

London Tenants Federation

20.12.06

Response to Consultation – Further Alterations to the London Plan

The London Tenants Federation (LTF) is an umbrella body bringing together borough wide council tenant federations and organisations across London. It does not supersede any of the individual borough wide organisations, but rather brings them together on common issues. Its remit is to share and exchange information and to respond collectively where there is consensus. The LTF has been in existence in its current form for just over 4 years. It maintains regular contact with tenants and residents organisations of about two thirds of London Boroughs.

London's council tenants consist of a high percentage of deprived households. In many London boroughs, almost three quarters of local authority tenants are unable to meet the cost of their rent without claiming housing benefit. Accompanying problems are unemployment, child poverty, overcrowding, mental health issues, substance misuse and isolation from family members, (including refugees, recent immigrants, recently housed and temporarily housed homeless individuals and families, single parents and elderly residents).

The LTF response to the Further Alterations to the London Plan will necessarily focus particularly on the impact of the proposal on those the LTF represents.

With this in mind, the LTF feels it essential that there be a more representative balance of those invited to the Examination in Public in June '07. The LTF was one of the few community / voluntary organisations who attended the EiP of the early alterations to the London Plan and was concerned about the dominance of developers and service providers, rather than representatives of London's communities around the table.

At the EiP of the early alterations to the London Plan, a number of London councils, through the Association of London Government were present at the EiP. As the LTF brings together a similar number of individual organisations, it feels there should also be facility for a number of its members to be present and to give specific evidence from their boroughs at the EiP of the further alterations.

This response reflects LTF agreed policies, recommendations made at LTF conferences including its most recent in September '06 and the work of one of its sub groups whose members attended the EiP in June last year.

1. Assessing the need for additional housing (Chapter 3, sections 3.7 & 3.8)

- 1.1 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 current studies suggest the greatest need is for larger sized rather than single person dwellings (specified in the London Housing Strategy, the Housing Requirement Study and indeed 3.18 of the further alterations).

- 1.2 The London Tenants Federation is concerned that such a change in average household size, will not only impact on the types of new dwellings constructed but also on the provision of facilities and amenities that meet the need of existing communities. The experience of existing tenants is that in many areas particularly in central London, shops, services and amenities that do meet their needs are being closed, sold off or priced out to create shops, services and venues that are more expensive and that cater for the needs of young, single and transient communities with more disposable income. Far from sustaining existing communities, it makes life increasingly difficult for them. The LTF can provide detailed evidence to support this.
- 1.3 The LTF believes that the priority should be to address the existing backlog of housing (i.e. London's huge levels of overcrowding; numbers of homeless families living in temporary and highly priced homes leased from the private sector and those on council waiting lists) and on genuinely sustaining existing communities.

The LTF is concerned that the assumptions made in the London Plan that the backlog in housing will be met within 10 years, will not be achieved, particularly with targets for 'affordable housing' falling far short of what is required. Need suggests that 60% of housing in London should be 'affordable', the target is set at 50% and the monitoring report for last year showed only 27% of homes built were classified as affordable. See policy 3A.7 Affordable housing targets.

Percentages of family sized housing required to address the huge levels overcrowding in London are shown to be falling far short of that required. 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 homes this is an issue that is high on the agenda of existing social housing tenants and those that they 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

The LTF proposes an alteration to the targets: **60% affordable housing, 80% of which should be social housing, and a new family housing target set at 42% of social housing.**

Additionally, the LTF proposes that **monitoring reports of the London Plan clearly specify separate percentage figures of social and intermediate housing achieved in each borough.**

- 1.4 LTF members report that in a number of London boroughs many new build market homes are left empty. This would indicate that too many of the wrong type of homes are being built and demonstrates the market dictating the terms. I.e. investors are keeping flats, particularly one bedroom flats, empty simply for 'capital growth'.

It is difficult to avoid the conclusion that what is being proposed in London is growth that is driven by the private sector and which will damage rather than sustain existing communities. It will necessarily support the continued rise in property prices, will continue to impact detrimentally on social housing sector rent levels (now pegged in part to property values) and will continue to increase the gap between the poor and the wealthy in London and make the task of building sustainable communities even more difficult.

- 1.5 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.

The LTF feels that central to housing provision should remain the provision of a stable home base for family life and not become open season for those who see it as a source of profit or who would reduce it to mere collateral against which to increase personal debt.

