

London Tenants Federation

11.12.16

Response to the consultation on 'A City for all Londoners'

1. Introduction

- 1.1 London Tenants Federation (LTF) is an umbrella organisation. It brings together (mostly) borough- and London-wide federations and organisations of tenants of social housing providers. Its membership also includes the London Federation of Housing Co-operatives and the National Federation of Tenant Management Organisations. A number of its member organisations involve both council and housing association tenants and a few (a minority) are also involving some private tenants.
- 1.2 LTF aims to facilitate a consensus voice for tenants on strategic regional housing, planning and community related issues. It had representation on the Mayor's Housing Forum from 2005 until the Forum was closed, its members have been invited to attend almost all Examinations in Public of the London Plan / alterations to the London Plan.
- 1.3 This response focuses on issues relating to growth and housing.
- 1.4 LTF is of the view that London's housing crisis exists as a result of continued application of policy that
 - consistently ignores the needs of households that are unable to meet the costs of market housing;
 - feeds the property market / property investment and the unaffordability of housing, rather than ensuring the provision of secure not-for-profit low-cost social-rented homes which would be the most effective way of dealing with the crisis, including unaffordability;
 - creates transience rather than stable and sustainable communities in which household members might demonstrate a long-term commitment to their locality and safely raise the next generation.

2. Sadly, there appears to be little in 'A city for all Londoners' that demonstrates anything but a continuation of the status quo, that is -

- (a) support for growth that **has** consistently impacted negatively on the ordinary working class households and which is now being renamed 'good growth'. The growth of huge amounts of luxury, private housing, along with high-end finance, business, professional and research employment sectors is not just something that '*some feel*' has impacted detrimentally on them. It continues to be evidenced in the increasing levels of homelessness, overcrowding, households languishing for decades on housing waiting

lists, living in temporary homes or being forced out of the capital, and in increased levels of deprivation and polarisation;

- (b) the persistent use of the term 'affordable housing' for housing that just isn't affordable, or worse still, to suggest that such housing is '**genuinely** affordable';
- (c) the allocation of affordable housing grant to reduce the cost of market-priced rented homes for 'middle income earners'. This would continue to feed the pockets of private landlords at the expense of delivering not-for-profit, low-cost social-rented homes for families for whom there is very high evidence of need;
- (d) the Mayor distancing himself from his statutory responsibilities to not only assess the levels of housing need and the ever-growing backlog of need in London but also to set out in strategic policy how he will address that need (including London's high levels of homelessness);
- (e) unacceptably negative views expressed about large social-rented housing estates – (particularly since there is concern that this is actually negative expression about the people who live in social-rented homes, rather than necessarily the homes they reside in).

The building of large council estates was no 'mistake', it was a genuine attempt to meet the housing needs of a wide range of households. It did so successfully for many years and delivered, and to an extent still does, relatively stable and sustainable communities. In London, many large housing estates were built adjacent to places of employment providing high numbers of local jobs. The real mistakes that have been made in London are the over-development of market housing (compared to evidenced need), the creation of luxury blocks of flats for high income households, that contain no social and minimal numbers of so-called 'affordable homes' and their monopolisation of large sections of the riverside and of central and inner London. This is what has created, or is at least part and parcel of, London's dysfunctional housing market, with extortionately high private rents and increased exclusion of ordinary working class households from accessing reasonably priced homes in which to raise their families and grow old in;

- (f) a failure to address the problem of ongoing loss of social-rented housing as a result of unnecessary demolition;
- (g) no consideration of how voluntary and community sector groups will be meaningfully engaged in developing and monitoring strategic housing policy, leaving the developers to have greatest influence on policy through the Mayor's Homes for Londoners Board;
- (h) continuation of policies that are based around transport and people having to make long journeys to work, rather than developing lifetime neighbourhoods where communities may have access to homes and jobs locally and thus reduce transport needs;
- (i) development of more opportunity areas without any assessment of whether the 'opportunity' areas that are now near to being fully developed have provided any genuine opportunity or benefit for communities with below median incomes – either in terms of homes or jobs.

