

London Tenants Federation

Andrew Barry-Pursell
Head of London Plan
Greater London Authority
City Hall
More London,
The Queens Walk
London SE1 2AA

10th November 2008

LTF response to ‘Planning for a Better London’

1. Introduction – information on the London Tenants Federation

- 1.1 The London Tenants Federation (LTF) is an umbrella organisation bringing together borough wide council tenant federations and organisations across London. The organisations that come under the LTF’s umbrella represent collectively around 340,000 London local authority households. The London Leaseholders Network is an associate member of the LTF.
- 1.2 It is an independent organisation; built on the basis of consensus. It respects the diversity of its membership; does not aim to supersede any of its member organisations but rather to strengthen them through sharing and exchanging information; responding collectively and individually to national and regional government consultation.
- 1.3 A high percentage of those we represent are from low income households. Almost three quarters of local authority tenants are unable to meet the cost of their rent without claiming housing benefit.
- 1.4 We have representation on the Mayor’s Housing Forum and one of our delegates currently chairs the Community Engagement sub-group of the Mayor’s Housing Forum.
- 1.5 The LTF was one of only a few voluntary and community sector organisations to be invited to take part in both the Examinations in Public of the Early and Further Alterations to the London Plan in 2006 and 2007.

2. Key concerns

- 2.1 The LTF’s response focuses on particular concerns for our members, rather than in all instances responding directly to the questions posed in the consultation paper. Specific proposals are set out in bold and underlined.
- 2.2 **London’s growth**. Since London’s growth has failed to benefit the section of the community that our organisation represents we have consistently raised objection to continued market led growth. It is also implicated in climate change issues and other matters relating to long term environmental sustainability. We have concerns regarding the estimates of population growth as set out in the current London Plan and which we focus on in more detail in sections – 3.7, 3.8, 3.9, 4.1 and 4.2 of this response.

2.3 **Evidence based approach.** We support the application of an evidence based approach – and thus also believe there must be very firm policy guidelines and targets to address evidenced need, which indicate that the social housing element should be increased.

2.4 **Social housing targets.** We are disappointed that the Mayor aims to reduce the social housing element of the affordable housing targets for London. This is contrary to evidenced need.

The LTF has consistently questioned government policies that would have increasingly more home ownership / part ownership. We believe that most social rented housing tenants are happy to be tenants (as has been confirmed through a recent survey carried out by Inside Housing Magazine).

We believe that many who have had no option but to buy, because of the lack of availability of low cost rented housing, are experiencing huge financial problems and an increasing number facing re-possession.

The LTF believes that particularly since the credit crunch and ongoing global financial crisis that there must be a rethink on this policy and an adoption of a view that people should have a right to rent without stigma and that such a policy is particularly prudent for huge numbers of working and low income people particularly those living in London.

2.5 **Quality of homes.** This includes space standards; both internal and external, levels of housing density and access to community and youth facilities. We are pleased that the Mayor has made some commitments relating to protection of play, garden and green spaces and believe this should be extended to the wide range of often informal green spaces in our local neighbourhoods, including green and play spaces on council and other social housing estates. We believe that too much public land has been handed over to the private sector; to the detriment of existing communities and that this land should be preserved exclusively for public benefit.

2.6 **Sustainable communities.** We have consistently raised concerns about the failures to address the issues of supporting infrastructure for existing populations and in areas of new communities such as the Thames Gateway. We are pleased that the Mayor has referred to this in his consultation paper and look forward to seeing firm policies to address this. If we are to attain sustainable communities it will be vital to address environmental and addressing climate change issues. We are concerned that additional funding should be allocated to address climate change issues. We have commented on this in more detail in section 4.10 & 4.11.

2.7 **Olympic and Paralympic games.** Since there has been massive detrimental impact on poorer communities in other cities that have hosted Olympic Games, it is essential to ensure any benefits impact on the entire community. We have set out some proposals relating to this in 4.18 – 4.21.