The LTF questions the government's drive to wholesale ownership. 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.

LTF members are also concerned that the massive past investment in housing land should be retained in public ownership. Innovative forms of housing provision and management such as Community Land Trusts might

have a place to bring additional land into the ownership of local communities for perpetuity.

The LTF proposes the following addition 3.8i:

‘The Mayor will undertake a new analysis relating to the projected long term population growth in London and of average household sizes. The analysis will address ‘housing’ as homes within strong stable and sustainable communities rather than housing as a financial asset. Additionally a new Housing Requirements Study 2007 will be carried out’.

2.0 Density Matrix (Section 3.15iii) and Table 3A.2

The London Tenants Federation is concerned about the levels specified in the density matrix. Appropriate levels of density should not depend simply on issues of whether an area is more or less central, or if it is close or not to transport. Density must also be appropriate to the notion of achieving sustainable communities.

If you are young, single and travelling frequently to work and across London to various entertainment venues your experience of living at high density levels may be entirely acceptable. However high density living is a different experience for council and housing association tenants and residents, large numbers of whom do not have high disposable incomes, who will spend a lot of time at home and in their local neighbourhoods, including those who are unemployed, elderly and those looking after young children.

Density levels must be sensitive to the needs of all communities and 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 and where everyone else feels they have to move out to find the quality of life and the amenities they need.

The focus on good space standards, internal and external, play and green spaces is welcome; however the LTF feels that if we are serious about maintaining sustainable communities then there should be an upper 350 habitable rooms per hectare limit for housing density, without the use of tall buildings

3.0 Making better use of existing housing (section 3.16)

The issue of new empty homes has been noted in 1.4 of this response. This is a separate issue to that of bringing unfit homes back into use, but is equally important. The LTF feels there must be a zero tolerance on empty flats.

- 3.1 The LTF proposes that the sentence **‘There is a need to invest in maintaining and refurbishing housing stock so it does not become vacant’ remain in the London Plan i.e. that it not be deleted as suggested in the Further Alterations.**

The LTF is concerned that the emphasis on the construction of new homes will result in there being less funding available to maintain and refurbish existing housing stock.

Many local authorities for example are selling street properties on the open market that they are unable to bring back into use as social housing stock. Many of these properties have previously been managed by short life housing groups. It results in increasing the need for affordable homes. Funding should be available to prevent such housing being sold on the open market and for it to be brought up to a decent condition to house those in need.

The Empty Homes Agency has suggested that whilst the number of empty homes in London has dropped over the last 5 years the drop is not significant. They have also 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 raise concerns that the methods used to record properties coming back into use do not accurately demonstrate the reality. The LTF proposes additions to 3.16

‘The Mayor will introduce a London-wide local performance indicator that accurately measures empty properties returned to use that contribute to new supply and will be adopted by London local authorities and which will prevent any over-counting of empty homes returned to use. He will introduce a London-wide interactive shared local authority data base of empty homes. He will establish ongoing monitoring of empty properties in the private sector and encourage local authorities to engage actively in engaging the public to report private sector empty dwellings.’

Additionally LTF members are concerned about the number of flats that are left empty by local authorities during estate regeneration schemes. LTF members suggest that it is common practice for local authorities to leave flats empty prior to stock transfer ballots or the demolition of blocks of flats. The LTF feels that there should be no loss of social housing in such schemes (see also 8.0 of this response) and that the practice of leaving flats empty in such schemes should be discouraged by asking that such voids are counted in any analysis of empty homes in London.

- 3.2 Management and maintenance of local authority and housing association tenants’ homes is an issue. High density demands a higher level of funding for management and maintenance of homes. Funding issues in this respect must be addressed. The Moonlight Robbery Campaign has highlighted the fact that nationally tenants are paying approximately £1.5 billion pa (33%) more in rents than the Government allows in local authority funding for major repairs and management and maintenance allowances. And indeed the ODPM’s own research estimated in 2002 that councils need £1.8 billion

a year more in management and maintenance allowances than is currently allocated.

There have also been reports in the housing press quoting Peabody's chief executive, Steve Howlett, saying that he had no choice but to sell housing in order to meet the decent homes standard. Peabody tenants have complained that money has been diverted from existing housing stock to ex council homes that have been acquired by Peabody through stock transfers.

