

## The London Plan and Proposed Alterations

The Greater London Authority Act of 1999 placed responsibility for strategic planning on the Mayor of London. It required him to produce a spatial development strategy which is called the London Plan. It was first published in February 2004.

It is a statutory planning framework aimed at guiding the development of London over the coming decades. It focuses on accommodating substantial growth in the capital.

A number of what are described as, 'opportunity areas', for accommodating more jobs and or homes (at least 5,000 jobs or 2,500 homes or a mix of both in each) are identified as well as other regeneration areas.

The London Plan's main strategic priorities are the regen-

eration of E London, particularly the Thames Gateway and the London-Stansted-Cambridge corridor.

Sub regional strategies - for central, north, south, west and east London are set out in the document.

Thematic policies relating to living in London (including housing), working in London, transport and sports and leisure are detailed, as are policies on environmental and waste issues.

Targets are set relating to the issues contained in the London Plan and each year a monitoring report is produced detailing progress on the targets set.

The Mayor has a legal duty to review and update the London Plan. In October '05 he published and began consultation on draft alterations to

the Plan relating to housing targets, waste and minerals. The LTF contributed a response to that consultation (see pages 3 and 4).

As a result of the LTF's response to the consultation, LTF members were invited to speak at the June '06 Examination in Public (EiP); on 3 of the 4 housing matters that were being discussed.

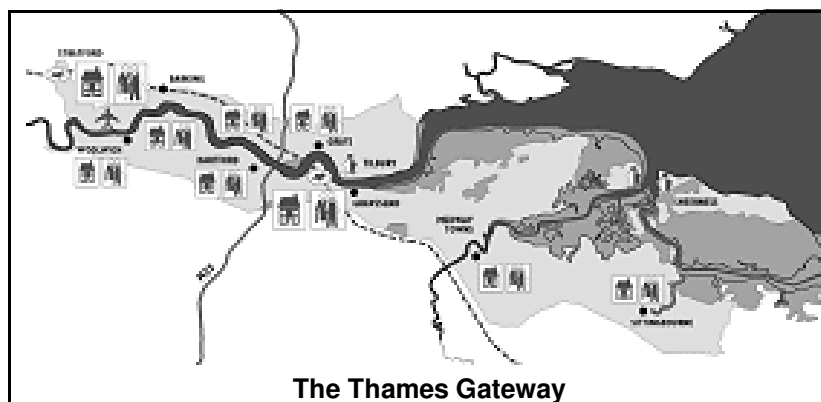
The LTF was the only council tenant organisation invited to attend the EiP.

A final report on the proposed alterations will be produced by the EiP panel in November '06 and the final alterations will be published in Feb '07.

Further housing alterations have since been proposed by the Mayor. They can be found on the GLA website [www.london.gov.uk](http://www.london.gov.uk)

The LTF will be making a response to consultation which will take place between September 25th and December 15th 2006. The LTF encourages London's borough wide council tenant federations and organisations to also respond.

An EiP of the further alterations will take place in Spring '07.



# London Plan - Housing Targets

The London Plan sets out objectives to meet the need for housing in the capital within 10 years. That need is assessed through estimates of London's population increase and the existing housing shortage. It says it aims to achieve an output of 30,000 additional dwellings each year and a minimum target of 23,000 homes to be constructed until 2006. Targets for each London borough area also detailed in the plan.

The table below shows the London Plan borough targets for '04/'05 and details what was actually built: total amounts of housing as well as numbers and percentages of 'affordable homes'.

