CHAPTER 1 – GOOD GROWTH VISION AND POLICIES

We do not feel that the scale of growth proposed in the draft London Plan, particularly with inadequate funding available to deliver social-rented homes and the social infrastructure required, constitutes 'good growth'.

The draft Plan continues to encourage drastic change in areas that have in the past provided homes, and employment (that better met the needs of working class communities) into dense high-rise areas with expensive homes and employment in high-end business, finance, educational and research sectors (that meets the needs of higher income households and developers).

Policy GG1 – Building strong and inclusive communities

This policy fails to mention economic equality. The difference in terms of need - when comparing those living in pent-houses along the Thames, and average social housing tenants, with an average income of £17,500 a year is not addressed. Many social housing tenants' families are unable to afford to travel far from their immediate localities and thus need a range of low or no cost, financially accessible social and leisure facilities near to their homes (from the CAZ to outer London). Strategic planning policy should adequately consider the needs of all sections of London's communities.

Protection and enhancement of existing social infrastructure should also be included in this strategic aim.

Policy GG2

(A) We object to the ongoing sell-off of public land for market housing development. This is not the best use of land. Public land should be protected to deliver homes for which there is the greatest need, particularly, the backlog of need for social-rented homes.

(B) There is absolutely no evidence that Opportunity Area development is meeting existing need. Grass roots evidence would suggest that these areas simply provide 'opportunities' for developers and need at the high end of London's communities pretty much to the exclusion of lower income households.

(c) How do ordinary working class, lower income households, get to express what is of value to them? How are they to be heard? In most instances lower income households don't engage in development of planning policy – because the language is too technical and there is an absence of funded support to facilitate their active engagement. When faced with more educated professionals and developers many feel they have an uneven chance to influence.

GG3 Creating a healthy city

This policy should specifically refer to health inequalities that relate principally to income levels.[1] It is incredibly patronising to suggest that monitoring of the numbers of Londoners engaging in active travel (KP1) is realistic measure of improvements health inequalities.

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[1] NB New data out from the Longevity Science Panel finds the gap in life expectancy between the richest and poorest in England has increased from 7.2 years in 2001 to 8.4 years in 2015. **People over 60 in the bottom 20% had death rates around 50% higher than the top 20% in 2001; by 2015, the difference had risen to 80%** (www.bbc.co.uk/news/health-43058394). The report authors 'said income inequality was the biggest factor'. More research today from the Literacy Trust shows huge gaps in life expectancy between districts with the lowest and highest levels of literacy: a boy born in Stockton town centre is expected to die 26 years earlier than one born in north Oxford: https://literacytrust.org.uk/research-services/research-reports/literacy-and-life-expectancy/

This follows on from findings by Public Health England last month that overall life expectancy has stalled since 2010 and has started to fall in certain areas, which is apparently 'unprecedented in

If the Mayor is serious about creating a healthy city, health inequalities need to be more carefully considered within a range of policies in the London Plan, not just those about encouraging more people to cycle.

Given that poor quality and overcrowded housing is one of the key determinants of poor health (in addition to income inequality) the Mayor should have a policy that actively require boroughs to set targets for achieving better conditions in the private rented sector and on gypsy and travellers' sites and also on addressing overcrowding (which are most prevalent in areas of 'deprivation').

The detrimental impacts of regeneration / gentrification, particularly on older people (either for those displaced but for those remaining) includes loss of strong and supportive neighbours and wider community networks and the stresses (sometimes for years) of potential loss of a home, local shops, services and amenities. It should be noted that connections within physical neighbourhood communities are much more important to lower-income communities than those who are wealthier. The Plan needs to acknowledge this.

GG4 Delivering the homes that Londoners need

(A) Delivering more homes without specification of types or tenure of homes, does not, in practice deliver the homes that are actually needed.

(B) We assess that only a very small percentage of homes that the Mayor deems to be 'genuinely affordable' will be affordable to households that have below median income levels.

(C) There is a real danger, particularly in Opportunity Areas and other large-scale developments, that new communities are being created comprising households mostly with above the median income levels living in one and two-bedroom homes – that is neither mixed or balanced communities.

GG5 Growing a good economy

We fear that conserving and enhancing London's global economy - generally ongoing growth of high end business, financial, professional, education and research; seeing London as the goose that lays the golden egg, is of little benefit to lower income households in the capital (as set out in Policy E11, paragraph 6.11.1), but also to and to the economy of areas in other parts of the country.