- 3.3 The LTF is also concerned that increased cost in construction in London – particularly as a result of the Olympics - is anyway resulting in ALMOs and local authorities finding it more difficult to reach the decent homes standard with originally agreed budgets. Good management and maintenance of tenants' homes is part of attaining sustainable communities. Poorly maintained estates rapidly get worse, demoralising tenants and contributing to anti-social behaviour, graffiti and vandalism.

4.0 Definition of Affordable Housing (section 3.26)

Definitions of affordable housing must reflect genuine affordability.

- 4.1 The proposed definition for social housing adopts a government definition relating to its rent setting policy for social housing tenants. However statistics show almost three quarters of council tenants in some London boroughs are unable to meet the cost of their rent without claiming housing benefit. More than half of these tenants are also in employment or are pensioners.

There are similar figures relating to the housing association sector.

Additionally a study carried out on behalf of the Association of London Government (now London Councils) found that for every £1 a week rise in rents 750 London households in low paid employment are pushed out of work and into benefits.

London council tenants rents would need to be 15 – 20% lower than they currently are for the ratio of rents to incomes to meet the national average ratio.

The LTF proposes an alteration to the proposed definition of social housing to read:

'Housing provided by a landlord where access is on the basis of housing need and at rents that all working households can genuinely afford without claiming benefits'.

- 4.2 In relation to the definition of intermediate housing the LTF is increasingly concerned that large amounts of intermediate housing remains empty because it is increasingly too expensive for those it is designed to help. At a recent LSE 'London Bigger and Better' debate, the regeneration officer

from Haringey suggested whilst they had attempted to increase the levels of intermediate housing in the borough, the fact was that it required an annual income of £60,000 a year to afford and was therefore too expensive for the majority. A recent BBC report also claimed that key worker housing was being sold to solicitors and bankers. LTF members in many London boroughs have examples of such housing remaining empty. (We would be happy to provide the evidence of this).

The LTF proposes an addition to the suggestion of an annual review of the affordability criteria for intermediate housing:

‘The criteria will be considered with the involvement of the voluntary and community sector, particularly relevant user groups and those with an interest in poverty issues.’

- 4.3 As already stated the LTF questions the government’s drive to wholesale ownership / part ownership (1.5 of this response). The focus on key worker housing has caused tensions in many areas where there are huge issues of overcrowding and homelessness and members feel it appears to create a difference between those in housing need. The LTF proposes an additional point 3.33i

‘The Mayor will commission an on going review of intermediate housing and assess whether it is meeting local housing needs.’

5.0 Increasing the provision of affordable housing

The LTF proposes an addition to policy 3.A.7:

‘Boroughs should monitor the housing target delivery against the provision of related social infrastructure and in each development should produce an implementation document that sets out the funding requirements for infrastructure’.

6.0 Off site provision of affordable housing (3.44i and 3.44ii)

The LTF has concerns that the proposals for enabling off site provision of affordable housing is very much more developer rather than community focused. The experience of LTF members, particularly those who live in inner London areas is that local authorities have increasingly sold small sites to developers. They are concerned that this has effectively been about avoidance of the provision of affordable dwellings. (Evidence of this can be provided) And whilst the justification for this proposal in the Further Alterations to the London Plan appears to argue the opposite, these changes seem to be a sop to developers in order that they may continue to build up market dwellings on small sites in exclusively wealthy areas and make provision for ‘social housing’ off site. There is fear that this will work contrary to notions of attaining sustainable communities and to the creation of ghettos.

Such occurrences must be prevented.

7.0 Special needs and specialist housing (3.54, 3.54i, 3.54ii and 3.55)

The LTF proposes an addition - section 3.54iii

“Elderly and others who need care, should be enabled to stay in their homes should they choose to. There is necessity to build life time homes which will accommodate residents’ needs through the duration of their lives.”

This would facilitate not only raising children but enable elderly residents to have space for family and other carers to stay with them should they require home care.

There is an important element here relating to sustaining stable communities where families and other support networks may look after the elderly or others with special needs within their homes, should this be their choice.

The LTF is concerned that within the debate regarding overcrowding and under occupancy, the elderly particularly have been targeted as the most highly represented amongst those under occupied. The LTF deplores the pressure that is frequently put on residents who have spent most of their lives in their homes, raised their children there and wish to remain within the community they have contributed to all their lives, in order to free up ‘units’. Moving such residents can also put them at greater risk of isolation, ill health and depression.