2.8 **Decentralised model / central zone.** The LTF supports the Mayor's proposals on this as detailed in section 4.6 and 4.7

3. The Mayor's Approach

- 3.1 **Evidence based approach** The LTF supports the Mayor retaining an 'evidence based approach' as suggested in this consultation paper. We believe there must also be very clear and transparent policies and guidelines to address evidenced need.
- 3.2 The LTF's greatest concern is around the need for more low cost rented housing in London. 150,000 London homes are overcrowded, 60,000 homes are severely overcrowded and 301,000 households are sitting on council waiting lists. Increasing amounts of tax payer's money continues to be spent on housing homeless families in temporary private sector housing rather than addressing the problem long term.
- 3.3 The London Housing Strategy Evidence Base 2005 found that to meet need, 59% of housing constructed in London should be social rented, 7% intermediate and only 34% market. We understand that in more recent studies the evidenced need relating to social rented housing has remained consistent.
- 3.4 We are concerned that the targets for affordable and social rented housing were not met in previous years and that targets for social rented housing set by the previous Mayor were anyway insufficient to meet need.
- 3.5 We are extremely concerned that the current Mayor's proposals to reduce the social rented element of the 'affordable housing' element appears to reject rather than support the 'evidence based' approach to policy making which it is suggested the current Mayor supports and that this will continue to increase rather than decrease need.
- 3.6 **Consensual approach** The LTF has serious concerns that the 'consensual approach' proposed in this consultation will simply mean a more laissez-faire approach to developers and market led development which will result in less social rented housing being produced and further erosion of the social infrastructure and facilities all communities need and are entitled to. Policies which are protective of local community needs and interests, such as social housing percentages, protection and expansion of social infrastructure and green spaces etc, must be binding and strengthened.
- 3.7 **London's growth.** The LTF is concerned that growth in London as supported through the London Plan has been of no benefit to the existing communities we represent. Levels of poverty in London have increased as is noted in the London Plan (sections 1.50 – 1.67).
- 3.8 Over the last 10 years the disparity between those who have and those who don't has escalated in London. For the top 50%, household incomes have increased significantly while the bottom 25% has got much poorer. London has the highest incidents of child poverty, after housing costs are taken into account in Great Britain.
- 3.9 The LTF believes that the previous London Plan assumed much about growth in terms of population and economic growth. **We propose that a new analysis relating to projected long- term population growth and of**

average household sizes should be undertaken – particularly in the light of the current financial crisis.

- 3.10 **London Planning Convention** The LTF feels there is need for much greater involvement of ordinary community members in the development and monitoring of local and regional planning strategies. We would support the Mayor's proposal for an annual Planning Convention should the intention be to involve members of community and voluntary sector organisations in equal numbers to professionals and delivery agents – that is both in terms of attendance and also of speakers and workshop facilitators.

4. Key Challenges

- 4.1 **Continued population growth.** As noted in 3.11 the LTF proposes the need for a new analysis relating to projected long term population growth and of average household sizes.

- 4.2 The London Plan 2001 figures suggest an increase of 0.8 million in London's population over 15 years (an average 53,300 increase per annum). The Further Alterations suggests a change of between 0.79 million to 1.11 million over 20 years (an average increase of 40,000 – 55,000 per annum). The production of this range in the 2006 figures suggests that there is a degree of uncertainty about the growth in population.

The change in the resultant number of households suggested here indicates also that there is an assumption that the average household size will fall from 2.38 persons to 1.44 – 1.54. It is unclear where the evidence for this assumption is derived from.

This drop in average household size is significant and appears to account for the additional housing targets and would suggest a huge increase in the number of single person dwellings. This is disturbing given that other studies continue to emphasize that the greatest need is for larger sized rather than single person dwellings.

- 4.3 Given the impact of the credit crunch and current financial crisis, we think it is unrealistic to assume that these figures can be considered reliable.
- 4.4 The LTF is concerned about the constant references to London's population being 'younger' than elsewhere. It feels that the population is becoming younger because that is what is being planned for. Planning for a younger and generally wealthier population can and has meant in many areas, particularly those in central London, the closure, selling off or pricing out of the very things that sustain communities – the local infrastructure of shops, services and amenities and their replacement with more expensive venues catering specifically for a young, single and transient community. This is contrary to the notion of attaining sustainable communities.

- 4.5 **The LTF would suggest that the Mayor set out sufficient policies and guidelines to ensure that each development serves the requirements of those sections of the community with identified needs, with an appropriate balance towards those in most need in order to address London's challenged and problems. This will ensure avoidance of the kind of exclusive development, as described above.**