We are concerned that the general practice in opportunity and regeneration areas has been loss of, rather than retention of existing businesses, industry and industrial land (as well as of existing social housing). Policy should focus on effectively addressing need in areas of deprivation and exclusion.

CHAPTER 2 – SPATIAL DEVELOPMENT PATTERNS

This chapter fails to provide a strategic framework for development across London that might deliver sustainable communities and lifetime neighbourhoods.

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peacetime': www.thetimes.co.uk/article/life-expectancy-falls-by-a-year-in-several-regions-of-england-prwcdgzvl. This might be down to austerity, or continued post-industrial deprivation. What the research literature generally finds is that once a certain minimum material threshold is passed it's inequality that effects health rather than material deprivation: the psychological effect of being at the bottom of the pile or having no control over your life.

Grass roots evidence suggests huge detriment in large scale development areas and at the edges of them, relating to rising housing costs and actual or potential displacement of local communities, shops and services that have sustained lower income communities in the past. There is evidence in the London Poverty Profile of movement of lower income households from inner to outer London. There is a question as to whether some changes in poverty indicators are as a result of displacement of lower income households from London.

Uncertainties relating to London's already dysfunctional housing market, the impact of Brexit, insufficient funding to support the development of housing that will meet the evidenced need of households with below median income levels as well as essential social infrastructure suggests that the plan is unsound.

Alternatives, such as the such as the Just Space's community plan, need to be properly considered.

There is a total lack of evidence / monitoring of Opportunity Areas to assess whether they are delivering the kinds of development required to meeting needs across income levels in London. This is the kind of evidence that is required to demonstrate that they do offer the best possibilities of delivering sustainable development that is - living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

We suggest that this chapter should instead focus on promoting lifetime neighbourhoods as a model for sustainable development across London. It should assert that all Londoners should have the opportunity to enjoy a good quality environment in an active and supportive local community. Ensuring this means planning for lifetime neighbourhoods in which communities are empowered and in which local shops, social and community facilities, streets, parks and open spaces, local services, decent home, jobs and public transport are affordable and accessible to everyone now and for future generations.

Policy SD1 Growth Corridors and Opportunity Areas

We propose the following additions and alterations

- SD1A(1) should say that the Mayor will
  - (a) set out a clear strategy for **delivering lifetime neighbourhoods;**
  - (c) support regeneration **that is informed the needs of and is supported by existing communities;**
  - **(e) involves local communities in developing policy, including development of positive grass roots policy;**
- SD1A(2) add – where supported by local communities
- SD1A (4) add after Opportunity Areas - '**that are delivering lifetime neighbourhoods**'
- SD1A (5) replace 'affordable' housing with '**social / low cost rented**'.
- SD1A(6) remove '**spatial**' as this is often achieved by moving in wealthy people and not actually dealing with actual inequalities and failing to measure impacts on existing less well-off communities.
- SD1A (7) add – '**types/tenure of homes**' and add 'and **loss of existing homes, jobs and social infrastructure.**
- SD1B - add across this section additions highlighted above

- SD1B (4) remove as this as it generally equates to insensitive and inappropriate types of development that obliterates any reference to existing communities and their histories within and surrounding opportunity areas.
- SD1B(9) is inadequate – local communities should be involved from the start in the development of policy. B9 should require communities to be involved in preparing plans for their areas including production of community-based policy alternatives. This would help to deliver sustainable bottom up lifetime neighbourhoods that more genuinely meet the needs of all section of the community – particularly since opportunity area are generally situated in lower income neighbourhoods.
- SD1B(9) should also require that statements of community involvement are developed in each opportunity area and that the Mayor provide, or require the boroughs to provide, facilities and grant funding to support existing community members to come together independently to engage in developing planning policy in Opportunity Areas.
- SD1B(10) remove – as there is no evidence to demonstrate that Opportunity Areas are delivering sustainable development.

As highlighted in the supporting text many opportunity areas overlap with regeneration areas. Loss / demolition of social-rented homes in regeneration areas has consistently been an issue for us.[2]

Policy SD4 The Central Activity Zone CAZ

While policy SD4 says this area should be promoted and enhanced as an international, national and London-wide role in terms for its culture, arts and entertainment, the area is also home to many social housing estates and is an example of the worst aspects of polarisation - extreme wealth and poverty sitting cheek by jowl. It is a place where there are streets of expensive restaurants, where in some, a starter might cost as much as elderly residents on local council estates have to spend on food in a week.

