

London Tenants Federation

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LTF Written Statements

Examination in Public of the Draft Further Alterations to the London Plan

MATTER 5

5.1 Town Centres /CAZ

5.1/1 Do the Further Alterations strike the right emphasis between the CAZ and the town centres?

The London Plan – sections 1.59 to 1.67 focus on the growing polarisation of London's communities, the increasing wealth at the top end and at the other end, the lowest levels of employment and some of the highest levels of deprivation in the UK. The LTF would like to see the London Plan promotes the development of London in a more egalitarian fashion, considering the impact on all sections of community – particularly those that it represents, i.e. those who live in council housing and are principally from the most deprived sections of London's communities.

London has developed as patchwork of linked London communities spread out over a very large area, with strong individual and distinctive characters – and as a result is quite different from other European cities. Social housing communities exist in all borough including central London boroughs.

The growth in the CAZ appears to work contrary to building in the way that London has previously developed and what makes it attractive to both Londoners and those visiting the capital. More than this, it appears to promote a new corporate and 24 hour city zone attractive to a young wealthy international elite and making life in central London less sustainable for London's poorer communities.

The evidence of gentrification processes are already very evident in central London boroughs – with property prices continuing to increase, buy to let increasing both in market and social housing, local employment disappearing, local facilities and shops disappearing to be replaced by services that exclude all but a wealthy elite.

Whilst this process is clearly not as a result of the London Plan, its encouragement of centralisation and a young 'singles' city, is accelerating processes that are already occurring and which cause damage to living stable but poorer central London communities.

The LTF gives examples in Islington and Camden -

At the south end of Islington, an area which previously comprised of small traditional business – of clock making, silversmithing and printing, - providing jobs for the local community, has been pushed aside to become a dormitory for the city, with buildings previously housing traditional industry priced out and replaced by loft apartments for city workers.

The gentrification process has continued, forcing up costs of local facilities, amenities and shops; local community facilities and nurseries have closed down and local shops are to be sold off by the local authority. One researcher, Loretta Lees from Kings College London has referred to what is occurring as 'super-gentrification'. She suggests that previous waves of gentrification had elements of altruism. However she suggests that the new super-gentrifiers "pretty much send their children 100 per cent private." "The earlier people" she says "were keen on sending them to state schools – they had a set of social values about mixing with the other classes. These people aren't particularly interested in the history or being part of the community. They don't particularly want to mix".

Additionally there are acute problems of increasing house prices, severe and unmet needs for social and family housing with extreme levels of overcrowding, homelessness and numbers on the waiting list.

Similar problems are occurring around the Kings Cross area (an opportunity area in the CAZ). The plans fail to adequately address need either in terms of housing or local employment.

Like the gentrified parts of S Islington, Kings Cross is an area whose local economy is being displaced. The area had, apart from local government and railway employment, many small and medium businesses, is home still for a number of charities and trade unions and campaign groups, small retailers and arts, employing high numbers from the local community.

Many local businesses are to be displaced in the plans and opportunities in the new corporate office developments will service international elite rather than the communities of local authority housing estate in the vicinity. There is concern that third sector organisations which provide employment and support the local community will be forced out.

The LTF suggests that an alternative more decentralised model should be applied in London with a balance of growth across the capital – to accommodate the needs of existing communities and which strives to achieve a sustainable city in all senses of the word – socially, economically and environmentally and be applied to all of London's diverse communities.

Matter 5.2 – Designated Locations - Opportunity Areas / Areas for Intensification / Areas for Regeneration

5.2/3 Do the further Alterations maximise legacy opportunities raised by the Olympic/ Paralympic Games 2012?

The further alterations fail to address any potential negative impact of the Olympic and Paralympic Games. In our response to consultation, the LTF has referred to numerous examples of detrimental impact on excluded communities in areas where previous Olympic Games have been sited.

The further alterations to the London Plan must address this, not only to maximise legacy opportunities, but to also to be consistent with elements in the London Plan relating to sustainability and social inclusion.

