

London Tenants Federation

Bringing together London's borough-wide council tenant federations and organisations

12.01.10

Response to draft replacement London Plan

The London Tenants Federation (LTF) is an umbrella body bringing together borough wide council tenant federations and organisations across London

London's council tenants consist of a high percentage of deprived households, including refugees, recent immigrants, recently housed and temporarily housed homeless individuals and families, single parents and elderly residents. In many London boroughs, almost three quarters of local authority tenants are unable to meet the cost of their rent without claiming housing benefit.

LTF does not supersede any of London's individual borough wide organisations, but rather brings them together on common issues. Its remit is to share and exchange information and to respond collectively to consultations where there is consensus.

It focuses principally on regional housing, planning and community related issues and how regional policies impact at the local level. LTF members are represented on the Mayor' Housing Forum and took part in Examinations in Public of the Early and Further Alterations to the London Plan.

LTF also has good links with other community and voluntary sector organisations that have an interest in housing, planning and community related issues and growing links with tenant representatives from the housing association sector.

1. Chapter 1: Context and Strategy

- 1.1 This section identifies persistent problems of poverty and disadvantage in London and the fact that it is an increasingly polarised city, but it fails to acknowledge that these problems relate to the continued and failed economic policies of growth of high skilled employment, the financial and business sector, real estate, retail and service industry sector; ongoing loss of industrial land and manufacturing jobs; the construction of more market and intermediate homes than specified in targets (based on evidenced need) and ongoing under provision of social rented housing (the only type of housing that is genuinely affordable for more than 50% of Londoners).
- 1.2 These policies continue to entice into the city a super rich who have no interest in the history of, or the needs of existing communities, at the expense of the bottom 25 – 50%. The gap that has continued to increase across the UK is very much wider in London than elsewhere and is evidenced through statistics that show a quarter of London adults and more than 40% of children across London as a whole and around 50% in inner London living in poverty.
- 1.3 Without much greater focus on addressing these issues, the disparity between those who continue to reap the benefits and the bottom 25% will simply continue to widen. The Mayor has a duty to address the issues of increasing inequality.

- 1.4 Poverty, inequality and polarisation are mentioned in the draft replacement London Plan, but there is little in the plan that focuses specifically on addressing these issues. In some instances where poverty is mentioned, no evidence is provided to support the policies proposed and / or there is increasing evidence on the ground, supported by academic research, that pursuance of these policies actually result in a worsening rather than an improvement in these conditions.
- 1.5 LTF members feel the Mayor's office is over optimistic about economic recovery in London and should not only be more cautious about continued development and growth but also ensure that alternatives are considered. For example while larger housing schemes are mothballed, the Mayor could work with the boroughs to ensure that small schemes with higher percentages of social rented housing are developed.
- 1.6 The LTF believes that more localised bottom up development of 'lifetime neighbourhoods' with a focus on local needs for employment, housing, social and community infrastructure would service London's communities (particularly those of the bottom 25 – 50%) to a greater extent than the draft plan's heavy focus on development of large town centres, areas of over development and intensification that would seem to benefit few other than the developers and top earners.

2. Policy 2.3 Growth Areas and Co-ordination Corridors

- 2.1 Surprisingly the Mayor fails to mention issues of deprivation and polarisation in this policy. The London Plan must ensure that all sections of London's community benefit in growth areas. Plans that fail to do so must be resisted.
- 2.2 LTF members also feel that existing local communities must be more actively involved in discussion and decision-making about growth areas. There is a need for the Mayor to support the development of community engagement strategies, monitoring of progress and highlighting of good practice.
- 2.3 LTF proposes the following changes to section B of policy 2.3 (underlined and highlighted in bold)

*The Mayor will work with partners in neighbouring regions to develop complementary strategies (**including community engagement strategies**) to realise the potential and address the challenges facing, the city region as a whole, especially those dealing with **deprivation**, population and economic growth, infrastructure and climate change. **These must benefit all sections of the community***

3. Policy 2.4: The 2012 Games and their legacy

- 3.1 It vital that existing communities in the host Olympic boroughs; residents, local businesses and services, (particularly those who are most vulnerable), are protected, supported and genuinely benefit from the Olympic Games development. Evidence from previous Olympic Games developments shows otherwise – with significant increases in rents and house prices, associated gentrification and negative impact on existing less well off residents particularly those living in short term insecure private rented housing.
- 3.2 During the five years preceding the Seoul 1988 games, 48,000 buildings, housing 720,000 people were destroyed for redevelopment. Most of the

demolished structures were single-story houses built with virtually no public investment; they were replaced with high-rise housing projects widely criticised for disrupting the vitality and texture of the urban environment. 90% of the 720,000 evictees did not receive replacement housing within the redevelopment site.

The 1992 Olympics in Barcelona unleashed development forces which led to a huge escalation in costs. Official figures show that tens of thousands of low-income people and small businesses were forced out of the city as a direct result of the Olympics. The market place price of old and new housing rose between 1986 and 1992 by 240 and 287% respectively. A further 59,000 residents left Barcelona to live elsewhere between 1984 and 1992.

The compilation of personal experiences of tenants from a range of socio economic backgrounds and geographic areas, backed by results of extensive surveys conducted by the Tenants Union, Rentwatchers and other groups, produced indisputable evidence of the widespread social problems, of housing and homelessness that increased in the years before the Sydney 2000 Olympics.

A study commissioned by Shelter New South Wales, examined the impact of six international events on local communities, the America Cup of Freemantle, the Brisbane Expo (trade fair), the Atlanta Olympics and Melbourne bid for the 1996 Olympics and well as the potential impact of the 2000 Olympics on Sydney. The report provided irrefutable evidence that, in the absence of appropriate policy measures, hallmark events had a negative impact on housing, particularly on low income private renters.

House prices in Homebush Bay, a derelict industrial area redeveloped for the 2000 Sydney Olympics rose 70% in the five years before the games, compared with a 50% growth in Sydney as a whole and 39% for the whole of Australia.

- 3.3 There are high levels of deprivation and housing need in all the Olympic boroughs. Newham for example had 24,159 on its waiting list in 2007 and 47% of children in the borough live in overcrowded homes.

At an LTF meeting held in Newham in 2009, it was reported that the average household income in the borough is only £19,000 a year (for the vast majority, not enough to access anything other than social rented housing). However, according to the most recent monitoring report of the London Plan, Feb 2009, in 2007 / 08 only 13% (rather than 35% as set out in targets) - 119 of the 939 homes built in Newham were social rented. At that rate it would take 203 years to address existing housing need in the borough.

