

London Tenants Federations 2571 – M19 – Housing supply and targets

Are the overall 10-year housing target for London and for the individual Boroughs and Corporations set out in Policy H1 A & in table 4.1 justified and deliverable? In particular:

- a) Are the assumptions and analysis regarding site suitability, availability, achievability and development capacity for large sites in the Strategic Housing and Employment Land Availability Assessment (SHLAA) reasonable and realistic?*
- b) Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed?*

No.

- Assumptions are based on over densification and over development of one- and two-bedroom homes at the expense of delivering a wider mix of family sized homes as part of delivering Good Growth – or as we would prefer – Lifetime Neighbourhoods.
 - Assumptions will result in overdevelopment of the wrong types of homes and failure to meet needs of low-income households (without a clear attendant strategy for prioritising delivery of homes that addresses the horrendous backlog need for low-cost social rented homes).
 - Assumptions around the number of potential homes and jobs that might be delivered in Opportunity Areas are dubious, to say the least. We think these are unjustified estimates in which the total infrastructure requirements have not also been considered. The result, as with the Old Oak and Park Royal Development Corporation (OPDC), is conflict between delivery of sufficient ‘affordable’ - particularly low-cost rented homes, and delivery of essential social and community infrastructure, that is. A number of the Development Infrastructure Funding Studies that have been carried out across London make this very clear (for example those of, the OPDC and Isle of Dogs and Vauxhall, Nine Elms and Battersea Opportunity areas).
 - Just Space (which LTF is a member of) has consistently argued for the need to have social impact assessments carried out in large scale developments. We support there being a requirement in the London Plan for these to be carried out along with the London-wide SHLAA and for each large-scale development and regeneration area.
 - We are concerned about the number of homes delivered that might be simply replacements for others being demolished in estate ‘regeneration’ schemes. We are not clear that this has been fully assessed. We feel that no estate regeneration sites should not be included in the SHLAA until a ballot of residents has been undertaken (because of the impact on the number of new homes that might be delivered that are simply replacements rather for existing homes).
 - We also highlight our concerns here about over delivery of one-bedroom homes which we feel is environmentally unsound. Single person households use more water and energy and produce higher levels of CO2 emissions than produced per person in family sized homes.
- c) Policy H1 B2) a) – f) identifies various sources of capacity. Will these be sufficient to meet the ten years target and what proportion of housing is expected to be delivered by means of different types? How much is expected to be delivered on existing industrial land in the context of Policies E4-E7?*

- d) *Will the focus on existing built up areas rather than urban extensions using GB/MOL provide sufficient variety of house types and tenure?*

In respect of the green belt, this is a planning policy that was / is primarily intended to manage the growth of towns and cities. Introduced in the 1950s. this was as a companion to the development of New Towns - with growth restricted in some areas and encouraged in others.

On one level, it would seem sensible to consider a review of the green belt, as much of the green belt consists of previously developed land, poor quality grassland and roadside verges.

However, we are painfully aware that the growth we have already experienced in London has meant too much development of high-end growth in terms of homes, retail and jobs (including the financial and business sector and high-end educational facilities and research). At the same time, there has been accelerated lack of affordability, horrendous levels of poverty, polarisation of communities, inequality and displacement of lower income households. In central and inner London, particularly, there has also been loss of precious green spaces and community infrastructure.

We fear that extending the boundaries of London out further into the Green Belt could simply result in more of the same bad growth focused almost exclusively on meeting the needs of wealthier communities in small sized homes and over dense developments and with insufficient green and community infrastructure.

We feel that it is essential that outer London boroughs must contribute their share to development of the homes needed in the capital. We don't feel this should be more of the same bad growth /development that is the status quo. We would like to see more intent on delivering Lifetime Neighbourhoods in both outer and inner London.

We also feel that more sustainable options to continued growth in London must be considered in order to address divisions in wealth both within London and between the North and South.

Longer term, this could possibly be achieved through encouragement of the spread of economic growth to regions across England – that is potentially having a number of cities, as in Germany, that have high productivity, jobs etc. Potentially this could help decrease polarisation and lack of affordability in in London as well as reducing the north/south divide.

