

Housing highlights in the New London Plan
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The biggest issues for me were

Policy H1 which removes the policy favourable to demolition and redevelopment (densification) of existing housing

The Mayor's rent policy for new council and social dwellings, which features in policies H7 and H10

Bedroom size mix and child play space (Policies H12 and S4)

Policy H1:

The shift away from demolition could be really significant if it is taken seriously when such plans are considered, promoted at local level, or come to the GLA for approval. This certainly reflects many local struggles around the city, and the concerns which have been highlighted. Investment in the existing stock will be much more productive in human terms, and much less damaging to the environment.

Policy H7:

The Mayor's preference for London Affordable Rent (£60 pw higher than average London council rents for a two bed flat) remains problematic, even the wording of the policy has been changed to reflect the opening of the government's Affordable Housing Programme to bids for new social rent development. What we are seeing is housing development funded by new social tenants and by the general taxpayer through housing benefits, rather than demanding that government restore adequate grant rates to build new housing. There is no awareness from the GLA of poverty impacts and the negative consequences for equalities that would inevitably follow. Or of issues with service charges and the housing benefit cap. Nor have there been any consequences in practice for those councils which charge way above London Affordable Rent for some of their tenancies.

Policy H10:

Estate redevelopment. The policy for replacement of social rent homes at rents on average £60 a week higher (London Affordable Rent) is a dreadful policy. This is the first time that huge rent increases via demolition/rehousing have been embraced as public policy. The caveat that where a right of return exists, replacement housing should be at social rent, does not solve the problem. This creates an incentive for landlords to move secure and assured tenants away permanently, further entrenching existing malpractices in this area. The Mayor's team insisted that they expect new Social Rents to be set no lower than £14 pw below London Affordable Rent in any case (i.e £45 pw higher than average existing council rents). This equates to the social rent formula cap, and suggests that the Mayor's equation of London Affordable Rent and Social Rent (for example in the brochure *Building Council Homes for Londoners*) could bring higher rents all round for new social rent properties. It is supposedly mandatory for landlords to use the social rent setting formula rather than setting rents at Cap, and so this is a murky area to which more attention must be paid, and proper regulation applied. I have written to the housing minister and the Regulator of Social Housing on this subject and received unsatisfactory replies.

Again, the impact of higher tenant service charges has not been considered in estate redevelopments. No wonder estate demolition is so unpopular and so discredited.

Policy H12:

The issue of bedroom size mix is a very clear case where the GLA has surrendered to the wish of developers to make higher profits. The GLA not only refused to set any targets for boroughs to deliver homes for the household types researched in its own SHMA, they tried to forbid boroughs from having any policy about this key issue. See below for details of some of the consequences. Well done to the Planning Inspectors for standing up over the latter point. But the reality is that excessive numbers of small and micro apartments are being delivered, to increasingly exclude families from London.

Policy S4:

The issues of families and children naturally hang together, and unsurprisingly we have needed to argue hard to get more realistic assessments of the number of children and young people, and ensure that good play and recreation provision is provided. Again the results in planning applications have been that developers provide play space for as few children as possible, and inside blocks that are often themselves segregated by tenure. So there is lots more to do in this area as well.

Conclusion:

The Draft New Plan is very much a developers' charter, the Examination in Public was useful however in allowing us to put our case, and giving a valuable insight into the workings of the system.

I have added some comments on the latest annual monitoring report on the London Plan, which shows the huge gaps between assessed need and the kind of buildings which London's planners are allowing the development industry to build.

Paul Burnham

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The GLA's **annual monitoring report on the London Plan** which was due in February but published in October shows that housebuilding activity ignores housing need in London. In fact, much housebuilding activity is positively harmful.

The net annualised housing requirement from London's 2017 strategic housing market assessment (SHMA) stated that 65% of new housing needs to be affordable (comprising 18% intermediate and 47% social and affordable rent). However, of the net conventional completions in 2017/18, 85% were (unaffordable) market dwellings, and probably half of these will have been delivered as private rented, rather than owner occupation.

Of the 15% that was affordable, 9% was intermediate (requiring deposits and advance payments), and only 6% was social and affordable rent. Of the latter, only 23% was social rent and 77% affordable rent. The Mayor's London Affordable Rent is £60 per week higher than council rents in London for average two bedroom properties (58% higher).

The over-provision of market housing was 2.4 times the proportion needed, tending to increase house prices and rents, and drive lower and middle income households out of the City.

Only 1.36% of net completions were at social rent: just 433 homes across the whole of London.

The affordable housing tenure mix needed to be 72% social and affordable rent and 28% intermediate according to the SHMA, but the outcome was the other way round: 60% intermediate and 40% social and affordable rent. Developers are building the kind of housing that helps to boost their profits, not meet needs.

Of the 33 local planning authorities (32 boroughs plus the City of London), only 20 had a positive number of net completions of social rent dwellings (with 1,088 homes in all). Six had net social rent completions of zero, and seven boroughs had net completions of less than zero: a net loss of 655 social rent homes. Demolishing more than they built in other words.

These seven boroughs were Brent, Ealing, Enfield, Harrow, Havering, Newham and Sutton. The worst of all was Brent, which completed 695 homes net, of which 842 (121%) were market dwellings, and Minus 217 (Minus 31%) were social rent dwellings.

On the number of bedrooms per property, the failure to build family sized homes is notable. The 2017 SHMA said that 29% of homes needed to be two-beds or larger, but in fact fewer than 20% of gross completions were two-beds or larger in 2017/18. The market pressures (shortfalls) are worst in the market sector, where 45% need to be family sized homes, but only 19% were built in 2017/18. This excessive proportion of smaller properties is quite explicitly to boost developer profits.

Reference:

[https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/monitoring-london-plan:](https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/monitoring-london-plan)

Table 3.8 gross housing completions by number of bedrooms 2017/18

Table 3.9 GLA net conventional completions by tenure 2017/18