8.0 Estate renewal (3.58)

The LTF proposes an addition to this section:

‘In estate renewal programmes there should be no loss of social housing.’

9.0 London’s diverse communities

London’s older people (3.65)

With reference to comment in section 6.0 of this response; the LTF proposes an addition to section 3.65 stating:

‘many older residents would remain in London if they were able to live near their families or retain family homes in order that they have the facility for their children, grandchildren and carers to stay and support them’.

Young people (3.66)

The LTF proposes an addition **‘The lack of genuinely affordable housing contributes to unemployment issues and child poverty’.**

The LTF proposes an additional section to 3.67iii:

‘Young people are often associated with anti social behaviour issues. The provision of affordable youth, sports and leisure facilities has been shown statistically to be effective in reducing such problems. The long term impact of positively engaging young people in youth, sport and leisure facilities also has a positive impact on their school results and resultant future job prospects

Provision of such facilities should be of high priority across London. Additionally many young people in London are from single parent families and / or without extended family nearby. Youth workers can provide excellent additional positive role models for many such young people.’

10.0 Providing for community services

The LTF is concerned that many public buildings, community facilities and amenities that are vital to sustaining London’s communities are being sold off to the private sector. The LTF proposes an additional point 3.78i

‘In the event of a public authority considering the sale of any publicly owned building, they should first offer the transfer of the building to community and voluntary groups in the locality.’

11.0 Promoting public health (3.89)

The LTF proposes an addition to this section:

‘Poor housing, overcrowding, homelessness and temporary housing have a hugely detrimental impact on health and well-being.’

12.0 Supporting London’s educational system – primary and secondary schools (3.91)

The LTF is extremely concerned about evidence from a number of London boroughs that school land has been sold to developers; including school buildings, playgrounds, playing fields and green space, sometimes for housing development. The LTF proposes an addition to this section:

‘School land should be protected from sell off and if underused, be accessible to the local community for education, leisure or other community use, within the extended school ethos’.

13.0 Communities, neighbourhoods and the development process (3.96 and 3.97)

The LTF feels these sections to be extremely important in attaining sustainable communities. ‘Sustainability’ is defined in many different ways and we feel it important that communities play a significant part in defining what it means to them. The LTF focused its 2004 conference on putting together a tenant definition of a sustainable community (attached to this response).

We propose that the checklists provided under policies 3A.15, 3A23 and 2A.1 be inclusive of the checklist the LTF provides in its definition.

14.0 Water, Chapter 4 Policy 4A.11 Water supplies and resources

Thames Water has huge problems in meeting the current demand for domestic water supply. This is partly due to climate change, but also because half the pipes in the Thames Water network are over 100 years old and a third over 150 years old. One consequence is low water pressure, which has a detrimental impact on high density housing above 3 stories. To overcome this problem requires considerable investment, as detailed below. This has been the subject of a GLA Inquiry which should be reported to the EiP.

In 2004, Thames Water began a programme of mains replacement and water pressure reduction, beginning in the Woodford zone – E London. As a result of reduced water pressure, huge numbers of us living above the 3rd floor are experiencing water and heating supply problems (combination boilers stop working with reduced water pressure). Thames Water says their legal responsibility, laid out in the 1991 Water Act, is to supply a minimum pressure of 1 bar, which will supply water only up to the third floor. This affects some 300,000 council homes.

As a result, councils in some boroughs have had to install additional pumps to maintain the water supply for residents living in flats above the third floor. Since 2003 seven boroughs, Hammersmith & Fulham, Islington, Camden, Tower Hamlets, Hackney, Croydon and Haringey have spent £1.6 million in installing additional pumps. Other boroughs that have reported problems are Brent, the City, Enfield, Hounslow, Lambeth, Southwark, Wandsworth, Newham, Waltham Forest, Westminster and Greenwich.

In areas where there is reduced water pressure, valves also have to be installed to high-rise properties; to ensure that contaminated water cannot flow back into clean drinking water (a clear public health issue). Haringey council has estimated that in their borough, this alone will cost in excess of £1.4 million. Until the valves are in place they cannot bring into operation the additional pumps they have installed at a cost of £300,000.