- 3.4 The same monitoring report shows that only 14% - 109 of the 783 homes built in Greenwich, only 17% - 267 of the 1570 homes built in Hackney, only 18% - 137 of the 743 homes built in Waltham Forest and only 25% - 526 of the 2063 homes built in Tower Hamlets were social rented.
- 3.5 At the same LTF meeting mentioned earlier (held in Newham in 2009) there were reports of development schemes in Barking and Dagenham where only 15% social rented housing was being promised and was later reduced to only 10%. There were reports of families using garages and sheds in Newham as

parts of their homes because of problems of overcrowding.

<http://www.londontenants.org/LHS%20Report%20Newham%20240309.pdf>

- 3.6 Tenants and residents organisations in the Olympic host borough have consistently reported that they have not been well enough informed or consulted about the Olympic legacy.
- 3.7 LTF proposes the following changes, underlined and highlighted in bold, to policy 2.4

*A The Mayor will work with partners to develop and implement a viable and sustainable legacy for the Olympic and Paralympics Games to deliver fundamental economic, social and environmental change within east London (~~delete 'and to close the deprivation gap between the Olympic host boroughs and the rest of London'~~) **in order to address existing deprivation and housing need in Olympic host boroughs.***

Insert -

B. The Mayor will work closely with the boroughs to carry out a Social Impact Assessment, to include an assessment of the likely impact on - local social housing and the private rented sector; numbers of existing residents likely to be displaced as a result of rent increases; homelessness; local small businesses; the community and voluntary sector and general social infrastructure.

C. The Mayor will develop a strategy to ameliorate any negative impact on existing residents, small businesses, voluntary and community sector in the area and to negotiate local community benefit, including through section 106 agreements.

D. The Mayor is committed to issues of equity, understanding and engagement with all levels of society and will develop a community engagement strategy to ensure that the needs and contributions of all communities in the Lower Lea Valley and Thames Gateway are listened to and addressed.

Rename section B, E and section C, F

4. Policy 2.7 Outer London: economy

- 4.1 LTF members have generally supported more equally distributed growth across London. However, we feel development (in both inner and outer London) should be carried out sensitively and in a bottom up fashion in neighbourhoods, with the aim of creating sustainable communities and lifetime neighbourhoods. LTF is concerned about large high-density market and developer-led growth in outer London and in inner London. It would like to see local employment opportunities developed through discussion with local communities, rather than ploughing ahead in increasing the number of identical large, high-density town / retail centres.
- 4.2 LTF members are particularly concerned about the proposed growth in tourism / visitor economy (paragraph 2.32). This kind of employment tends to be poorly paid hotel work – some being part of London's black economy. Tourism can result in increased prices of local goods and services and add to already increasing levels of transience in London. It can also take valuable land needed for housing / employment / community infrastructure use.

5. Policy 2.9: Inner London

- 5.1 The text of this section makes note that inner London contains 'probably some of the country's largest concentrations of deprived communities' but other than in vague words, the policy fails to address this issue.
- 5.2 Many of the LTF members in inner London boroughs report life getting more difficult for social housing tenants – including loss of local shops, amenities and services, their replacement with very expensive ones which are unaffordable to local social housing tenants; high levels of anti-social behaviour and insufficient provision for young people and lack of employment opportunities for residents of social housing estates. There are concerns that few are able to access local employment opportunities since local employers prefer, even for lower skilled work, to employ young educated people.
- 5.3 To address issues raised above, the policy must ensure that any further developments ensure employment opportunities that address disadvantage are encouraged.
- 5.4 LTF proposes the following changes to the text of policy 2.9

Strategic

A Inner London boroughs have some of the largest concentrations of deprived communities. The Mayor, the boroughs and other stakeholders will work to ensure that the needs of these communities are addressed. They will specifically ensure local employment opportunities are opened up to disadvantaged communities and will ensure that sufficient social rented and family sized housing is constructed to meet need to contribute to positive improvements relating to health and education achievements.

B Criteria around Lifetime Neighbourhoods should apply equally to inner and outer London.

6. Policy 2.12: Central Activities Zone – predominantly local activities

- 6.1 LTF members welcome policy 2.12. Issues such as those raised in 5.2 of this response apply also to the Central Activity Zone.

7. 2.13 Opportunity Areas and Intensification Areas

- 7.1 LTF members are concerned about the drive towards high density in opportunity areas. It proposes here, as in relation to Policy 2.4 Olympic Games and 2.14 Areas for regeneration, that social impact assessments should be carried out in relation to the impact of development on existing communities.
- 7.2 LTF proposes an additional point to section C of the policy

f. Social Impact Assessments will be carried out in all proposed Opportunity Areas and Areas of Intensification, to include an assessment of the likely impact on - local social housing and the private rented sector; numbers of existing residents likely to be displaced as a result of rent increases; homelessness; local small businesses; the community and voluntary sector and general social infrastructure

8. Policy 2.14: Areas for regeneration

- 8.1 LTF members are concerned that there is a lack of evidence that spatial or neighbourhood regeneration schemes genuinely help to address existing levels of deprivation and are instead about changing the demographics of an area (moving in wealthier residents) in order to address average / ward deprivation levels.
- 8.2 Evidenced-based assessments tend to focus on average ward or neighbourhood level statistics rather than on actually benefit, or not, to the deprived communities that the schemes are apparently designed to help. Ward based or neighbourhood average statistics on income, health and educational achievement are easily changed by changing demographics in area – but whether this actually improves the life chances of deprived community members is questionable.
- 8.3 This approach taken in these schemes is based on the idea that the high levels of deprivation experienced by residents in poorer / working class areas are of their own making and can be solved by introducing better off people who will seemingly set a better example. Not only is there a lack of evidence to support this, but in fact there is increasing empirical and research based evidence that the opposite occurs, leaving the developers and those better off as the only beneficiaries.
- 8.4 There are example across London where the policy has resulted in a reduction in the number of social rented homes; where the construction of luxury apartments on council estates has been strongly opposed; where results of introducing more expensive properties has been an increase in local property values, goods and services; where local shops servicing poorer communities have disappearing and been replaced by more exclusive shops, restaurants, cafes and facilities that meet the needs exclusively of wealthier residents, making life more difficult and expensive for poorer residents. LTF members also have examples of increasing transience and of loss of valuable and precious green space.
- 8.5 LTF members have expressed concerns that regeneration schemes have tended to be developer-led, with the community only involved in discussions once plans that already been drawn up – or, where there has been discussion at an early stage there has been a focus on drawing up ‘wish lists’, with a lack of transparency about how plans might be achieved and how much funding may or may not be available or ‘what strings may be attached’.
- 8.6 The insensitive proposals (currently on hold) in the West Hendon regeneration area in the London Borough of Barnet demonstrate some of LTF concerns. West Hendon is an area of 680 flats situated on 10.5 acres of land with a children’s playground, a community centre and green spaces adjacent to the Welsh Harp Reservoir. It is proposed that the 680 homes will be demolished and replaced with 2,171 new homes, including 21 buildings of up to 20 storeys high. The new development proposals shows that social housing homes (currently council owned) will be of smaller space standards. There are to be no new social rented homes in the development. In terms of sustainability, no additional community facilities, schools or nurseries are proposed; there is to be a new fitness centre but with no guarantees it will be affordable for social housing tenants,

Additionally the Welsh Harp is of special scientific interest with 170 hectares of open water, marshes, trees and grassland, providing a valuable habitat for wildlife. Some of the high rise flats are to be built on the edge of the Welsh Harp and there are fears that shade from the tower blocks and noise pollution will scare away wildlife. Whilst some alterations have been made in the design process local community groups are still far from content that this is anything but massive over-development that is detrimental to the existing community and the local environment.

