

Whose London?

Further Alterations to the London Plan

London Tenants Federation (LTF) members say this summer's Examination in Public (EiP) of the Further Alterations to the London Plan exposed the Plan as an instrument for uncontrollable development and unacceptable housing density levels. The LTF feels the plan is effectively providing a field day for property developers rather than ensuring London's need for low cost rented housing is met and that its communities are sustainable.

LTF reps attended four days of the EiP contributing to debate on the central activity zone, town centres, regeneration and opportunity areas, industrial locations, the suburbs and housing density.

LTF members from Haringey, Southwark, Islington, Barnet, Tower Hamlets and Lambeth gave evidence of over development of expensive single household dwellings and resultant failures to meet affordable and family housing targets set out in the London Plan.

They detailed failures of the London Plan to protect and develop the social facilities, amenities, play and green spaces, which sustain our communities.

Their contributions prompted the chair of the EiP to invite full debate on the issue of sustainable communities and to ask the LTF to

....continued p2

Getting to the Examination in Public

Responsibility for the London Plan, the capital's statutory planning document, lies with the Mayor, Ken Livingstone.

An EiP of 'early alterations' was held last summer.

The EiP is designed to provide an opportunity for structured discussion and testing before an independent panel appointed by the Secretary of State.

To get invited to the EiP, the LTF responded first to consultation about the proposed alterations and later contributed written submissions. These can be found on www.londontenants.org



LTF lobby outside City Hall on the first day of the EiP

Mayors Housing Strategy could lead to London Plan re-write

LTF members who took part in this summer's EiP were among those who found themselves questioning basic issues that underlie the plan itself, rather than just the details of the alterations.

In answer to questions from the EiP chair, the Mayor's planning officers said that the consultation on the Mayor's Housing Strategy could result in a need for a further cycle of alterations to the London Plan and ultimately a complete re-write.

The Mayors Housing Strategy, (like the London Plan), will be a statutory document, setting out housing strategy for the London region and will impact on each London borough.

The draft strategy was published on 18th September and can be found on the GLA website <http://www.london.gov.uk/mayor/housing/>

[strategy/index.jsp](#)

Consultation will first take place with the London Assembly and public consultation will commence in the new year.

The LTF will now be gearing itself up to ensure that London's tenants are heard above the developers that have tended to dominate so far.

In February this year the LTF responded to a document from the Mayor's office entitled 'Towards the Mayors Housing Strategy' (which can be found on www.londontenants.org)

We want to encourage as many borough wide council tenants federations and organisations as possible to respond to the draft strategy when it is produced. The strategy will impact on us all, so it is important we have our say.

London Plan - Examination in Public

Whose LondonContinued from p1
take the lead in that debate.

In our response to consultation on the further alterations to the London Plan we said that the London Plan needed to contain a definition of a sustainable community. We suggested the inclusion of our own - 'Sustainable Communities - Tenants Definition'.

After debate on sustainable communities, the chair of the EiP asked the GLA to work with us to come up with a definition that included the main substance of our definition

Housing Debate

The debate on housing provided the opportunity for our strongest contributions, particularly on housing density.

The GLA's contention is the London Plan's density matrix (which sets out levels of density for different parts of London) has safeguards to ensure sufficient social infrastructure.

However unexpected and perhaps unwitting support to the LTF's case came from a developer who remarked that he was unaware of **any** planning applications being rejected as a result of lack of social infrastructure. The developer also revealed that 67% of accepted planning applications have higher housing densities than those set out in the guidelines.

Our successes

Although we acknowledged the EiP's remit was limited to proposed alterations to the London Plan rather than the plan itself, the LTF was successful in raising many of the concerns associated with the London's growth (which the plan promotes). Without doubt we raised the profile of London's tenants in an arena where we are not usually heard.

LTF members were asked to lead on two other areas of debate; relating to section 106 planning agreements and the Olympics

Some sections of text of the alterations to the London Plan's have also been changed as a result of our contributions.

LTF links with other community and voluntary sector organisations at the EiP

The LTF was one of just a few community and voluntary sector organisations invited to the EiP of the Further Alterations to the London Plan.

We made much about the GLA's failure to ensure a sufficient voice for London's communities at the EiP and about the over dominance of developers and service providers present. This included holding a lobby outside City Hall on the first day of the EiP. (photo front page)

We also got together with other community and voluntary sector organisations so that we could support one another on issues where we have similar concerns.

