

# London Tenants Federation

11.09.15

## **LTF response to London Assembly Housing Committee's call for evidence on Boosting London's new Housing Supply.**

### **1. Introduction:**

- 1.1 London Tenants Federation (LTF) is an umbrella organisation. It brings together borough- and London-wide federations and organisations of tenants of social housing providers. Its membership includes the London Federation of Housing Co-operatives. The National Federation of Tenant Management Organisations is also an LTF member. Most of the LTF member organisations are council tenant organisations and some involve both council and housing association tenants.
- 1.2 LTF aims to facilitate a consensus voice for tenants of social housing landlords on strategic regional housing, planning and community related issues. It has had representation on the Mayor's Housing Forum since 2005 and its members have attended, by invitation, all Examinations in Public of the London Plan or alterations to the London Plan, since 2007.
- 1.3 Part of LTF's work focuses on bringing together tenants and other community groups in areas where large scale developments with funding from Trust for London. We work quite closely with Just Space in this project. Since January this year the work has focused on supporting networks in London's two Mayoral Development Corporation areas (the LLTF and OPDC). LTF (with Just Space) has also supported residents, small businesses and other stakeholders of the Carpenters Estate, Newham in beginning to look to develop a Neighbourhood Plan; having supported them (also with Just Space) to produce a community plan via a project funded by Antipode - an international geography journal. The Antipode funding was awarded to LTF, Just Space, Southwark Notes Archive Group and Loretta Lees, at that time of Kings College London.
- 1.4 LTF attended the London Assembly Housing Committee debate on the issue of demolition versus refurbishment. Its co-ordinator (from the panel) facilitated some of its members and contacts providing evidence at the second of two committee meetings to highlight key issues and regional policy changes that LTF members felt were required.
- 1.5 LTF acknowledges the Mayor's requirement to identify land available for delivery of housing in London, to seek to ensure that both the Further Alterations to the London Plan's (FALP) minimum 42,000 annual housing targets is met and that the boroughs seek potential delivery of a further 7,000 homes each year to address the need assessed in the Strategic Housing Market Assessment (SHMA) 2013.

LTF members are, however, extremely concerned about the ongoing inequality of treatment of London's communities in terms of both delivery of London Plan housing targets and meeting identified need. This is specifically in terms of the consistent failure (over the last 11 years) to deliver sufficient genuinely affordable social-rented homes to meet either London Plan targets or need.

- 1.6 In addition, social housing land has been targeted as potential for delivering new private / market homes since the late 1990's. Where this has taken place there has been a resultant loss of genuinely affordable social-rented homes, albeit deemed to be regeneration or housing renewal. Looking at increasing critical media reporting, LTF is not alone in suggesting this is not housing renewal but a deliberate aims to benefit one section of the London's communities to the detriment of another.
- 1.7 An increasing number of reports are now providing evidence-based data showing that working class households are being forced out of London<sup>1</sup>; something that LTF members have argued has been occurring or likely to occur for years.
- 1.8 LTF feels there are needs to redress the balance around
  - meeting the need for genuinely affordable homes in London;
  - providing protection of existing social (mostly council) housing estates and street properties (certainly unless they are replaced like for like in terms of tenure and size) particularly at a time when there is a lack of government grant to support delivery of new social-rented homes
  - a prevention of the land that provides social housing, green, play and community spaces being consistently eyed up to deliver more unaffordable homes
  - a reconsideration of parts of London where segregated wealthy communities have incredibly low density housing - to deliver blocks of social-rented homes.

**2.0 Housing need and targets:** It is generally acknowledged that overall London Plan housing targets are not met; however, it is seldom highlighted that the reason that targets are not met is the chronic failures to deliver the social housing element of the targets. In fact, while London Plan net targets for market homes have (since 2004) generally been met, those for social-rented homes have only been half-met.

This means that land available for delivering new homes continues to be developed for the benefit of those buying and dwelling in market homes at the expense of lower income households who desperately need social-rented homes. As a result, increasing numbers of households are living in inadequate and/or temporary housing which they will never be able to afford without claiming housing benefit, in overcrowded homes or are being forced to move out the capital.