- 8.7 LTF members feel that in order to genuinely address social exclusion there is a need to ensure careful bottom-up regeneration, sensitive to and led by local communities experiencing deprivation. LTF has some examples of where there is evidence of benefit of this approach - e.g. Fellows Court in Hackney.
- 8.8 Paul Cheshire's 2007 'Segregated Neighbourhoods and Mixed Communities' (Joseph Rowntree Foundation / LSE) provides evidence that moving wealthier residents into poorer areas results in increases in property prices and goods and services; actually making life harder for less well-off residents.
- 8.9 Irmie and Thomas in 'The limits of property-led regeneration' (1993) argue that the property-led approach can undermine local and community interests, particularly as it prioritises the short-term objectives of the property industry.
- 8.10 We have provided other examples of academic research into this issue in section 18 of this response - Policy 3.10:mixed and balanced communities.
- 8.11 LTF proposes the following additions to policy 2.14 (underlined and highlighted in bold) – some of content of which was drawn up as a meeting on the London Housing Strategy in a workshop facilitated by residents of Fellow's Court, Hackney.

Add '**Process of regeneration**'

C Careful analysis will be carried out in all regeneration scheme to assess and ensure specific benefit to existing residents of deprived communities

Social Impact Assessments will be carried out in all proposed regeneration areas, to include an assessment of the likely impact on - local social housing and the private rented sector; numbers of existing residents likely to be displaced as a result of rent increases; homelessness; local small businesses; the community and voluntary sector and general social infrastructure

Regeneration schemes will be based on empowering residents of deprived communities through training and building bottom up democratic and accountable tenants' and residents organisations to ensure improvements are more cost-effective and sustainable.

They will have clarity of process including transparency around available funding prior to plans being developed; enabling tenants and residents to identify existing problems as well as priorities in terms of solutions within available budgets.

9. **Policy 2.17: Strategic industrial locations**

- 9.1 LTF members are particularly concerned about the continuing loss of industrial locations in London. They note that many council estates in London were built near industrial locations – providing homes close to places of local employment. Many of these have since been replaced with expensive market housing, such as those adjacent to the Thames in Lambeth and Wandsworth.
- 9.2 LTF members are supportive of the aim to promote, manage and protect Strategic Industrial Locations. It is noteworthy that the European countries that have managed to better survive the current economic crisis are those that have retained higher levels of manufacturing than has been the case in the UK. LTF feels it important that the Mayor not only protect industrial locations in London, but that he promote the development of local industries, to assist in building sustainable and lifetime neighbourhoods that might also benefit the environment (with less need to travel and transport goods)

10. Policy 2.18: Green infrastructure: the network of open and natural spaces

- 11.1 LTF members generally support this policy. However, it suggests that a link be made here to policy 3.5 which states that LDF's introduce a presumption against development on back gardens, (which LTF feels should be extended to the green spaces on social housing estates - tenants' back gardens).

11. Policy 3.2: Addressing health inequalities

- 11.1 Health is not only affected by access to good healthcare and having better physical environments. Other factors such as the day to day stresses of bringing up a family on low pay, not having a job or living in overcrowded housing also impacts on health and life expectancy and should be acknowledged in this policy.
- 11.2 The needs of elderly and disabled people must be considered and should be linked to policy 3.8 – Housing Choice. The findings of the Chartered Institute of Housing's recent report, 'Housing, health and care' are of note in this respect.
- 11.3 In poorer part of London, average life expectancy can be 15 years less than in wealthier parts of London. Life expectancy for males in Bethnal Green is only 69.6, whilst in Holland ward, Kensington and Chelsea it is 84.2.
- 11.4 There are several studies on the impact of overcrowding on health. Research carried out by the Association of London Government in 2001 demonstrated a strong correlation between the incidence of overcrowding and incidents of Tuberculosis. The rate of TB infections began to rise again in the early 1990s (after a long decline) paralleling the increase in overcrowding. In late 2003 the ODPM commissioned the De Montfort University to produce a report on the impact of overcrowding on health and education. It found
- Overcrowding can have severe effects on the health and the well being of household members, especially children.
 - There is a relationship between overcrowding and respiratory conditions, meningitis and TB in children, and respiratory conditions and TB in adults.
 - There is a relationship between overcrowding in childhood and respiratory conditions developed in adulthood.

- There is a relationship between overcrowding and children's mental health.
- There is some evidence of a relationship between overcrowding and children's social and emotional development.
- A recent study found household overcrowding during childhood to be significantly and independently associated with slow growth rate.
- There is evidence to suggest a relationship between overcrowding and educational under attainment.
- One study also found a significant association between overcrowding and child maltreatment.

11.5 LTF proposes the following addition (highlighted in bold and underlined) to section B of the policy

The Mayor will promote London as a healthy place for all – from homes to neighbourhoods and in the city as a whole – by:

a coordinating investment in physical improvements in areas of London that are deprived, physically run-down, and not conducive to good health

b coordinating planning and action on the environment, climate change and public health to maximise benefits and engage a wider range of partners in action

c promoting a strong and diverse economy providing opportunities for all.

d seeking to address overcrowding and including in the annual monitoring report of the London Plan levels of overcrowding by tenure and progress towards achieving reductions

12. Policy 3.3: Housing Targets

- 12.1 The high levels of increasing housing need (particularly for social rented housing) in London are evidence of a housing crisis. Setting out targets relating to housing capacity rather than addressing need would seem only to retain the status quo – that is, failure to address chronic housing need and resultant detrimental impact on the health and wellbeing of large numbers of Londoners and the education achievements of their children.
- 12.2 The 2004 evidence base suggested the need for targets of 60% social rented housing to meet need. It also suggested that only 7% of those unable to afford market housing were able to afford intermediate housing. It is difficult to believe that there has been any change in this respect given that the banks are unwilling to lend to those buying market or shared ownership housing. There are very clearly shifting sands in terms of the evidence base and the only dependable evidence of need, which is growing, is that for higher percentages of social rented housing.
- 12.3 Previous evidence-based housing targets have consistently been over met for market and intermediate housing, whilst those for social rented homes have consistently been unmet. The result has not been a gradual and incremental reduction in housing need but an increase and what would appear to be an intentional changing of demographics, particularly in inner London areas.
- 12.4 This exposes the failure of a policy that suggests sufficient social housing can be produced on the back of the private sector. It demonstrates a dominance by the developers over what is produced and a keenness by decision-makers to socially engineer the movement of wealthier communities into London at

the expense of existing and new poorer communities who are in desperate housing need. These problems will not be addressed by the Mayor shifting targets to something nearer to the 'less than required' levels that have been produced in the past.

