

08 FEB 18



Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall, London Plan Team
Post Point 18
London, SE1 2AA

2nd February 2018

Dear Mayor Khan,

Please see attached London Young Labour's Policy submission as part of the new London Plan consultation process.

If you have any enquires please feel free to contact [REDACTED]

All the very best,

London Young Labour

London Young Labour Submission to the New London Plan

Introduction

'The housing crisis...can affect social cohesion, cause poor health and plunge residents into poverty. I cannot overestimate how terrible a situation we inherited.' – Sadiq Khan, Mayor of London.

London Young Labour (LYL)'s policy submission to the London Plan is on behalf of tens of thousands of young members across London, comes at the end of an extensive process, where we consulted our members across the city.

We canvassed members' views using an online form to ask what they felt the most important campaigning issues were; housing and housing related issues topped the ballot, with well over half the total votes cast. Our members also named specific issues around high rents, renters' rights, and the housing shortage among their top priorities.

LYL then elected housing as its priority campaign at our summer conference in 2017 after hearing from a housing panel that included Mayor Phil Glanville from the London Borough of Hackney, Jonn Elledge from the New Statesmen and Anthony Breach from Centre for Cities.

As part of our priority housing campaign, we hosted a policymaking session where we discussed and agreed the policy submissions in this document. They represent a broad range of opinion from across our membership and show how committed our young members are to shaping the future of London.

This submission focuses solely on housing and its associated policy areas. It is largely, therefore, a submission to Chapter 4 (Housing) but also touches on areas such as the Greenbelt (Chapter 8, G3) where the issue's relationship with housing is, in our view, inextricably linked.

London Young Labour campaigned hard in 2016 for a Labour Mayor in City Hall and strongly support the Mayor's efforts to tackle the housing crisis in London. We know, however, that the housing challenges London faces are varied and complex. Councils across London have developed individual strategies to help mitigate housing issues while hampered by severe financial restrictions from central Government. London-wide guidance from City Hall that considers the human cost of austerity and provides direction to councils will go a long way to delivering against the increasing needs of Londoners.

We hope you consider these submissions to the new London Plan.

London Young Labour

Empty Homes

While we recognise that bringing long term vacant properties into use can only make up part of any strategy to solve London's housing crisis, we believe having tens of thousands of homes sit empty – many in luxury private developments - while so many people are homeless or in inadequate housing is unacceptable. We therefore strongly support the provisions of Policy H11, particularly the provisions in 4.11.1 to encourage local councils to use Empty Dwelling Management Orders to make better use of housing stock.

We note, however, that the actual use and enforcement of Empty Dwelling Management Orders by councils has been relatively low since its introduction in 2006, and would support City Hall investigating how it can encourage and support local authorities to use their powers more effectively. Accordingly, we strongly support the provisions of H11B: 'The Mayor will support boroughs with identified issues of homes being left empty as 'buy to leave' properties to put in place mechanisms which seek to ensure stock is occupied'. We believe City Hall has a valuable strategic role to play across councils to reduce the number of empty homes.

Specialist and Supported Accommodation

Supported and specialist housing is vital to some of London's most vulnerable residents and as such it is a top campaigning priority for our members. The growth in homelessness since 2010 is of deep concern, as is the precipitous fall in funding to women's refuges as a result of central Government cuts. We support Policy H14, therefore, which states that 'The delivery, retention and refurbishment of supported and specialised housing... should be supported'. We strongly support the Mayor's efforts to tackle homelessness and rough sleeping, for example through the London Homeless Charities Group, and believe the London Plan – and particularly its role in encouraging constructing more sheltered housing – has a key role to play.

We strongly support the provision of section 4.14.1 that 'Boroughs should undertake assessments of the short and long-term needs for supported and specialised accommodation within their borough'. We are concerned at reports that people are moved to other parts of the country due to a lack of local provision. While we agree that some multi-borough or pan-London coordination will often be necessary, the evidence shows that in many cases, ensuring that provision is as close to home as possible means vulnerable residents can stay near their communities and benefit from the support of their families and friends.

We would recommend, therefore, that each borough's assessment of short and long-term needs ensures that provision is as local as possible. Vulnerable people such as those made recently homeless should be housed within their borough wherever possible, or a neighbouring borough at the least.

Conversely, there will be some cases, for example victims of domestic violence and abuse, where the resident would not want to be housed in the local area and we would encourage City Hall to continue to use its strategic position across the boroughs to ensure this need is met.

