

London Plan Examination in Public

The London Plan is a very important document, since it impacts on communities from the regional to the local level. It has policies on how much and what kind of new housing will be built, where major developments and regeneration schemes will occur, and where tall buildings may be located. It also contains policies on social infrastructure, green spaces and children's play areas.

The draft replacement (new) London Plan sets out policies on future development in London up to 2031. All London councils must be in 'general conformity' with the

London Plan when putting together their own 'Local Development Frameworks'.

From late June to mid October, a public hearing; an Examination in Public (EiP), of the draft replacement London Plan took place at City Hall.

The EiP was overseen by an independent panel that invited organisations, including local authorities, developers and voluntary and community groups to attend debates focused on issues highlighted as being contentious in consultation responses.

The debate at the EiP was

structured around questions set by the independent panel aimed at testing the general 'soundness' of the Plan's policies and drawing out evidence from the organisations taking part.

It is important that voluntary and community groups, like the LTF, are involved in EiPs in order to bring a grass roots voice to an other wise quite technical process.

This special London Plan Newsletter focuses on LTF's engagement at the EiP, the evidence gathering that it carried out as part of its preparation work and the policies it hopes to have influenced.



LTF Draft London Plan EiP Conference

London Tenants Federation (LTF) is an umbrella organisation bringing together London's borough-wide council tenant federations and organisations. Some LTF member organisations also represent housing association tenants. LTF aims to provide a strong voice for London tenants at the regional level. It responds to regional and national government consultations. LTF delegates are represented on the Mayor's Housing Forum.

LTF is a member of the London Civic Forum, the London Voluntary Sector Council and Just Space Network. It has links with other regional and national tenants organisations and with organisations representing tenants of other tenures in London. Around two thirds of London's borough-wide council tenants federations and organisations are LTF members. LTF is funded by London Councils, in the past through its Housing Steering Group and since October 2008, through a 4-year grant from its Grant's Committee.



LTF EiP Conference

LTF's conference in June, focused on some of the 18 London Plan policies that LTF was invited to attend debate on, at the EiP of the draft replacement London Plan.

Speaker Paul Bowers from the 'Big Opportunity', an organisation which aims to provide a voice for the voluntary sector in planning for the post 2012 Olympic Legacy, said that since social and physical improvements for East London were a key element of the Olympic bid, that the decision-makers must be held to account on this.



Paul Bowers

The five Olympic host boroughs; Greenwich, Hackney, Newham, Tower Hamlets and Waltham Forest have compiled a 'single regeneration framework' which aims to ensure that in 20 years time the people of East London enjoy the

Analysis shows that levels of deprivation in east London, relative to the rest of London, have changed little between 1885 & 1995

same economic life chances as those in the rest of the capital.

Conference attendees raised concerns that too much market housing and insufficient social-rented homes are being developed in East London; that promised employment opportunities for local residents are not being delivered and that while all Londoners are paying for the Olympics, little London-wide benefit is visible.

Sarah Davis gave a presentation on the Chartered Institute of Housing's 'Housing, Health and Care' report, which looks at the needs of an aging population.

Sarah said that by 2036 there will be 2.3 million people aged 85 years plus in England; a 184% increase on current figures. By 2041 there will be double the number of older disabled people and by 2025 over a million people living with dementia.

With people living longer there will be greater levels of ill health. 40% of people who are 80 years old or more report living with a long-term illness or disability. 1.5 million have a condition that requires specially adapted accommodation.

While fewer older people than the national average live in London, numbers are growing.

Sarah said that doing nothing is

30% of pensioners live well below the national average income level

not an option, since there are growing cost implications, with a likely 325% increase by 2041. 40% of total household and community care costs are spent on people who are over 65 years of age.

LTF has proposed that the Mayor commission a study into the housing needs of London's older people.

It feels that there is currently immense pressure on older people to give up family homes that they may have lived in most of their lives and which holds theirs and their family's memories. If older people in these circumstances do give up their homes LTF says they should always be offered a two-bedroom home; with space for a family member or carer to stay with them, on a regular basis.



Sarah Davis

The Olympic Games Legacy *Victor Adegbuyi, Newham Fed*

LTF has consistently raised concerns about the detrimental impact that has occurred in other cities that have hosted the Olympic Games, including property price increases, gentrification and displacement of people living in insecure housing.

At the EiP we and other organisations, such as Planning Aid for London, said that when the London Plan policy on the Olympic Games refers to 'convergence'

between East and West London, the policy must be clear that this is to be achieved through direct benefit to existing East London communities, rather than importing in wealthier people.