The LTF proposes the following changes -

1. In the Introduction to the London Plan Objective 4: bullet point 3 – as follows; amendments in bold.
 - *Ensure the legacy of the 2012 Olympic and Paralympic Games **addresses existing levels and indicators of deprivation and in NE and SE London and increases access to facilities and housing from deprived areas. (see also Chapter 5)***
2. Additions to bullet points listed in policy 5D.2. 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).**
 - **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).**
 - **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).**

5.4 The Suburbs

5.4/2 Are the Further Alterations robust in aims to safeguard and improve social and transport services for the suburbs?

5.4/3 Do the Further Alterations strike the right balance between facilitating change and environmental quality in the suburbs?

LTF members are concerned that there is as much over development in suburban area as there are in urban areas and that also that the Further Alterations are not sufficiently robust to safeguard and improve quality of life for residents.

The example of the West Hendon regeneration area in the London Borough of Barnet is one example of overdevelopment that concerns LTF members.

West Hendon is an area of 680 flats situated on 10.5 acres of land with a children's playground, a community centre and green spaces adjacent to the Welsh Harp Reservoir. The 680 homes are to be demolished and to be replaced with 2,171 new homes, including 21 buildings up to 20 storeys high. The new development shows that social housing homes (currently council owned) will be of smaller space standards. There are to be no new social rented homes in this development. In terms of sustainability, there is to be no additional community facilities, there is to be a new fitness centre with no guarantees of affordability for social housing tenants, no additional schools or nurseries.

Additionally the Welsh Harp is of special scientific interest with 170 hectares of open water, marshes, trees and grassland, providing a valuable habitat for wildlife. Some of the high rise flats are to be built on the edge of the Welsh Harp and there are fears that shade from the tower blocks and noise pollution will scare away wildlife.

Whilst some alterations have been made in the design process local community groups are still far from content that this can in anyway be described as anything but incredibly insensitive over development of an area that should be protected with failures to address the social and other infrastructure needs of the existing community.

The LTF fears that similar insensitive over development is also occurring in suburban parts of inner London areas – with huge numbers of infill sites, the building of housing on school grounds and removing much needed green and open spaces.

Alterations such as policy 2A.6 The Suburbs: Supporting sustainable communities, need to be strengthened in order to prevent over development and in order to genuinely protect open spaces, to sustain existing communities and new communities through the provision of sufficient infrastructure. Implementation at the local level is imperative.

The LTF proposes the following amendments (amendments in italics and underlined)

To bullet point 2 of Policy 2A.6

- maintaining and improving the features that make London's suburbs attractive, including improving the public realm, conserving both public and private open space including back and front gardens as green lungs and providing spatial policies that support the retention and improvement of services including health facilities, schools, community facilities and policing.

To bullet point 6 of Policy 2A.6

- where appropriate, modernising or redeveloping housing stock and providing a mix of housing types, sizes and tenures, including affordable housing that can meet the full range of resident needs. Such redevelopments should ensure no loss of social housing; related community facilities, play and green space or reduction in internal space for existing residents. (see also Chapter 3A)

To 2.23ii

In order to achieve sustainable communities the housing stock should have the capacity to meet the needs of people throughout their life cycle, safeguarding within them, where existing, space for carers and visiting offspring for economy of social service expenditure and the contribution that this makes to a sense of wellbeing and security. Also to offer housing that can be considered by reference to the current "London Living Wage" to be affordable. They must also be supported by adequate social (Chapter 3A) as well as physical (Chapter 3C and 4) and environmental (Chapter 3D) infrastructure."

To 3.65

Twelve percent of London's population Many older people would be more predisposed to remain in London after retirement, if they were able to live near families or retain family homes in order that they have the facility for their children, grandchildren and carers to stay and support them. And also if London's environmental quality was higher.....if concerns over safety and security were more transparently addressed. Every effort should be made to address these issues.