The London Mayor could make the case for a range of options to be considered around preventing ongoing unsustainable bad growth in London.

- e) *Is the emphasis on development in outer London consistent with the intention in Policy GG2 that seeks to proactively explore the potential to intensify the use of land on well-connected sites?*

We feel that it is important that outer London take a much more equal share in the delivery of homes in London. Central and inner London has had such huge amounts of

development across the last couple of decades (mostly with little benefit apparent to low income households).

Positively in respect of many outer London boroughs (although not all), they have generally delivered higher percentages of social rented homes than inner London boroughs have– as shown below and overleaf. Our table sets out the London boroughs from best to worst in terms of percentage delivery of social rented homes from 2005 to 2017.

If we take the mid-point (disregarding City of London) as that between Ealing and Lambeth, the best half (percentage wise) includes 13 outer London and only 3 inner London boroughs while the worst half includes 6 outer London and 9 inner London boroughs.

Whatever the reason for this occurring, outer London could clearly help much more in addressing London’s need for low cost / social rented homes, especially since many outer London boroughs have overall lower percentages of existing social rented stock.

	Social rented	Total housing delivery	Non-social housing	% social rented
Tower Hamlets	5334	26392	21058	20
Havering	1238	6802	5564	18
Enfield	1157	6430	5273	18
Greenwich	2530	14094	11564	18
Brent	2607	14850	12243	18
Kensington and Chelsea	474	2740	2266	17
Croydon	2891	17858	14967	16
Barking and Dagenham	953	6145	5192	16
Haringey	1350	8865	7515	15
Hounslow	1640	11063	9423	15
Richmond upon Thames	704	4789	4085	15
Bromley	1233	8617	7384	14
Barnet	2026	14435	12409	14
Newham	2360	16994	14634	14
Merton	818	5908	5090	14
Ealing	1704	12549	10845	14
Lambeth	2203	16322	14119	13
Westminster	1596	12102	10506	13
Islington	2580	20346	17766	13
Hillingdon	1278	10416	9138	12
Southwark	2544	20810	18266	12
Lewisham	1728	14378	12650	12
Bexley	484	4196	3712	12
Hackney	2087	18286	16199	11
Sutton	650	5809	5159	11
Camden	1189	11291	10102	11
Waltham Forest	819	7791	6972	11

Kingston upon Thames	398	4466	4068	9
Hammersmith and Fulham	722	8863	8141	8
Redbridge	506	6393	5887	8
Harrow	455	6743	6288	7
Wandsworth	798	17809	17011	4
City of London	26	1403	1377	2

f) *Does the Plan adequately consider the cumulative impacts of other policies on the deliverability and viability of housing?*

No – particularly not in respect of delivery of low cost-rented homes or the green, social and community infrastructure required.

We have already mentioned the fact that insufficient public funding for both low-cost / social rented homes and social and community infrastructure impacts negatively on inclusivity and sustainability.

Without adequate public funding to deliver both and thus provide a greater possibility of delivering Lifetime Neighbourhoods, delivery will continue as it has for the last 12 years or more and viability will continue to be determined by developers’ profit margins.

This is an unequal basis for determining deliverability and viability.

As members of Just Space we feel that use of social impact assessments – to consider any detrimental impact to some sections of London’s communities and regarding delivery of sufficient social and community infrastructure could go some way to rebalancing this unequal framework.

We feel the Mayor must support this and require social infrastructure assessments to be carried out as part and parcel of determining need and capacity to deliver additional homes. This should fit alongside assessments of needs for the green, social and community infrastructure that is also required. They should be carried out at London-wide level and in any individual large-scale development. This should be included in different sections of the London Plan.

g) *What is going to bring about the step change in delivery implied in the Plan compared to the current one? What are the tools at the disposal of Boroughs in 1.4.6? Is it realistic to expect this to occur from 2019 or should there be a stepped or transitional arrangement?*

h) *Should Table 4.1 include targets for different types and tenures of housing?*

The table reflects the total number of homes that it has been assessed there is capacity for in London. The table suggests that the total is more important than the different component types of housing that make up the total.