We noted that only 4,522 social-rented homes were constructed in Greenwich, Hackney, Newham, Tower Hamlets and Waltham Forest from 2006-9, while housing waiting lists and overcrowding continue to rise.

We said that promises of employment opportunities for existing East London communities must be delivered; noting that in the past, for example around the City Airport, they were not.

We raised concerns about the relocation and loss of local jobs and that few local young people had gained apprenticeships in the construction of the Olympic site; specifically only one from the London borough of Hackney.

LTF EiP Conference

LTF's EiP conference was attended by around 70 tenant representatives from 19 London boroughs; some of whom were housing association tenants.

We had help from other community and voluntary sector groups in facilitating workshops; including the Just Space Network's Co-ordinator, representatives of the

Kings Cross Railway Lands Group, Spitalfields Community Association and Black Neighbourhood Renewal and Regeneration Network.

Workshops were held on the Olympic Games, Lifetime Neighbourhoods, health and housing, housing design and, regeneration, intensification and gentrification.

Individual tenants who had good grass-roots evidence on relevant issues were identified in the workshops. They were later interviewed on a one-to-one basis by volunteers. This provided us with valuable evidence for LTF representatives to use at the EiP.

We are very grateful to the volunteers who assisted in carrying out one-to-one interviews and in taking notes in the conference workshops.

These include a worker from one of the LTF member organisations, planning students from the University of London and a housing consultant who in the past worked for London Councils.



Opportunity and Intensification Areas

The draft replacement London Plan, like the previous London Plan, identifies 'Areas of Opportunity and Intensification'. These are areas where major developments are planned in London.

It identifies 33 Opportunity Areas, that it suggests are able to accommodate 'at least' 5,000 new jobs or 2,500 new homes; including the Elephant and Castle (Southwark), Cricklewood and Brent Cross (Barnet), North Deptford (Lewisham) and the Isle of

Dogs (Tower Hamlets).

The draft replacement London Plan also identifies ten Intensification Areas, which it says are: built-up areas that have good existing or potential public transport accessibility, where building at higher densities is planned.

LTF feels that while these large developments provide positive opportunities for developers, they often have negative impact on the character of existing neighbourhoods and on existing communities.

Despite LTF representatives being asked to lead debate at the EiP on behalf of the community sector on this matter, particularly on the need for greater and better community engagement in major developments, in fact little time was allocated for debate on this.

However, at the same time, LTF feels that too much time was allocated in the debate to some developers who were arguing that more homes and jobs could be squeezed into these areas.

Lifetime Neighbourhoods

LTF's tenants' definition

Lifetime Neighbourhoods is a relatively new and developing concept. It is mentioned in a 2008 Government publication called '*Lifetime Homes, Lifetime Neighbourhoods*' and more recently researchers from the University of York were commissioned by Government to draw up guidance for planners and others on the concept.

The idea of Lifetime Neighbourhoods first came about through an acknowledgement of the needs of an increasingly ageing population; looking at how housing and neighbourhoods can support older people's needs in terms of health, well-being and independence.

The London Mayor, Boris Johnson, mentioned Lifetime Neighbourhoods in his *Planning for a Better London*; a document which set out his ideas around developing a new London Plan.

LTF felt this to be very positive, but also felt that the concept needed to have a wider definition. A Lifetime Neighbourhood would be one that would cater for the needs of people of all ages and for the duration of their lives, and this should be in terms of housing, social amenities and facilities and engagement in democratic and accountable decision-making.

This led LTF to drawing up a 'tenant definition' of a Lifetime Neighbourhood at its conference last year. The definition built on its existing 'tenant definition' of a Sustainable Community.

The definition was refined after its conference and a summary definition also agreed.

LTF's definition has since then gained wider support from other members of the Just Space Network. (please see more on the *Just Space Network* on p 8)

The definition also gained the attention of the researchers from York University who are drawing

up Government guidance.

One of the researchers attended the LTF's AGM in July this year to discuss his work and the LTF's definition. This constituted one of four consultation sessions being carried by the consultants in their work on the drawing up the guidance.

After meeting with LTF members

they has said they would like to include the LTF's approach to the definition of lifetime neighbourhoods as a 'case example' in their report - giving credit to the LTF's positive work on this developing concept.

A report and draft guidance was presented to the Government in late August.

'Lifetime Neighbourhoods' – Tenants' Definition

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 our 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
- 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

Lifetime Neighbourhoods

LTF argues at the EiP for a strong London specific policy and a social infrastructure matrix *Jean Kerrigan (Lambeth) & Dave Morris (Haringey)*

The draft, replacement London Plan contains a policy on ‘Building London’s Neighbourhoods’ which mentions Lifetime Neighbourhoods.