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<sup>1</sup> [www.theguardian.com/uk-news/2015/aug/28/vast-social-cleansing-pushes-tens-of-thousands-of-families-out-of-london](http://www.theguardian.com/uk-news/2015/aug/28/vast-social-cleansing-pushes-tens-of-thousands-of-families-out-of-london)

2.1 By 2006 60,000 homeless households were living in temporary accommodation<sup>2</sup> and in the 2008 SHMA<sup>3</sup> it was identified that almost 46,700 households had been placed by the boroughs in more expensive private rented accommodation (covered by housing benefit) because of a lack of social-rented homes. The backlog of need for social-rented homes in London now stands at the equivalent of 13 years of the existing average delivery rate of social rented homes<sup>4</sup>. The backlog of need for market housing stands at less than one year's worth of the existing average delivery rate of market homes.

**3.0 The policy context that has promoted estate renewal / regeneration and displacement of low income households since the late 1990's:** All the following policies are questionable and in terms of the evidence base – which is essential in terms of planning policy, although the Mayor's office claimed that the 'jury was still out' on the benefits or otherwise of promoting mixed and balanced communities at the EiP of the draft replacement London Plan 2010.

3.1 Mixed and balanced communities policy: The previous government's mixed communities policy derived from the USA's Hope VI programme in which public based housing estates were blamed for socially segregated communities.

As noted already numerous estates were in London 'regenerated' but with a lost social-rented housing - apparently creating a better tenure mix. In reality there was / is seldom any mixing between the social tenants and the new luxury dwellings that tended to replace the previous social-rented homes. The Labour Government's New Deal for Community Schemes was based principally on changing the social mix in poorer parts of London and likewise included in many instances demolition of social rented homes and replacement with private homes.

A number of academics have been critical of these schemes. Loretta Lees has referred to what has been happening in parts of London since 2007 under the name of mixed and balanced communities is 'super-gentrification' – with new luxury apartment dwellers pretty much sending their children to private schools, being uninterested in the history of the communities and neighbourhoods they have moved into and don't particularly want to mix.

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<sup>2</sup> 24dash.com article 26.10.15 - <http://www.24dash.com/news/housing/2006-10-26-new-housing-hope-for-london-families-in-temporary-accommodation>

<sup>3</sup> Greater London SHMA 2008 -<https://www.london.gov.uk/sites/default/files/archives/mayor-housing-prices-docs-SHMA-main-report.pdf>

<sup>4</sup> 2013 SHMA assessed the current backlog as 121,399 homes, made up of 60,893 social-rented, 45,705 intermediate and 14,801 market homes. Average delivery rate of social rented homes from 2007-13 was 4,892 (and is now rapidly dropping) – derived from London Plan AMRs

The LSE's Paul Cheshire argues that the policy of mixed communities tries to treat a symptom rather than the cause of inequality. His 2007 'Segregated Neighbourhoods and Mixed Communities' provides evidence that moving wealthier communities into poorer areas results in increases in property prices, goods and services, actually making life harder for less well-off sections of the community. In his 2009 'Policies for Mixed Communities: Faith-Based Displacement Activity?', 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.

The London Plan policy 3.9 continues to promote mixed and balanced communities and refers negatively to 'London's legacy of 'mono-tenure' estates'. LTF argues that there are no 'mono-tenure' housing estates in London.

- All council estates have a mix of social tenants and leaseholders and increasingly more transient private tenants of buy to let landlords
- housing association estates increasingly have a mix of social tenants and leaseholders, intermediate and affordable rent homes.

The mix has not always been seen as being a positive by social housing tenants. Often it has produced far less stable / sustainable communities, some having higher levels of anti-social behaviour (notably from insecure private tenants) and increasing lack of affinity between households of the various tenures. In some boroughs LTF members have reported quite high levels of tensions between tenants and newer mostly younger leaseholders who have bought properties from previous tenants who exercised their right to buy, who unfortunately have little sympathy for or rapport with poorer social housing tenants. Inevitably it has destabilised the common collective base for social housing tenants in negotiating with their landlords and more widely engaging collectively in decision-making in their neighbourhoods.

