

The London Plan 2018

Submission from Pat Turnbull, [REDACTED]
[REDACTED]
[REDACTED]

Proposed amendments are in bold.

Foreword from Sadiq Khan

Amend to remove the terms 'genuinely affordable' and 'affordable' throughout the London Plan so that the type of housing is described specifically i.e. social rented housing, London Affordable Rent, London Living Rent, shared ownership, market housing for rent, market housing for sale.

Chapter 1 –Planning London’s Future (Good Growth Policies)

The term 'good growth' should be removed throughout the London Plan on the basis that the type of growth described is generally only good for a small minority of Londoners.

The references to predictions of London’s population to 2041 should be removed from the plan as the future size of London is impossible to predict so far into the future, and this prediction is used throughout to justify a type of growth – intensification, densification and height - which is generally harmful to the lives of most current Londoners.

Policy GG2 Making the best use of land and Policy GG4 Delivering the homes Londoners Need

1.4.3. Replace all references to affordable housing with 'homes which most Londoners can afford to live in'.

Amend sentence 2 to read '43,000 of these should be social rented'...

1.4.4. All references to overall targets for delivery of homes should be removed from the London Plan. In all places where this occurs there should be specific reference to the numbers of each type of home based on the need stated in 1.4.3.

Opportunity Areas

A clear map of the current 38 plus 9 Opportunity Areas should be included in the London Plan.

All references to Opportunity Areas currently scattered throughout the London Plan, usually allowing leeway for more intense development in these areas, should be removed from the text. Instead a new sentence should appear in the introduction: 'The GLA undertakes to make an urgent, detailed and public assessment of the effect of Opportunity Areas on the homes, jobs and facilities of those currently living in London. It will put on hold as of now the nine new Opportunity Areas and will not add to the 38 already existing until this exhaustive investigation has been completed and its findings published. The investigation will be undertaken with the full participation of all sections of the London community whose lives have already been affected by Opportunity Areas.'

Chapter 3 Design

Policy D4 Housing quality and standards

The density matrix should be reinstated; standards based solely on design will not protect Londoners from the over-development of their areas, over-development which will worsen their living conditions. References to design in this context should be deleted throughout.

D6 Optimising housing density

3.6.1. Delete the sentence 'This will mean developing at densities above those of the surrounding area on most sites.'

Policy D8 Tall buildings

Delete the sentence 'Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations...'

3.8.2. Delete the sentence '...In large areas of extensive change, such as Opportunity Areas, definitions of tall buildings should relate to the evolving context...' (see also point about Opportunity Areas at start of submission).

Chapter 4 Housing

Policy H1 Increasing housing supply

A. Table 4.1 Sets the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents – **all targets should specify tenure, basing themselves on the needs identified in 1.4.3.**

Delete the following points, all of which will lead to over-development and a negative transformation of Londoners' environment:

B ...1c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites...

b) mixed-use redevelopment of car parks and low-density retail parks

c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses...

f) industrial sites (Policy E4, E5, E6, E7)...

Policy H2 Small sites

References to off-site contributions of 'affordable' (replace with social rented) housing should be deleted. All developments however small should include a proportionate amount of social rented housing based on the needs identified in 1.4.3. See below – and cash in lieu is no use as the borough then has to identify yet another site to put the housing on.

H Boroughs wishing to apply affordable housing requirements to sites capable of delivering ten units or fewer ...should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions...

Table 4.2

10 year targets ...for net housing contributions on small sites...

4.2.12. As demonstrated by the 2017 SHMA, London has significant unmet need for affordable housing ...boroughs should be capable of securing cash in lieu contributions for affordable housing contributions from such sites ...

Policy H4 Meanwhile use

4.4.2. Meanwhile housing can be provided in the form of precision-manufactured homes. **This requires a more precise definition to ensure that these are not container homes and other types of housing unfit for human habitation.**

Policy H5 Delivering affordable housing

Amend heading - remove 'affordable' – replace with 'which most Londoners can afford to live in and maintain a good life style'.