To 3.66

London is a young city with just over a fifth of its population under 18.....The most important cause of child poverty is the high cost of housing in London and the lack of employment among households with dependent children. Nearly a quarter of households with children in London and nearly a third in inner London have no adult in employment. This compares to 16 per cent nationally.

To 3.67ii

Supplementary Planning Guidance is being prepared to provide guidance on the use of benchmark standards for children’s play and informal recreation in preparation of play strategies and provision of suitable facilities. **The long term impact of positively engaging young people in sports and leisure activities has been shown to reduce problems of anti-social behaviour and to make a positive impact on young peoples school results and future job prospects. Youth workers can provide excellent additional role models for young people from single parent families and those without extended family living nearby. Provision of financially accessible youth, sport and leisure facilities should be of high priority across London.** Reliable, safe and cheap public transport.....vital role to play.

To 3.78

Accessible and affordable community facilities are key to enabling.....including for example sporting, **youth** or cultural facilities.

To Policy 3A.16

Immediately after the existing text - **In the event of the consideration of a sale of a public building, a public authority will first offer transfer of the building to community and voluntary groups operating in the locality.**

To 3.91

Immediately after ‘training and meeting facilities when these are currently not being used during the school day’. ***School land should be protected from sell off. If any school land is underutilised it should be made accessible to the local community for education, leisure or other community use within the extended school ethos.***

To Policy 2A.1, the addition of the London Tenants Federations ‘Sustainable Communities – Tenants Definition’ (attached)

MATTER 6 - HOUSING

6/1 Does the density matrix strike the right balance between guidance and flexibility? Will it deliver the required housing whilst safeguarding local character?

London is built upon a patchwork of villages which have grown. It is this that forms London's character and which is valued not only by London's residential communities but by those who visit the capital. It comprises of areas of different character with living residential communities of various housing tenures and of household incomes. This includes the centre of London where levels of social housing are higher than in other European capital cities.

The density matrix is principally based on an assumption that - there should be higher densities of housing the closer one gets to the centre and the denser the housing, the more suitable it is for households without children or the necessity for play space. Additionally it suggests that higher densities can be applied should housing be near to public transport.

The emphasis placed upon access to public transport brings with it the danger that we take our sights of the higher goal whereby people can satisfy their daily needs of work, shopping and recreation within walking distance and only have to rely on mechanised transport for more occasional needs, the 'walkable city' concept.

In cost terms, for deprived families living in central London, many of whom have a household income of less than £15,000 a year, using transport facilities to gain access to green and leisure facilities is not within their budget, even with free bus and tube travel for children.

The LTF fears that the London Plan's current density matrix will further damage existing living communities and principally those of social housing tenants in central London and that it is designed to facilitate a younger and more transient population – Parisian style occupying the central London 'urban' areas.

The London Plan Special Planning Guidance November 2005 suggests that the specified higher density levels in Central London are designed to facilitate this.

Sections 5.8 stipulates 'In broad terms higher densities, which assume a lower number of habitable rooms per dwelling will be more suitable for households without children and will require less open space and play provision.' And 5.9 - 'Lower density developments lend themselves more, though not exclusively, to family housing. The London Plan density matrix assumes a much higher number of habitable rooms per dwelling for lower density development. This generally makes them more appropriate for higher proportions of social rented affordable housing, given the need for predominantly family social housing provision, which in turn will require a higher level of provision of open areas and play space.'

If we are serious about maintaining strong sustainable communities and London's special character, there should be an upper 350 habitable rooms per hectare limit for housing density across London, without the use of tall buildings.

Also in order to protect local character, there is need for greater sophistication in the analysis of appropriate housing densities, particularly with increases in 'mixed tenure' estates.

The LTF's response to consultation notes differences in terms of appropriateness of high density housing, in relation to household size and income. Other issues that impact on housing density, are – accessibility to community, play, youth and leisure facilities (financial accessibility as well as proximity), funding levels for management and maintenance, space standards – internal and external and levels of overcrowding.

