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Draft London Housing Strategy 2013

Dear Housing Policy Team

I would like to make the following comments on this document:

1. I welcome proposals to significantly increase the supply of all tenures of housing to solve the chronic housing shortage in London, however 42,000 homes per year seems to be a conservative estimate compared to other assessments which suggest a much higher figure.
2. Despite my comments above, I am concerned about the potential impact of a London wide target on individual boroughs. It is not clear what mechanism is in place to ensure that all boroughs meet their own targets, and this will put additional pressure on those boroughs that have met their targets to approve additional schemes which are too high and too dense in order to reach the numbers. I raise the concern about targets as I understand that Southwark has already met its own target for hotel bed spaces, but we still have to take more - whether or not we want to - because there is a London wide target.
3. I note that Southwark already has a higher requirement for new homes than many other boroughs, and whilst we welcome development that will strengthen the borough's economy this must not be to the detriment of existing communities. Local construction jobs provide much needed employment, however the buildings live on long afterwards and the pressure to create short term employment should not override the sustainability of the house building programme.

4. I note that the document focuses on prioritising and promoting development in London's 33 opportunity areas, however this must not be seen as a green light to developers if it is to the detriment of existing communities or it contradicts both local and London policies. In addition, I raise the concern that currently the threat of Mayoral "call in" may already be leading to a reluctance to refuse development that is not compliant with either local or London Plan policies. I cite the Mayor's recent Rotherhithe New Road call in and approval as an example of where the Mayor called in and overturned a refusal of a highly inappropriate housing development. Boroughs must be allowed to make the planning decisions that are right for the area.

5. I cannot see anything in the document to show how public land in the centre of London will be protected for use as schools and GP surgeries. With councils and other public bodies being pressurised into selling their own land for private development, especially in the high value areas, there will be nowhere to put the expansion of these basic services that will be necessary to meet the demands of the increased population.

6. Whilst the Community Infrastructure Levy and/or Section 106 agreements will provide funding for transport and social infrastructure, care needs to be taken not to create housing densities that put unsustainable demands on this infrastructure. In addition, this funding is only available for capital programmes and the revenue funding does not always come forward to ensure that they are implemented.

7. Care must be taken not to increase the pressure on our open spaces, of which we already have a quantity deficiency in areas such as the north of Southwark. Increased demand for the use of local open space cannot be entirely mitigated through Section 106/CIL contributions. Whilst amenity space on new developments needs to meet with GLA and council policy specifications, such areas are not always sufficient to act as a substitute for a local park.

8. Whilst the document states that London needs to provide housing for those on modest incomes, not enough is done to make that a reality. House prices are rising not just because of the shortage in supply, but because more and more properties are being built to a higher specification to meet the demands of overseas investors.

A recent report by Civitas, "Finding Shelter", states that "London property is now seen for many in terms of its investment potential, as a safe haven for cash in an unstable global economic climate, rather than something that should be meeting a basic social need for the capital's residents. For too many it is providing financial shelter rather than human shelter" (Green and Bentley, Feb 2014).

This problem is clearly evident in the north of Southwark, where has had the effect of pushing up all the house prices in the area. The document itself states that "The share of new homes bought by overseas investors is much greater in high value prime London locations". More simple homes, not glass towers, need to be built in the centre of London for workers to purchase and live in.

9. Proposals to increase the number of private rentals are welcomed, but the rents must be set at levels that people can reasonably afford to pay. This is especially important with the introduction of housing benefit rent capping, which would affect people in the north of Southwark where market rents are very high. A return to the rent control system that existed prior to 1986 may offer the solution to the escalating cost of private renting. It is also essential that the quality and stock condition of the private rented sector is monitored by an external body.

10. At 80% of market rent the “affordable” rent model is not affordable to those on low incomes in central London areas such as north Southwark. This document supports mixed and balanced communities but it is not happening in practice. Coupled with the pressure on councils to sell its most valuable public land and council housing for private development, those on low incomes who are an essential component of every mixed community are being forced out of the centre. More homes need to be let at the lower end of the affordable rent spectrum in order to accommodate the thousands of low income families on the London housing waiting lists. The Mayor should better support Southwark to achieve the 35% affordable, on-site housing target that it set out in the local planning policy.

11. It is not helpful for the Mayor to keep endorsing Southwark and other local authorities’ practice of taking money in lieu from developments in high value areas of the borough to spend elsewhere. Whilst it may be argued that this money can provide increased numbers of homes in other parts of the borough, it does not achieve the stated aim of keeping mixed communities and mixed developments across London. The need to achieve a greater quantity of homes has to be balanced with the rights of all communities to have new affordable housing in their area.

12. It is not enough to say that the GLA “will have a plan in place” to retrofit poorly insulated private sector homes by 2030. That is an unambitious target and it should state clearly how that is going to be achieved in practice, as the GLA cannot control the behaviour of private landlords. On the other hand, the target for retrofitting affordable homes seems overly ambitious and there needs to be more detail about how the GLA will support boroughs and housing associations to do this. There needs to be an investigation into whether the practice of fitting double glazing to older council and housing association properties is creating the significant damp issues that residents are now suffering.

13. The GLA needs to be far more creative about reducing our carbon footprint in the future, starting with house building. More should be done to radically overhaul the way that housing is built, with every new development aiming to provide passive house or equivalent standard solutions. More research needs to be done to investigate ideas such as making all new developments have south facing roofs with solar panels.

Kind Regards



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