

London Tenants Federation

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LTF Response to consultation on proposed changes to the National Planning Policy Framework

Introduction

- 0.1 London Tenants Federation (LTF) is an umbrella organisation. It brings together borough- and London-wide federations and organisations of tenants of social housing providers. A number of its member organisations involve both council and housing association tenants and a few (a minority) are also involving some private tenants.
- 0.2 LTF's key focus is engaging its member organisations in London-wide strategic regional housing, planning and community related policy. It facilitates a consensus voice for tenants of social housing providers in the capital. LTF has had representation on the Mayor's Housing Forum since 2005 (although the Forum rarely meets now). Its delegates are often invited to attend (as panel members) London Assembly housing and planning committee meetings. Its members have attended, by invitation, almost all the Examinations in Public, relating to the London Plan, since 2007.
- 0.3 LTF has strong links with other community and voluntary sector organisations in London that also have an interest in housing, planning and community related issues.
- 0.4 LTF members are concerned that successive governments' have failed to deliver genuinely affordable (not-for-profit) social-rented homes to meet evidenced need in the London and that the market has failed to deliver homes to meet targets for affordable housing set in the London Plan.
- 0.5 Particularly of concern for LTF members is impact on availability and affordability of homes in London for those in the bottom half and more by income that consistently appear to be disregarded. General failures to deliver sufficient social-rented homes to meet evidenced need has been compounded by promotion of 'regeneration' and 'renewal' of social housing estates that have resulted in severe loss of social-rented homes and their replacement with luxury housing.
- 0.6 The backlog of need for social-rented housing continues to increase even with the time assessed to address need, through the London Plan, being stretched to 20 years. The results of this are ongoing increases in homelessness, street homelessness, overcrowding and households being forced into so-called 'affordable' rent homes and private rented homes which they will never be able to afford without claiming benefits to meet the cost. In addition households that should be able to access genuinely affordable (not-for-profit) social-rented

homes in the capital are being displaced from their communities, family and support networks, some to places outside London.

Research carried out for Shelter in 2010¹ provides evidence that inner London is pretty much unaffordable to private tenants that are dependent on Local Housing Allowance and inner London boroughs have been moving homeless families out to outer London boroughs and outer London boroughs moving their homeless families outside London since 2011/12.

0.7 This response necessarily focuses on London.

1. Affordable Housing (Q1 & Q2)

- 1.1 The NPPF requires planning authorities to use their evidence base to ensure that their Local Plans objectively meet need for market and affordable housing in the housing market area. Stretching the definition of affordable homes to include starter homes (that will only meet the need of the top third of households) takes an already nonsensical definition to most people to the levels of ludicrousness.
- 1.2 A focus on delivering homes that will only meet the need of the top third in London at the expense of delivery of homes for which there is greatest need, demonstrates absolute determination to force an increasing number of ordinary lower-income working class households out of London or to live in over-priced for-profit homes of poor conditions which are detrimental to health and well-being. LTF members increasingly fear that London will end up with poor townships outside London where the residents will have to take half a dozen buses to get into the centre to work.
- 1.3 The GLA's Strategic Housing Market Assessment 2013 provided evidence that there was a requirement for 15,700 new social-rented homes each year. The current target, though, is 10,200. Worse still, is the fact that annual delivery rates for net social-rented homes are seldom more than 50% met; increasing the back log of need each on year. That backlog, aside from assessments of new need, stood at 60,893 in 2013.
- 1.4 According to Savills, buyers on median incomes would face a cash shortfall in 48% of areas across England and almost all of London and the SE when buying a starter home. A couple seeking a mortgage up to 3.5 times their income would come up short in all London boroughs and would face a shortfall of more than 30% in two thirds of them. £450,000 is 12 times the median London household income level. Savills have also assessed that in London, some households that earn £60,000 cannot afford to buy or rent and that in a typical London borough, market rent levels would need to be reduced by half to make them affordable to households excluded from the housing market.²

2. Increasing residential density around commuter hubs (Q3,Q4 & Q5)

- 2.1 LTF members are concerned that increasing residential density around commuter hubs (as occurs anyway in London) results in greater levels of development of exclusive and smaller-sized homes, and thus failures to deliver

¹ http://england.shelter.org.uk/__data/assets/pdf_file/0016/290041/CCHPR_final_for_web_2.pdf

² <http://www.independent.co.uk/news/business/news/housing-crisis-350000-uk-households-unable-to-rent-or-buy-without-help-by-2020-a6736541.html>

sufficient social and community (including green and play) facilities that would accommodate households of all sizes and incomes. In addition, the proposals would seem to support a notion that rather than building homes in places where people want to live and work, you build in places to facilitate people travelling away from - to work. This is contrary to notions of delivering walkable cities and sustainable, lifetime neighbourhoods.