- 12.5 The Mayor and the GLA are overoptimistic about financial recovery in London, since numerous commentators challenge this view. Also, given current market conditions and the resultant mothballing of large housing schemes in London, an alternative plan must immediately be implemented.
- 12.6 It would seem sensible that the Mayor work with the boroughs to focus immediately on small infill housing schemes containing high percentages of social rented housing rather than retaining sights on large areas of intensification. This would anyway be more sympathetic to supporting the idea of sustainable communities and lifetime neighbourhoods.
- 12.7 LTF believes that higher targets for social rented housing must be applied, the LTF suggests 60%; with no get out clauses for developers or boroughs and that the Mayor must lobby for additional public money to support local authorities in building council housing in an attempt to address London's housing crisis.

13. Policy 3.4: Optimising housing potential

- 13.1 The LTF notes the change in emphasis from maximising to 'optimising' in relation to housing density, however members still have concerns that higher densities than proposed in the matrix are still routinely being approved. Indeed this was highlighted by developers at the Examination in Public of the Further Alterations to the London Plan.
- 13.2 Appropriate levels of density should not depend simply on issues of whether an area is more or less central or close or not to transport. Density levels must be sympathetic to achieving sustainable communities and lifetime neighbourhoods. Policy 3.4 does refer to design principles in Chapter 7, but LTF members feel the policy wording needs to be strengthened and a more sophisticated method of determining appropriate densities needs to be developed.
- 13.3 Clearly if you are young, single and travelling frequently to work and across London to various entertainment venues your experience of living at high density levels may be entirely acceptable. However high density living is a different experience for council and housing association tenants and residents, large numbers of whom do not have high disposable incomes and who spend a lot of time at home and in their local neighbourhoods, including those who are unemployed, elderly, disabled or looking after young children
- 13.4 Density levels must be sensitive to the needs of all communities and all communities must have the facility to live in all parts of London. However, what appears to be promoted in the density matrix is the creation of, Paris style, a playground for the young, childless and wealthy in the centre, where everyone else feels they have to move out to find the quality of life and the amenities they need.
- 13.5 Other issues that impact on housing density are – accessibility to community; play; youth and leisure facilities (financial accessibility as well as proximity);

funding levels for management and maintenance of homes; space standards – internal and external and levels of overcrowding.

- 13.6 There appears to also be no consideration of the impact of high density on costs of management and maintenance of housing, particularly in mixed communities. Given that currently there is an annual £2.35 billion under-funding of management, maintenance and major repairs to England's council homes (a third of which are in London) and housing associations are clearly struggling financially. These are issues that must be factored in.
- 13.7 There is already evidence of management problems on mixed tenure estates. In October '06 Inside Housing magazine reported that the SE London Housing Partnership had become so concerned about the surge in antisocial behaviour against social and shared ownership residents by people renting homes privately. Mike Cleaver head of Gallions Housing Association home ownership said in the article, "In particular, where homes are allowed to become severely overcrowded, but also where the new owners neglect to pay management charges". LTF members regularly complain that buy to let (renting to short term private tenants) has increased problems of anti-social behaviour on their estates. This impacts on management and maintenance costs.
- 13.8 Given that the Mayor is keen to retain some sense of the history of the development of London as a patchwork of villages, there would seem to be some contradictions in the planning for increasingly high densities in the centre and in areas of intensification, which quite dramatically change the character of areas and often damage existing communities. A more sympathetic approach would be to work closely with communities and boroughs to develop a more even spread of housing facilities and amenities across boroughs and across London, embedding the existing pattern of London's development and supporting existing communities. The focus on being global and bigger and better increases the sameness with other cities internationally, rather than preserving and supporting the quite distinct character of London. This is what both Londoners and visitors to the capital like about London.
- 13.9 The emphasis placed upon access to public transport in the density matrix also brings with it the danger that we take our sights off the higher goal whereby people can satisfy their daily needs of work, shopping and recreation within walking distance and only have to rely on mechanised transport for more occasional needs, the 'walkable city' concept.
- 13.10 If we are serious about maintaining strong sustainable communities and London's special character, there should be an upper 350 habitable rooms per hectare limit for housing density across London, without the use of tall buildings.
- 13.11 The link between high densities, over development and the failure to protect open space and other community amenities of all kinds is of concern to LTF representatives across London.
- 13.12 Density levels appear to have been determined by criteria that neither meets the needs of all communities nor their sustainability.
- 13.13 LTF proposes changes and additions to policy 3.4 – underlined and highlighted in bold

Strategic and LTF preparation

*A Taking into account local context, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. (Delete - Development proposals which compromise this policy should be resisted) **Higher densities than those set out in table 3.2 will be rejected***

B The Mayor will develop and consult on a more sophisticated density matrix, which will also take into account household income and financial accessibility to transport, proximity of financially accessible sport and leisure, community, youth and play facilities, levels of ongoing management and maintenance funding, levels of overcrowding and preservation of local character.

14. Policy 3.5: Quality of design and housing developments

- 14.1 LTF generally supports the Mayor's proposals around quality and design of housing developments and the development of a design guide. It looks forward to the policy being implemented across all forms of tenure.
- 14.2 LTF welcomes the Mayor's focus on protecting back-gardens from development. It feels though that in order to address equalities issues, the Mayor must provide the same protection for social housing tenants' collective gardens / green spaces on their estates. These collective spaces provide valuable green space for people who live in high density housing to walk through and look out onto from their flats, they provides valuable play space (particularly important since there are high levels of over-crowding in social rented housing), provide in some instances spaces for gardening and producing food and spaces for older people to sit out in.
- 14.3 LTF proposes the following addition to section A of policy 3.5

Strategic and LDF preparation

*A Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live. Boroughs (~~may~~ – delete) should in their LDF's introduce a presumption against development on back gardens, **including the collective gardens (green and play spaces on housing estates)** (~~delete 'where this can be locally justified'~~)*

15. Policy 3.6: Children and young people's play and informal recreation facilities

- 15.1 LTF members have expressed concerns that children's playgrounds – in public spaces on school grounds and on housing estates have been lost / sold off for housing development. This is clearly unacceptable, since the number of children in London is forecast to increase from 1.6 million to 2 million by 2016. 20% of Londoners are children under the age of 18
- 15.2 It seems that policy 3.6 is focused principally on younger children. Older children that are becoming more independent and moving away from family

supervision also need safe and supervised provision, particularly important for those who are living in overcrowded homes. Teenagers are at the highest risk of being victims of crime as well as being perpetrators of anti-social behaviour where there is a lack of youth provision. This can result in increased costs in management and maintenance of housing (relating to graffiti removal and vandalism) and can weigh heavily on police resources that should perhaps be focused on other more serious problems. There is also increased risk in areas with high levels of child poverty and where there are problem, financially, in accessing facilities.