A The strategic target is for 50% of all new homes delivered across London to be affordable ...**Amend to read '65 per cent of all new homes delivered across London to be social rented'.**

B 4.5.2...the mayor is adopting a threshold approach to viability. This means that schemes meeting or exceeding the threshold without public subsidy, or consistent with the requirements in Part C of Policy H6 Threshold approach to applications, are not required to submit viability information...**If this policy is to remain, the threshold should be 65 per cent social rented homes. See point 4.5.4. below.**

4.5.4. ...In previous years where there has been a relaxation in affordable housing and other planning requirements this has typically led to higher land values, rather than an increase in housing delivery ...the London SHMA has identified that 65 per cent of London's need is for affordable housing.

Policy H6 Threshold approach to applications

A...applies to development proposals which are capable of delivering more than ten units or which have a combined floor space greater than 1,000 square metres...**should apply to all development proposals regardless of size.**

B The threshold level of affordable **replace with social rented** housing is initially set at:

(1) a minimum of **65 per cent on all sites.**

D Fast tracked applications are not required to provide a viability assessment at application stage...

E Where an application does not meet the requirements set out in Part C it must follow the Viability Tested Route...**Delete this clause. Developers will run rings round borough and GLA teams on viability.**

Policy H7 Affordable housing tenure

A ...The following split of affordable products should be applied to development:

1) a minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent / London Affordable Rent)

2) a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared Ownership

3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing...

4.7.2. There is a presumption that the 40% to be decided by the borough will focus on Social Rent / London Affordable Rent...

4.7.8 Currently all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000. Intermediate ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the definition of affordable housing),

should be affordable to households on incomes of up to £90,000. Further information on the income caps and how they are applied can be found in the Annual Monitoring Report.

This entire section needs to be completely altered. All references to affordable products should be replaced with social rented housing. 65 per cent of what is required on all developments should be social rented housing. There should be no leeway for boroughs as there should be no leeway for developers. Almost all of what is proposed above as 'affordable' housing is aimed at households at well above the London median income.

Table 4.3 2017 SHMA findings

For dwellings to be considered affordable, annual housing costs ...should be no greater than 40% of net household income...**Amend to read 30 per cent.**

Policy H10 Redevelopment of existing housing and estate regeneration

4.10.1. The 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...**Delete this sentence. Regeneration of London's housing estates has reduced the amount of social rented housing and replaced it with large amounts of market housing that do not meet need.**

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...**Delete this point. This is entirely subjective; what often actually happens is that households on below median income are forced out and replaced with households on well above median income, or investors.**

4.10.3 In some cases, regeneration will include the loss and replacement of homes and it is important that any such scheme is delivered with existing and new **delete and new** residents in mind ...take account of the requirements of the Mayor's Good Practice Guide.

4.10.4 ..all estate regeneration schemes should go through the Viability Tested Route...

Policy H12 Housing size mix

A ...6)...a higher proportion of one and two bed units generally more appropriate in more central or urban locations. **Delete this sentence. It appears to encourage the removal of families from 'central or urban' locations. The number of families in temporary accommodation or unsuitable private rented properties shows there is a shortage of family housing. Building family housing frees up smaller units for smaller households.**

D For low cost **replace with social** rent, boroughs should provide guidance ... to ensure affordable **replace with social rented** housing meets identified needs ...take account of:

1) the criteria set out in part A **delete**

2) the local and strategic need for affordable family accommodation

3) local issues of overcrowding

4) the impact of welfare reform

5) the cost of delivering larger units and the availability of grant

4.12.3 Family units have historically been considered to be those consisting of three or more bedrooms. However, as many families do live in two-bedroom units...**Delete**

this last phrase. It appears to accept as inevitable worsened living conditions for families. What, in our rich 'world city'?

Policy H13 Build to Rent

This whole section needs to be rethought. As it stands it does not look as if this sector will deliver anything like the type of housing that meets Londoners' needs.

Policy H17 Purpose-built student accommodation

Again, this entire section needs a rethink. This type of accommodation with this amount of leeway for developers will deliver yet more tiny and expensive student accommodation.

Policy H18 Large-scale purpose-built shared living

Needs a rethink – danger of the construction of yet more expensive housing that does not meet reasonable space standards instead of separate, good size family units.