In some parts of the CAZ where there has traditionally been a large number of supporting voluntary sector organisations (such as in Kings Cross). However, evidence shows organisations such as this have, or are been forced relocate as they are no longer able to meet local costs, reducing support for local communities.

The needs of many less well-off members of society living in the CAZ (and whose families may have lived there for generations) find other problems relating to living adjacent to luxury apartments – including loss of access to affordable sports, leisure, play and youth facilities, shops, services and other amenities that met their local needs.

Policy SD4 should acknowledge this. It should also require that boroughs acknowledge this in their development plans and that they provide support in retaining social housing communities in the CAZ as well as affordable workspaces for shops and businesses that lower income households are dependent on.

The pressure in terms of property prices mean that buy to let and Airbnb is high on local authority estates – creating transience and sometimes divisions in neighbourhoods where there were once strong and stable predominantly working-class communities.

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[2]   LTF's 'Holding onto the homes we have now and why' provides a wide range of case studies.

We propose that SD1K should be replaced with '**local residential neighbourhoods in the CAZ should be conserved – particularly those servicing the needs of low income households in terms of homes, jobs, shops services and amenities. Boroughs should support and protect these areas in full consultation with the existing local communities**.

Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and implementation

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

Policy SD10 Strategic and local regeneration

We are concerned that 'strategic and local regeneration' often means transforming areas traditionally meeting the needs of lower income household, albeit that they may well need better care and attention, services and amenities that meet local needs, into areas more desirable to and eventually to be colonised by wealthier households. The results are increased property values, new shops, services and amenities that meet the needs higher incomes moving in and inevitable displacement of lower income households.

Monitoring is generally that relating to changes in levels of deprivation in lower super output areas. As this can be easily achieve by moving in higher income households into an area, it is hardly an effective or accurate way to assess any benefit to deprived or excluded communities. It is notable that there is a general lack of longitudinal studies that assess the impact on existing communities. The Mayor should requite the latter to be carried out in regeneration areas.

Regeneration plans should be based on grass roots (existing) community based needs assessments of what they perceive to be the problems in their areas and what support or change they feel are needed in their areas – in terms of housing, jobs and training, green, play and social infrastructure.

CHAPTER 3 DESIGN

Policy D1 – London's form and characteristics

We propose:

(i) Policy D1(B)1 contradicts policy set out elsewhere – including policy relating to Opportunity Areas. This section should also apply to Opportunity Areas ad large scale developments.
(ii) Policy D1(B)2 is, in part, about clear measurable standards and in part on subjective evaluations. We feel the policy should stick with clear measurable standards.
(iii) Issues such as designing out exposure to poor air quality, noise and crime, having good space standards and storage space, use of good quality construction materials, delivery of 150-year lifetime of buildings (at least), should be included in policy D1.

(iv)   A matrix should be developed that facilitates assessment of adequate levels of green, play, youth and community infrastructure, affordable leisure facilities, local shops, services and amenities for any development - large of small. This should be based on delivering lifetime and walkable neighbourhoods.

Policy D2 Delivering good design

We have concerns about how 'good' design may be determined and who determines this. As expressed in response to D1 this should be about clear measurable standards.

Re: Initial evaluation.

(A)   Add – 'Detailed discussion with local existing and immediately neighbouring residential and small business communities should be carried out in relation to any proposed 'growth' area should also be carried out. This should relate to their key concern and assessed needs.'

Re: Determining capacity for growth

(B)   Initial evaluations should also include a social impact assessment of any proposals to ensure sustainable growth and specific benefit to existing communities is achieved.

Re: Design quality and development certainty

(D)   Master planning and any design codes should be informed through careful engagement with local communities, measurable standards and social impact assessments.

Re: Design Scrutiny

(F)   Design reviews must involve representatives of the local community, who must be informed by wider community views – e.g. through being mandated through networks of community and voluntary sector groups.

In addition, a full and detailed description of what 'good design' must be developed to support this policy, if monitoring of any achievement or otherwise, is to be assessed.

Policy D6 Optimising housing density

Previous London Plan density policies, which have promoted higher density linked with better transport connections, have asserted that 'lower density development is generally most appropriate for family housing' (as if families don't also need good public transport connections). This has resulted in a predominance of one and two-bedroom homes, almost to the exclusion of family sized dwellings, in areas with good transport connections.

High percentages of above density matrix level developments have consistently been approved, often, we observe, that lack the amounts of green, play and social infrastructure needed.