At the EiP we argued that the policy would be stronger and have more direction, if:

- it were named ‘Lifetime Neighbourhoods’,

- it began with a strong definition of a Lifetime Neighbourhood; focused on sustainability of neighbourhoods in the widest possible sense; in social, economic, environmental and community involvement terms
- it referred to forthcoming Government guidance

- the London Mayor worked with other groups to set out a London specific definition of a Lifetime Neighbourhood
- the Mayor drew up a ‘matrix’ specifying minimum levels of services, social infrastructure and amenities that Londoners should be able to access within - a walk; a short cycle or bus ride, or a train, tram or tube journey, from their home.

Since London developed by swallowing up a network of villages and now has the form of a patchwork of neighbourhoods / villages, LTF feels it has the potential to provide an exemplary Lifetime Neighbourhood model.

LTF’s stance was supported by the other community groups; the London Forum for Civic and Amenity Societies, Kings Cross Railway Lands Group, Care and Repair UK and Inclusion London.

We also gained support from a couple of housing associations and the Federation of Small Businesses. Developers however argued against the policy being included in the Plan full stop, saying that it repeated other policies in the Plan.

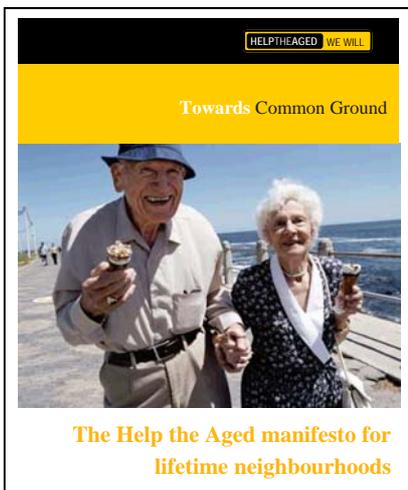
The debate gained coverage in ‘*Planning Resource*’ magazine.

- 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 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, so that all residents have a sense of ownership
- support for and development of vibrant local self-organised grass-roots 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.



Help the Aged (now Age UK) manifesto for Lifetime Neighbourhoods is also a very good publication

Housing Targets

| Borough | London Plan total housing target 2006-9 | London Plan social-housing target (at 35% total target) | Social housing need (at 58% total target) | Social housing produced 2006-9 |
|------------------------|---|---|---|--|
| Barnet | 5000 | 1750 | 2900 | 366 (21% of target & 13% of evidenced need) |
| Camden | 2040 | 714 | 1183 | 220 (30% of target & 19% of evidenced need) |
| Enfield | 1450 | 508 | 841 | 427 (84% of target & 51% of evidenced need) |
| Hackney | 2890 | 1112 | 1676 | 1051 (104% of target & 63% of evidenced need) |
| Haringey | 4340 | 1519 | 2517 | 328 (22% of target & 13% of evidenced need) |
| Islington | 3220 | 1127 | 1868 | 932 (83% of target & 50% of evidenced need) |
| Westminster | 2330 | 816 | 1351 | 508 (62% of target & 38% of evidenced need) |
| N London Total | 19260 | 6741 | 11171 | 3832 (57% of target & 34% of evidenced need) |
| Barking & Dagenham | 2890 | 1012 | 1676 | 297 (29% of target & 18% of evidenced need) |
| City of London | 290 | 102 | 168 | 0 |
| Havering | 1420 | 497 | 824 | 247 (50% of target & 30% of evidenced need) |
| Newham | 7910 | 2769 | 4588 | 544 (20% of target & 12% of evidenced need) |
| Redbridge | 2350 | 823 | 1363 | 318 (39% of target & 23% of evidenced need) |
| Tower Hamlets | 8370 | 2930 | 4855 | 1464 (50% of target & 30% of evidenced need) |
| Waltham Forest | 1790 | 627 | 1038 | 492 (78% of target & 27% of evidenced need) |
| NE London Total | 25020 | 8757 | 14512 | 3362 (38% of target & 23% of evidenced need) |
| Bexley | 970 | 340 | 563 | 211 (62% of target & 37% of evidenced need) |
| Bromley | 1540 | 539 | 893 | 300 (56% of target & 34% of evidenced need) |
| Greenwich | 4820 | 1687 | 2796 | 346 (20% of target & 12% of evidenced need) |
| Lewisham | 2820 | 987 | 1636 | 196 (29% of target & 12% of evidenced need) |
| Southwark | 4780 | 1673 | 2772 | 970 (58% of target & 35% of evidenced need) |
| SE London Total | 14930 | 5226 | 8659 | 2023 (39% of target & 23% of evidenced need) |
| Croydon | 3050 | 1065 | 1769 | 765 (72% of target & 43% of evidenced need) |
| Kingston | 1110 | 389 | 1769 | 90 (23% of target & 14% of need evidenced) |
| Lambeth | 3650 | 1278 | 2117 | 580 (45% of target & 26% of evidenced need) |
| Merton | 1170 | 410 | 679 | 300 (73% of target & 44% of evidenced need) |
| Richmond | 810 | 284 | 470 | 176 (61% of target & 37% of evidenced need) |
| Sutton | 1060 | 371 | 615 | 461 (124% of target & 75% of evidenced need) |
| Wandsworth | 2310 | 809 | 1340 | 316 (39% of target & 24% of evidenced need) |
| SW London Total | 13160 | 4606 | 7633 | 2688 (58% of target & 35% of evidenced need) |
| Brent | 2930 | 1026 | 1699 | 786 (77% of target & 46% of evidenced need) |
| Ealing | 2480 | 868 | 1438 | 807 (93% of need & 56% of evidenced need) |
| Hammersmith & Fulham | 1300 | 455 | 754 | 458 (100% of target & 61% of evidenced need) |
| Harrow | 1130 | 396 | 655 | 340 (86% of target & 52% of evidenced need) |
| Hillingdon | 1170 | 410 | 679 | 199 (48% of target & 29% of evidenced need) |
| Hounslow | 1360 | 476 | 789 | 754 (161% of target & 96% of evidenced need) |
| Kensington & Chelsea | 1240 | 434 | 719 | 16 (4% of target & 2% of evidenced need) |
| W London Total | 11610 | 4063 | 6739 | 3360 (83% of target & 50% of evidenced need) |
| LONDON TOTAL | 83980 | 29393 | 48708 | 15265 (52% of target & 31% of evidenced need) |