15.3 There is significant evidence of the benefits in terms of reducing anti-social behaviour where there is good provision of youth recreational facilities. In EC1, reports to the police of incidents of anti-social behaviour were reduced by 42% in 2004 (on top of a 20% reduction in the year before) as a result of additional funds being allocated by the EC1 New Deal for Communities scheme for extra activities for young people – including youth clubs being open extra hours, football training and basket ball sessions on council estates and additional after school activities provided in secondary schools

15.4 Proposed changes to policy 3.6 are underlined and highlighted in bold below -

Strategic

*A The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play, informal recreation **and youth** provision, incorporating trees and greenery in outside spaces (delete – ‘wherever possible’).*

Planning decisions

*B Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor’s Supplementary Planning Guidance ‘Providing for Children and Young People’s play and informal recreation’ sets out guidance to assist in this process. **Assessments should also be made of and future needs for additional youth provision and appropriate plans made to accommodate this***

Proposals which include loss any of children’s play ground / green space areas in public places on school or housing land should be rejected

LDF preparation

C Boroughs should:

*a undertake audits of existing play, informal recreation **and youth** provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities*

*b produce strategies on play and informal recreation **and youth provision** supported by LDF policies to improve access and opportunity for all children and young people in their area.*

16. Policy 3.8: Housing choice

16.1 The range of ‘choice’ offered in terms of housing should reflect evidenced need.

16.2 LTF members feels that the need and the demand for social rented housing is underestimated, since many people don’t register on housing waiting list as

they make the assumption that they will never be able to get a social rented home. Many residents have taken up shared ownership or ownership that are struggling to meet costs of rent, service charges, particularly those for major repairs. It feels that affordable housing targets should be expressed in percentage and absolute terms. In order to meet need and to equalise the over-development of market and intermediate housing in London targets for social rented housing should be set at 60%. Currently too few have the 'choice' to access social rented housing.

- 16.3 Overcrowding has increased by 50,000 over three years and must be addressed as a matter of urgency. LTF proposes that targets for 4-bed plus properties should also be set out in the London Plan and suggests these be set at 40% for homes in the social rented and intermediate sector – in order to in some way address need set out in the SHMA.
- 16.4 The London Plan has identified an increasing number of older residents in London. In addition, the Chartered Institute for Housing has recently published 'Housing, health and care', a report which highlights the fact that households headed by people aged over 65 years will increase by 48% (or 2.4 million households) by 2026. The report demonstrates that when health, social care and housing services work together they can make sure people with ongoing health and care needs live in better conditions, can stay independent as long as possible and avoid more costly hospitalisation and residential care. The report challenges government, at all levels, to tear down silos, share agendas, transform services and invest for the long-term.
- 16.5 The Mayor should take a lead in addressing this issue. LTF suggests he carry out a detailed report on the future housing needs of older people in London, linked to health and care issues and including assessments of needs of supported and sheltered housing.
- 16.6 There is a need immediately to protect and increase the levels of supported and sheltered housing, since LTF members have reported loss of sheltered housing in their boroughs and one that housing previously classified as housing specifically for older people has been reclassified as general purpose housing.
- 16.7 LTF also proposes that in attempts to reduce levels of under-occupancy in London that Mayor will encourage all boroughs to offer two-bedroom properties (rather than one-beds) to elderly residents who want to move from three or four-bedroom properties, in order that they have one spare room for a family member or carer to stay and provide support when required.
- 16.8 LTF proposes the following changes and additions to sections of Policy 3.8 underlined and highlighted in bold below.

Strategic

A Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

B *The Mayor will carry out an assessment of the needs of older people in terms of housing, health and care and set out guidelines for implementing recommendations including protection of and increasing*

levels of sheltered and supportive housing and wheelchair accessible / easily adaptable homes

LDF preparation

(Delete B) C Taking account of housing sub-regional requirements identified at the regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify **and address** a range of **existing** needs **and plan for future evidenced need** (delete – *‘likely to arise with their areas’*) and ensure that:

- a. new developments offer a range of housing choice, in terms of mix of housing size and types, that will (*delete – taking account of the housing requirements of different groups and the changing roles of different sectors, including the private rented sector*) **best address existing chronic housing need in London and** in meeting these

17. Policy 3.10: Mixed and balanced communities

- 17.1 There is a complete lack of evidence that attempts to socially engineer ‘communities mixed and balanced by tenure’ does redress social exclusion or strengthen communities’ sense of responsibility for and identify with their neighbourhoods. In fact there is a growing amount of academic research which suggests that far from redressing social exclusion / addressing issues of poverty, such policies can make problems worse for poorer communities.
- 17.2 Paul Cheshire’s analysis and reassessment of evidence in ‘Policies for Mixed Communities: Faith-Based Displacement Activity?’ – July 2009 call into question current policies designed to produce “mixed communities.” He says that although empirically income mixing, even in very small neighbourhoods, is considerable (see, e.g., Hardman and Ioannides 2004), it is still true that poor people tend to be concentrated in poor neighbourhoods and richer people in more affluent ones. He says careful examination of the evidence suggests that such policies for neighbourhood mixing are based more on faith than on any real evidence of additional social ills stemming specifically from geographical concentrations of poverty and affluence.
- 17.3 Kleinhans ‘Social Implications of housing diversification in urban renewal: A review of recent Literature’ 2004 says there is almost a complete lack of empirical evidence supporting the effectiveness of the ‘role model’ theory. The theory is something which LTF members feel is incredibly patronising.
- 17.4 August and Walks ‘From Social Mix to Political Marginalisation? The Redevelopment of Toronto’s public housing and the Dilution of Tenant Organisational Power’ 2009 found that diluting concentrations of poverty was found to break up ‘a strong sense of community, a history of political activism in the face of unsupportive housing management, a significant degree of political influence in local decision making, and in turn a dense network of tenant-led and tenant serving organisations’.
- 17.5 The £10 billion investment in Canary Wharf resulted in the creation of 80,000 jobs and a 22% average pay of high-value male workers to over £100,000; yet two-thirds of the children living in Tower Hamlets continue to live in households officially defined as poor.