We feel that a range of properties sizes that meet the full range of household sizes should be developed across London. Every development should contain the levels of green, play and social infrastructure required as part of delivering lifetime neighbourhoods.

We don't support D6 policy's requirement that density should be optimised in each development'. We feel this presents an expectation of over-development (particularly of smaller dwelling sizes) - all apparently acceptable by being cloaked in a charade of 'good design'

We propose that the Mayor produce a more sophisticated matrix that facilitates development with densities that accommodate a full range of dwelling sizes, adequate levels of green, play, youth and community infrastructure and access to affordable leisure facilities, shops, services and amenities for any development. This should be based on delivering lifetime and walkable neighbourhoods.

D7 Public realm

We feel that it should be made clear in policy that new developments should not take over or prevent free access to rights of way (between buildings, whether public or private............London Waterways - paragraph 3.7.1.) We fear this is a problem in terms of routine appropriation of public realm areas for expensive café and restaurant areas along the Thames. This may make such areas 'vibrant' for some, but also inaccessible and exclusive to others. We propose that such areas should be provided for within the footprint of the development to prevent difficulties for others accessing public rights of way.

D8 Tall buildings

Tall residential buildings have higher management and maintenance costs than low rise buildings, which are then passed on in service charges to tenants and residents. This is an issue of concern for households with below median income levels.

New tall buildings are also very much associated with high-end development (residential or office). We have some concern about creation of clusters, or distinct spatial divisions of high-rise as a building types. Examples of this being in opportunity areas particularly, but not exclusively, along the river.

Where this occurs, various justification are provided – that they identify a 'gateway' into an area or are way-finders – while in reality they create distinct edges or comprise pretty much segregated wealthy areas that contain almost no social-rented homes and small amounts of intermediate housing; being neither inclusive or accessible to low income households.

D10 Safety and security and resilience to emergency

Designing out crime should be mentioned in the policy (as well as in supporting text).

D11 Fire Safety

In the light on the Grenfell Tower tragedy many are concerned about the safety of tall buildings.

The Mayors' office should work with relevant authorities to collate, monitor and update data relating to fire safety in relation to new construction materials and methods of construction as well as on detection and prevention of spread of fire. and means of escape.

Policy will need to reflect any recommendations that come out of the Grenfell Inquiry.

CHAPTER 4 HOUSING

Policy H1 Increasing housing supply

1.1   We feel that the overall housing target, derived from the Strategic Housing Land Availability Assessment (SHLAA) can only be achieved through - over-delivery of one and two-bedroom homes, failure to address high levels of overcrowding prevalent in some of the most deprived communities of London and failure to deliver mixed and balanced communities and lifetime neighbourhoods.

1.2   We don't feel that this can be defined as 'good' or sustainable growth particularly where there are huge questions around financing for essential social infrastructure and homes that households with below median income levels can afford.

1.3   Having a single target for all types of homes needed in London gives the impression that delivery of homes, regardless of type and tenures is essential and is meeting need while often is it only meeting need at the top end.

1.4   Successive London Mayors have argued that delivering of more market homes (than evidence suggests is required) is the best way to bring down house prices. However, an increasing range of media commentators say that building more homes (regardless of type) will not deal with the housing crisis and won't bring down house prices.

       The Kate Barker national review of housing supply of 2004 recognised this, saying that even if private housebuilding roughly doubled from 120,000 to 240,000, house prices would still continue to rise on a trend of 1.1 per cent above inflation. The review said that to stop house prices rising at all would imply a level of market housebuilding that would be "undesirable and unachievable"[3].

1.5   The evidence of need for social-rented homes in London is enormous. The SHMA identifies this at 47%, but taking 25 years to meet the backlog of need. If the very high levels of backlog of need for social rented homes (at 163,000) was to be met over a 10-year period this would require 62% or more of homes delivered to be social rented.

1.6   We proposed that policy H1:

       - title be changed to '**increasing supply of the range of homes needed in London**';
       - should provide targets for the different tenures of homes required over a 10-year period setting out need as identified in the SHMA (but with alterations we suggest in Policy H12) along with an overall total;
       - require a cap on delivery of homes above targets, except in the case of social / low-cost rented homes, where there is such a high backlog of need.

Policy H2 Small sites

2.1   While some protection for exiting social-rented homes is provided in respect of larger scale estate regeneration and demolition (Policy H10), we are worried that social housing estates will be targeted for small scale demolition and development through this policy, resulting in on going loss of precious social-rented homes, green and play spaces. Section B(1) is of concern in this respect.