- 2.2 The NPPF should encourage planning authorities to include density matrices in their Local Plans that provide guidance on levels of density and inclusion of a full range of household sizes and appropriate levels of green, play, social and community infrastructure particularly in areas of high density.

3. Supporting housing development on brownfield land and small sites (Q7, Q8, Q9 and Q10)

- 3.1 LTF members are increasingly concerned that council estates are being eyed up as brownfield sites for development. Where any brownfield sites with existing residential property are proposed for inclusion on planning authorities' registers, there should be full consultation with residents of those homes.
- 3.2 Given governments failures to deliver new social-rented (not-for-profit) homes, existing social-rented homes should be protected in planning policy and unless structurally unsound, refurbishment should always be an option with full analyses of the social, economic and environmental costs of refurbishment v demolition considered. Where there is loss of any social-rented (not-for-profit) homes, planning policy should require replacement like for like in terms of both size and tenure.
- 3.3 Many small sites were being grabbed in London some years ago because developers were not required to include 'affordable' housing within them. Not-for-profit rented homes should be included in all sizes of development.
- 3.4 LTF members are concerned about the amount of land that is taken up to build supermarkets and their car parks. All proposals for supermarkets should include building homes above.

4. Ensuring housing is delivered on land allocated in the Local Plan (Q11 & Q12)

- 4.1 The planning system should not support developers holding onto land and waiting for property values to increase. The government should ensure that developers build where they have planning permission. The approach should be use it or lose it.
- 4.2 LTF would support the inclusion of net housing targets v delivery of net targets being set out in annual monitoring report of Local Plans, where this includes a breakdown of types of homes delivered both by tenure and dwelling size. The focus should be on delivery of targets to meet objectively assessed need.
- 4.3 The biggest problem in London is that delivery of market homes against London Plan targets are more or less met, while delivery of social-rented homes have consistently only 50% met. Thus delivery overall is not met mostly because delivery of social-rented homes have consistently not been met. This is the kind of data we feel should be included in consultations such as this.

5. Supporting delivery of starter homes

(a) Unviable and underused commercial and employment land (Q13 & Q14)

- 5.1 Clearly to have sustainable development land must be allocated to address economic, social and environmental need. This should to be carefully assessed to ensure that what is deemed to be unviable and underused genuinely is. In high value land and property areas such as London, 'unviable' in market terms, can result in failures to address sustainable development in its widest sense and meeting needs of all sections of the community. There are examples in London where employment land that still has local businesses and services that meet the needs of local communities are being forced off to build luxury developments (such as in Carleton Riverside).
- 5.2 LTF would wish to see full consultation along with assessments of needs and viability which take full account of social, environmental and economic impact on local communities.
- 5.3 Again there is no objectively assessed analysis of need for starter homes in London. Current proposals in the Housing and Planning Bill and in this consultation would appear not to have due regard for this requirement in the NPPF.

(b) encouraging starter homes within mixed use commercial developments (Q16)

- 5.4 As point 5.3

6. Transitional arrangements (Q21)

- 6.1 There should be no transitional arrangements – since this would not conform to requirements around meeting objectively assessed need.

7. General questions (Q22 & Q23)

- 7.1 There is inadequate analysis of the data provided in the consultation. For example no explanation is provided of why there may have been greater delivery from smaller sites in 2006 and no regional breakdown of data.
- 7.2 Regional differences across the country are ignored – and a one size fits all is assumed. Given the huge differences in terms of unaffordability, levels of homelessness and overcrowding, and failures to meet the particular need for social-rented (not-for-profit) homes in London are thus ignored. This is not then an adequate base for provision of planning policy. See also section 4.3 above.
- 7.3 The proposed amendments are ideologically driven rather than being based on evidence and genuinely adhering to the five guiding principles of sustainable development.

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On behalf of London Tenants Federation