- 4.6 **Central Activity Zone.** The LTF has in the past been extremely critical of the over development of the central London zone and has noted our concerns that there be respect for its previous pattern of growth – i.e. London being a patchwork of linked communities spread out over a very large area, each with strong and distinctive character. We are pleased that the Mayor appears to share this concern.
- 4.7 **The LTF proposes that there should be a revision of density levels in the Central London Zone in order to reflect this change. The current density levels set for Central London operate against the development of family housing and necessary infrastructure. We suggest this be addressed alongside the development of the planning policy framework for the Central Activity Zone.**
- 4.8 **Improving the environment and tackling climate change** The LTF feels that there has been an over emphasis on new growth, specifically of private housing which has failed to address sufficiently the infrastructure needs of either existing or new communities. An assumption appears to have been made that if the homes are built, infrastructure will simply follow.
- 4.9 We therefore support the Mayors suggested protection of green, garden and play spaces – in urban as well as suburban areas; additionally **we propose that in order to achieve this all playgrounds, play spaces and playing fields, (including those of our schools and housing estates) must be protected from private development. We propose that all public land be protected from private development and be made available exclusively for public use and benefit.**
- 4.10 LTF members feel that additional funds must be made available to address the serious issues relating to the prevention, mitigation and adaptation to climate change. We are anyway concerned that there is a current annual shortfall of £2.35 billion per year in funds allocated for management, maintenance and major repairs to council tenants' homes. We feel there should be no additional pressure on local authorities without additional funds being made available.
- 4.11 We have been concerned for some time that local authority tenants (through council housing revenue accounts) have had to pick up the cost of installing additional pumps in many buildings that are of four floors or higher in response to Thames Water's reduction in water pressure which we have no control over.
- 4.12 **Planning for all Londoners** We believe that the proposals we have set out in 4.4, 4.7 and 4.9 above will assist in this aspiration. **In addition we propose that a new density matrix must also relate to provision of supporting infrastructure – including play and green spaces, community and youth facilities.** We are particularly supportive of ensuring lifetime homes and indeed communities – enabling support amongst our communities for both young and old.
- 4.13 **Planning for the whole of London** Again we are supportive of an approach that will provide for strong local and sustainable communities that might

provide local employment and training opportunities and which reduces the need for travel, which is also environmentally friendly.

- 4.14 **Planning Gain** The LTF is extremely worried that councils are becoming increasingly dependent on section 106 contributions to maintain ongoing basic services to our communities – in terms of the community facilities and amenities that are essential to sustaining communities – rather as any gain to mitigate the effects of development. We are worried then both about the lack of funding for social and community infrastructure and that section 106 is a powerful incentive to accept and support otherwise unacceptable planning proposals.

5. Key Policy Responses

- 5.1 **Distribution of affordable and social housing** We are concerned that the Mayor's approach to attaining the targets for affordable homes will result in an unequal, disproportionate or lack of provision of new social rented housing in London. Evidenced need exists across the capital. Many of our members are concerned that new homes need to be available in each borough in order to support and sustain the existing communities of those boroughs. We feel all sections of the community should be catered for, proportionate to the evidenced need, in any new private development, with a view particularly of addressing evidenced need for social rented homes.
- 5.2 The dependence on the private sector to deliver social rented housing in London has failed to address evidenced need and that there is greater need for support from central government in terms of both policy and finances to address need. This is even more important given the current financial crisis and the falls in housing development.
- 5.3 **Housing need** The biggest priority in London must be to address the existing backlog of housing need (i.e. London's huge levels of overcrowding, the numbers of homeless families living in temporary and highly priced homes leased from the private sector and those sitting on council waiting lists) as well as ensuring existing communities and new communities are sustained through the provision of sufficient community infrastructure.
- 5.4 **Renting / home ownership.** The LTF has consistently questioned the government's drive to wholesale ownership. We feel renting should be recognised, without stigma, as a valid, versatile and worthwhile form of tenure and particularly prudent for a large percentage of the working population of London.
- 5.5 A recent survey carried out by Inside Housing Magazine found the majority of social housing tenants' are content to remain as tenants and we believe large numbers of other people have been financially stretched way beyond their means as a result of buying, would have preferred to rent in the social housing sector should this have been an available option. Given the increasing levels of repossessions in London, we would argue even more strongly now for the need for more not less social rented housing.
- 5.6 We are disappointed that the current Mayor has proposed to reduce the percentage of social rented housing within the affordable housing target and

to increase target levels of intermediate housing. In many boroughs, where intermediate housing has been produced, it has been too expensive even for the small percentage of those who it is targeted at. There have been many reports of such housing being left empty. We think it is not wise to increase further intermediate housing, when there is such need for social rented homes.