- 3.2 Tony Blair's Strategy Unit's 'London Project' 2004, talked more bluntly about encouraging social housing tenants to take up on schemes to move out of London and particularly noted the 'potential substantial equity tied up in land occupied by social rented accommodation in London; as many locations would fetch a high price on the open market'. This document appeared to show little sympathy around the needs of communities of social housing tenants, nor their stability or sustainability of their communities.
- 3.3 Lord Adonis and Brandon Lewis, Minister of State and Housing statements on demolition of council homes in London. Lord Adonis, one of the Labour Party's most senior figures proposed in an IPPR think tank piece, in March 2015 that London council estates should be demolished in order to build swathes of new homes for sale. He argued that demolishing existing neighbourhoods and rebuilding at higher densities could create a net increase in housing without needing any funding from the

state. As with the London Project he argues that the value of council estate land is particularly in central London. He also argued that councils should pay off the freeholders and leaseholders and take possession of their homes. In June this year Housing Minister Brandon Lewis joined his call for the demolition and redevelopment of council estates across London - in a move to apparently help boost the supply of new homes in the capital. He has allocated £150m to help fund plans for redevelopment of London Council housing Estates.

**4.0 London Plan policy 3.3Ea and 3.3Ee:** Although a focus of this investigation, these sections of Policy 3.3 of the London Plan make no specific mention of existing social housing estates. It really isn't surprising then that social housing tenants feel increasingly vulnerable in terms of their future in their existing homes and neighbourhoods.

There are large parts of London with much lower density levels than on any council estate across the capital, but with the exception of areas where large scale developments are already planned (including opportunity and intensification areas) it appears that these are not given equal consideration for increased density or a better social mix. This includes some very large areas of segregated wealthy communities.

4.1 It is not unreasonable to suggest that vast differences in housing targets between those in Tower Hamlets with its almost 4,000 a year housing target compared to some of the outer London Boroughs with not much more than 300 annual housing target is principally about the protection of very low density, mono-tenure, segregated wealthy parts of London that have large, under-occupied private homes and vastly oversized private gardens.

4.2 In most instances the land on social-housing estates that are not already occupied by housing is not 'surplus' land but the gardens, green, play and community spaces for the social housing tenants living there. While there are, of course, instances of need for renewal and improvement of these spaces and sometimes potential to deliver additional or infill social rented homes, it is incorrect to broadly describe this as 'surplus land'. This definition leads cash-strapped Councils to sell it for new housing developments that are unaffordable for average earners.

The London Plan currently provides relative protection for private back garden land (or at least a possible presumption against development on back gardens at the local level) which is not extended to the collective gardens of social-housing estates.

Incredibly, the reason that council housing estates were originally built with good levels of green space was that these provided healthier and safer play spaces adjacent to homes, for families that had previously lived in poor quality and overcrowded back to back housing (with all their associated health risks).

Many of the households living on local authority estates are again living in seriously overcrowded homes also with high levels of associated health risk. For example, senior

NHS consultants are concerned and gone public about costs from acceleration of housing problems as serious stress factor. This is something that is not considered in the London Plan density matrix – although it should be.

- 4.3 In addition, since social housing estates now house predominantly the most vulnerable in society, many households are then unable to afford to take their children to London's wider expanses of green parkland or to access increasing expensive local leisure provision or holidays. The gardens, green, community and play spaces on council estates are thus crucial to their health and well-being. They also provide easily accessible spaces for elderly or disabled residents who may not frequently have access to getting out of their homes - providing gardening areas or places to sit outside to socialise with passers-by, family or neighbours. London's air pollution level is declared officially as damaging and green spaces provide much needed "Green Lungs" for pollution relief. These all should also be considered in the London Plan density matrix.

It is notable that in respect of council estates, this land is managed and maintained (albeit not always very well) via the housing revenue account; that is paid for by council tenants and leaseholders' rents and service charges, yet these spaces are also often accessible to the wider community.