- 17.6 In Clerkenwell ward Islington, there were massive demographic changes during the 1990's and as a result it is no longer considered in ward average terms to have the concentrations of deprivation as referred to in the London Plan, in fact – average incomes in the ward are more than £55,041. However, for more than half the households in the ward incomes average at £18,000 and on most of the council housing estates household incomes remain little higher than £12,000 a year. There has been absolutely no evidence of 'trickle down' impact. Local shops and services have changed to become predominantly exclusive and too expensive for residents of council housing estates. A number of local services have closed and public buildings sold off.
- 17.7 One researcher, Loretta Lees from Kings College London has referred to what is occurring here (2007) as 'super-gentrification'. She suggests that previous waves of gentrification had elements of altruism. However she suggests that the new super-gentrifies "pretty much send their children 100 per cent private." "The earlier people" she says "were keen on sending them to state schools – they had a set of social values about mixing with the other classes. These people aren't particularly interested in the history or being part of the community. They don't particularly want to mix".
- 17.8 Atkinson 'The evidence on the impact of gentrification: new lessons for the urban renaissance? (2004) says this results in the dilution of political voice, the breaking up of existing communities and social capital, the replacement of existing (affordable) commercial activities and local services, increased crime, pressures on surrounding affordable areas and community resentment and conflict – in addition to loss of affordable housing.
- 17.9 In areas less 'desirable' to wealthier residents the result has been increases in buy to let – with increasingly higher percentages of short term private renting, creating transient rather than sustainable communities.
- 17.10 This is also occurring on council estates, which are not exclusively mono-tenure as is suggested in the draft replacement London Plan. A third of all council homes have been sold under the right to buy, so every housing estate contains a mix of tenants, leaseholders and private tenants or non-resident leaseholders. LTF members have much evidence of resulting transience and management problems including anti-social behaviour.
- 17.11 The only real mono-tenure areas are the very exclusive wealthy areas. If the Mayor was serious about building mixed and balanced communities he would focus on building exclusively social rented housing in areas such as Mayfair, Belgravia, Kensington, Knightsbridge and St John's Wood.
- 17.12 Social and economic exclusion are very real issues in London and need to be addressed by targeting the specific needs of deprived communities through a bottom up and a carefully evidenced based approach, to address the real causes of deprivation, including the lack of appropriate employment opportunities.
- 17.13 LTF suggests references in the London Plan to 'mixed and balanced communities' should be deleted replaced with 'sustainable communities'.
- 17.14 LTF proposes deletion of the current policy and replacement with the following policy and underlined bold text

Policy 3.10 Sustainable Communities

A. A bottom up approach should be promoted to addressing social exclusion and strengthening communities' sense of responsibility for and identity with their neighbourhoods. This should involve a careful analysis of the self-determined needs of existing poorer communities, including required support in terms of employment, education, training and social and community infrastructure.

B. The Mayor will provide funding for accurate analysis of the impact on specifically deprived communities (rather than more general ward / area based ones) in both existing regeneration areas and in new schemes which apply the approach specified in A.

C. Social Impact Assessments will be carried out in any proposed large development scheme including an assessment of the likely impact on – local social housing residents; homelessness; local small businesses; the community and voluntary sector; general social infrastructure and the numbers of existing residents likely to be displaced as a result of rent increases.

18. Policy 3.12: Affordable housing targets

- 18.1 The targets proposed by the Mayor for new affordable homes and specifically those for social rented housing are inadequate, fail to take into account evidence of need and fail to properly address equality of opportunity for poorer communities.
- 18.2 Since 2004/05 the number of overcrowded homes in London has grown by 50,000 and the numbers of households on London council waiting lists has grown by 29,000. Previous targets for affordable homes failed to address growing need. Even if the annual 13,200 new affordable homes targets proposed in the draft replacement London Plan had been applied over the last 4 years (which would have provided an additional 20,029 affordable homes) this would still have failed to address even the newly arising need in London and would not have addressed the already existing need of 4 years ago.
- 18.3 The 2009 strategic housing market assessment estimates the need for 18,200 homes per year, while the Mayor proposes targets of only 13,200. This is unacceptable. Targets must be set to address need – both in numerical and percentage terms. LTF is concerned that the trend of over-development of market and intermediate homes must be reversed and suggests the need to set affordable housing targets at 60% (19,560).
- 18.4 The Mayor also proposes that only 60% of the affordable housing should be social rented and 40% intermediate. There is no evidence to support this change; in fact the 2009 Strategic Housing Market Assessment shows that the target for social rented housing should be increased to 80% social rented and the amount of intermediate reduced to 20%.
- 18.5 The push for more intermediate housing is as a result of both failures of the housing market and of policies focused on pushing an ever increasing numbers of households into home ownership regardless of whether they genuinely have the desire, or are able to afford to. This is foolish under the current climate, with increases in housing repossessions and banks being no happier to lend to shared-owners than to outright owners. The policy is only of benefit those better off at the expense of those in greatest need.

- 18.6 This resulted in 10,000 low cost homes being left empty last year and the government having to provide additional funds to enable them to be let as rented homes.
- 18.7 A study carried out in Islington March '09 on low cost housing ownership found that 94% of those becoming shared owners in the borough had previously lived in private rented accommodation. Over three quarters of the households becoming shared owners consisted of adults without children; a substantial number being single households and very few with children. Households were predominantly white and the majority White British. This is clearly not a reflection of those in greatest need.
- 18.8 The Joseph Rowntree Foundation 2008 report 'Achieving mobility in the intermediate housing market: moving up and moving on?' said that shared ownership 'cannot be considered a purely transitional tenure or a 'stepping stone' to full home-ownership', (as suggested by the Mayor). The report said that for many shared owners the sector had become permanent hybrid tenure. The research also found mobility among shared owners to be lower than social rented tenants, home-owners with a mortgage and private rented.
- 18.9 Additionally the cost of producing intermediate housing is more expensive than producing social rented housing – evidence below of national average cost of intermediate and social rented housing through the Homes and Communities Affordable Housing Programme

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			£
<i>Allocation year</i>	<i>Intermediate</i>	<i>Rent</i>	<i>Difference</i>
1998-99	73,111	65,571	= 7540
1999-2000	81,394	72,262	= 9132
2000-01	99,898	84,917	= 14981
2001-02	103,004	97,359	= 5645
2002-03	110,553	108,348	= 2205
2003-04	122,566	118,538	= 4028
2006-07	155,786	136,839	= 18947
2007-08	165,116	153,025	= 12091
	2008-09	165,683	= 16092
			<i>Source:</i> Homes and Communities Agency

- 18.10 LTF proposes the following changes underlined and highlighted in bold to policy 3.12