When the total is met, it clearly provides a good press release for the London Mayor, regardless of whether, for example, targets for social rented homes, are met or not. In other words, the table as it is can act to shield to exposing the failures to deliver homes

that really meet the needs of lower-income households or even those with incomes below the median.

As we know from the massively high backlog need for social rented homes, the constituent parts of the total are as important, especially if the intent is, as required by the NPPF, “to meet the full, objectively assessed needs for market and affordable housing in the housing market area”.

Identifying targets for market, intermediate and low-cost / social rented housing in London, would be a positive way of looking to achieve this and would also be a better way for the general public to understand what is needed / can be developed in different boroughs in order to meet London-wide need.

This is important, since despite successive London Plan Examinations in Public determining that targets are deliverable, those for social rented homes have been consistently unmet.

It would ensure that both the Mayor and the boroughs are more open, transparent and accountable.

Ultimately it would help to add to public pressure around the need for investment of homes for which there is greatest need (that is low cost / social rented homes).

We propose that the Mayor should work in collaboration with the boroughs to achieve a breakdown table as suggested.

i) *Should the target be for longer than 10 years given that the plan period runs to 2041?*

Yes.

j) *How and where is the shortfall between the identified need of 66,000 additional homes a year and the total annualised average target of 64,935 to be made up? Will LPAs outside London in the wider south east be expected to deal with this on an ad hoc basis and is this realistic?*

Presumably, in part, there will be increased levels of homelessness and overcrowding. However, significant levels of displacement (as we highlighted in our submission on matter 17) of low-income households is anyway occurring and would likely increase.

- The Guardian reported in October 2018¹ that *the number of households being moved out of London by councils has increased dramatically, rising by almost 50% in the first half of this year as town hall leaders blame rising homelessness, tightening public finances and a chronic lack of new cheap homes in the capital.*

They said that Councils have sent homeless households as far away as Glasgow, Newcastle and Cardiff in the last year, according to figures collected by local authorities and seen by the Guardian. Seven hundred and 40 households have been relocated to Kent, 574 to Essex, 30 to the West Midlands and 69 to Surrey.

¹ <https://www.theguardian.com/society/2018/oct/29/number-of-homeless-households-moved-out-of-london-soars>

More than 1,200 households were sent out of the capital in the first six months of this year – a 46% rise in the number of out-of-London placements. Six hundred and eighty-eight households were sent away between April and June alone, the highest rate in at last six years, up from 113 households in the first quarter of 2012-13.

- This is presumably the ongoing impact of post introduction of local housing allowance, which created displacement of households as the rents of private properties used by authorities to place homeless families in, were/are above the LHA limits. While government data repeats that most displacement has occurred within London’s boundaries, anecdotal evidence from early on was that inner London boroughs were moving households to outer London boroughs and outer London boroughs moving households to areas outside London – both at the edges of London and further afield.