What is not desirable are the levels of over-density achieved in a majority of new housing schemes and failures within these developments to deliver the green and play spaces required and which fail completely to conform to the London Plan's policy on Lifetime Neighbourhoods.

- 4.4 Regarding section 3.6 of the Executive Director of Secretariat's report referring to 'poor construction' of some of the council estates built during the 1960's and 1970's. The statement is not justified with evidence of how many, which and where. While this could be the case, LTF is worried that generalised and unjustified statements like this can lead unnecessarily to demolition of structurally sound homes that could be refurbished – at much lower long-term economic, social and environmental costs.
- 4.5 LTF is far from convinced that in practice sufficient assessment is carried out at the local level to compare social, economic and environmental options relating to refurbishment v demolition and strongly feel that the London Plan could and should provide strong direction to change this. (Please see more on this in section 5.5 and section 7(7)).
- 4.6 LTF members agree that some sensitive infill of new homes, additions to existing estates or use of redundant garages - to build some new homes - may be perfectly acceptable to social housing estate residents and could provide additional desperately needed new social-rented homes. However, any 'renewal' should be with the full support of existing residents and any options should always include one option that is community determined. With all estate renewals each household should receive a

survey sheet to complete, with clear options provided and the majority view should hold.

- 4.7 In instances where demolition is proposed an independent ballot of all impacted households should be carried out. We support the London Assembly Housing Committee's suggestion (in Knock it down or do it up) that this is 'good practice'. This could also be supported in the London Plan.
- 4.8 The priority issue for LTF members at this present time is to retain as much existing social-rented housing as possible (since it is the only genuinely affordable type of housing in London) and especially since grant funding is not available to deliver new social-rented homes.
- 4.9 LTF members don't necessarily agree with sections in the Report of the Executive Director of the Secretariat to Planning Committee members (section 4.3 of that report) that street based solutions are better than arrangements of blocks of flats around green, play and community facilities on estates, or that "getting away from high-rise approaches of the past" is necessary or desirable. The former for example can provide much better and safer 'overseeing' of play and other communal facilities.

High rise council blocks can be, and many are, very well maintained. Many have had high quality refurbishments. There are also an increasing number of innovative refurbishment solutions that can provide not just reductions in fuel poverty, but effective monitoring of vulnerable households and inclusion of community facilities that are extremely effective. Carillion's Eco-pod is one such scheme. In addition there is a tower block on Westminster that houses elderly residents and has a roof garden. The residents of this block are happy with their housing. The fact that high-rise blocks can also facilitate access to larger green, play and community spaces on estates can be seen as extremely positive.

- 4.10 LTF members feel that to address need, new homes delivered on council / housing association estates should be social rented, not private / market homes. Despite Wandsworth Council's horrendously poor delivery rate of new and additional social-rented homes (over many years), they were one council that quite early on delivered infill social housing units on its existing council estates. As a result of the success of this, other councils followed on with similar schemes.

Inclusion of private housing is not welcome. As with social housing estates with multi-landlords, it can and frequently does, create housing management problems. Some of this is associated with transience and higher levels of anti-social behaviour. Some communal self-build could be welcomed – where supported on individual estates.

Regeneration or renewal schemes are best proposed by the residents that live on council / housing association estates and who know and understand well any problems they may have on their estates as well as best possible solutions – rather than top down proposals suggested by architects, consultants and landlords.

**5.0 Demolition v refurbishment** In many council estate ‘renewals’ since the late 1990’s there has been demolition and overall loss of social rented homes and often also communal green spaces – (this includes on the Priory Green Estate, Heygate Estate, Ferrier Estate, Morris Walk, Colville Estate, Woodberry Down Estate and West Hendon Estate). Residents of the Carpenters Estate in Newham have battled for years against demolition proposals. They have consistently been provided with inadequate justification for demolition rather than refurbishment and had insufficient response to concerns raised over likely loss of large numbers of social rented homes - in an area that was supposed to benefit from the Olympic Legacy. Incredibly Newham assessments of possible costs of refurbishment of homes are not only very out of date are not set out in a fashion where one might assess what are essential and what are desirable items and figures provided are eye-wateringly high (some four to six times higher than other tower block refurbishments – including some carried out by the borough. This is an issue that was picked up in the planning inspector’s report of the London Legacy Development Corporations Local Plan. We don’t know how many other similar cases there may be in London to this.