Increasing Housing Supply and Threshold Approach to Applications

We believe it is crucial to ensure that ensuring that as many new builds as possible are genuinely affordable. Far too many developments with little to no affordable housing were approved by the

previous Mayor and as such we strongly support the principle of the plan's minimum threshold (H6.B) and the use of the Fast Track to encourage developments with affordable housing. Members have, however, expressed concern about the split of the 35% threshold into:

- a) 30% low cost rented homes,
- b) 30% affordable housing such as London Living Rent and shared ownership and
- c) 40% as determined by the council

Particularly in boroughs which are reluctant to provide affordable housing, members are concerned that the 35% commitment could be 'watered down' by the provisions of (c) and, while we are conscious of the need for different approaches in different boroughs we believe City Hall should consider either raising the total affordable housing threshold amount or ensuring that the 40% council determined is reduced or more strictly defined.

Student Accommodation

Many of our members are students living in London or recent graduates of London universities, and we are deeply concerned that the high cost of accommodation in the city is becoming increasingly unaffordable for those on lower incomes. Research from the TES, for instance, showed that in 2017, students from the most disadvantaged parts of the UK made up just 3.5% of entrants to King's College London (down from 4.8% in 2016), 3.8% of entrants to Imperial College (down from 3.9%) and just 4 % of entrants to University College London (4.3%).

Accordingly, we strongly support measures for a minimum proportion of affordable bedrooms in new student developments, such as those outlined in 4.17.6, particularly 'Providers of PBSA are encouraged to develop models for delivery of PBSA in London which minimise rental costs for the majority of the bedrooms in the development'. We believe addressing the cost of affordability is crucial for tackling the cost of living crisis for students in the capital. Hidden charges are also often punitive for students in London and therefore welcome paragraph 4.17.9 which clarifies City Hall's position.

While we support the principle of ensuring there is a defined minimum quantity of affordable student housing (35% as outlined 4.17.6 and 4.17.8) but feel this could go further or be more clearly defined. For example, rents could be based on a calculation of living costs rather than the calculation outlined in 4.17.7 (55% of maximum income) which is in danger of being relatively low if the maximum grants available are not significantly above average.

Members also expressed particular concern about the quality of student housing, with many personally experiencing student accommodation of predominantly low quality. We strongly support the principle behind 4.17.5 but feel this could be taken further; with many developers exploiting construction loopholes to construct second-rate student accommodation. We feel that City Hall should work as closely as possible with developers in ensuring student accommodation is built to the same standards as residential accommodation.

Green infrastructure and Urban Greening

We welcome the Mayor's ambitious commitment to make London at least 50% green by 2050 and update planning guidance to work towards that goal (section 8.1.3) and the need for a green

infrastructure approach (8.1.1) that takes into account the wider context of green infrastructure (8.1.2). Protecting, enhancing and expanding London's green spaces is a top priority for our members, particularly in the context of Londoners' health. The recent progress made in tackling air pollution, for example, was highly encouraging and sufficient green spaces in London will be crucial to continuing to reduce pollution.

Members expressed extensive interest in innovative approaches to urban greening such as those outlined in paragraph 8.5.2 and as such we strongly support these measures. In heavily and densely populated areas such as Tower Hamlets where space is scarce we particularly welcome City Hall actively encouraging innovative solutions such as green walls and roof gardens.

The Green Belt

Our members believe that protecting the environment and green spaces in London is extremely important and recognise the strong public opinion in favour of retaining the Green Belt. However, we feel that the public perception of the areas that make up the Green Belt is very different to the reality. Much of the land that makes up the Green Belt, which makes up over a fifth of the total land area of London, is taken up with uses such as golf courses or simply neglected and derelict.

While we remain strongly against building on genuine green spaces such as Areas of Outstanding Natural Beauty, Areas of Conservation or Special Protection, nature reserves or woodland, and entirely agree on the need for more high density housing outside the Green Belt, we believe the urgent need for housing means that limited building on some smaller, less 'green' areas of the Greenbelt is unavoidable.

We therefore believe that City Hall should undertake a comprehensive, strategic review of the Greenbelt, taking into account factors like proximity of land to stations and the land's long term use. Such an approach would not have to mean the Greenbelt shrinks; one idea from our members was that Greenbelt land built on could be replaced by adding more land to the Greenbelt elsewhere. For example, if a site involved building 100 hectares near an underground station it could be replaced by 150 hectares to the Greenbelt further out of London.