BOROUGH	Total housing completions	London Plan target	% of London Plan target met	No of affordable homes built	% of affordable homes built
Camden	860	850	101%	193	22.4%
Islington	688	900	76%	183	26.5%
Kensington & Chelsea	541	540	100%	25	4.6%
Lambeth	843	1450	58%	244	28.9%
Southwark	1627	1480	110%	536	32.9%
Wandsworth	1616	820	197%	297	18%
Westminster	649	970	67%	187	28.8%
<b>Central Sub Region</b>	<b>6824</b>	<b>7010</b>	<b>97%</b>	<b>1665</b>	<b>24.4%</b>
Barking & Dagenham	501	510	98%	231	46.1%
Bexley	263	280	94%	72	27.4%
City	256	110	233%	83	32.4%
Greenwich	2118	800	265%	379	17.9%
Hackney	1297	720	180%	287	21.4%
Havering	455	350	130%	123	27.0%
Lewisham	559	870	64%	441	78.9%
Newham	1097	890	123%	409	37.3%
Redbridge	706	540	131%	236	33.4%
Tower Hamlets	3911	2070	189%	317	8.1%
<b>East Sub Region</b>	<b>11163</b>	<b>7140</b>	<b>156%</b>	<b>2347</b>	<b>21.0%</b>
Brent	362	680	53%	266	73.4%
Ealing	484	650	74%	363	75.0%
Hammersmith & Fulham	651	400	163%	248	38.0%
Harrow	561	330	170%	89	15.9%
Hillingdon	266	440	60%	124	46.6%
Hounslow	570	470	121%	120	21.0%
<b>West Sub Region</b>	<b>2894</b>	<b>2970</b>	<b>97%</b>	<b>1210</b>	<b>48.8%</b>
Barnet	972	890	109%	172	17.7%
Enfield	349	660	53%	355	101.7%
Haringey	1119	970	115%	292	26.0%
Waltham Forest	435	460	95%	144	33.1%
<b>North Sub Region</b>	<b>2875</b>	<b>2980</b>	<b>96%</b>	<b>963</b>	<b>33.5%</b>
Bromley	759	570	133%	108	14.2%
Croydon	918	850	108%	546	59.5%
Kingston u Thames	538	340	158%	165	30.7%
Merton	391	430	91%	112	28.6%
Richmond u Thames	591	270	219%	217	36.7%
Sutton	411	370	111%	290	70.6%
<b>South Sub Region</b>	<b>3608</b>	<b>2830</b>	<b>127%</b>	<b>1438</b>	<b>39.8%</b>
<b>London Total</b>	<b>27364</b>	<b>23000</b>	<b>119%</b>	<b>7623</b>	<b>27.9%</b>



# Housing Alterations and LTF Response

## **Need for low cost rented homes in London**

Over 150,000 London homes are overcrowded and 61,000 severely overcrowded. Over 60,000 homeless households are living in temporary homes and 301,000 are registered on London council waiting lists.

Many LTF members say there is plenty of building going on in their boroughs but little of it is low cost rented housing. The London Plan annual monitoring reports show clearly that most local authorities are failing to achieve their own or the Mayors targets in relation to 'affordable housing'.

Check out the table on page 2 to find out how good or bad your borough is in ensuring that homes are built to meet need.

## **Proposed Housing Alterations - October '05**

The main alterations proposed to the London Plan, in relation to housing, were as follows:

- To increase the minimum target for housing provision in London from 23,000 to 31,090 additional homes per year.
- To set new targets for each borough from 2007/8 to 2016/17
- For higher densities to be consistent with sustainable residential quality
- To add a new paragraph which reads "The delivery of these targets is dependent on adequate funding for transport infrastructure, social infrastructure and affordable housing. This funding should ensure that development is sustainable and provides an appropriate mix of provision in terms of type and affordability in accordance with the policies set out in the Plan. Delivery will also be affected by market forces. Consequently these targets will be reviewed on a 5 yearly basis."

The LTF's response to consultation on the proposed housing alterations in the London Plan focuses on that need.

## LTF RESPONSE

### 1. Increasing London's supply of housing. (Policy 3A.1)

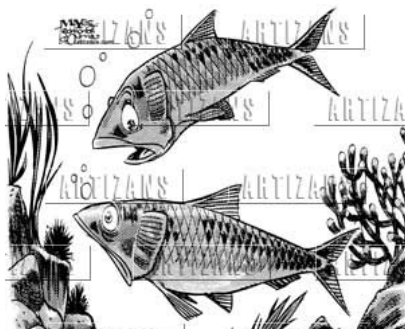
1.1 The LTF welcomes the suggestion to increase targets for the supply of housing in the capital but proposes that there must be specified targets in relation to the supply of social housing. The suggested 31,090 falls short of the 35,000 homes per annum identified by the GLA's '04 Housing Requirements Study and fails to specify targets to meet social housing needs in London.

1.2 The LTF proposes that targets for social rented housing be specified in the London Plan. The need for social housing is born out by the high numbers currently living in temporary accommodation and in overcrowded conditions. In 2003, 24,000 homes were built, but only 7,500 of these were affordable homes. The GLA's 2004 Housing Requirement Study suggested that to meet housing need, over 60% of the (35,000) additional homes required should be affordable homes, made up of 20,800 social rented and 2,500 intermediate. Massive amounts of public funds are daily being handed over to the private sector by local authorities, in carrying out their duty to provide housing for homeless families. This issue must be addressed as a priority and can only be done with a targeted increase in the supply of social rented homes.