Chapter 6 Economy

Policy E1 Offices

This section, as the first section of this policy, specifically mentioning 'world city businesses' indicates the priorities of the writers of this plan. They are not with large sections of the London population and jobs that serve that population.

Policy E2 Low cost business space

A The provision, and where appropriate, protection of a range of low-cost B1 business space should be supported ...**Remove 'where appropriate'. Who decides this?**

Accompanying text

6.2.2 Low-cost business space is often found in locations such as back-of town centre and high street locations, railway arches, heritage buildings in the CAZ, and smaller scale provision in industrial locations...**These locations should be included as to be protected in the Policy itself. They are exactly the types of low cost space that have already been substantially lost all over London.**

Policy E3 Affordable workspace

A In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is:

- 1) dedicated for specific sectors that have social value such as charities or social enterprises
- 2) dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces
- 3) dedicated for disadvantaged groups starting up in any sector
- 4) providing educational outcomes through connections to schools, colleges or higher education
- 5) supporting start-up businesses or regeneration...

This is a very restricted selection. Why not people or small businesses serving the needs of the local community? It seems to set a value system on what is useful that may not correspond with the fundamental needs for jobs or services of London's people.

Policy E4 Land for industry, logistics and services to support London's economic function

The Economy section of the London Plan needs to be examined to see if its proposals are likely to be able to stem this serious loss of industrial land in London, land which provides jobs for so many Londoners.

Policy E5 Strategic Industrial Locations (SIL)

Policy E6 Locally Significant Industrial Sites

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

These policies need a rethink. There is a danger that the process of intensification as suggested in these three policies will drive even more industry out of the capital. Industrial estates and other workplaces often consist of low rise buildings rented relatively cheaply. If a plan-led process leads to these buildings being demolished and replaced by higher rise new buildings, some industries will not be able to use them, and others may be driven out by increased cost.

So this drive to cram more in may destroy even more workplaces. There seems here to be a dogmatic view of what is desirable in London which may contradict reality and create a London which does not provide jobs or meet Londoners' needs. It may look prettier, but is that the prime consideration when it comes to economic activity?

Certain types of mixed use development are likely to militate against certain types of industrial production e.g. developers of housing for market sale will not want economic activity nearby which will lower the price of the housing.

Policy E8 Sector growth opportunities and clusters

This policy needs a rethink. The non working class jobs referred to in this policy seem to be preferred by the writers of this plan. There have also been cases where higher education institutions were used as a tool to try to drive out working class homes and jobs eg Carpenters Estate in Newham. The Fashion Hub in Hackney has turned out to be, not a thriving hub of creatives, but a collection of expensive stores. Space provided for start-ups in Here East on the Olympic site costs £250 a month for a desk. Only people who can fund themselves without a steady job can afford to use this kind of space.

Policy E9 Retail, markets and hot food takeaways

This obsession with hot food takeaways seems somewhat out of proportion. For many people on low incomes and having to hold down more than one job,

they are a necessity. On markets – although lip service is paid to markets in general, the only ones mentioned are those providing for tourists rather than the daily needs of ordinary Londoners. Gradually the markets that serve the needs of many Londoners are being forced out by over development which does not actually serve most Londoners' needs. Protection needs to be genuine.

Policy E11 Skills and opportunities for all

What a pity this section is the last in the Economy chapter, almost tagged on as an afterthought. Is the approach of the draft London Plan likely to make this problem of unemployment, particularly youth unemployment, worse or better? 'Regeneration' of the type which means less productive work and more low paid service and shop work could make things worse.

I propose the plan looks at ways it can help re-establish the colleges which have disappeared – the Building Colleges, for example, at a time when people are bemoaning the shortage of building workers. While the spread of universities seems to be welcomed by this plan, the teaching of practical and productive skills seems to hardly get a mention.

Policies GG1 Building strong and inclusive communities, S1 Developing London's social infrastructure, and HC7 Protecting Public Houses

The London Plan needs to support an approach where access and value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

Many community spaces are irreplaceable and unique and need to be looked after for future generations. Communities' knowledge needs to be valued and included from the start in policy discussions across the GLA.

Community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations.

Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected and their use encouraged.