2.5   We support the inclusion in Policy H2A(4) – providing support for custom, self-build and community-led housing, but feel that the policy should be strengthened.

2.6   We propose the following:

       - Policy H2 should more actively encourage custom, self-build and community-led housing – particularly where it meets social / low cost rented need;
       - it should require boroughs to establish relationships / work closely with local custom, self-build and community-led housing organisations to delivery social / low cost rented homes; Leathermarket JMB being a good example of this;

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[3]   http://webarchive.nationalarchives.gov.uk/20120704150620/http://www.hm-treasury.gov.uk/d/barker_review_report_494.pdf

- design codes should not be determined on clear measurable standards;
- the following text (in bold should be added to section F7 - **social housing estates, including** estate regeneration schemes**,** unless full consultation has been carried out and full agreement attained in line with the Mayor's good practice guide on estate regeneration.

H3 Monitoring housing targets

3.1 We propose :

- monitoring of homes lost through demolition (section A) should occur when demolition takes place. The current practice of not taking loss through demolition into account until new homes have been delivered means that net housing data in the London Plan Monitoring Reports is incorrect much of the time;
- additional social rented homes should be monitored separately from London Affordable Rent homes;
- benchmark targets for student housing (section C) should be set for each borough, along with a requirement to cap delivery above targets set, particularly in parts of London where too much 'studentification' has occurred;
- benchmark targets should be set for self-contained older people's housing, also set out in forms of tenure, (section D) and also for care homes.

H4 Meanwhile uses

4.1 We feel the Mayor should actively support short life user groups / co-operatives in housing people on a short-term basis. We propose that the Mayor actively collate London-wide information of where 'meanwhile' use housing is available and invite short-life user groups to manage homes, as they have done in the past.

4.2 We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.

4.3 'Meanwhile housing can be provided in the form of precision manufactured housing' should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

H5 Delivering affordable homes

5.1 We are concerned that the Mayor set policy first, in election promises (of 50% 'affordable housing') rather than using evidence to inform policy and to then negotiate with Government around the funding required to address London's housing need.

5.2 We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in private-rented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056.

The backlog of need for social rented housing however is now 40 times that of intermediate housing, having more than doubled since 2013.

5.2   We question the SHMA's departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data)[4] that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.

5.3   The big question in terms of Policy H5 is 'affordable to who? So-called 'affordable' housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. 'Affordable' housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.

5.4   Most types of 'affordable housing' do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional. The likelihood is that in attempts to deliver 50% affordable housing, boroughs will choose to deliver intermediate housing as more can be delivered for the same cost.

5.5   The Mayor should set a strategic London-wide target as has occurred in previous London Plans, in order that London-wide need might be delivered.

5.6   We propose:

- The title of policy H5 be renamed, more accurately, 'sub-market housing'.
- The policy should refer by name to the different types of sub-market housing.
- Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).
- This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10-year period the social housing target would need to be 62% (of all homes) or higher.
- The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.
- The Mayor should require that all section 106 to be used to deliver social-housing.
- Intermediate housing should be delivered without affordable housing grant.

H6 Threshold approach to applications

6.1   We object to this policy – for pretty much the same reasons as above.

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[4]   http://blogs.lse.ac.uk/politicsandpolicy/how-help-to-buy-helps-the-privileged/

6.2   Having a threshold 35% target for 'affordable homes' will not necessarily address evidenced need.

Policy H7 – Affordable housing tenure

7.1   We propose that this policy should be renamed '**sub-market housing tenures**'.

7.2   The term '**genuinely affordable**' should be removed. Genuinely affordable to who?

7.3   We propose that

- H7A(1) should be at altered to at least 50% (of all housing) to be social / low cost rented – to meet need identified in the SHMA.
- H7 A(2) should be altered to 15% (of all housing) to be intermediate housing to take into account the need identified in the SHMA – but also accounting for the fact that the SHMA figure is not accurate in terms of evidenced need.
- H7A(3) This should be removed. We are extremely concerned this will result in delivery of more intermediate housing than is evidenced as being needed at the expense of delivery of social / low cost rented homes.
- current text should be removed. Alternative text should say 'boroughs should ensure that all affordable housing grant is used to deliver low cost rented homes and section 106 should also be prioritised for delivery of social rented homes'.