In the early stages of consultation we met with other organisations who, like us, had been invited to the Early Alterations to the London Plan -

including Shelter and the London Forum for Civic and Amenities Societies.

Later, once we found out who had been invited to attend the EiP, we linked with Friends of the Earth, the London Civic Forum and organisations that come under its umbrella, such as Age Concern and the Black Londoners Forum.

The growing gap between London's wealthy and deprived communities is of course a major concern to many of London's voluntary and community sector organisations.

If London is to be a 'World City' as the Mayor proposes with great economic growth, it must also deliver social and environmental benefits for all Londoners, not just a few.



Tenants reps from Tower Hamlets and Lambeth (3rd & 4th from the left) at the EiP

LTF proposals accepted

- We were pleased to see that a suggestion we made at the Early Alterations of the London Plan that figures not previously included in the monitoring reports of the London Plan, be included; specifically those relating to numbers of new social rented housing built in each London borough. The February 2007 monitoring report includes this information.
- The Further Alterations to the London Plan proposed removing a section from the London Plan stating '*there is a need to invest in maintaining and refurbishing housing stock so it does not become vacant*'. The GLA has agreed to reinstate this, in response to the LTF's objection to its removal.
- In relation to a section in the London Plan on young people, we proposed adding '*The provision of affordable youth, sports and leisure facilities has been shown to be effective in reducing antisocial behaviour*'. The GLA has agreed to include this.

London Plan - Examination in Public

At the heart of every community is the local employment by which it lives

Although initially surprised we had been invited to contribute to debate at the EiP on employment, especially as we hadn't made major submissions on this issue, we were clear that when local employment dries up, entire communities find that they are no longer strictly sustainable.

We gave specific examples in our evidence of communities that had evolved through the available local employment. In Lambeth, for example, large estates such as China Walk, Vauxhall Gardens and Tanswell Estate had housed workers who worked in riverside industries; along with pottery, food processing etc.

We noted that the Isle of Dogs local industry has now largely disappeared and craftsmen's skills have become lost to the area. New construction jobs are not providing alternatives for local residents, but have instead been taken up by Europeans that migrate World-around from one large project to another.

Developers and planners are it seems, less keen than us on the provision of proper jobs. One developer that boasts of some 10 million square feet of development in London, suggested that it would be "best to replace metal bashing industries with something cleaner."

In response, LTF delegates argued that workers who have spent their lives welding

are not going to take up the only training available locally: in hairdressing, travel agents, retail or media studies. We emphasised that once they have reached beyond a certain age, workers whose jobs come to an end will not be given new jobs, irrespective of what skills they have or how much further training they are given.

We argued that it is not sufficient to focus only upon the creation of new clean employment. Existing industries must be regarded as precious resources which may well not survive relocation.

There was debate on whether some councils are sitting on unused designated employment land and if this land should be re-designated for housing use. We were worried about this suggestion. Whilst the land should not be left unused, we are anxious that such land is not re-designated simply to built more luxury flats but would hope that the possibilities of mixed development - retaining some units for employment along side homes for the people working in them, be fully explored first.

LTF delegates also reminded the EiP that at the Early Alterations to the London Plan it had been agreed that a Comprehensive Employment Land review be carried out and that this has not been implemented.



LTF's Laurence Olivier

At a meeting with other community and voluntary sector organisations, held after the EiP, one organisation asked "Who was the LTF's Laurence Olivier".

The LTF representative they were referring to was Lambeth Tenants' Council's Graham Nichols who had done an excellent job in presenting information on the problems relating to Section 106 Planning Gain in Lambeth (more on this - p 7).

This demonstrates clearly that despite the growing levels of prejudice levelled at council tenants in the media, that with a bit of hard work in preparing our case, we can do as well as the 'suits' that are paid a fortune by their organisations to set out theirs.

The LTF was also complimented at the EiP for our presentation. We were careful to not just set out our opposition to parts of the proposed alternatives to the London Plan but to also propose our own suggested changes to its text.

Without doubt the LTF did as well as if not better than many of the others around the table, and we would like to thank all our members who attended for their hard work

The Olympics

The LTF was invited by the EiP Panel to lead the discussion on the Olympics; an acknowledgment we had made one of the major submissions on this issue.