The ALG (now London Councils) estimated that the total cost to councils could range from £90 million to £340 million.

This issue doesn't just affect residential accommodation. Within the public sector it also affects: housing association tenants, schools, colleges, hospitals and residential care homes. One school in Enfield has been advised that in order to maintain its water supply, they need to install a pump at the cost of £14,000. The local education authority will have to foot the bill.

The London Fire Brigade obviously has problems with this issue. They have written to Thames Water seeking their commitment to the National Guidance Document on Provision of Fire Fighting, which sets out guidelines for water flow rates required for fire fighting in a range of situations – from domestic to industrial. If Thames Water is unwilling to confirm its commitment, then the London Fire Brigade may consider using powers in the Fire and Rescue Services Act 2004, to seek to require that Thames Water meet specific water pressure and / or flow requirements. There are currently large areas of London where, the provision of water supplies for fire fighting, from local fire hydrants, is inadequate for larger fires.

Additionally, we understand that despite requests from the ALG, Thames Water has failed to share their information on anticipated / estimated costs with London local authorities, making it near impossible for councils to manage their finances in relation to this issue.

The LTF proposes an additional point to Policy 4A.11:

‘Overcoming the impact of reduced water pressure, especially the water and heating supply problems in housing above three storeys, by installing pumps and valves and ensuring compliance with water pressure targets.’

15.0 Olympic and Paralympic Games (Chapter 5, 5.69 – 5.73)

15.1 In 3.3 of this response, comment is made on the impact of the Olympics on the general cost of construction across London.

15.2 The LTF is concerned that previous Olympic Games developments have resulted in high house price increases in areas surrounding the games locations, that there have been associated gentrification and negative impact on the poor particularly those with insecure tenure of their homes. Some examples are detailed below -

Seoul 1988 – During the five years preceding the games, 48,000 buildings housing 720,000 people were destroyed for redevelopment. Most of the demolished structures were single-story houses built with virtually no public investment; they were replaced with high-rise housing projects widely criticised for disrupting the vitality and texture of the urban environment. 90% of the 720,000 evictees did not receive replacement housing within the redevelopment site.

Barcelona 1992 – The 1992 Olympics in Barcelona unleashed development forces which led to a huge escalation in costs. Official figures show that tens of thousands of low-income people and small businesses were forced out of the city as a direct result of the Olympics. The market place price of old and new housing rose between 1986 and 1992 by 240 and 287% respectively. A further 59,000 residents left Barcelona to live elsewhere between 1984 and 1992.

Sydney 2000 – The compilation of personal experiences of tenants from a range of socio economic backgrounds and geographic areas, backed by results of extensive surveys conducted by the Tenants Union, Rentwatchers and other groups, produced indisputable evidence of the widespread social problem of housing and homelessness that increased in the years before the Olympics.

A study commissioned by Shelter New South Wales, examined the impact of six international events on local communities, the America Cup of Freemantle, the Brisbane Expo (trade fair), the Atlanta Olympics and Melbourne bid for the 1996 Olympics and well as the potential impact of the 2000 Olympics on Sydney. The report provided irrefutable evidence that, in the absence of appropriate policy measures, hallmark events had a negative impact on housing, particularly on low income private renters.

House prices in Homebush Bay, a derelict industrial area redeveloped for the 2000 Sydney Olympics rose 70% in the five years before the games, compared with a 50% growth in Sydney as a whole and 39% for the whole of Australia.

15.3 Olympics London 2012 In July '05 Square Foot Property Investor and Home Buyer announced -

'We've won (mais oui, mes chers) and a swathe of East London will be transformed into a wonderland of residential and commercial loveliness.

The Eastern Quarter will be changed for the better, for the reshaping of the land just north of London's Docklands is earmarked as the natural overspill area for an overstuffed capital.

East London is set to become the gateway for the Thames corridor housing master plan. Some 300,000 new homes are to be constructed in the South East in the next 10 years. Over 120,000 of these will be built along the Thames Gateway; a 42 mile-long stretch east along the river from Stratford, across southern Essex and north Kent.

Within this Gateway "patch", five areas will fill out with new homes: Stratford and the Lower Lea will see 15,000 new units; Barking and Dagenham another 15,000; North Kent Thameside some 25,000 new homes; Greenwich, Woolwich and Thamesmead a further 20,000; and the Medway Riverside in Kent an additional 10,000 homes.