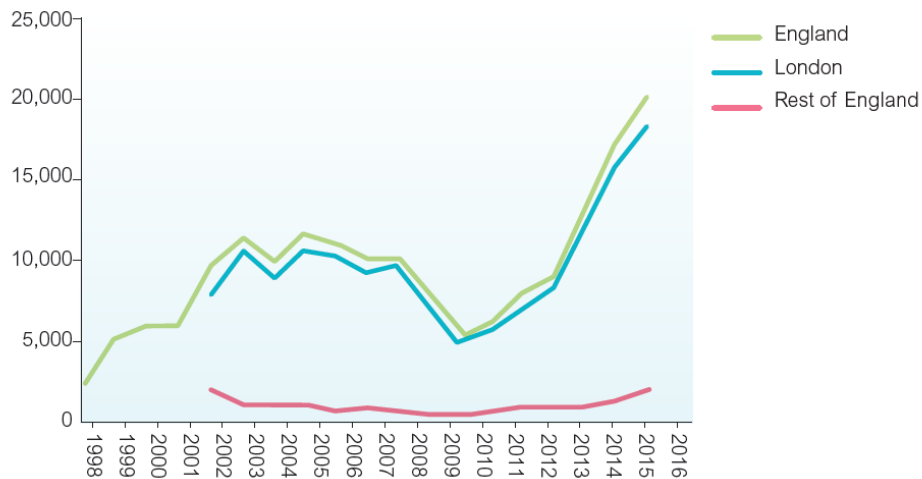
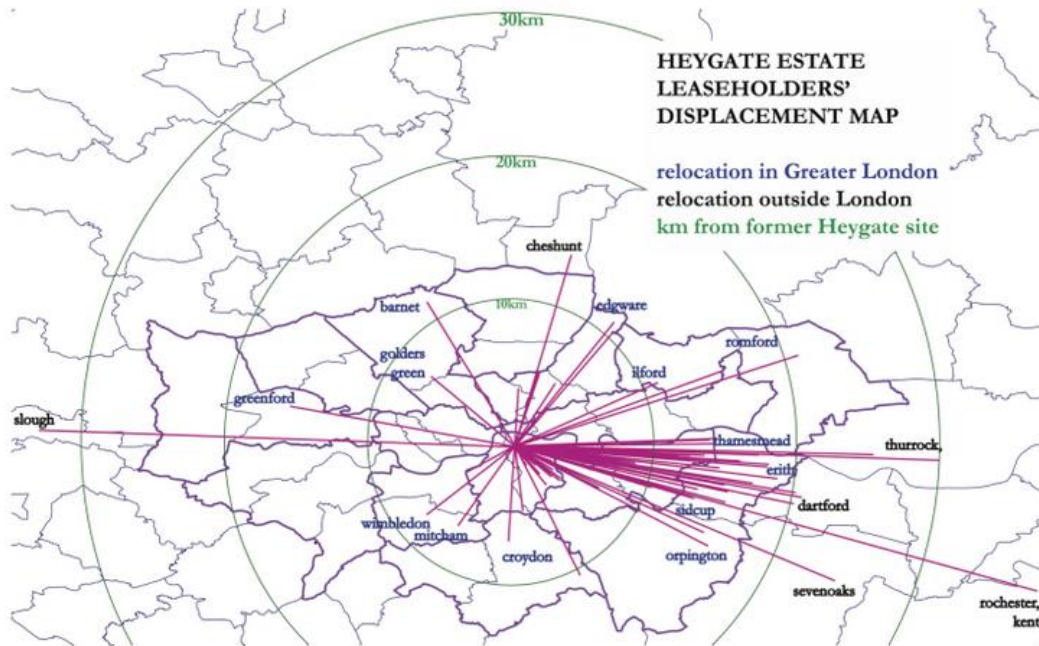


Chart 5 Number of households in temporary accommodation outside the placing local authority
Source: DCLG Homelessness Live Tables

- There is ongoing displacement of council tenants and leaseholders as a result of estate demolition schemes – including those the Mayor approved during the very long time period that he took to publish his Good Practice Guide on Estate Regeneration. Professor Lorretta Lees’ (Leicester University) current research project, which focuses on gentrification, displacement and the impacts of estate renewal in London in the C21st shows that a conservative estimate of 135,000 London council tenants have been displaced since 1997, through 54,263 council homes being demolished or slated for demolition in schemes of 100 units or more.

While clearly much of this displacement will have taken place within London’s boundaries, we know at the very least, that leaseholders have struggled to find new homes that are affordable to them in their localities when estate regeneration has occurred and many are forced to move from London. Please see map overleaf on leaseholder displacement (from the Heygate estate demolition).



Map produced for and originally published in LTE, Just Space, SNAG and Lees, L. (2014) Staying Put: An Anti-gentrification Handbook for Council Estates in London.

We can't see that this has been fully assessed in the SHMA or elsewhere by the Mayor's office. It should be, since the likely impact is not just the housing impact on boroughs outside London, but other social support costs to individual households and for additional infrastructure. We can't see that this has been adequately planned for with authorities outside London.

- k) *Does paragraph 4.1.8A adequately explain how Boroughs are to calculate a target beyond 2028/29?*
- l) *What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?*

Boroughs are required to conform to the London Plan and would have to revise their Local Plans.