

**MATTER 18 Housing Strategy**

**Will the housing policies achieve the good growth objectives in Policies GG1, GG2, GG3 and GG4 relating to building strong and healthy communities, making the best use of land, creating a healthy city and delivering the homes Londoners need? In particular how will the provisions of GG4E regarding ambitious and achievable build-out rates be put into effect? Will the provisions of Policy H1 B-F provide an effective strategic context for the preparation of local plans and neighbourhood plans?**

As we made clear in our initial responses to the draft London Plan, the underlying assumptions of what makes growth good in the plan are unsatisfactory. Specifically, and in summary, we stated that: GG1 fails to make explicit the requirement that London's diverse communities can meaningfully and substantively participate in planning and development; GG2 embeds into the plan a deeply problematic understanding of 'best use' of land based on levels of densification and intensification that will have a deleterious impact on the wellbeing of existing and future Londoners; GG3 fails to ensure that planning decisions are based on detailed and inclusive evidence of multiple and intersecting health inequalities that support an integrated approach; and GG4 does not, as it must, prioritise meeting identified housing need for social rented homes and homes that meet the whole range of specialist needs.

Due to the Draft London Plan's single-minded focus on the quantity rather than quality of new housing completions, as well as greatly increased densification and intensification of land, we believe that there is a real risk that the housing policies laid out in the Draft London Plan will not only fail to achieve Good Growth, as we understand it, but actively undermine it.

**GG1 Building Strong and Healthy Communities:**

Neighbourhoods that are healthy and inclusive will have facilities, amenities and community spaces that are accessible and affordable to everyone, now and for future generations. These spaces are highly valued for the opportunities they provide for social interaction, community networking and empowerment. The housing policies in the draft plan place at risk many such facilities, amenities and community spaces.

The housing policies in the draft plan focus on getting as much housing built as possible, raising densities and prioritising this as being much more important than what kind of housing is built, at what prices and for whom. This focus endangers social housing, industrial spaces and diverse high streets, and social/green infrastructure. The housing policies, as they relate to the SHLAA, in the plan assume a great deal of estate demolition historical instances of which have been shown to reduce the stock of social housing. The proposals for housing densification on non-designated industrial land, high streets and town centres will cause severe losses of jobs and services in localities across London. And a further concern is that much social and green infrastructure risks being lost.

Absent from the plan's housing policies are any concrete policy requirements for participation from local communities in planning developments; requirements to replace like for like housing; requirements to protect tenancies or the right to return or to remain in the neighbourhood are entirely missing from these policies also.

Finally, the housing policies H2D2 and H2E proposing a presumption in favour of incremental developments risk adversely impacting the diversity of London's communities. Where redevelopments are piecemeal, site by site, and targeted at currently privately owned property, this is likely to intensify the challenges of regular displacement, poor maintenance and insecurity faced by families in the private-rented sector; displacement of children from schools and neighbourhoods; loss of family housing replaced by smaller more profitable units.

## **GG2 Making the Best Use of Land**

The Draft London Plan strongly suggests that the best use of land is high-density residential use, focusing on meeting the housing policy target of 66,000 homes a year. We reject the notion that this is the best use of land and argue that this misguided fixation on simply increasing the quantity of houses completed will undermine the Mayor's attempts to achieve the other three good growth objectives.

The London Plan is based on virtually uncapped levels of market-led development densification and intensification, which will predictably have serious effects on the ways of life of the current population living and working in London. Already, a great deal of space in London has been taken up by developments that do not serve the needs of Londoners. By furthering this state of affairs, the housing policies risk:

- Driving up land prices, placing unbearable pressure on diverse users of space who are unable to pay rising rents;
- Displacing low-income Londoners and families, especially those on council estates slated for demolition and private renters;
- Reducing the homes built for families by failing to specify targets for family sized units (H12);
- Damaging the base of London's diverse economic activities, namely through job losses and service displacement because of housing densification on non-designated industrial land, high streets and town centres;
- Depleting social and green space and infrastructure, including school playing fields

## **GG3 Creating a Healthy City**

Housing and health are inextricably linked. Good housing policies can do much to improve individual and community well-being, whilst unsatisfactory housing policies will have the opposite effect. The housing policies in the Draft London Plan risk working against aspirations to create a healthy city.

## **GG4 Delivering the Homes Londoners Need**

The Draft London Plan housing policies will fail to deliver the homes that Londoners need. There are several concrete reasons for this, all of which stem from the fact that the housing policies are geared towards enabling market developers to build the homes that are most profitable for them, rather than on meeting need as identified in the SHMA. Specific reasons why the housing policies will fail to achieve GG4 include:

- A fixation on the quantity of houses to be built without enough attention paid to who can afford to live in them;
- A privileging of housing output at the expense of Sustainable Residential Quality (SRQ) principles;
- A disregard for the importance of prioritising and addressing the housing backlog, which is overwhelmingly for low-cost rental housing;
- A lack of attention paid to the relationship between densification and housing output type, which suggests that as densities rise the number of family sized dwellings that are low-cost fall;
- A continued use of the term 'affordable' as linked to market rents rather than incomes;
- Targets for 'affordable' housing (in policies H5A and H7) that have not been derived from the SHMA and which fall short by 15% of the SHMA's requirements for 65% affordable, which in any case underrepresent the need by extending the time in which to meet the backlog of assessed need to 25 years;
- Failure in policy H12 to specify dwelling mix targets at a London wide level (despite this being included in previous London Plans and/or Mayoral supplementary planning guidance).

- A dangerous presupposition in the SHLAA for a great deal of 'estate regeneration' which historically, as the London Assembly has shown, tends to reduce the stock of social housing;
- Policy H13 on Build-to-Rent lacks evidence to suggest how it will meet housing need and risks benefiting 'vulture' hedge funds rather than Londoners on low and middle incomes.

From all of the above, it follows that we do not believe that the provisions of Policy H1 B-F provide an effective strategic context for the preparation of local plans and neighbourhood plans