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London Tenants Federation submission to The Housing, Communities & Local Government Committee Call for Evidence

Changes to reform of the planning system

Introduction: London Tenants Federation brings together borough- and London-wide federations and organisations of tenants (including leaseholders)¹ of social housing providers. Our membership also includes the London Federation of Housing Co-operatives and the National Federation of Tenant Management Organisations.

A number of our members involve both council and housing association tenants and a few involve some private tenants. LTF's main focus is engaging its member organisations and individual tenants' associations in London-wide strategic policy – particularly relating to housing, regeneration and planning.

We have strong links with other community and voluntary sector organisations in London that also have an interest in housing, regeneration, planning and community related issues.

We have engaged in most Examinations in Public of the London Plan, including that of the draft new London Plan to which we were invited to attend 19 full or half day sessions of the hearings at City Hall.

Q1. Is the current planning system working as it should do? What changes might need to be made? Are the Government's proposals the right approach?

1. Broadly we suggest that the system works best for developers and those that benefit from market-led developments, generally that's higher income households, at the expense of low-income households and their needs, particularly for homes they can afford and employment.
2. We are very concerned about the way in which large-scale growth areas are defined in London now - in the form of 'opportunity areas' and the amount of development it is assessed they can accommodate.
3. While it is often suggested that these opportunity areas (and the two that are now Mayoral Development Corporation Areas) provide growth that will impact beneficially on low income households, no formal short term or longitudinal studies have been carried out to provide evidence for this.

¹ When referring to 'tenants' we mean both tenants and leaseholders (as set out in our Articles of Association)

4. These areas involve the sell-off of public land to achieve increases in land values which may benefit developers but inevitably do not provide the kind of development, in terms of homes or jobs, that might benefit low income communities.
5. In the London Legacy Development Corporation Area, the Olympic Boroughs (later called the Growth Boroughs), set out a strategic regeneration framework in 2009. This sought convergence through which it was stated, the more deprived communities of the East London boroughs who hosted the 2012 Games would have the same social and economic chances as their neighbours across London, within 20 years. The Growth Borough Unit monitored the targets set. However, the last convergence report was published in 2016-17 and no further have been published since then.

A baseline was put together with the Department for Culture, Media and Sport, but no longitudinal studies have taken place to track any detailed benefit, or otherwise, to the communities of the LLDC area and surrounding boroughs that were there in 2009.

There has been much development of market housing, with wealthier people moving into the areas.

We were told by the original CEO of the growth boroughs, at a conference we organised in September 2016, that *“Regarding the problem of the shifting out of the existing population and replacing them with wealthier communities, we know that this is already happening with regard to the boroughs policies on housing and homelessness and in particular the housing benefit restrictions. I don’t think there is anyone who doesn’t think that the money could have been better spent in a way that was more regenerative of east London. However, the money would not have been there if London hadn’t won the Olympic bid. Shouldn’t we look at how can we make sure that local communities do benefit and say there is still an argument for convergence? Four years on, there is far less interest in this.”* Indeed, there is even less interest now in 2020.

6. The Old Oak and Park Royal Development Corporation area (where we worked with community groups from 2015-18) has high levels of deprivation including some of the poorest wards of Brent, Hammersmith and Fulham and Ealing. It was sold to local communities as being a large regeneration scheme – which many existing residents felt might support improvements for them, their communities, their local shops and services. However, the proposal to develop an additional 25,500 homes and 65,000 jobs, alongside a new HS2 station, raised fears that existing homes, jobs and communities would eventually be displaced by wealthier communities and businesses moving in.
7. Despite requests to the Mayor of London that he include monitoring of the kinds of jobs and homes developed in the opportunity areas in his annual monitoring report of the London Plan he has not conceded to this.

8. The LLDC carries out annual monitoring reports relating to its 2015 Local Plan. In both of 2016 and 2017, 78% of the homes delivered in its boundaries were market homes which very few households from the area or indeed the boroughs surrounding it would be able to afford. In 2018, 77% of the homes developed in the OPDC areas were market homes.
9. There are around 118,000 overcrowded social rented homes in London, which are also concentrated in some of the poorest boroughs. These include Newham, part of which is in the LLDC area and Brent, part of which is in the OPDC area.
10. We note that Covid 19 has had the harshest impact on communities that are already suffering in the poorest conditions in their homes, particularly overcrowding where social distancing is impossible. Brent and Newham have been mentioned frequently in reports about this in mainstream media.
11. Any planning reform must consider the impact of Covid 19 on deprived communities and assess how well the existing planning system was servicing low income communities prior to Covid-19.
12. Having said that we are supportive of the evidence-based focus in relation to the development of planning policy and feel things would be worse if this was removed. It has been an important way for grass-roots, lower-income and excluded community groups to engage meaningfully in the development of planning policy, locally and London-wide. See more on this in relation to or submission to Q5.

Q2. In seeking to build 300,000 homes a year, is the greatest obstacle the planning system or the subsequent build-out of properties with permission? and

Q4. What approach should be used to determine the housing need and requirement of a local authority?