& Affordability

In 2004 the previous Mayor, Ken Livingstone, commissioned a study, which found that to meet London's housing need, 58% of all homes built should be social-rented, 7% intermediate and 35% market.

However London Plan targets were set at a lower level than required for social rented homes (at 35%), double that needed for intermediate housing (at 15%) and higher than needed for market housing; (at 50%).

Annual monitoring reports of the London Plan shows that while over the last three years, targets for all types of housing have overall been met, only 52% of the target for social-rented homes has. This is less than a third of that needed (as evidenced in the 2004 housing requirement study) *See adjacent table (page 6).*

At the same time 150% of the target for market housing or double that of evidenced need have been built.

The result has been that between 2002 and 2009, housing waiting lists in London rose by 55% (228,789 to 354,389) and overcrowding by 47% (150,000 to 220,000). Few other than Buy-to-Let investors have benefited.

A more recent housing need study, the 2008 Housing Market Assessment, finds that if the local housing benefit caps announced in June are taken into consideration, targets for social-rented housing should now be set at 64% of the total.

The draft replacement London Plan sets out borough by borough housing targets and a London-wide numerical target for 'affordable housing'.

At the EiP, LTF argued for targets for social-rented homes to be set at levels that will genuinely address need and a for a cap to be placed on market housing; at the level of evidenced need.



"Well, the bikes are designed for long-distance searches for homes they can afford"

New 'affordable housing' definition required

The London Plan contains a definition of affordable housing, which suggests, that more or less anything other than market housing is 'affordable'.

The definition is inaccurate and misleading, concealing the high levels of housing un-affordability in London.

Nationally around 70% of social-rented housing tenants are unable to meet the cost of their rent without claiming housing benefit; so even social rents are not affordable to the majority of tenants.

Intermediate housing is also too expensive. Shelter's recent report on intermediate housing; 'Forgotten Households', says that more than

850,000 low-income families are unable to access intermediate housing.

LTF says that an accurate description of affordable housing would be that having paid housing costs, a household would still have sufficient left to meet all other needs without having to claim housing benefit - LTF suggests an equivalent to the Joseph Rowntree Foundation's Minimum Income Standard.

At the EiP of the draft replacement London Plan LTF proposed that all references to 'affordable housing' in the Plan be removed and that they be replaced with 'social-rented' and or 'intermediate housing' as appropriate.

In the past, Governments sensibly kept council rents reasonably low and at a cost that most tenants could afford by directly subsidising both the building and maintaining of council homes.

However, over time, Governments have decided that council tenants should pay the full cost of managing, maintaining as well as paying off the historic capital debt on something they don't own.