7.4   Regarding Policy H7 supporting text

4.7.3   **Social-rented** should be included. The government has said that some affordable housing grant might be spent on delivering social-rented homes and also some boroughs may be able to deliver social-rented homes on their own land without access to affordable housing grant. Social-rented should be defined as **homes with existing social rents and service charges** and with any future rent increases as determined by government policy (not 50% higher than existing council rents – see comment below).

4.7.4 It is incorrect to say that **London Affordable Rents** are based on traditional social rents. They are based on the targets for convergence which it was assumed social-rents would reach through 'rent restructuring' by 2012. As this had not occurred the Lib-Dem / Conservative coalition extended the deadline for convergence to 2015/16. However, convergence was not reached by that date and in high value property areas like London, the gap between actual rents and the target rents had actually widened.[5] The government ended the convergence policy in 2015/16 and introduced social rent reductions of 1% for four years (to reduce housing benefit costs). London affordable rents are based on the higher convergence target[6] which are actually 50% higher than existing council rents and around 30% higher than existing housing association rents; a significant uplift.

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[5]   Page 20 - House of Commons Library Briefing Paper on Rent Setting (social housing June 2017) - http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN01090

[6]   Average weekly London Council rents in 2015/16 were £107.93 (up from £65.75 in 2002/03). https://www.gov.uk/government/statistical-data-sets/live-tables-on-rents-lettings-and-tenancies (table 702)
        Average weekly Housing Association rents in 2016 and £125.47 in 2016 – up from £67.99 in 2003 (as of 31st March 2013). https://www.gov.uk/government/statistical-data-sets/live-tables-on-rents-lettings-and-tenancies (table 704)

We understood that 'affordable rents' should include service charges, but London Affordable Rent does not. With service charges added, housing costs can be £35 a week or more, we fear that in some instances above benefit caps.

We propose a cap be applied to London Affordable Rent plus service charges, ensuring that they are always below benefit cap levels.

4.7.5 – It should be made clear that **London Living Rents** are only accessible to middle income households with incomes of up to £60,000 a year. The text should be clear as to whether the 'average' is the median or mean income in London (the mean being **£51,770 and the median being £39,100**)

The supporting text should state that intermediate housing should be delivered without access to affordable housing grant. There are private companies already providing intermediate housing in this way.

4.7.6 The text of this paragraph should specify the levels of household incomes that may be able to access London Shared Ownership homes.

H8 Monitoring affordable housing

8.1   We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.

Policy H10 – redevelopment of existing housing and estate regeneration

9.1   Proposed alternative policy text to H10B 'Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by ~~equivalent or~~ better-quality accommodation, providing at least the equivalent level of affordable housing floorspace, **flat sizes, density and tenure. Rental and service charge costs should be as existing.** ~~and generally should produce an uplift in affordable housing provision.~~ **Where additional homes are delivered this should comprise 65% affordable homes (50% social rented and 15% intermediate). Refurbishment options, to demolition. should always be considered.**

9.2   Proposed additions / alterations to (c) For estate regeneration schemes the existing affordable housing floorspace should be replaced **at least** on an equivalent basis **(including floor space, flat size and density)**. **Any replacement social housing should be of the same tenure, rents and service charges as existing. Where additional homes are delivered this should comprise 65% affordable homes (50% social rented and 15% intermediate). Refurbishment rather than demolition should always be considered. A thorough comparative analysis of social, economic and environmental costs and benefits should always be carried out.**

9.3   We propose addition of the following – 'In all instances involving loss of social rented homes through estate regeneration (whole estate or sections of estates), should only go ahead where agreed by the majority of tenants, determined via a ballot.'

Policy H11 – Ensuring the best use of stock

11.1   Given high levels of needs for new homes it is essential to take good care of existing homes. This policy needs to be far stronger in respect of requiring good management and maintenance of existing stock of all tenures.

11.2 The policy for example could require that in any estate regeneration scheme that there is a full fire statement / independent fire strategy is required (as D11B)

11.3 Section C should mention of Airbnb, as this is a significant problem in some areas.

11.4 We propose that there should be a requirement for all new housing to last for at least 150 years and for good quality management and maintenance plans to be put in place in order that we plan for longevity of our housing stock.

Policy H12 – Housing size mix

12.1 The SHMA incredibly assesses that the need for one-bedroom homes has more than doubled since 2013 (from 16,381 to 36,335). This is based on an assumption of zero under-occupation in all but owner-occupied homes, which we feel is incorrect.