- 5.7 Numerous government policies and schemes have been developed to 'assist people getting onto the housing ladder'. Many of these have been unsuccessful. In the current climate we would suggest it is not valuable to develop further 'initiatives'.
- 5.8 The LTF proposes that the Mayor ensures there is no loss of social rented housing in any regeneration scheme and that existing social rented housing must be properly maintained in order to prevent any becoming vacant. The current annual £2.35 billion shortfall in management, maintenance and major funds must be addressed.
- 5.9 We are pleased that the Mayor is committed to addressing the issue of empty homes. Prior to the EiP of the Further Alterations to the London Plan, the Empty Homes Agency suggested that whilst the number of empty homes has dropped over the 5 previous years, the drop was not significant. They expressed concern that whilst London councils have a high level of activity in returning empty homes to use, their performance does not appear to translate into significant reductions in the overall numbers of empty properties. They raised concerns about the methods used to record properties coming back into use.
- 5.10 **The LTF proposes the introduction of a London-wide local performance indicator that accurately measures empty properties returned to use that contribute to new supply and which will be adopted by local authorities and which would prevent any over-counting of empty homes returned to use. We propose he introduce a London-wide interactive shared local authority data base of empty homes and that he establish ongoing monitoring of empty properties in the private sector. We feel a public campaign to encourage the reporting of empty private sector dwellings would be a good idea.**
- 5.11 **Family homes.** The LTF is pleased to see the Mayor's support for more family sized homes. The 2004 GLA Housing Requirement Study estimated that 42% of new social housing should have 4 bedrooms or more. We would be pleased to see targets developed to address that evidenced need. Policies restricting the alarming rate of conversion of family housing into Houses in Multiple Occupation also need to be strengthened.
- 5.12 **Legacy of the 2012 Olympic and Paralympic Games** The London Tenants Federation is concerned that previous Olympic Games hosted by other cities have resulted in a negative impact on poorer communities. It is keen to see that avoided in London and to see long term benefit extended particularly to the existing community in this part of E London. We also fear that the ecology of the area could be destroyed and that the benefits of open space, wildlife and nature reserves and general quality of life be lost and would be pleased to see guidelines for protection of these spaces.

- 5.13 At the EiP of the Further Alterations to the London Plan, the LTF referred to a report entitled “Fair Play for Housing Rights: The Olympic Games and Forced Evictions – A study of seven past and future host cities” which, reflecting its title, is highly critical of the social impacts associated with other Olympics Games sites. We feel the Olympic Games are an additional challenge that must to be addressed by the Mayor in a way that will protect rather than undermine the interest of the surrounding communities.
- 5.14 The LTF made a number of proposals in response to consultation regarding the Further Alterations to the London Plan, which we propose again as follows.
- 5.15 **The Mayor should work closely with the boroughs to carry out a Social Impact Assessment to include analysis of the impact on - local social housing and the private rented sector along with the number likely to be displaced as a result of rent increases, homelessness, local small businesses, community and voluntary sector and general social infrastructure.**
- 5.16 **The Mayor should develop a strategy to ameliorate any negative impact on existing residents, small businesses, voluntary and community sector in the area and negotiate local community benefit, including through section 106 agreements.**
- 5.17 **A community engagement strategy needs to be developed to ensure the needs and contributions of all communities in the Lower Lea Valley and Thames Gateway are listened to and addressed.**
- 5.18 **The previous Mayor gave a commitment to meet with community organisations, outside of the EiP forum, to discuss the social and related issues. We hope the current Mayor will develop this further as suggested in 4.18, 4.19 and 4.20.**

Yours sincerely

Michael Beverley
Secretary
London Tenants Federation

Response supported by: Newham Tenants and Residents Federation, Federation of Islington Tenants Associations, Croydon Tenants and Leaseholder Panel, Sutton Federation of Tenants & Residents Federations, Haringey Residents Federation, West Hendon Community Forum; Camden Federation of Tenants & Residents Federations, Barking and Dagenham Federation of Tenants & Residents Federations, Westminster borough-wide Housing Panel, Kingston Federation of Tenants and Residents Associations, Federation of Enfield Community Associations, Hammersmith and Fulham Federation of Tenants & Residents Associations, Hillingdon Federation of Tenants & Residents Associations, Hounslow Federation of Tenants & Residents Associations, London Leaseholders Network, Lambeth Tenants Council

*LTF is an umbrella organisation bringing together London's borough wide council tenant federations & organisations
London Tenants Federation, C/o Camden Federation of T&RA, 11- 17 The Marr, Camden St, London NW1 OHEE-mail
info@londontenants.org Tel 020 7874 5464 Web Address www.londontenants.org*