Council housing anyway has insufficient levels of funding for management and maintenance of its homes. A study carried out by the Building Research Establishment in 2002 found that nationally councils are under funded by £1.8 billion pa to manage and maintain council homes. High density housing requires higher levels of management and maintenance than low density housing.

One in 20 London homes is overcrowded with most occurring in social housing.

The LTF opposes the proposed alteration 3.5vi **In addition to PTAL, where alternative transport assessments can reasonably demonstrate that a site has good public transport connectivity and capacity, the density of a scheme can be at the higher end of the appropriate density range. Where connectivity and capacity is limited density should be at the lower end of the appropriate density range.**

The LTF proposes instead the need for a more sophisticated measure of what is acceptable in terms of density and to replace the proposed alteration 3.5vi, with **'The Mayor will draw up a more sophisticated density matrix, which will also take into account household income and financial accessibility to transport, proximity of financially accessible sport and leisure, community, youth and play facilities, levels of ongoing management and maintenance funding, levels of overcrowding and preservation of local character'.**

The sections on density of the London Plan SPG - Housing Nov '05 require similar amendments.

6/2 Does density and design strike the right balance between sustainability and need?

Density levels have been determined by criteria that neither meets the needs of all communities nor their sustainability.

The greatest need in London is for social rented housing. Ken Livingstone noted at the recent Mayors Housing Strategy Conference that 80% of Londoners can only afford social rented housing.

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 34% market.

The latest monitoring report of the London Plan, February '07 shows only 19% of homes constructed in 05/06 were social rented (a short fall of 40%), 12% intermediate and 69% market housing (35% more than is required). As the production of market housing is more than double the rate required and 80% of Londoners can only afford social rented housing, there is an immediate necessity to reduce its construction and to focus entirely on genuinely meeting the need for social rented housing.

Further evidence is provided by statistics that show 70% of new market housing is being bought to let. The LTF fears this is storing up future Rachman type problems. It also creates transient rather than strong stable communities, with tenants who have little or no commitment to their areas. A study carried out by Camden Private Tenants found that few private tenants were engaged in their communities – in fact none of those surveyed even read their local newspaper (a well known and free newspaper).

There is huge need for more family dwellings in London. According to the London Assembly's *'Size Matters – The need for Family Housing – June 2006'* there is an estimated shortage of 30,000 3 and 4 bedroom properties and yet a surplus of 12,000 one bedroom properties. There are 150,000 overcrowded homes in London.

As is detailed in the London Plan, sections 1.59 to 1.67, the gap between deprived and wealthy communities in London is widening.

Whilst this issue cannot in itself be resolved by decreasing levels of density, increasing density to facilitate the construction of more homes of the tenure, size and density that don't meet existing need, makes conditions for poorer social housing communities increasingly difficult. As a result gentrification processes across London are changing the character of many areas, forcing out local shops and services, increasing prices of goods and services and reducing what is accessible to poorer communities.

There has been a trebling of maximum densities in less than 10 years. In Haringey for example, their adopted UDP 1998 had a density range of 175 – 250 hrh up to a maximum of 350 in specified areas. The council's attempts to increase the maximum to 700 hrh in 1998 were opposed by many community groups eager to protect the character and sustainability of local neighbourhoods. In July 2006, despite a 2 year public consultation process and the Haringey UDP Inquiry Inspectors comments that *'The prospect of serious problems of poorly designed and managed tower rise blocks being repeated is ominous'*, the council trebled the maximum to 1100, under pressure from the GLA.

The picture is similar in neighbouring boroughs: Islington (2002): range 200hrh-350hrh, max 450hrh. Barnet (as of 2005): range 148-235hrh, new development to be >250hrh. Waltham Forest (as of 2005): 200-250hrh, but in 3 key locations

200-450hrh. Camden (2000): 99-247hrh, with a max 617hrh in Central Area. Enfield (1999): 150-240hrh.