Density and Design

While we believe it is necessary to build 'out' we equally believe it is necessary to build higher density housing to address the severity of London's housing crisis. As such we welcome the commitment in Policy D6 that 'Development proposals must make the most efficient use of land and be developed at the optimum density' and particularly that 'Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused'. We feel City Hall should incentivise housing to be as high density as possible – while still meeting high standards of quality, including space requirements – by encouraging high-quality and innovative design.

In particular, we feel that public debate around density is too often framed as an unhelpful binary choice between towering, oppressive blocks and inefficient housing that does not meet the needs of a crowded urban centre. Not enough attention is given to the 'missing middle'; well designed medium-rise blocks and other dense housing could go a long way towards solving London's housing crisis where high-rise is less appropriate.

Innovatively designed housing can be crucial in not just building new, affordable and dense housing but in environmentally friendly construction. For example, the groundbreaking the PLACE/Ladywell temporary housing development, built by a Labour council in Lewisham, was the first of its kind. Utilising off-site construction methods, the development is not just cheaper to construct than traditional housing, but is of high quality and requires much less heating, saving costs and reducing emissions. We welcome the Mayor's commitment to innovative design and believe City Hall is well placed to encourage radical solutions across London.

London Young Labour members believe that everyone in London has the right to housing which is not only affordable, but is of high quality and a decent place to live. We therefore welcome the commitment in paragraph 3.3.1 to an inclusive design approach, particularly with reference to access for disabled Londoners and the commitment to high-quality design for all Londoners.

A practice we find particularly appalling is the proliferation of 'poor doors' – developments where the entrance for affordable housing is kept separate and out of sight from the entrance for more expensive housing – which is an unacceptable practice and highlights some of the worst excesses of housing approved under the previous Mayor. We therefore particularly welcome paragraph 3.3.4 which states that: 'Entrances into buildings should be easily identifiable, and should allow everyone to use them independently without additional effort, separation or special treatment'.

Estate Regeneration

We recognise that, as section 4.10.1 notes, 'regeneration and intensification of London's housing areas has been, and will continue to be, a key part of the evolution of London, and critical to meeting its housing needs', but we believe it is vital to ensure that estate regeneration which rehouses tenants is sympathetic to local residents' needs: in other words, regeneration, not gentrification. Estate regeneration has often been handled poorly in London, with too little consideration of tenants' views and local need, and many of our members expressed deep concern over redevelopment schemes in places like Haringey and Southwark.

On that basis we welcome and support the commitment given in Policy H10.C. that 'existing affordable housing floorspace should be replaced on an equivalent basis' and of 4.10.4 that 'it is important to ensure that estate regeneration does not lead to the loss of affordable housing and that it delivers an uplift in affordable housing where possible'.

We believe that City Hall has an important strategic role to play in enforcing good practice and being ready to step in where needed, such as in Barnet in December, when the Mayor refused permission for an estate regeneration project in Barnet due to the project's proposed loss of 257 affordable homes. Under the previous Mayor City Hall took a far too relaxed approach to regeneration, particularly regarding the loss of social and affordable housing and we welcome this more interventional approach. We believe City Hall should consider the viability of working in partnership with local authorities to encourage new, sustainable developments of 100% local authority owned housing with high proportions of affordable housing.

Many members have expressed concern at the lack of consultation and information in many redevelopments, with local communities often not properly balloted and not being given enough information on what is happening to their own homes. We strongly support the principle, therefore, in paragraph 4.10.5 that 'it is particularly important that information about the viability of schemes is available to the public even where a high level of affordable housing is being delivered'. We

believe City Hall can play a unique role in ensuring residents are kept informed and treated fairly; for example, in ensuring ballots are fairly conducted, and as such warmly welcome Sadiq Khan's recent announcement on consulting residents on estate regeneration as part of the 'Homes for Londoners' policy process.

Fire Safety

In the aftermath of the appalling tragedy in Grenfell we fully support the commitments to fire safety outlined in Policy D11, particularly regarding sprinklers and other assessments (3.11.3), independent fire statements (3.11.5), robust evacuation procedures (3.5.5), and safety measures in tall buildings (3.8.4). As in many areas we believe City Hall can play a crucial oversight function and we would encourage it to use all its powers available to ensure developers are kept to the strictest possible interpretation of the measures it outlines in D11.