

# London Tenants Federation

20.01.06

## **Response to Consultation – Draft 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 exchange and share information and to respond collectively where there is consensus. The LTF has been in existence in its current form for just over 3 years. It maintains regular contact with tenants and residents organisations of about two thirds of London Boroughs.

The LTF's focus on regional housing issues has increased since the establishment of the London Housing Board. The organisation has membership of the Housing Forum for London and 2 of its sub groups. It took part in the GLA Stakeholder Taskforce, held a conference on the London Housing Strategy in September '04 and responded fully to the consultation on the strategy. It welcomes the opportunity to make comment on the proposed alterations to the London Plan.

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

**1.1 The LTF welcomes the suggestion to increase targets for the supply of housing in the capital but proposes there must be specified targets for and in relation to the supply of social housing.** The suggested 31,090 falls short of the 35,000 per annum identified by the GLA's 2004 Housing Requirements Study and fails to specify targets to meet the need of social housing in the capital.

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

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

living in severely overcrowded 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

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

**1.5 The LTF proposes a careful analysis of the levels of funds required to support the construction of the amount of social housing required in the capital and of the most efficient and sustainable ways of delivering this.** The LTF is generally concerned that the current mechanisms for increasing supply of social housing are currently not delivering and that there is a genuine need for government to consider proper public investment in new council homes. The LTF is dismayed that rents of council and housing association tenants have been hiked up in the review of the governments rent setting policy to support the development of more social homes to be delivered by RSLs. The LTF consider this to be an unfair tax specifically targeted at the poorest members of our community.

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

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

**2.2 The LTF supports the notion that development is sustainable and proposes the inclusion of definitions of ‘sustainable’ and inclusion of defined standards of internal and external spaces.** Community engagement / involvement is a key criteria in attaining ‘Sustainable Communities’, residents must be involved in defining problems and solutions and indeed assessing the effectiveness of policy and strategy. The LTF would like to see defined regulations around affordability (please see 2.4), space standards (at a minimum of Parker Morris standard) and access to community, youth, play and green spaces. In 2004, the LTF held a conference in which it set out a ‘tenants definition of a sustainable community’ and it would be very happy for this definition to be included. Please find a copy attached.

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

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

**2.5 Funding issues relating to management and maintenance of high-density homes must be addressed in the London Plan.** Council tenants, particularly those living in central London have huge concerns about increasing density in London, making the requirement for standards suggested above imperative. High density also demands a higher level of funding for management and maintenance of homes. The Moonlight Robbery Campaign has highlighted the fact that the ODPM’s own research estimates £5 Billion is needed nationally for Management and Maintenance allowances, yet in 2004/5 only £3.1 Billion was made available from rent for council’s to spend on management and maintenance of our homes. Nationally tenants are paying £1.5 billion pa (33%) more in rents than the Government allows in their funding for major repairs and management and maintenance allowances.

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

The LTF would welcome the opportunity to present these proposals in more detail at the proposed examination in public.

I look forward to hearing from you in the near future.

Yours sincerely

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