The London Plan does not address the displacement of existing communities and serious environmental impact caused by the development of the Olympic site. The consultation process for residents of the Lower Lea Valley is inadequate and there is a strong sense of exclusion.

We gave evidence on the demolition of Clays Lane estate, the uprooting of the Manor Gardens Allotments and the loss of playing fields, local public baths and outdoor tennis courts in Tower Hamlets.

We referred to a recent report by

COHRE (Centre on Housing Rights and Evictions) which describes the negative impact of previous Olympic Games on housing and homelessness. We said the GLA must learn from this and provide protection within the London Plan.

The LTF proposed that the impact of the Olympics on existing tenants, small businesses and the voluntary and community sector be analysed by the Mayor through a Social Impact Assessment; that Section 106 agreements must provide community benefits and that the Mayor must show commitment to the participation of local residents by developing a community engagement strategy for the Lower Lea Valley.

EiP Sustainable Communities Debate

The housing infrastructure in London is reaching new depths of despair for council tenants as every part of their estates and environmental surroundings are under daily threat of being built on to provide more unnecessary luxury accommodation.

Playgrounds, meeting places, community buildings, green spaces etc. are being torn down to make way for overdeveloped, over dense buildings often blocking light and air to the existing communities.



"It says the council is selling off its 'brownfield sites' including the green space on our estate, its gardens and even our window boxes - to build more luxury flats".

The build up of evidence from LTF members across London led to a full discussion on sustainable communities and an invitation from the Chair of the EIP Panel that the LTF and GLA propose a definition of 'sustainable communities' for the London Plan.

Comments: from Haringey

Planning developments are probably the most controversial issues taken up by local communities throughout Haringey.

We live in an already very crowded borough, lacking in many local amenities and facilities that all neighbourhoods need if they are to be positive and sustainable places to live.

However, current planning policies are making things worse. Corner shops, local pubs, 'backlands' sites, community centres, healthcare and other public sites, informal open spaces, and heritage features etc are constantly being eyed up and destroyed by property speculators and the Council, mostly for very dense, luxury housing schemes.

Only 11% of the 624 homes completed in 2005-6 were social rented housing, i.e. genuinely affordable and secure.

.....from Barnet (West Hendon)

The promise of a transport link to West

Hendon is **NO** excuse for Barnet to allow developers to increase from 680 to 2220 units with all the extra homes destined for the private sector (and at extortionate prices)

This overdevelopment, overpopulating, and high density will simply reintroduce the social dilemmas and exclusion in existence from the 1970s.

The Welsh Harp, is a Site of Special Scientific Interest - to English Nature, the Wild Life Trust and other nature conservationists; all of whom are on our side. Its green spaces, and all wildlife habitats will be threatened with extinction.

In effect there is no difference between heaven and hell. If you can afford you have a choice of either, but if you cannot afford to 'That is HELL'.



The policy makers really should have the pleasure of first hand experience of this before they put members of the community here.

.....from Elephant and Castle (Southwark)

The Elephant and Castle faces the twin pressures of being a designated 'Opportunity Area' (for more development) in the London Plan and

London's housing need

- 150,000 London homes are overcrowded and 60,000 London homes are severely overcrowded.
- 301,000 are sitting on London council waiting lists
- Alterations to the London Plan acknowledge that to meet need in the capital 67% of homes built here should be affordable.
- Housing requirement studies suggest that 60% of homes built in London should be 'social rented homes'.
- Only 7% of those unable to buy market housing can afford 'intermediate housing' (key worker, shared ownership etc).
- London Plan housing targets fail to meet need.
- The Housing Requirement Study (2004) estimates that 42% of new social housing should have 4 bedrooms or more, whilst 2006 figures show only 6% achieved.

London Plan 50% affordable housing targets not being met

- The London Plan sets targets for both market and affordable housing.
- Targets are for 50% 'affordable' homes in any new development.
- London Plan guidance says 35% of the 'affordable' homes should be social housing and 15% intermediate.
- The latest monitoring report of the London Plan, Feb '07 shows that last year only 33% of homes built in London were 'affordable' and only 19% of those were social rented.
- Only 27% of the homes built in the previous year were 'affordable'.
- To find out what percentage of social and affordable homes were built in your borough last year see page 31 of the Feb '07 Monitoring Report of the London Plan http://www.london.gov.uk/mayor/planning/docs/monitoring_report3.pdf

EiP Sustainable Communities Debate

being on the fringes of the CAZ (Central Activities Zone - simply London's Central area where the London Plan proposes high densities and 24 hour a day opening for expensive venues).