Strategic

*A a. The Mayor (~~delete 'will'~~) the boroughs, the Homes and Communities Agency and other relevant partners (~~delete 'should'~~) **will** seek to maximise affordable housing provision and seek an average of at least (~~delete~~*

*'13,200') **19,560** more affordable homes per year in London over the term of this Plan and within this seek to ensure that (~~delete '60%'~~) **80% of such homes are** social rented and (~~delete 40%~~) **20%** is intermediate housing. That priority should be accorded to provision of affordable family housing.*

LDF preparation

*B Boroughs (~~delete 'should'~~) **will** set an overall target in LDFs for the amount of affordable housing provision needed over the plan period in their area and separate targets for social rented and intermediate housing and reflect the strategic priority accorded to provision of affordable family housing.*

C LDF affordable housing targets should take account of

- a. current and future housing targets requirements identified in line with Policies 3.8, 3.11 and 3.12*
- b. the strategic targets and priority accorded to affordable family housing set out in section A above*
- c. the approach the approach to coordinating provision and targets to meet the range of strategic, sub-regional and local affordable housing needs in London set out in Policy 3.8, paragraphs 3.58–3.60 and Supplementary Planning Guidance*
- d. Delete 'the need to promote mixed and balanced communities' (see Policy 3.10) – and replace with 'the need to address chronic and evidenced housing need in London and create sustainable communities'.*
- e. Capacity to accommodate development including potential sources of supply outlined in para 3.60*
- f. The viability of future development, taking into account future resources as far as possible.*

*D Affordable housing targets **should be expressed in both absolute and in percentage terms** in light of local circumstances, reflecting the borough's contribution towards meeting strategic affordable housing targets in light of the framework set by the Plan and guidance in SPG, and providing a robust basis for implementing these targets through the development control process.*

19. Policy 3.15: Existing housing

- 19.1 LTF is generally supportive of this policy, but feel it needs to be strengthened to ensure there is no loss of social rented housing. There are examples of considerable loss of social rented housing in large regeneration schemes in London and of boroughs selling off council homes including family-sized street properties to the private market. There should be no loss of social rented housing in any replacement or regeneration scheme. Where additional housing is being constructed, targets for new affordable / social housing should apply.
- 19.2 Regeneration plans for the Ferrier Estate and surrounding area in Greenwich include demolition of 1,900 council homes and construction of 4,000 new homes, a hotel, a replacement primary school, a doctors surgery, a supermarket, offices, retail units and community spaces. Only 1,480 of the homes are to be affordable and only 50% of the affordable homes are to be

social rented – 740 in total. The total loss of social rented homes in this scheme is 1160.

- 19.3 A number of London boroughs are selling off street properties on the open market. In Camden, 30 homes were sold by McHugh and Co Auctioneers in 2007-9. Adapted disabled properties in purpose-built council homes less than 20 years old and in good repair (at Aspern Grove) have been earmarked for auction. A block of three flats in Russell Nurseries Estate in fashionable Belsize Park was sold in August 09
- 19.4 Existing council homes need to be protected. The Mayor should both lobby government and look for innovative ways of bring these desperately needed council family sized homes back into use.
- 19.5 There is also a massive shortfall in funds for the management, maintenance and major repairs to council homes (some £2.35 billion a year). Since around a third of the country's council housing is in London, the Mayor will also lobby government for additional funds to address this current level under-funding to assist in protecting existing affordable / social rented housing in London.
- 19.6 LTF proposes the following changes and additions to policy 3.15, underlined and highlighted in bold

Strategic

A The Mayor will and boroughs and other stakeholders should support the maintenance and enhancement of the condition and quality of London's existing homes.

The Mayor will lobby central government to address the £2.35 billion short fall in funds for management, maintenance and major repairs to council homes.

Planning decisions and LDF preparation

*B Loss of housing, including affordable and **specifically social rented housing**, should be resisted unless the housing is replaced, at existing or higher densities with at least equivalent floorspace.*

C This policy includes the loss of hostels, staff accommodation and shared accommodation that meet an identified housing need, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard. The loss of housing to short-term provision (lettings less than 90 days) should also be resisted.

D Boroughs should promote efficient use of the existing stock by reducing the number of vacant, unfit and unsatisfactory dwellings, including through setting and monitoring targets for bringing properties back into use. In particular, boroughs should prioritise long term empty homes, derelict empty homes and listed buildings to be brought back into residential use.

E Where additional housing is provided in any replacement / regeneration scheme, this must comprise 60% affordable housing (80% of which must be social rented).

F. The Mayor will lobby government for funding and also look for alternative and innovative ways to provide funds to bring empty council street properties back into use as council owned family homes

20. Policy 3.17: Protection and enhancement of social infrastructure

20.1 There is need to link policy 3.17 to proposals for Lifetime Neighbourhoods (Policy 7.1). LTF proposes that guidance on infrastructure must take into account criteria set out for Lifetime Neighbourhoods; management and maintenance of social infrastructure and local community engagement in decision making and that these must be specifically included in policy 3.17

21. Chapter 4 – London’s Economy

- 21.1 As referred to in comments regarding Chapter 1 of the London Plan, the persistent problems of poverty and disadvantage in London impacting particularly on those who live in social rented housing relates to failed economic policies that have placed huge emphasis on real estate, finance and service industries and reduced focus on industrial and manufacturing industries.
- 21.2 Many of London’s communities evolved through available employment, such as in Lambeth – large estates including China Walk, Vauxhall Gardens and Tanswell Estate had housed workers who worked in riverside industries along with pottery and food processing. Local industry in the Isle of Dogs has largely disappeared and local craftsmen’s skills have become lost to the area. Construction jobs in Tower Hamlets failed to provide alternatives for local residents. When local employment such as this goes, entire communities find themselves no longer strictly sustainable.
- 21.3 At the Examination in Public of the Further Alterations to the London Plan, one developer who boasted some 10 million square meters of development in London, suggested that it would be ‘best to replace metal bashing industries with something cleaner’. Quite clearly men who have spent their lives welding are not going to take up the only training available locally: hairdressing, travel agents, retail or media studies.
- 21.4 LTF members are shocked at the continuing loss of manufacturing jobs in London – particularly since other European countries that have maintained a larger manufacturing base have more rapidly come out of recession than the UK. They feel that existing manufacturing jobs in London must be protected and encouragement given for them to increase.
- 21.5 The bottom 25% will not benefit unless alternatives to the status quo (business, real estate, finance and retail) are examined. LTF believes that more localised bottom up development of ‘lifetime neighbourhoods’ with a focus on local needs for employment, housing, social and community infrastructure would service London’s communities (particularly those of the bottom 25% – 50%) to a greater extent than the draft plan’s heavy focus on development of large town centres, areas of over development and intensification that would seem to benefit few other than the developers and top earners.
- 21.6 The GLA anyway has an over-optimistic view of the economy. Whether these large developments will go ahead as planned is questionable.
- 21.7 The Mayor should ensure a more equal emphasis on attracting lower-skilled, but reasonably paid employment, not just the highly paid and highly skilled in London.