When the Olympic bandwagon rolls into East London, the rewards will be greatest for those who chose to invest here in advance of the opening ceremony. Invest wisely in East London now and you could stand to make a killing.

By 2007, Stratford will boast its own terminal, whisking travellers to Brussels in just two hours. This will be an international location, with a huge shopping centre coming in 2008. Houses valued here at £200,000 today could be worth £400,000 by then.

It should be a win-win story all round: thousands of contractors and sub contractors would be needed to deliver the Games – those in construction, manufacturing and service provision are probably already weak with excitement.

Indeed, the £6bn economic multiplier will make more than property investors rich. The Lower Lea Valley, one of London's most underdeveloped areas, will be transformed beyond all recognition, bringing not only the biggest Olympic Park to be built in Europe for over 150 years, but securing 12,000 new jobs, 9,000 new homes and improved transport

Canny investors have already bought into an ugly duckling East End, but it's not too late to profit from the investment spin-off surrounding the build of the 500-acre Olympic park - the largest built in Europe in 200 years. Lower Lea Valley is set to be transformed into a thriving cityscape; there will be rejuvenated waterways and parks; a 9000 capacity car park/rail from Ebbsfleet to Olympic Park in 10 minutes.

Yes, East Londoners will profit big time but the outright winners will be those smart enough to capitalise long before the national anthem is sung.

15.4 In October 05 The Times newspaper reported that sellers in Tower Hamlets had asked 2.2% more than the previous month; Newham saw a 1.4% rise in asking prices, whilst across London as a whole, prices were down 0.2%.

15.5 Additionally there are reports of an increasing number of European immigrant workers boosting London's buy to let housing market. LTF members are concerned also that there is an increase in the number of market properties being left empty, particularly in E London.

15.6 In East London it is those who live in overcrowded or privately rented accommodation under short let tenancies that are the most vulnerable. It is a population that already has an annual turn over of 40%. When rents rise, reflecting higher property values, the likely results are an increased number of notices to quit.

Hackney has 12,632 private renters, Newham 15,399, Tower Hamlets 12,215, and Waltham Forest 13,256, totaling some 53,502.

15.7 Although there is a commitment to build up to 42,200 homes in the region, this is unlikely to keep pace with the displacement of private rental tenants.

The LTF has concerns that despite promises of 50% affordable housing, this will not be met, particularly in relation to the social housing element and as a result, that the most vulnerable will be forced to move from their areas of residence.

15.8 The Clay Lane Estate, which is to be demolished is to be replaced by affordable and market housing, but with the proportion of affordable housing is subject to availability of housing subsidy, and local market conditions.

The Stratford City proposal is to achieve only 30% affordable housing.

15.9 London Tenants Federation members, particularly those with direct experience of issues relating to the Canary Wharf development have concerns that such issues will recur regarding the Olympic site. When work began at Canary Wharf, there was an increase in the need for housing; to provide accommodation immediately for construction workers, many of whom were came from outside London.

There was an increase in the number of local authority leaseholders selling up to suited workers and moving out of the area. Developers bought up any small piece of land; putting additional pressure on public, community and green space. Local businesses disappeared and premises were sold to developers. Property prices rose significantly, impacting on the ability of local residents to afford to buy or rent.

LTF members from E London additionally fear that the ecology of the area will be destroyed, and that the benefits of open space, wildlife nature reserves and general quality of life will be lost.

15.10 The London Tenants Federation proposes the following additions to the section on the Olympics and Paralympics:

1. The Mayor will work closely with the boroughs to carry out a Social Impact Assessment, to include assessment of the impact on local social housing and private rented sector and the numbers likely to be displaced as a result of rent increases, homelessness, local small businesses, the community and voluntary sector and general social infrastructure (See Policy 3A.25).
2. The Mayor will develop a strategy to ameliorate any negative impact on existing residents, small businesses, voluntary and community sector in the area and to negotiate local community benefit, including through section 106 agreements (see Policy 3A.15).
3. The Mayor is committed to issues of equity, understanding and engagement with all levels of society and will develop a community engagement strategy to ensure that the needs and contributions of all communities in the Lower Lea Valley and Thames Gateway are listened to and addressed (see Policy 3A.16).

LTF is an umbrella organisation bringing together London's borough wide council tenant federations / organisations

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