1.3 The LTF proposes that targets for family housing must be specified in the London Plan. The 2004 GLA Housing Requirement Study estimated that 42% of new social housing should have 4 bedrooms or more. However delivery is currently at 6%. With 1 in 20 of all households in London living in overcrowded homes and 1 in 50 living in severely overcrowded

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homes this is an issue that is high on the agenda of existing tenants and those that the LTF specifically represents. This issue also has equalities implications in that census data shows higher proportions of over crowding in BME households. That data specifies 12% of white British, 35% of BME households collectively and 62% of Bangladeshi households specifically in London lacking one room or more.



They put you in a tin and pack you in like London council tenants.

1.4 The LTF proposes that the Housing Requirement Study be reviewed every 3 years and that losses of social rented housing through right to buy (RTB) be included in assessments of need for social housing. 30% of council homes have been sold under RTB and are thus a loss to the total number of homes in the social rented sector. Whilst legislation reducing the discount has reduced the rate of loss, there needs to be ongoing analysis of need that includes this information.

1.5 The LTF proposes a careful analysis of the levels of funds required to support the construction of the amount of social housing required in the capital and of the most efficient and sustainable ways of delivering this. The LTF is generally concerned that the current mechanisms for increasing supply of social housing are not delivering and that there is a genuine need for government to consider proper public investment in new council

homes. The LTF is dismayed that rents of council and housing association tenants have been hiked up in the review of the governments rent setting policy to support the development of more social homes to be delivered by RSLs. The LTF consider this to be an unfair tax specifically targeted at the poorest members of our community.

2. 3.14a – ‘The delivery of these targets is dependent on adequate funding for transport, social infrastructure and affordable housing.....’

2.1 The LTF’s support for the increase in housing supply is conditional on the addition of 3.14a.

2.2 The LTF supports the notion that development is sustainable and proposes the inclusion of definitions of ‘sustainable’ and inclusion of defined standards of internal and external spaces. Community engagement / involvement is a key criteria in attaining ‘Sustainable Communities’. Tenants and residents must be involved in defining problems and solutions and in assessing the effectiveness of policy and strategy. The LTF would like to see defined regulations around affordability, space standards (at a minimum of Parker Morris standard) and access to community, youth, play and green spaces. In 2004, the LTF held a conference in which it set out a ‘tenants definition of a sustainable community’ and it would be very happy for this definition to be included.

2.3 Also in relation to sustainability, the LTF proposes inclusion of standards relating to life long homes, adaptability, energy consumption, use of solar and passive solar controls for heating and cooling buildings, use of local materials and local labour.

2.4 The LTF proposes the London Plan define ‘affordable’. Currently ‘affordability’

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is defined as a number of things, but does not mean that the majority of social housing tenants can afford the full cost of their rents or that they are able to consider the cost of shared ownership. 60—70% of social housing tenants are unable to afford the cost of their rents without claiming housing benefit. With the implementation of proposals from the government's 3-year rent restructuring review, tenants will find their rents rising faster than their incomes in 17 London Boroughs. This has a clear impact on issues of sustainability.

**2.5 Funding issues relating to management and maintenance of high-density homes must be addressed in the London Plan.** Council tenants, particularly those living in central London have huge concerns about increasing density in London, making the requirement for standards suggested above

imperative. High density also demands a higher level of funding for management and maintenance of homes. The Moonlight Robbery Campaign has highlighted the fact that the ODPM's own research estimates £5 Billion is needed nationally for Management and Maintenance allowances, yet in 2004/5 only £3.1 Billion was made available from rent for council's to spend on management and maintenance of our homes. Nationally tenants are paying £1.5 billion pa (33%) more in rents than the Government allows in their funding for major repairs and management and maintenance allowances.

Finally, the LTF is concerned that other sections in the London Housing Plan that refer to housing should also be revised in order that the Plan is consistent and that it secures stipulated standards.

## Examination in Public

The Greater London Authority Act 1999 requires the Mayor to hold an Examination in Public (EiP) into draft alterations before deciding whether to incorporate them into the London Plan. The purpose of the EiP is 'to provide the Mayor with more information and to test the soundness of the draft alterations and representations made on them, through structured discussion in public before an independent panel'.

The LTF's response to consultation on the proposed housing alterations, gained LTF members an invitation to the EiP. The Examination took place in the third week of June and was held in the City Hall chamber.