- 3. Strategic housing policy contained in the London Plan and the London Housing Strategy should;**
- (a) no longer include the sham term - 'affordable housing'.** Strategic policy should specify the exact types of housing being referred to and make clear the distinction between not-for-profit low-cost rented homes and those that have high-cost rents simply because they provide a large profit for private landlords. A target of 50% affordable housing means nothing if at least 65% of this is housing isn't actually affordable;
 - (b) provide evidence for the Mayor's assertion that building more market homes will bring down the price of market homes in London.** How many market homes will need to be delivered to bring down the prices? How much available housing land in London will this use up?
 - (c) set out precisely how the Mayor will address the shockingly high levels of need, including the backlog of need, for social-rented homes in London.** Between 2005 and 2015, almost 200,000 net market homes were delivered in London (124% of the London Plan target for market housing) forming 70% of the total number of homes delivered, while less than 48,000 net social and so-called 'affordable rent' homes were delivered (only 53% of London Plan target for social/'affordable' rent homes) and forming only 17% of the total number of homes delivered;
 - (d) assert that affordable housing grant will be used proportionally on addressing evidenced housing need.** The Mayor's proposals to spend more than 60% of the affordable housing grant on delivering intermediate and London Living Rent homes is not evidence based. Evidence would suggest the need to spend it all on delivering social-rented homes;
 - (e) protect existing social-rented homes (including allocation of funding to support housing refurbishment) to prevent unnecessary demolition of perfectly good and structurally sound low-cost rented homes;**
 - (f) provide a presumption against development on the green space and gardens of social tenants' estates;**
 - (g) provide a more sophisticated housing density matrix, which will take into account household income levels, proximity of financially accessible sport and leisure, community, youth and play facilities, levels of ongoing management and maintenance funding, levels of overcrowding and preservation of local character.** The link between high densities, over development of the wrong types of housing and the failure to protect open space and other community amenities of all kinds, is of huge concern and should be properly monitored;
 - (h) ensure that public land is used exclusively to develop social-rented homes and supporting green, play and social infrastructure, including homes developed by community-based housing such as: Community Land Trusts, co-operatives and collective low-cost self-build homes and not be handed over to private developers;**
 - (i) link policy on housing, health and well-being.** Households that are adequately housed in secure homes at costs they can afford, require fewer and less expensive medical interventions. Poor, cold, insecure, overcrowded, cramped and unaffordable housing is linked to a range of increased physical and mental health conditions and premature death. At a time when transience is increasing, not just in the private but also in the social or 'affordable' rent sector, it should be noted that children in families who have to move frequently are at particular risk of poor outcomes. Failures to

address the need for social-rented homes can only continue to impact negatively on the health of those with the lowest incomes in London;

- (j) **ensure new homes are built to last for a minimum of 150 years;**
 - (k) **provide a commitment to encourage (with the boroughs and educational establishments) the development of training courses across London to address skills gaps in the construction industry and to pressure developers to provide higher levels of apprenticeships for young Londoners who experience excessively high levels of unemployment.** This is not a new concern and should be addressed properly by ensuring that young working class Londoners can gain reasonably well-paid employment in the construction industry. It is shameful that this has not been fully addressed previously;
 - (l) **commit the Mayor to full engagement of London's voluntary and community sector groups (including tenants' organisations) that have a focus on housing policy, in developing and monitoring housing strategy.** This should be supported by the Mayor's office to fund the establishment of a voluntary and community sector housing forum to relate directly to the Mayor's office, and for the forum to have six representatives on the Mayor's Homes for Londoners' Board.
4. **Establishment of formal engagement of the voluntary and community sector in regional strategic housing policy.** LTF wrote to the Mayor earlier this year around engagement of the voluntary and community sector in London. LTF delegates met with Alan Benson and Dominic Curran in early September this year to discuss this and the Mayor's guidance on regeneration. It was proposed that LTF submit a proposal around community and voluntary sector engagement at the regional level, which is submitted here as a separate document

We would request a separate response to this proposal.

Yours sincerely

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