To Southwark Council, this is an "area cleared for action" with at least 1200 council homes to be demolished and 15 local amenity sites lost - currently play space, community gardens and council tenants garages. New market housing is the order of the day.

Despite a target of only 35% affordable housing in the Local Plan (2007), planning applications are coming in well under this. There has been no challenge from the Mayor.

....from King's Cross (Camden)

Large areas of disused railway land around King's Cross and St Pancras stations have always been looked to as a potential source for more social housing.



"The original families are more socially isolated now than before Canary Wharf happened."

Yet in the last 20 years the area has been the focus of intense pressures from property developers, seeking to transform it to a glossy corporate business centre. The local economy of small and medium sized businesses, craft and specialized retailers is being squeezed out by the impending increases in rents, rates and the affordability of premises. The high unemployment and housing needs of the surrounding estates are not being addressed.

from Isle of Dogs (Tower Hamlets)

The communities of the Isle of Dogs and Tower Hamlets experience the ripple effect of Canary Wharf on housing and employment. Local leaseholders move out by selling to Canary Wharf employees, who are also catered for by new build luxury apartments. As Canary Wharf expands, land values rise and more small businesses are being forced out.

There is a sense of despondency amongst the local population as their housing is still deteriorating, they are trapped by low income, working or not, amongst a rapidly increasing affluent sector. This has created a huge income gap and in a sense the original families are more socially isolated now than before Canary Wharf happened.

.....from Brixton (Lambeth)

For families living in, or adjacent to, Brixton town centre in Lambeth, its designation in the London Plan as an entertainment centre results in serious disruption to daily life. This particularly impacts on children playing or travelling to school. Families have to live, shop and bring up their children in such areas and their needs must be considered when designating these "special" town centres.

London's growth

- The London Plan assumes an average population increase of 40,000 - 55,000 in the Capital pa.
- It assumes growth will predominantly result in an increased number of international, young and single people moving to London.
- Since 2001, the London Plan assumes a fall in average household size from 2.38 persons per household to between 1.44 and 1.54.
- It is unclear where the assumptions about growth derive from.

What's being built

- Year on year more than double the amount of market housing actually required in London is being built.
- Less than a third of the social rented housing needed each year is being built.
- More than double the amount of intermediate housing required in London is being built.
- 67% of the London's new market housing is being bought up by 'buy to let' landlords - big property companies as well as individuals.

'Sustainable Community' - definition proposed by the LTF for the London Plan

"Sustainable communities are places that evolve through bottom up solutions, with all residents having a sense of ownership of their community, including the widest possible consultation, democratic accountability and involvement in decision making.

They are safe and inclusive, well designed, managed and maintained, are sensitive to the environment and meet the diverse needs of existing as well as future residents.

They have homes that meet local needs and services, community spaces and activities that are accessible and affordable to all."

EiP - Section 106 Planning Gain

Comment from Lambeth LTF member who gave evidence at the EiP

Under Section 106 of the Town and Country Planning Act local councils have powers to enter into legal agreements with developers to make acceptable developments that would otherwise be considered unacceptable.

These S106 agreements can include a requirement for the developer to build affordable homes within their development. Or there might be agreements to pay money to compensate for loss, or damage caused, or to mitigate any wider impact the development has on local communities.

Giving evidence to the EiP on the London Plan LTF members

highlighted problems facing London boroughs when they attempt to negotiate and spend S106 money. We pointed out that there can be long delays. Often the money ends up not being spent as planned on projects that maintain mixed and balanced communities.

The LTF evidence revealed that frequently S106 money is negotiated in lieu of developers building a required number of affordable housing units. The money may then be spent far away from the development and often years later.

By the time the S106 money is spent by the council, it has lost value and does not purchase the negotiated

number of affordable homes.

Examples were given from Lambeth and other boroughs that clearly supported this argument and also showed that S106 agreements can be time consuming for inadequately resourced councils. LTF members argued that the advantage lies with the developer and that the purpose of the S106 money – to help create mixed and balanced communities – gets lost in the process.

To overcome this problem LTF made a simple proposal. - When developers want to negotiate money in lieu of building affordable housing within their development they must agree the sum of money and identify the site where it will be spent.