The difficulties in gaining requested information from Newham Council including through freedom of information requests (which were only responded to having made a complaint to the Data Commissioner) demonstrates the importance of an issue raised Rebecca Tunstall from the Centre for Housing Policy, York University; panel member at on the London Assembly Housing Committee. Rebecca highlighted that there is seldom a comprehensive paper trail of how decisions have been made around demolition v refurbishment. This would suggest a complete failure to carry out analysis of long-term economic, social and environmental issues on all options that might facilitate informed decisions being made by both residents and decision-makers. It would also seem to suggest that decisions are being made prior to full analysis being carried out. This surely is an issue that needs to be addressed as a matter of urgency.

According the London Assembly housing committee report ‘Knock it down or do it up’ there has been a net loss of 8,000 social-rented homes since 2005<sup>5</sup>. Poor delivery of new and additional social-rented homes is thus, in part, due to the number of new homes built that are simply replacements for homes that have been demolished (often unnecessarily).

5.1 LTF, with Just Space, has worked with the University College London’s Engineering Exchange on a series of publications on the issue of demolition versus refurbishment –

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<sup>5</sup> London Assembly Housing Committee Knock it Down or Do it Up  
[https://www.london.gov.uk/sites/default/files/KnockItDownOrDoItUp\\_0.pdf](https://www.london.gov.uk/sites/default/files/KnockItDownOrDoItUp_0.pdf)



including a review of the evidence<sup>6</sup>, which was submitted to the London Assembly Housing Committee's investigation into this issue. The report concludes that "*The case studies and evidence reviewed in this report indicate that refurbishment of social housing can deliver significant improvements in energy, environmental and health performance, leading to costs savings and improved living standards for residents. The overall lifetime costs of refurbishment may be lower than demolition and construction, with less disruption to local communities and residents. Engaging residents in regeneration decisions has resulted in successful refurbishment of a number of hard to treat social housing properties and estates in different parts of the UK*".

5.2 Failures to retain perfectly good and structurally sound social-rented homes results in: increases in the housing benefit bill, displacement of working class households out of London and increases in CO2 emissions.

5.4 The London Plan consistently fails to require an assessment of embodied carbon emissions particularly in replacement schemes, while the Centre for Sustainable Development argues that for the UK Government to reduce carbon emissions by 80% by 2050, it is necessary to reduce the carbon emitted in the whole life-cycle of a building, including that emitted during the process of material extraction, manufacturing, delivery to site, construction process, maintenance and refurbishment, waste processing, demolition and recycling - that is, the elements make up the '*embodied carbon*' of the building.

**6.0 Quality of housing** Many of the LTF members have raised concerns about the quality of new homes being constructed and are particularly concerned that there need to be much stronger assurances around the length of time homes will last when new homes are delivered – particularly if existing homes are being demolished to deliver new homes. This obviously sits side by side need to ensure any homes demolished are replaced with like for like in terms of tenure and size.

6.1 LTF members would like to see the London Plan set out a requirement that homes developed will last for at least 125 years. When Georgian houses in London have lasted 250 years and have often been refurbished and internally reconfigured, we don't feel this to be an unreasonable suggestion. Homes should be constructed in a way that has a hierarchy of spaces that might facilitate rearrangements and changes in services over a lifetime of the home. Within blocks of flats this might also require the inclusion of communal spaces / possible communal spaces. This might also keep a reasonable check on CO2 emissions.

