

# DRAFT FURTHER ALTERATIONS TO THE LONDON PLAN

## SUBMISSION FROM PAT TURNBULL

### **Chapter 2 London's Places**

#### **Policy 2.4 The 2012 Games and their Legacy**

I propose a new subsection (h) for **Policy 2.4 B** which addresses community involvement in Mayoral Development Corporations. This should explain the processes that MDCs will apply for community involvement and decision making.

**Policy 2.4 C** is very focused on attracting new residential development and businesses. This kind of regeneration will not benefit existing communities in the surrounding boroughs or communities that were dispersed to make room for the Olympics. This section should emphasise that development should ensure benefit to the existing local community.

#### **Policy 2.13 Opportunity Areas and Annex 1**

I do not support the addition of five new Opportunity Areas (Annex 1) and an increase in targets for jobs and housing in the existing 33 Opportunity Areas as these are unlikely to meet the needs of the existing populations in these areas. To 'help tackle the huge issue of deprivation and inequality among Londoners' (Policy 1.1) what is needed is the building of more social rented homes, and the preservation and further provision of jobs that can be filled by the local population and meet its needs.

Opportunity Areas are being designated without informing or involving the people living, working and running small businesses in these areas. There needs to be a proper, well publicised consultation process, adequate in length to allow all interested parties to take part, well in advance of the designation of any Opportunity Area.

#### **Changes to the Opportunity Areas**

##### **City Fringe – Tech City – specific objections to the inclusion of Hackney Central and Dalston in this Opportunity Area**

This proposed extension of this Opportunity Area into Hackney will be to the disadvantage of the existing local inhabitants and existing small businesses. Recent research shows that affordable work space is already being lost in Hackney at a considerable rate. Many of the schemes that do exist are being let, not through workplace providers, but on the open market.

Dalston and Hackney Central both include strong town centres, serving the needs of the local population. An Opportunity Area is likely to accelerate the rate of loss of affordable office, retail and industrial space in and around these town centres. There is also a risk to well established ethnic minority businesses in these parts of Hackney.

Point 3.19 emphasizes that town centres and Opportunity Areas should be used for intensive housing development. This will not only make the area less pleasant to live in; the homes built are extremely unlikely to meet the needs of local people in including social rented homes, the only ones which are actually affordable to most Londoners. In fact, it is more likely that council rented homes will be demolished to make room for these expensive new developments.

### **Chapter 3 Housing and Social Infrastructure**

At all points where 'affordable' housing is referred to it should be replaced with the words 'social rented'.

A new assessment of need is required which reflects the effects of the poor delivery of social rented homes, including unnecessary demolition of existing social rented homes, the only type of housing which most Londoners can actually afford.

#### **Policy 3.3 Increasing Housing Supply**

**Paragraph 3.19 and Policy 3.7 Large Residential Developments** make clear that this target is to be achieved by high density development. I consider that delivering super density housing above 1,100 habitable rooms per hectare in Opportunity Areas will not comply with the sustainable residential quality principles in table 3.2. In particular, it will not provide family housing or social rented housing or comply with internal space standards. It will provide housing that does not meet the needs of thousands of Londoners who are currently in overcrowded, sub-standard, unaffordable living conditions. I therefore disagree with the increased housing targets and propose that the targets should remain as they are until a programme of house building is instituted which meets the genuine needs of Londoners.

#### **Point 3.19**

This emphasizes that town centres and opportunity areas should be used for intensive housing development. This is likely to crowd out business space and housing that the local population can actually afford and thus fail to meet its needs.

For **Gypsies and Travellers** the failure to meet evidenced need by bringing forward new pitches, the provision of which is a strategic need for London, is compounded by boroughs returning Travellers Pitch Fund allocations. The Mayor needs to take responsibility for allocating land from that which he has at his disposal for new pitches to be erected.

#### **Policy 3.8 Housing Choice**

##### **Older persons' housing**

The targeted specialist housing for the older person provides only 300 affordable units per annum. It is unlikely that those in need will be able to afford to buy new build specialist accommodation even if they are an existing owner occupier, let alone if they are not. The proportion of social rented housing needs to be raised in this category to at least half the projected homes to be built.

##### **Students**

I would challenge whether the purpose built student accommodation being produced is affordable and meets student needs.

##### **Private Rented Sector**

The PRS is rarely a tenure of choice; it is a tenure people are forced into because of the dire shortage of social rented housing and the extremely high prices of homes to buy. There is an urgent need for more regulation in the PRS. The Mayor should attach conditions to building on GLA land, for instance that new homes for private rent must offer assured rather than assured shorthold tenancies. To provide greater

certainty over rents, there should be a London Living Rent based on a proportion of income.

#### **Chapter 4 London's Economy**

The FALP pay little attention to the existing diverse economic sectors and activities that make up the London economy. A full review should include participation by organizations representing small businesses, trades unions and representatives of the voluntary, community and social enterprise sectors. The FALP risk entrenching a debt-based real-estate boom that could return the London economy to crisis conditions.

#### **Paragraph 4.2**

The emphasis of this chapter on 'development, growth and investment' risks undermining the Mayor's objectives as stated in Paragraph 4.1 to 'help tackle the huge issue of deprivation and inequality among Londoners'.

#### **Paragraph 4.6**

The Mayor's aim of encouraging broad-based growth is not well-served by the addition of a reference to very specific sectors of the economy, namely the technology, media and telecommunications sector. This should be removed, and replaced by a list of a broad range of sectors to be encouraged.

#### **Chapter 6 London's Transport**

##### **Policy 6.1 Strategic Approach**

I propose this should include the following:

- reduce fares on public transport
- maintain ticket offices on the underground
- extend the congestion zone
- limit the use of roads by cars when pollution reaches certain levels (as recently implemented in Paris)
- reverse the privatisation of the London bus service