This must, we argued, be established before the S106 agreement is signed. Where the Mayor has power of veto on planned developments it should be used to enforce this proposal.

The LTF suggested this to ensure that S106 agreements for money in lieu deliver the maximum number of affordable homes. If a site is identified, and costs are factored into the agreement from the start, the S106 can deliver the homes.

Our S106 evidence was posted on the GLA's website (section relating to the EiP) as a Briefing note 61.

Recently some London boroughs have significantly increased the value of S106 agreements they negotiate. In Lambeth agreements worth over £9m were signed in 06-07 – an increase from £2.6m in 04-05, and only £0.6m in 05-06.

However Lambeth are falling behind in delivering affordable homes. In the past four years they reached only 62 per cent of their target and are now lagging 889 homes behind on a target of 8,200 new units in 2002-2016. So far in 2007-08 only 30 homes have been completed out of a 600 target.

LTF Open Meeting Environmental and Climate Change Issues City Hall

The Queens Walk, London SE1 2AA
Thursday 22nd November - 2pm

Environmental and climate change issues are to be one of the key themes of the Mayors Housing Strategy, which was published on 18th September and out for public consultation in January '08. It will impact on our existing and future homes. The LTF aim to ensure we are well enough informed to respond to consultation and to ask pertinent questions of our landlords on these issues.

The meeting will have invited speakers (including one from the Mayor's Office) and workshops. It will be open to tenants representatives from across London .

More information and booking forms will be available from mid October. Please contact us if you are interested in attending. Contact details on the back page of this newsletter.



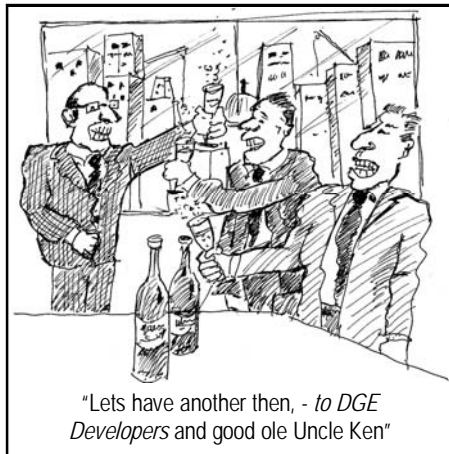
LTF EiP delegates at City Hall

EiP - Section 106 Planning Gain

Comment from Haringey LTF member who gave evidence at the EiP

All development in London should be for the benefit of our communities.

This is not the case as the power and money are in the hands of private developers, landowners and local councils.



But due to widespread local protests and campaigns over the years, many protective policies have been introduced in local boroughs and in the London Plan. However these policies are often scandalously overlooked if they restrict developers' profits.

Councils argue that 'planning gain' capital payments can compensate for the otherwise unwanted, inappropriate or over-

intense development. But Councils are becoming dependent on such payments to prop up basic services which instead should be adequately funded from public funds. Hence despite all their fine words it is in the Council' interests to rubber stamp development whether it benefits the community or not.

Another problem is that Council services are understaffed and 'revenue' funds are what's really needed - for park-keepers, teachers, community centre staff etc.

This has been a common experience for us in Haringey, and the EiP Panel asked us to lead the debate on this. One recent example sums things up.

Wood Green's oldest public building was demolished without warning. There was uproar! The Council, who owned the land, had rejected a request by London Buses for a desperately-needed bus terminal at the site which might also have retained the building. Instead, they made a secret £3m deal to sell the land to a developer pending the granting of permission for 2 massive residential tower blocks. The planning application was backed by Ken Livingstone.

There followed a long and bitter campaign, a new residents association, Freedom of Information Act requests required to uncover the murky truth and the Council doing a U-turn.

But the developer appealed and won, albeit for a much-reduced building - and of course a large 'section 106' payment of little use to the soon-to-be-blighted local areas.

Hence, often the most effective 'planning gain' is not just monetary payment, but the imposition of physical conditions within developments - creation of public open space, play areas, community facilities, family and social housing, height and density restrictions etc.

This year an application was lodged to turn a factory in my area into flats. My residents association campaigned for a new entrance through the development into the local park. Council planning officers said this would be 'impossible'. However, after much effort, the new entrance has been agreed!

There are many such battles all over London, with victories and defeats. We must organise ourselves in every neighbourhood to stand up for the interests of our communities.