The predictable results, of course being

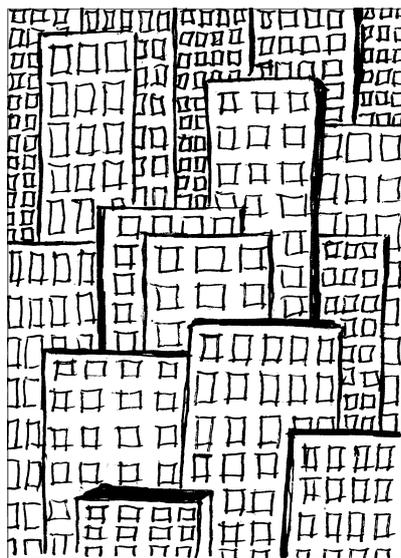
rents rising above the levels that most can afford and with Government subsidy going to meet tenants rent costs, through housing benefit.

Government then indirectly rather than directly subsidises the bricks and mortar, but with detrimental impact on tenants, individually and collectively.

It is unlikely that we have seen the worst of this, as the recent Comprehensive Spending Review would suggest.

Tall and large buildings *Sadiq Mohamed (Kingston) & Muslui Bakare (Waltham Forest)*

It is often said that to achieve the number of new homes that are required in London, we must build high. However numerous studies have shown that as many lower-rise homes can be constructed on a similar sized ground space — such as is achieved in Georgian squares.



LTF members are concerned that tall and large buildings often have significant negative impact in our neighbourhoods.

At the LTF EiP conference, attendees complained of the growth of tall and large buildings in London, particularly in exclusive developments beside the river, blocking sightlines for existing residents, produce glare and overshadowing, and deflecting strong wind down to the ground level making it dangerous for passers-by, particularly children, elderly and disabled people.

They argued that there is need for buildings that are both environmentally and socially friendly; respectful of existing

neighbourhoods and communities.

The London Mayor, Boris Johnson, has publically said that he would restrict the construction of tall buildings in London.

Parts of his London Plan's policy on this is good. It sets out some restrictions relating to the negative impact of tall and large buildings. At the EiP we and other community groups proposed some additions; including that tall buildings should not intrude on the privacy of other dwellings and should be required to provide good living standards.

The Mayor's policy though is rather contradictory, since as well as the restrictions it says that 'Tall and large buildings **should be part of a strategic approach to changing or developing an area**', and indeed that such buildings may be located in just about all major development areas set out in the London Plan. At the EiP we proposed

- these specific sections of the policy be deleted
- tall and buildings should only be built where and when they fully meet the criteria suggested in other parts of the policy; with additional suggested criteria
- decisions around where tall and large buildings might be constructed in London should be agreed by boroughs and communities, with additional safeguards enabling discussion with local communities on a case-by-case basis, prior permission being agreed

The GLA agreed to some small changes to the policy that will make the policy slightly less promotional of tall and large buildings and have agreed to look at alternative wording for other sections.

After the Examination in Public

Post the EiP, the independent panel will write a report on the hearing and having considered the representations by those attending the EiP may propose alterations to the draft replacement London Plan. While the panel's conclusions do hold some weight, at the end of the day the Mayor can choose to support or not support them. Following this, the London Plan will go to Government for final approval and is likely to be published in late 2011.

Inner London

The draft replacement London Plan's policy on Inner London says the Mayor, boroughs and stakeholders should work to realise the potential of inner London in ways that sustain and enhance recent economic and demographic growth.

The policy talks about tackling London's problems of inequality and exclusion, noting that there are areas of 'marked affluence' sometimes next door to 'highly deprived communities' in inner London. The policy though is unclear on how the polarisation of London's communities is to be addressed and how or even if genuine benefit to existing deprived communities will be ensured.

LTF was asked to lead the debate on this policy at the EiP and to produce a detailed briefing note. The note highlights evidence provided by LTF members and tenants at the LTF conference relating to developments in inner London that have resulted either in no discernable benefit or in fact in negative impact on existing communities. The briefing note can be found on the LTF website.

LTF proposed at the EiP that the policy spell out specifically that growth should ensure evidenced benefit to existing 'deprived' communities through the carrying out of social impact assessments.

Just Space Network

LTF is a member of the Just Space Network, which brings together community and voluntary sector groups who have an interest in planning issues, particularly around the London Plan.

Through Just Space, community groups have been able to share and exchange on their different areas of expertise, support one another and provide a strong collective voice on behalf of communities who wouldn't otherwise have a look in at the EiP.

For more information please see the Just Space website - <http://justspace2010.wordpress.com>