**City Hall Chamber**

The LTF was the only council tenant organisation to be invited. LTF members attended for 3 days and spoke on 3 of the 4 housing matters discussed.

LTF members from Southwark, Tower Hamlets and Islington, along with the London Leaseholder Network's LTF representative attended.

Report on the EiP - p 6 and 7.

# Examination in Public Report

LTF members found that the community sector was marginalised at the Examination in Public (EiP). The statutory and private sectors dominated. 4 other community organisations were invited: *the London Forum of Civic & Amenities Societies, MACE Housing Co-op, King's Cross Railway Lands Group and the London Social Forum.*

Gaining access to the EiP is not easy. First, you have to know there is a consultation taking place. Second, you have to make a written representation within the time limit. Third, you have to be selected to attend and give evidence at the Examination. Fourth, if you are not selected you have to appeal. The EiP decides on issues of great importance to tenants, and we feel community voices must be represented in far greater numbers at future EiPs. We also feel here must be the support in place to enable this happen.

## London Tenant Federation

### 'TENANTS VISION FOR HOUSING IN LONDON' CONFERENCE

Saturday 30<sup>th</sup> September  
Friends Meeting House, Euston

Housing Minister Ruth Kelly has announced a review into the 'purpose of social housing'. Consultation is planned only with housing professionals.

Her announcement coincides with the publication of a paper from the Smith Institute which includes suggestions of:

- **Abolishing tenure for life**
- **Statutory obligations to sell off homes on social housing estates**
- **Setting rents relative to earnings**
- **Ending 'right to housing' for priority homeless**
- **Increasing the levels of home ownership**

**Our conference will ensure London tenants views are heard.**

European social housing tenants and the General Secretary of Habitat International Coalition, will be joining us.

If you would like to attend the conference please either contact your tenant federation or e-mail us directly on [info@londontenants.org](mailto:info@londontenants.org)

## Matter 1 The Borough Housing Targets

The main issue discussed was the huge need for more social rented housing in London. The number registered on London council housing waiting lists is almost 3 times higher than the total council and RSL housing stock in the capital.

Helen Cagnoni of the Federation of Islington Tenants Associations noted that few boroughs are achieving the Mayor's 50% social housing target. She said "*There is a need to set numerical targets for affordable housing and for social rented housing in each borough, particularly family dwellings, in the London Plan and in its monitoring reports.*"

Shelter were strong supporters of this, and are developing some joint work with us.

The GLA has based the borough housing targets on medium density. This is to encourage family housing. But, the alterations also call for "the maximisation of housing". Home builders said that without clear guidelines they will build to the highest density permitted and beyond.

Boroughs that are not enforcing social housing targets and which don't even have a 50% affordable housing target, are attracting more interest from developers. The GLA wants all boroughs to adopt the 50% affordable housing target in their development plans, and said that there would be more guidelines about density. The GLA has just published a report *London Plan Density Matrix Review* (June 2006).

# Examination in Public Report

## Matter 3 The Impact of New Housing Targets on Other Policy Areas

Chris Graham of the London Leaseholders Network noted that social infrastructure and environmental sustainability are high on tenants agendas. He suggested the need to set out standards for both within the London Plan density matrix. He said “*we mustn’t end up making the same mistakes of the past – the need for community, youth, play and green spaces are essential particularly in areas of high density. Meeting housing targets alone won’t make sustainable communities.*”

It was suggested that in boroughs where insufficient affordable housing has been built, there should be requirements to deliver above 50% affordable housing.

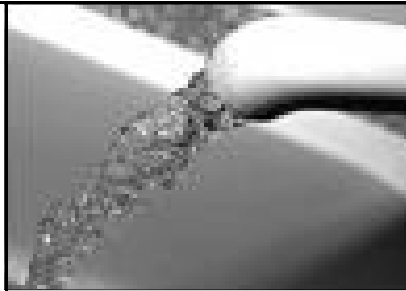
There was much debate on whether social or intermediate housing (shared ownership and key worker housing) was most needed. The GLA announced a study into the take-up of intermediate housing. There was also debate on the needs of short-life housing and housing co-ops tenants, travellers and gypsies, which a number felt had been ignored in the housing alterations.

## Matter 4 Deliverability of Housing Targets

Southwark Group of Tenants Organisation’s, Richard Lee, spoke about water supply problems. He said “*Thames Water has problems in meeting current demands for domestic water. This is partly due to climate change, but also because half the Thames Water network pipes are over 100 years old and a third over 150. One consequence is low water pressure, which has a detrimental impact on housing above 3 storeys. It’s hard to see that there has been joined up thinking between increasing housing supply and water provision.*”

The GLA seemed to dismiss water supply problems in its efforts to increase housing growth, but acknowledged there will be significant changes on water supply in the Further Alterations to the London Plan. They will launch a *Water Action Framework*.

