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Dear colleague

This is the final, final version with one more typo corrected.

Now i will leave it there.

Kind regards

Paul Burnham

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**F**

Dear colleague

This is the Final version of our submission to the Draft London Plan consultation. I would be most grateful if you could please use this version. Thank you for your help. Paul Burnham

**Draft New London Plan - response from Haringey Defend Council Housing**

**1. The Draft London Plan is a disaster** for working class Londoners. This is a charter for developers and for private profit.

**2. London's leaders have not heard the message from Jeremy Corbyn's surge in the general election, or the message from Haringey, where the Labour Party friends of the developers have been deselected at packed meetings around the borough. We need housing for the people and not for profit.**

**3. The Plan does nothing** to address the shortage of the type of housing that people with lower incomes and lower savings actually want and need: which is council housing.

**4. Security of Tenure:** There is no proper understanding of security of tenure in rented housing. It is not just about the rent level - the permanent tenancies which we now enjoy as Council or housing association tenants are a social gain that cannot be measured just in money terms. The increasing use of short tenancies, with no landlord or public responsibility to rehouse at the end of the tenancy, should be evaluated in this Plan, with steps taken to protect and enhance security of tenure.

**5. Service charges:** There is no proper awareness of the way that landlords use service charges to increase their income from residents. The Superdensity literature (two publicly available reports plus associated video discussions available on YouTube) indicates very clearly that at least some architects and planners understand the challenge to social inclusion posed by higher and higher densities, primarily of upper end market housing, to the detriment of those few Council, social or affordable tenants who may reside in the same schemes. For example, The Love Lane estate in Tottenham was last year promised seven new or higher weekly service charges after proposed estate renewal.

**6. Democratic accountability:** There is no understanding of the democratic accountability which Council tenants and residents are able to exert regarding our homes and communities. Even when we do not get all that we want, decisions are taken by publicly-accountable and elected authorities. There are Council meetings and Scrutiny meetings which residents can attend and speak at. Documents are publicly available. Where facts are hidden and documents not fully released, Freedom of Information procedures allow for enhanced disclosure. In Haringey, this engagement with our local authority has led to a very effective challenge to bad policies which were based on backroom deals between developers, Councillors, and lobbyists including the notorious events at MIPIM Cannes.

**7. Affordable Housing:** The so-called affordable housing targets in the plan do not distinguish between social and affordable rent. There is no target at all for new social rent dwellings, in a plan that is to cover the 23 years 2019 to 2041 (p 169). Instead, Social and Affordable dwellings are shunted together. Council housing is not even mentioned. This is in line with the government's national planning policy framework, but that is no excuse. The London Plan should be needs-based, and then the Mayor and the GLA must plan, argue and campaign for the actual needs of existing communities in this City.

**8. The No-social housing Plan:** On p 171, "Para 4.7.3 Within the broad definition of affordable housing, **the Mayor's preferred affordable housing tenures are** [highlight in the original]:

- London Affordable Rent
- London Living Rent
- London Shared Ownership"

- i.e., not social rent. You would not think that the vast majority of "affordable" housing in London is council and housing association rented dwellings. But it is so.

There are 397,000 council tenancies and 405,000 housing association tenancies in Greater London.

The Draft Plan claims that:

'London Affordable Rent is rent for households on low income **with the rent level based on social rent levels**. The NPPF defines affordable rent as up to 80 per cent of market rent, however, to ensure rents in London are genuinely affordable, the Mayor expects rents charged for homes let for London Affordable Rent to be set at benchmarks substantially below this level, **based on traditional social rents**.' (p 171, our emphases)

However, the following table compares 'London Affordable Rent' 2017-18 Benchmark weekly rents, exclusive of service charge, to Haringey Council social rents for 2107-18:

Bedsit and one bedroom £144.26 instead of £89.06 (62% higher)

Two bedrooms £152.73 instead of £103.95 (47% higher)

Three bedrooms £161.22 instead of £119.12 (35% higher)

Four bedrooms £169.70 instead of £135.44 (25% higher)

Five bedrooms £178.18 instead of £156.58 (13% higher)

Six or more bedrooms £186.66 instead of £164.62 (13% higher)

Source - Freedom of Information request

It is therefore not true that London Affordable Rent is 'based on social rent levels'.

London Affordable Rent is up to 62% higher than council rents.

**9. Estate Demolitions:** The Draft Plan continues to target existing council and housing association estates for demolition, but in a most dishonest way. On p 176,

"4.10.2 The aims of an estate regeneration project will typically fall into three broad categories. These are:

- maintaining good quality homes
- maintaining safe and good quality homes
- improving the social, economic and physical environment in which homes are located."

So it's not about demolition then? This is quite unrealistic.

This all too closely mirrors the policies of Haringey Council, where the reality of demolition plans is routinely denied, and regeneration for the demolition estates is routinely portrayed as being primarily social and community-focused in nature.

There is no mention in the Draft Plan of the research by GLA members, which shows that estate redevelopment schemes in London already cause a net loss of social housing.

There is no mention of the key problem of pursuing mass estate renewals in the absence of any government development grant for Council or social housing - in other words, under the funding regime dating from George Osborne's Comprehensive Public Spending Review in October 2010. Estate demolitions in this funding regime can only lead to rent increases, loss of tenant security, and social cleansing promoted by moving as many secure tenants as possible out of renewal areas (under the false

flag of "right of return") and the very important wider area impact of higher house prices and higher private rents. These are policies that the Plan should name, shame and oppose.

On p 175, Policy H10 Redevelopment of existing housing and estate regeneration, has a point C, which includes this:

*For estate regeneration schemes the existing affordable housing floorspace should be replaced on an equivalent basis i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with **rents at levels based on that which has been lost**, and the delivery of additional affordable housing should be maximised.*

The problem here is that the Mayor and local politicians claim that London Affordable Rent is '**based on social rent levels**', and so it would then be all-clear for to reprovide demolished council housing with 'Affordable' homes at rents that are much higher - up to 62% higher, in the case of Haringey. There is no mention of service charges, which can also be much higher. There should be a guarantee of no service charge increases for residents affected by estate demolitions.

This mirrors what has been reported from the Southwark 35% Campaign - the widespread passing-off of Affordable for social housing. Social rent is promised at planning, but what is actually delivered is much higher Affordable Rent.

It also all very closely mirrors the policies of Haringey Council, where the reality of demolition plans is routinely denied, and regeneration for the demolition estates is routinely portrayed as being primarily social and community-focused in nature.

**10. London Tenants Federation:** We endorse the London Tenants Federation submission, with its detailed analysis of the defects of the Draft Plan.

#### **11. Conclusion:**

What a disastrous route to follow. Of course the landlords and developers want higher and higher rents, but we must stop their plans! Our recommendation is to replace this Draft Plan with one that reflects the needs of the people of London, rather than the greed of the property development industry.

#### **12. Planning Inspector:**

We wish to meet the Planning Inspector, and we request the opportunity to discuss our comments at the Examination in Public.

**13. Confirmation:** Can you please confirm receipt of this submission. Thank you.

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