## **7.0 Specific London Assembly Housing Committee Questions relating to its investigation (some short responses):**

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<sup>6</sup> Demolition or Refurbishment of Social Housing? A review of the Evidence – UCL Urban Lab and Engineering Exchange for Just Space and London Tenants Federation <http://www.engineering.ucl.ac.uk/engineering-exchange/files/2014/10/Report-Refurbishment-Demolition-Social-Housing.pdf>

1. *In terms of demolition and comprehensive redevelopment, or smaller scale schemes, what are the relative benefits of each approach?*

At the present time, with no grant funding available to deliver new social rented homes, the only reasonable option is to attempt to retain as much existing genuinely affordable social rented housing as possible. Any large scale demolition and refurbishment should include cost assessments (which we have mentioned in sections 4.5 and 5.0 above) including those relating to the loss of social rented homes – economic, social and environmental.

There is much evidence that refurbishment is long-term a better option than redevelopment (including evidence based documents that have been commissioned by LTF and Just Space and produced by UCL's engineering exchange).

LTF objects to the ongoing targeting of social-rented housing land to more deliver unaffordable private homes, particularly when new private schemes developed have consistently failed to deliver social-rented homes to meet both targets and need and when such schemes almost always result in a loss of social-rented homes.

2. *What financial models are being employed to regenerate housing estates, and how does this affect dwelling type and tenure?*

The status quo is the type that we have seen on the Heygate, Ferrier and Woodberry Down, where public land is sold to developers to deliver new private and various types of Newspeak 'affordable' homes (many of which are not genuinely affordable). In most instances there is a loss of social-rented homes and with grant funding no longer available to deliver social-rented homes but instead 'affordable rent' homes, future schemes will necessarily result in a greater loss of social-rented homes.

Some new schemes such as those being considered in Lambeth suggest renewal that includes redevelopment of existing levels of social housing as well as new private homes via a Council Owned Company and a Special Purpose Vehicle. In some respects the aims to avoid right to buy have generally been supported by the tenant movement in Lambeth, but there are still some issues of concern.

These include (i) whether the extension of the right to buy to housing association tenants might also apply to a council owned company (ii) whether social rents will be secured at genuinely affordable levels with an SPV wanting to made a profit (i.e. whether the council would be able to retain rents at social rent levels), (iii) the amounts of financial and other information that should be transparent / available in the public domain, to facilitate informed decision-making by tenants on individual schemes (iv) the extent to which existing tenancy agreement terms will be retained and (v) the extent to which there may be genuine tenant involvement in determining options.

Earlier this year the Cross-Domain Westminster Residents Panel wrote to the Council demanding that the council stop selling existing social housing that is not fully replaced locally and to apply section 106 properly in order to either get the needed mixed housing built on sight or within Westminster.

3. *How do we avoid the mistakes of the past in terms of delivering sustainable communities?*

This is a very important question particularly as the London Plan has a very good policy on delivering Lifetime Neighbourhoods. LTF feels that while the often quoted negative stereotype that older local authority estates were poorly designed and constructed is not an accurate one. While in some instances this was most certainly the case, but others were well designed, some with careful consideration of inclusion of social and community infrastructure.

There are some very good examples of this – for example

- King Square Estate in Islington which has an estate built around an open garden, grass and play area which then leads to a paved square with local shops and amenities. Both are widely used not just by residents of the estate but surrounding communities – the square with green and play spaces being very popular with children who attend a neighbouring primary school and nursery.
- Carpenters Estate in Newham, which has very good social and community facilities and amenities, local shops, a pub, play and green space and surrounding local businesses some that relate to the construction industry and a Building Crafts College. Compared to surrounding new private and mixed tenure blocks of flats that have no community or green spaces this is a very good potential example of what one might wish from a Lifetime Neighbourhood – despite the local authority's determination to demolish it and replace with anything seemingly except the existing community.

LTF feels that the following are required:

- a commissioned study on good examples of Lifetime Neighbourhoods – such as those listed above (which LTF would be pleased to support / engage in);
- application of serious bottom-up regeneration that involves residents of estates in determining what is good and bad about both their estates and links to neighbouring facilities and amenities along with community determined options with provision of transparent information on economic, social and environmental costs and benefits;
- a minimum life-time expectancy for new homes to be set in the London Plan and a requirement for delivery of buildings that might be easily refurbished with a sensible hierarchy of spaces.