The link between high densities, over development and the failure to protect open space and other community amenities of all kinds is of concern to LTF representatives across London (please refer to Haringey Federation of Residents Associations response to consultation and the example from Barnet detailed in the LTF submission - Matter 5.4 -The Suburbs).

The LTF's response to consultation raises doubts about the accuracy of assessments of increases in population of London, the derivation of the assumed reductions in average household size, the assumed impact on need and how that may be addressed.

The dependence on the private sector to deliver social housing and the blanket support from all housing deliverers and policy makers of the unproven assumptions that sustainable communities can only be achieved by through mixed tenure schemes are part and parcel of these failures.

Evidence is already emerging of the problems on mixed tenure estates. In October '06 Inside Housing reported that the SE London Housing Partnership had become so concerned about the surge in antisocial behaviour against social and shared ownership residents by people renting homes privately. Mike Cleaver head of Gallions Housing Association home ownership said in the article, 'In particular, where homes are allowed to become severely overcrowded, but also where the new owners neglect to pay management charges.

The LTF believes that need in London must be addressed, by a focus on increasing the levels of social rather than 'affordable' housing; ensuring that there is no loss of social housing in any regeneration scheme; ensuring that existing social rented homes are properly maintained to prevent any becoming vacant; ensuring a greater number of existing empty properties are brought back into use and by ensuring strict implementation of social housing targets.

In order to achieve sustainable communities in all parts of London, density levels must be kept to levels that service the needs of communities both existing and new and of all tenures.

Specifically the LTF

- **Asks for clarification on the new figures specified in Chapter 3A – Housing policies - 3.7 and 3.8.**
- **Proposes an addition to 3.58 - 'In estate renewal and regeneration schemes there should be no loss of social rented housing'.**
- **Opposes the removal of 'There is also a need to invest in maintaining and refurbishing the existing housing stock so it does not become vacant'.**
- **Proposes an addition to 3.16 regarding empty homes as specified in the LTF response to consultation on the further alterations.**

The LTF welcomes some FA's focus on issues such as maintaining green spaces and the provision of play facilities, we do though have concerns about failures to implement policies at the local level and feel some sections of the FA need to be strengthened.

Please refer to the LTF's submission on the Suburbs for proposed amendments to alterations to Policy 2A.1, Policy 2A.6, 2.23ii, 3.65, 3.66, 3.67ii, 3.78, Policy 3A.16 and 3.78.

6/4 Are the Further Alterations on affordable housing consistent with national policy; is the threshold of 10 dwellings for affordable provision an optimum number?

The Further Alterations on affordable housing are consistent with national policy in that they do not adequately define 'affordability'. Statistics show that almost three quarters of social housing tenants in some boroughs are unable to meet the cost of their rents without claiming housing benefit. More than half of these tenants are also in paid employment or are pensioners.

Neither government, nor the FAs address regional differences in terms of affordability. For example 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. Existing definitions would need to be changed to satisfy a correct definition of affordability (as specified in the LTF response to consultation).

Intermediate housing is not meeting the needs of those it was designed to help (examples are given in the LTF response to consultation). Some boroughs are producing far more intermediate housing than is required. For example the latest monitoring report of the London Plan Feb '07 suggests that in 05/06, 42% of homes constructed in Islington were intermediate housing when need is at only 7%. The LTF proposes an addition to 3.29 – **'The Mayor will commission an on going review of intermediate housing and assess whether it is meeting local housing need'**.

The LTF supports the change in threshold from 15 to 10 dwellings for affordable provision, particularly when a significant number of small sites are being developed – especially in central London boroughs. The LTF is keen to see that the practice of developers being able to negotiate away the 50% affordable housing target avoided. It feels that the off-site provision should be permitted only in exceptional circumstances.

The PPS3 was published after the publication of the FALP. The London Plan must be updated to address the requirements of PPS3 requirements.