Clive Palmer, a tenant rep from Tower Hamlets discussed the possibilities of training and employment opportunities that the construction of new homes could provide. He said “*There are minimal opportunities currently being provided in this respect and little more than a few token training schemes for local young people. Genuine attention needs to be paid to the use of local labour schemes in the construction of new housing and indeed in the maintenance of existing homes.*”



“Whilst we welcome the Government’s belated attempts to consider the likely impact of increased housing growth upon water use, we are completely uncon-

vinced by the figures produced. Not only is the methodology flawed, but the findings are produced in such a way that even the minister with responsibility for water issues misinterpreted them. The Government must be more transparent about the fact that their housing growth plans will have a very significant impact on water use in the southeast England, and focus on ensuring that the necessary preparations are made.” - House of Lords Science and Technology Report—June ‘06

Many spoke of the need to provide social infrastructure “up front” and suggested that if targets for infrastructure were specified, it would be easier to gain public funding.

The need for more government funding to provide social housing and social infrastructure was raised by many. There was concern that there could be a cut-back in decent homes to pay for new housing. The GLA talked up new public spending commitments (10% extra money from the Housing Corporation), but accepted that a further funding increase is essential to achieve 50% affordable housing

# Housing Benefit Reform – Update

Proposals for housing benefit (HB) reform were initially set out in the DWP's 'Building Choice and Responsibility: a radical agenda for HB' in '02.

The proposals were 1. HB to be paid directly to the tenant rather than the landlord and 2. A flat rate local housing allowance (LHA) to be paid for similar sized properties in a locality; regardless of the rent. Those with actual rents below the LHA would get to keep the excess allowance. Those with rents above the LHA would need to 'shop around' for cheaper housing'.

Pathfinder schemes were set up in the private sector and have been assessed as successful by the DWP.

## Green Paper

In Jan '06 a welfare reform green paper, including HB reform, were published.

The green paper proposed rolling out HB reform in the private sector across the country. It also asked 'How HB could be adapted to meet government welfare reform objectives in the social housing sector?'

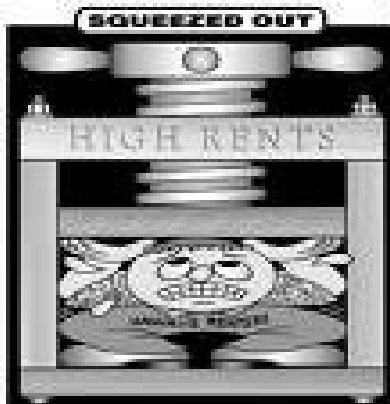
The LTF's response to the green paper focused on 6 main points.

1. **Lack of social housing**  
Proposals aimed at encouraging tenants to shop around

for a cheaper property is unworkable in areas like London where there is enormous lack of social housing.'

2. **Overcrowding.** The introduction of a LHA could make the problem of overcrowding in London worse. Families could end up choosing to stay in overcrowded conditions in order to see more money in their pockets.

3. **Choice or coercion?** The lack of social housing in London combined with high housing costs has seen an increase in housing policies relating to 'choice'. 'Choice' based simply on ability to pay, is coercion. If the LHA did not meet the cost of rents in high property value areas, tenants would be forced to move from their homes and communities.



4. **Impact on elderly tenants.** Tenants living in under occupied homes tend to be elderly tenants. Their flat may have been their family

home for 30 - 40 years. The LHA proposal would force such tenants to move from their homes.

5. **High rent levels.** London's high rent levels have resulted in 60 - 75% of council tenants claiming HB in order to meet the cost of their rent. A change in the government's rent setting policy would have a greater positive impact on financial inclusion and reducing barriers to work than the LHA proposals.

6. **Potential increases in rent arrears, homelessness and threatened homelessness.** The introduction of a LHA combined with insufficient council housing in the capital has the potential to increase levels of rent arrears and homelessness.

## Government Response

The Government's response to the green paper consultation was published on 19th June.

The news is good regarding the proposed introduction of the LHA in the social housing sector - at least for the time being. The response says:

*'We recognise concerns about introducing the LHA for tenants in the social housing and we have decided not to take forward legislation to extend the LHA approach in this sector.'*