessment, a detailed cost/benefit analysis (including temporary accommodation costs and the cost of decant and rehousing), detailed social, economic and environmental comparison of options
5. All estate redevelopment must provide a minimum 20% net increase of family sized 3 bed+ social rented homes
6. All estate redevelopment must include a social infrastructure plan for the estate, co-designed with residents and providing an overall increase in social infrastructure proportional to the densification

HN3 Delivering affordable housing

A 2, 4 and 5 – we are not convinced by the numbers of intermediate homes projected, the plans for registers, and the aim to 'give priority access to intermediate homes to key workers'. We believe the costs of intermediate properties are too high for most key workers, and their interests would be better served by providing more social rented homes and thus making them available to a wider range of people, as council housing used to be before 1979.

Table 3.2 –we disagree with these differentiated lower targets and the division into three bands. The 60 per cent target should be more than strategic; it should be the immediate target.This is the only way we have a chance of starting to meet Londoners' urgent housing needs. This policy condemns those not currently in social housing to having little chance of a secure home that meets their needs in their lifetime.

D1 – In light of the above, we believe that all so called affordable housing should be social rented. Intermediate housing is too expensive for the majority of Londoners, particularly those in most urgent housing need. The urgent need is for social rented housing. Combined with the lowered targets in Table 3.2, this means even if the targets were met, and we know many developments have delivered nothing like the targets aimed for, the number of social rented homes delivered will be insufficient.

We propose the following changes to make the plan sound:

1. To ensure that the focus of the plan is to achieve the low cost housing that the majority need, it is essential to move away from "affordable housing at 80% of market rent" to a precise definition that is based on people's income. As a starting point, we must return to the definition in the 2004 London Plan that "affordable homes" should have costs (rents and service charges) no greater

than 30% of net income for households with income in the lowest quartile of London household incomes.

2. The London Plan should focus principally on addressing the backlog need for social rented homes as set out in successive SHMA's.

3. All public land should be used exclusively for social rented homes and accompanying social, economic and environmental infrastructure. This draws upon research on the common wealth and public good.
4. Reasonable alternatives for the provision of social rented housing must be properly considered. Data and evidence provided by **Action on Empty Homes** shows that **1 in every 25** homes in England are **empty** and there are areas where 1 in 10 homes (or worse) are empty. This equates to thousands of empty homes in many London Boroughs.

   Strong policy on **reuse** will encourage Boroughs to utilise the strengthened **Empty Dwelling Management Orders.** Reuse goes hand in hand with a policy of retrofit first. We draw attention to ***Home Again: A 10-City Plan to rapidly convert empty homes into social rent homes*****,** Shelter, April 2024.

HN4 – Gypsy and Traveller Accommodation

Table 3.4 – we welcome borough targets for net additional permanent pitches, but believe the figures used to project need are inaccurate and need adjusting to a more accurate assessment.

There is no detail on how these targets are expected to be achieved, which is unsound given the NPPF requirement for a "substantial increase in the supply of traveller sites by ensuring sufficient land comes forward".

The Plan's emphasis on optimising density makes it harder for these targets to be achieved.

HN7 – Housing size mix

There is no mention of the need for low cost family housing, despite the evidence of upwards of 100,000 children living in temporary accommodation (an unprecedented number), with a disproportionate impact on groups with protected characteristics, and of families being

displaced from London leading to a large number of school closures in inner London Boroughs. There must be an assessment of need for 3 bed and 4 bed social rented homes and a policy response.

We propose a target that at least 30% of new homes should have 3 or more bedrooms.

HN9 - Accessible housing

We welcome **A1** 'provide at least ten per cent affordable homes that meet Building Reg requirements…wheel chair accessible dwellings'. However, we propose that, as the country is an ageing population, the percentage should be higher. Better still, all social rent homes should by default be made accessible, future proofing housing for the elderly and as a result of economic scale reducing the unit costs. Whatever the percentage, wheelchair accessible homes should be social rented, so that they are within the financial reach of the many disabled people on low incomes.

Chapter 5 - Creating a greener, resilient and healthy city

GHR3 Whole life-cycle carbon

We agree with **A** which aims at retaining existing structures to minimise carbon emissions. As it is an aim it means that it is liable to loopholes by profit driven developers. Stricter immutable policy must ensure that this aim is a reality and not just a hope.

For the plan to be sound, a new policy needs to be added for the Healthy City. Health impact assessments must be a requirement for major housing and regeneration schemes, with the full participation of the local community (Community Health Impact Assessments) and including health equity indicators.