The LTF suggests that the point of planning is to develop a framework for the London in the future that Londoners genuinely want rather than one that simply accepts market trends.



"We believe their claims about density, but it is getting very uncomfortable"

London Plan Density Matrix

- The London Plan sets out guidance on levels of density in London. It promotes higher density nearer to the centre of London, which it describes as a 'Central Activity Zone'.
- Additionally it suggests density can be higher where there are good transport links.
- In the LTF response to consultation on the further alterations to the London Plan we said 'Density levels must be sensitive to the needs of all communities. All communities must have the facility to live in all parts of London, rather than creating a playground for the young and wealthy in the centre (Paris style), where everyone else feels they have to move out to find the quality of life and the amenities they need.'

LTF Annual General Meeting

LTF (which is an umbrella organisation) has never seen the necessity to elect officers. Our members are elected by and are accountable to tenants in their own boroughs not from across London.

We have always operated by consensus and where we don't agree, we leave individual borough federations and organisations to make their own responses to consultation and to campaign as they see fit.

LTF delegates to the Mayors Housing Forum and its sub groups are mandated through our general meetings, and our support worker carries out tasks as agreed in our annual work plan and at our general meetings.

The LTF has though grown considerably both in numbers of federations and organisations that come

under our umbrella and also in our influence at the regional level.

We desperately need more support and so have over the last year set out a fundraising strategy.

To carry out fundraising we must have named officers to sign funding applications. So in April this year, we had our first ever AGM. We have shied away from electing a chair but have elected a secretary and treasurer.

The roles of the two officer posts relate specifically to fundraising; (rather than taking on more traditional roles of these posts) in effect maintaining our structure pretty much as it was before and which works well for us.

Michael Beverley, Kensington and Chelsea was elected LTF secretary and Henry Talman LTF Treasurer.

Consultations & Briefings

Government has commissioned two reviews of housing this year: John Hills 'Ends and Means: The future roles of social housing in England' and Martin Cave's 'Every Tenant Matters: A Review of Social Housing Regulation.

The LTF briefing on the Cave Review can be found on our website www.londontenants.org

Since the publication of the Cave Review, there have been two further government consultations - one on Tenant Empowerment. The LTF's response the Tenant Empowerment Consultation can be found on our website

In July the government published a Housing Green Paper, which can be found on www.communities.gov.uk/documents/housing/pdf/439986. The LTF briefing paper on the Green Paper can also be found on our website. The deadline for responses to the Green Paper is 15th October.

The next major piece of consultation impacting on London tenants is the draft Mayors Housing Strategy, (published September 18th) and can be found on the GLA's website <http://www.london.gov.uk/mayor/housing/strategy/index.jsp>

Mayors Housing Forum delegates - elected at LTF AGM

Mayors Housing Forum (MHF) Delegates - Richard Lee (Southwark) and Michael Beverley (K&C). **MHF Deputy Delegates** - Helen Cagnoni (Islington) and Graham Nicholls (Lambeth) **MHF Supply Sub Group Delegate** - Chris Graham (London Leaseholders Network) **MHF Supply Sub Group Deputy Delegate** - Henry Talman (H&F) **MHF Community Engagement Sub Group** - Jean Kerrigan (Lambeth) and Michael Beverley (K&C) **MHF Community Engagement Sub Group Deputy Delegates** - Tony Goodchild (Hackney) and Richard Lee (Southwark)

The Right To Rent

One of our conference recommendations, September '06 was - *We question the Government's drive to wholesale ownership; we must have a right to rent. Renting should be recognised, without stigma, as a valid and worthwhile form of tenure for many people and particularly prudent for a large percentage of the working population in London.*



The 'right to rent' was the focus of debate at our AGM. We invited Michael Hall, the chair of Leeds Tenants Federation (which has for sometime been campaigning on this issue) to speak about their campaign. Michael Hall's speech can be found on www.londontenants.org

We also invited others to comment on the issue including (from left to right) Gordon Deuchars (Age Concern) Mark Thomas (Shelter) and Alan Benson (GLA), pictured here with Jean Kerrigan, Lambeth Tenants Council, who chaired the AGM. Chris Graham (London Leaseholders Network), although not shown in this photo, also spoke on the Right to Rent at the meeting.

Since then, LTF members have met with other regional tenants federations who are also keen to campaign on the Right to Rent..

We aim to distribute more information on this in the near future.