- 21.8 There is also a need to ensure a massive expansion of and transition to sustainable, green low carbon jobs and industries.
- 21.9 The Mayor should encourage the development of local employment including local social enterprises. These might include - building and maintaining council and housing association stock and other publicly owned buildings, ensuring local training, employment and where possible use of local goods; maintenance of local green and play spaces; provision of school / college / university meals.
- 21.10 He should encourage the development of schemes to encourage businesses to employ local people and encourage training schemes that have some element of work experience with local employers.

22. Policy 7.1 Building London's neighbourhoods and communities

- 22.1 LTF is supportive of the introduction of 'lifetime neighbourhoods' in the London Plan and feels it to be an important and significant change of focus from 'build homes and social and community infrastructure will just follow'.
- 22.2 However, at present, policy 7.1 and the London Plan's glossary definition of a 'Lifetime Neighbourhood' is inadequate. It also needs to be linked to policy 3.17.
- 22.3 LTF put together its own definition of a 'Lifetime Neighbourhood' after discussion at its July 2009 London Plan conference. The definition builds on its 'Sustainable Community – Tenants' Definition'. Later last year the definition was supported (with a few minor additions) by a number of voluntary and community sector groups that are involved with Just Space Planning Network. Unlike the London Plan definition, it also takes into account local economies and shops, community empowerment and affordability – sufficient to sustain a local community (attached at the end of this response p 24 & 25). LTF proposes the Mayor adopt this definition and include it in the London Plan.
- 22.4 LTF proposes the following underlined and in bold changes to policy 7.1

Strategic

*A (Delete - In their neighbourhoods, people should have the best possible access to services, infrastructure and public transport to wider London. Their neighbourhoods should also provide a character that is easy to understand and relate to) replace with - . **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 homes and public transport are affordable and accessible to everyone now and for future generations.***

The Mayor will set out in detail a definition for a 'Lifetime Neighbourhood' standard and requirements for meeting it

Planning decisions

B New development should be designed so that the layout, tenure, mix of uses and interface with surrounding land will improve people's access to

social and community infrastructure (including green spaces), **local shops and employment**, commercial services and public transport.

C New development should maximize the opportunity for community diversity, inclusion and cohesion and should contribute to people's sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the 'lifetime neighbourhoods' criteria (see para 7.5).

D The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility and permeability of the neighbourhood.

E The policies in this chapter provide the context within which the targets set out in other chapters of this Plan should be met.

LDF preparation

F Boroughs should prepare plans to ensure infrastructure and services will be delivered to meet (delete – 'the needs of new development and regeneration') and replace with **'Lifetime Neighbourhood requirements / standards'**.

G Boroughs should work with their local communities to set goals for their neighbourhoods and strategies for achieving them.

23. Policy 7.7 Location and design of tall and large buildings

23.1 LTF does not support policy 7.7. There are contradictions in section A which suggests they should be part of a strategic approach to changing and developing an area and as the same time should not have an unacceptably harmful impact on their surroundings.

23.2 The imposition of tall buildings is generally unacceptably harmful in terms of impact on local surroundings. They generally undermine neighbourhood character, local community spirit and the possibility of quality sustainable communities for those both within and nearby tall buildings. They always create wind turbulence – causing difficulties particularly for elderly people and small children passing by. Additionally a key issue is that they rarely support more affordable housing and despite the supposed luxury of them, many have very poor space standards, poor for living in for any length of time. The same density levels can be achieved in low rise construction. The cost of managing and maintaining tall buildings is also higher than that for lower rise buildings.

Yours sincerely

Tejinder Jutley
Secretary
London Tenants Federation

'Lifetime Neighbourhoods'

A 'lifetime neighbourhood' is one that has:

Communal spaces, facilities, services and activities - well run, accessible, affordable and relevant to all:

- Community centres and meeting places that are accessible to all within our communities
- Amenities for young people and support for them to engage
- A wide range of social amenities and facilities accessible, affordable and inclusive to all residents in an area. (The market determines that too much is inaccessible to those on low incomes or dependent on benefits).
- Neighbourhood-based public services and facilities which are needed; e.g. for the range of health, education, leisure and economic needs. Localisation, not centralisation.
- Well-designed and maintained, car-free play spaces for children
- Well-equipped and well-managed public parks and green spaces
- Safe, green and living streets and public realm (including building frontages and interfaces).
- Accessible, affordable and extensive public transport links
- Respect for heritage and the conservation of the positive character of local neighbourhoods
- Access to allotments, food growing and community gardens
- A vibrant and relevant local economy, especially small workplaces and sustainable good quality jobs
- Local shopping parades and corner shops
- Funding for community-led projects and initiatives
- Nearby spaces and zones on the edges of communities for specific specialist needs, i.e. local town centres, major leisure facilities, green belt

Homes that meet out needs

- Well-designed estates – with no nooks and crannies
- Adaptable 'lifetime homes' that can change as peoples' needs and family make-up changes, assessable to the elderly and disabled
- A wide range of homes in each estate and neighbourhood, so for example, older persons can move from full independence to supported housing and to extra care housing without having to move.
- Good space standards; equivalent to or higher than Parker Morris
- Allocations policies that recognise community needs and care for elderly
- Housing supply to reflect need rather than the market
- Affordability to be defined as a rent that all tenants can genuinely afford
- High standards of management and maintenance of our homes
- Positive investment in council homes

Good consultation, democratic accountability and empowerment of communities

- Democratic and accountable structures that genuinely involve tenants at all levels of decision-making about our homes and communities
- Local authorities and housing associations that engage in proper consultation. That means genuine involvement and empowerment, not information-giving sessions after the decisions have already been made
- Real involvement in decision making from initial ideas to final product (including planning, design and implementation), so that all residents have a sense of ownership
- Support for and development of vibrant local self-organised grassroots networks of social co-operation, solidarity and mutual aid
- Government that engages in proper consultation
- Tenants and residents will remain apathetic until councils and governments start to deliver
- People who live in a community have full control over what they need.
- All residents to have a sense of ownership of their communities, including the widest possible consultation and democratic accountability including young and old, disabled and BME residents
- Residents to be consulted, drive the agenda, own and run the process there after
- Funding to enable residents to represent themselves and govern their own communities
- Investment in communities to ensure that all can take part and community needs are addressed
- Recognise and support natural, organic communities and networks, rather than impose artificial boundaries
- Social and environmental sustainability of neighbourhoods
- Long-term, joined up thinking for community benefit.

Summary: 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 homes and public transport are affordable and accessible to everyone now and for future generations.