4. *How can affordable family housing be maximised?*

Newspeak words, such as 'affordable' (which often refers to housing that is not affordable), should be removed from policy documents and instead only specific types of housing – social rented, affordable rent (at up to 80% market rents) and intermediate housing should be used.

The London Plan should set targets for family sized homes of different tenures and should require the boroughs to do likewise.

Given that the need for family housing is greatest in the social rented sector, any new homes on existing estates should priorities family sized social-rented homes.

5. *How can schemes be delivered with greater speed?*

What is more important is that bottom up and genuinely sustainable schemes are delivered when it comes to any 'renewal' on social housing estates. Demands of greater speed will only increase the 'mistakes of the past'.

6. *What approaches can be taken to maintain existing community networks and reduce disruption for tenants during estate regeneration?*

This has probably been covered sufficiently in sections numerous above.

7. *Is the London Plan fully supportive in terms of enabling estate regeneration? What more could the next Mayor do?*

As already detailed LTF does not feel that the priority should be on enabling estate regeneration that results in a loss of social rented homes, except where this replaces like for like in terms of size and tenure and where there is a thoroughness, transparency and openness around costings – economic, social and environmental.

LTF does not feel that that status quo supports existing communities nor helps to deliver sustainable communities or Lifetime Neighbourhoods.

We suggest below a few key items that the next Mayor should include in a new London Plan.

- Annual data relating to the number of homes of different tenures that have been demolished should be recorded in annual monitoring reports of the London Plan (to assist with transparency on this issue).
- Data on existing social-rented homes that have been converted to 'affordable' homes should also be included in annual monitoring reports of the London Plan.
- Removal of the word 'affordable' and instead identification of types of homes that are deemed to 'affordable' rather than using the generic term which is at the very least a misuse of the word 'affordable'.
- A requirement for planning authorities in London to ensure that a full balance sheet of addressing economic, social and environmental costing is provided in any social housing estate regeneration schemes and that each proposal should include at least one community based proposal in order to ensure that (i) the majority of new homes delivered are additional rather than replacement homes and that (ii) best efforts are made to deliver sustainable communities and lifetime neighbourhoods. These should also require that the following are

also included: decanting and relocation costs and loss of any income as a result of homes being left empty<sup>7</sup> (please see data in the reference below relating to the Carpenters Estate in Newham).

- Social, health and well-being indicators of existing residents should be incorporated into decision-making around regeneration / estate renewal schemes and should also be routinely monitored, including in relation to any residents who may be displaced within the scheme.
- A much stronger policy on protecting existing homes.
- A requirement that any loss of social rented homes in any development scheme should be replaced by social rented homes.
- Policies on climate change should require assessments of CO2 emissions relating to embodied and not just operational carbon.
- Promote the reuse of buildings as well as any materials from demolition. The climate change section of the London Plan should make references to retrofitting, refurbishment and demolition. Existing policies where this should occur are 5.13 (sustainable drainage); 5.14 (water quality and wastewater infrastructure) 5.15 (water use and supplies) 5.16 (waste net self-sufficiency) 5.18 (construction, excavation and demolition waste) and 5.20 (aggregates).
- The inclusion of a minimum life-time expectancy for new homes (set at, at least, 125 years).
- Policy 3.9B (mixed and balanced communities) should be removed since in practice this would seem to encourage loss of social rented homes.
- Consideration of a new density matrix that addresses - the different needs of communities in relation to household income (and thus accessibility of green and nearby affordable leisure facilities) and issues such as levels of overcrowding. Over development schemes (higher than density matrix levels of density) should be named and shamed.
- Provision of protection in the London Plan for the green and play spaces on local authority housing estates. It would seem that there is also a need for some evidence based analysis on the extent to which the green and play places on these estates is used / needed by the wider community outside the estates.

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<sup>7</sup> In an FOI to Newham Council in 2015 their estimated loss of income from council tax and rent (through leaving homes empty on the Carpenters Estate) up to 31.03.14 was more than £9.2 million. We assume that 18 months on this might at least amount to £11 – £12 million.