12.2 A [formal evaluation](#) of the bedroom tax carried out for the DWP, published in Dec 2015 found that "not more than 8% of those affected" had downsized to smaller properties. There was some evidence that larger homes had been re-let, and there had been a "small increase" in the numbers of overcrowded tenants rehoused. Landlords were apparently reporting that there was an insufficient supply of new properties for downsizers to move to.

12.3 However, Policy in Practice http://policyinpractice.co.uk/housing-benefit-reforms-impact-tenants-towns-cities-london-boroughs-update/ says that a significant share of tenants impacted by the bedroom tax have chosen to remain in their homes and top up the rent instead – therefore not freeing up family sized homes.

12.4 We are also concerned that building so many homes for single people or couples is not reasonable. Older people may need separate rooms and / or space for someone caring for them at some stage. Most single people do, later, have children.

12.5 We are generally concerned that the targets will fail to deliver mixed and balanced communities – particularly in new large-scale development areas.

12.6 We are also concerned that delivery of such high levels of particularly one-bedroom homes is environmentally unsound – families and people sharing produce less CO_2 emissions and use less water per person.

12.7 We feel that following a reassessment of need for family sized dwellings that a strategic target for delivery should be set.

H13 Build to Rent

13.1 'Genuinely affordable rent' (section A) to who? This should be removed.

13.2 We are of the view that this type of sub-market housing should be delivered without access to affordable housing grant.

H17 Purpose-built student accommodation

17.1 We propose that the following be added to this policy

- Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).
- New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and any other boroughs that may also have very high levels of studentification.

- There needs to be a way of measuring where development of student housing does / doesn't contribute to delivering mixed and inclusive neighbourhoods.

Additional Policy – Co-operative / community led housing.

We propose that the Mayor should

(i) work with existing, newly formed or developing London-based co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;
(ii) with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;
(iii) with the boroughs, develop a London-wide list / online map of potential small development sites to match co-operatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;
(iv) provide support social housing tenants who wish to manage or collectively own their own homes.

CHAPTER 5 SOCIAL INFRASTRUCTURE

Policy S1 Developing London's Social Infrastructure

Our greatest concern about this policy is the availability or lack of availability of funding to support the needs for new social infrastructure. At present in many areas of large scale development there is a play off between the need for 'affordable' housing and that for social infrastructure when both are needed to facilitate the development of sustainable communities and Lifetime Neighbourhoods. Insufficient funding leaves a question around whether the London Plan will deliver sustainable development.

We propose the following alterations:

- '**Financially accessible to all section of communities'** should be added to section C after – 'Development proposals that provide high quality'.
- '**Including that managed by voluntary or community sector groups'** should be added after 'social infrastructure' in S1G.

Policy S4 – Play and informal recreation

Experience at the grass roots level is that provision of good quality your facilities has a positive impact on the reduction of anti-social behaviour on social housing estates / local neighbourhoods and propose that:

- this policy should be entitled '**Play and recreation for children and young people**'.
- S4A(i) and (2) - alterations should be made as point above.
- Paragraph 5.4.4, final paragraph text 'where possible' should be removed.

CHAPTER 6 ECONOMY

This chapter adds to our concerns that the draft London Plan policy principally benefits those at the top end (by income) at the expense of those with below median income levels. Policy E11 text, paragraph 6.11.1 expresses precisely the problems: London apparently has a strong global economy, yet its employment rates have lagged behind the rest of the country

for three decades. It has particularly high rates of youth unemployment and increasing levels of in-work poverty.

Social / affordable rent tenants and those living in more expensive private rented housing who really can only afford social-rented homes, necessarily suffer most.

Policy E1 – Offices

Competitiveness of office space is promoted and increases in stock encouraged, as are apparent 'unique agglomerations and dynamic clusters of world city businesses and other specialist functions'. It is very difficult to see how this will impact positively on the points highlighted above from the supporting text of policy E11.

There is also a fair amount of office space owned by the public sector (which is more likely to employ people from households with lower and middle incomes) yet seemingly not 'competitive'. The Mayor, however sees these (as set out in the London Housing Strategy) simply as opportunities to sell off for housing development.

Policy E2 Low-cost business space

We support the provision of low-cost business space and propose that 'where appropriate' in section E2A be removed.

We would like to see text from 6.2.2 - 'locations such as back-of town centre and high street locations, railway arched, heritage buildings in the CAZ and smaller scale provision in industrial locations' – specifically mentioned / protected in the policy.