- 2.1 The problem with the 300,000 total target, and the way it is divided up between authorities across the country is this: it is not based on evidence of need for different types of homes required – relating to affordability and the sizes of properties - nor the capacity to deliver them.
- 2.3 The target seems to be based on the theory of supply and demand and the suggestion that prices of market homes would reduce if sufficient were produced. There is no evidence to support this. There is no evidence:

- of the number of additional market homes that might need to be built for prices to actually begin to fall;
- what happens to the increasing number of households that in London are homeless, are living in overcrowded or temporary homes and who can't afford anything other than social rented homes;
- that the Government does actually want property prices to fall anyway.

2.4 London's most recent assessment of housing need (2017 London Strategic Housing Market Assessment) showed that we require around 65,000 new homes per annum, 47% of which are required for social-rented homes, if the backlog of unmet need were to be addressed over a 25-year period². We note that planning guidance in the past required that backlog need should be addressed in 5 years. Are we to assume that, as the backlog of need will continue to increase, more and more lower income households will just be forced to move out of London?

Q5. What is the best approach to ensure public engagement in the planning system? What role should modern technology and data play in this?

5.1 As a social housing tenants organisation, our members initially engaged in regional planning policy through [Just Space](#) and learnt much through the peer learning that was facilitated within this network. Understanding quite difficult and technical planning language is still part of our members' learning experience.

5.2 Through this, we began to engage in Examinations in Public of alterations to the London Plan, learning just how much strategic housing policy was included in planning policy.

In 2010, representatives of around 12 of our member organisations were invited to engage in the 2011 Replacement London Plan examination. They were invited to engage in debates on a range of housing issues including - regeneration, housing density, older peoples housing, family sized homes, housing design, tall building, mixed and balanced communities and lifetime neighbourhoods.

Before our attendance at the EiP, we organised meetings with other Just Space members and discussed the questions that the planning inspector was asking. This helped us in preparing additional written submissions and gathering together grass roots evidence to deliver at the hearings.

We were asked to lead on some of the discussions, including around Lifetime Neighbourhoods, and eventually a summary of the LTF's own definition of a Lifetime Neighbourhood was included in the London Plan.

² <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan>

LTF was also asked to provide a briefing paper on inner London – focused on new developments, mostly along the riverside, that were delivering very few social rented homes.

LTF members provided their grass roots evidence of regeneration areas and areas where density had increased significantly.

At the end of the hearing the Examination Secretary praised LTF for bringing issues to the table that would not otherwise have been raised.

- 5.3 We later bid for grant funding (from Trust for London) to work with Just Space in supporting tenants and other community groups in influencing or challenging policy in some of London's opportunity areas (in Greenwich, Hackney and Newham) and later the two Mayoral Development Corporation Areas, between 2012 and 2018.

Our experience suggests that, particularly for low-income and often excluded working-class communities, development of networks of community groups and individuals, supported by funding, can facilitate meaningful involvement in the strategic planning that they are often excluded from. It can facilitate provision of an independent space to encourage peer learning, for people to share and exchange, develop grass roots alternatives and to support one another longer term.

- 5.4 The latter part of our project funded work was focused mostly on the Old Oak and Park Royal Development Corporation Area (OPDC). We set up a network of groups that named themselves the Grand Union Alliance (GUA), after the canal that runs through the OPDC area. Two years of this particular work was funded through an ESRC grant awarded to Professor Jenny Robinson, UCL, focused on a comparative analysis of governance innovations in large scale urban developments in Shanghai, London (the OPDC area), Johannesburg.³

While LTF is no longer involved in supporting this network, Just Space still provides some support and the GUA website⁴ holds a lot of the evidence of work carried out with its members, while we were supporting them.

This included work with JTP architects on a community charette⁵ using a lot of visual materials that we would not usually have been able to provide, which was more engaging for the networks' members.

In the early stages of the GUAs existence it was ahead of the game in setting out its statement of intent as a community-based organisation and a community engagement charter. Later, in response to the OPDC's consultation on its statement of community involvement, the GUA drew up some ground rules for good quality engagement (influenced by some that were previously drawn up by a Neighbourhood Planning

³ <https://www.geog.ucl.ac.uk/research/research-projects/governing-the-future-city/london>

⁴ <https://grandunionalliance.wixsite.com/grandunionalliance>

⁵ http://media.wix.com/ugd/4e0a01_12e5e006d8a341e392be53779180f300.pdf

network in Bristol). A majority of these were adopted by the OPDC. They can be found on the homes page of <https://grandunionalliance.wixsite.com/grandunionalliance>

Early suggestions of alterations by the GUA to draft policy resulted in modifications, although not so many as the process moved on.

Some of the members of the network also engaged in challenging planning applications and made further attempts to influence the OPDC around the way it operated in this respect.

- 5.5 While of course digitalisation might support involvement, digital exclusion is still a big issue – impacting particularly on older people and potentially those who don't have English as a first language. We feel this might also, in part, encourage more individual responses rather than providing greater opportunities for community members to come together to discuss issues and hear each other's concerns, and perhaps arrive at a consensus position; opportunities which we feel were so beneficial in the work we have been involved in.

Your sincerely

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