Policy E3 Affordable workspace

We are concerned that section A of the policy is too specific (fixed on what are defined by many boroughs as 'clean' rather than 'dirty' businesses. We propose that those involved in start-up businesses in, for example, trades, construction, mechanics, repairs, recycling and renewing should be included in section A and in the policy text, as should those that commit to employing and training local people.

Policy E4 Land for industry, logistics and services to support London's economic function and Policy E5 Strategic Industrial Locations and Locally Significant Industrial Sites

Given that the result of huge loss of industrial land in London has negatively impacted on communities living in social housing, we would like to see protection and support of existing / remaining. While it is suggested that in industrial land rate vacancies are above the London average in the Thames Gateway, we feel that these should still be retained. There are other parts of London where there is a lack of industrial land space. There should be a co-ordinated London-wide approach to dealing with this – rather than handing more land over in the Thames Gateway for high-end business sectors.

Policy E7 Intensification, co-location and substitution of land for industry logistics and services to support London's economic function.

We have some concerns that mixing of industrial activities and residential will drive out what are deemed to be 'dirty businesses' and about the potential of increase property values, making it more difficult for some businesses to be able to afford to stay.

Policy E8 Sector, growth opportunities and clusters

We are concerned that much of this policy is aimed at 'people like us' (i.e. those developing the policy) rather than seriously considering how policy may address the issues highlighted

in the text of E11 – particularly for exiting lower income households that are unemployed or are in in-work poverty and young people.

Policy E9 – Retail, markets and hot food takeaways

Our comments in relation to SD6, SD7, SD8 and SD9 apply here. Much of this kind of over-development of global retail stores creates sameness – not vitality and diversity.   It damages local markets, such as Sheppard's Bush market, which meet the needs of less well-off local communities. The markets referred to in this policy and supporting text are either more expensive specialist markets or are aimed principally at tourists rather than local low-income communities.

Policy E11 Skills and Opportunities for all

Such a policy should be the focus of this chapter. It should, however, be far more developed in terms of how the draft policies will support in addressing the specific key issues highlighted in paragraph 6.11.1 – alongside the setting targets around achieving positive change.

CHAPTER 8 – GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT

Policy G4 Local green and open spaces

We propose that G4 should include '**green space on housing estates should be protected and enhanced**'. The management and maintenance of these spaces are paid for through tenants' rents and service charges rather than through council tax. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

CHAPTER 9 – SUSTAINABLE INFRASTRUCTURE

Policy SI2 Minimising greenhouse gas emissions

Given the London Plan proposals for development of such high levels of new home building, the Mayor is remiss in not ensuring full assessment of the impact of all carbon emissions in developments (including embodied carbon).

The UK government pledged to reduce carbon emissions by 80% by 2050. The Centre for Sustainable Development says that in order to meet that target it is necessary to reduce not just the operational carbon emitted (once a building has been constructed), but also the embodied carbon (the processes of material extraction, manufacturing, delivery to site, construction processes, and also demolition and recycling).

Faithful and Gould (who have worked with RICS) suggest that the amount of embodied carbon used to make a building can be as high as 65%.

Our interest in this is also that in the assessment of the environmental benefits relating to refurbishment or demolition of homes, demolition can appear to be a better option (despite actually being more damaging to the environment) where embodied carbon is excluded in the assessment.

While 'proposals for minimising embodied carbon in construction' is mentioned in supporting text 9.2.10, this is insufficient in terms of total embodied carbon in a 'cradle to grave' analysis. Policy SI2 should require assessment of embodied carbon in both new

developments and in refurbishment schemes and provide a target for reducing embodied carbon emissions.

Policy SI3 – Energy Infrastructure

Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat

We are also concerned about the lack of any written-in protections for heat network residents, in terms of reliability, service, or costs. There are lock-in cost implications to the consumer of a single commercial provider in any one area; essentially a monopoly, and presently an unregulated one.

We feel this policy should require that

(i)   a full assessment is made in each case of costs of different alternative energy supply options, dependent on number of users and energy performance to assess whether CHP and District Networks have the potential to be the best options in terms of costs for low income households and in terms of the climate and local environmental (air quality);

(ii)   there be full consideration of renewable energy options including community owned energy projects and of community owned heat networks;

(iii)   residents should be fully consulted on heating options in both refurbished and regenerated schemes, and buyers should be fully informed about what they are buying into.

(iv)   there should be ongoing monitoring of new schemes to ensure that what they say will be achieved is actually delivered, with information made available to residents in understandable form, and with punitive sanctions when commitments / contracts are breached, with compensation going to the end user.

I support this proposalsGary Hayes
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