



A new plan for London: Proposals for the Mayor's London Plan

Response from the G15 Group of London housing associations

Introduction and Context

1. G15 is a group of London housing associations and comprises:

A2 Dominion Group	Metropolitan Housing Trust
Affinity Sutton	Notting Hill Housing
AmicusHorizon Group	Network Housing Group
Catalyst Housing Group	Peabody
Circle Anglia	Southern Housing Group
East Thames Group	The Hyde Group
Family Mosaic	The L&Q Group
Genesis Group	

Collectively, the G15 houses around one in ten Londoners and manages around 410,000 homes. We build 14,000 – 15,000 new homes every year. We invest over £25million annually in economic and community development to create thriving, sustainable neighbourhoods across the capital.

2. We support the Mayor's vision for a London that excels among global cities - expanding opportunities for all its peoples and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st Century. We welcome the opportunity to respond to the Mayor's initial proposals for the London Plan Review and look forward to working with the Mayor, his advisers and officers on emerging policy.
3. The new London Plan will provide a policy framework for the Mayor's London Housing Strategy. G15 has provided an initial response to the London Mayor's draft housing strategy (draft for consultation with the London Assembly and functional bodies) and this document reflects a number of these comments. We will also be responding to the Mayor's revised draft for public consultation.

Chapter 2 – London's Places

4. We welcome the proposal to introduce a new section into the Plan recognising the distinct social, economic and environmental issues facing areas of inner London. G15 has a significant proportion of its total housing stock in the inner London boroughs, as defined in Map 3, and has a good understanding of the particular dynamics and challenges in these communities and markets. We would welcome an opportunity to engage further with the Mayor's team as plans evolve.

Chapter 3 – London’s People

5. The Mayor’s data shows that London will continue to see significant population and economic growth. We share the view that, accommodating this growth, is fundamental to ensuring that London is made up of strong, thriving, diverse and sustainable communities and retains its position as a world-class city. We welcome the recognition that the provision of sufficient and appropriate housing and supporting physical and social infrastructure is key to meeting these objectives.

Housing Supply

6. We recognise that Londoners require a more diverse housing supply and a wider choice of homes at prices they can afford. There is a growing need for more intermediate housing options, enabling those on lower and middle incomes to build up housing equity and a route into home ownership.
7. We note the new initiatives for addressing this outlined in the Mayor’s draft housing strategy, including the introduction of the ‘First Steps’ programme, which widens the eligibility of traditional low cost home ownership schemes to joint incomes of up to £74,800 in 2009/10. We consider it important that guidelines for such products are clear and do not potentially further confuse lenders and buyers, especially in the current climate where there is limited mortgage availability. We welcome the Mayor’s commitment in the latest draft of his housing strategy to work with lenders to raise their awareness of the relatively low level of risk attached to lending for low cost home ownership.
7. We welcome the commitment to provide more homes meeting the requirements of older people and those with special needs, particularly in view of demographic trends. We would expect plans to consider access, space, adaptability and the provision of supporting infrastructure and resources.
8. We support initiatives to bring long-term empty homes back into use and to make the most efficient use of existing housing stock. We welcome the Mayor’s pledge of financial support in the Mayor’s draft housing strategy to assist in achieving this.

Affordable Housing

9. We welcome the Mayor’s commitment to providing 50,000 affordable homes across London between 2008 and 2011. As highlighted in our response to the Mayor’s draft housing strategy, it is important that the targets negotiated and agreed with boroughs deliver in aggregate, at least 50,000 new homes and that they avoid any further concentration of social rented housing in areas where there are already high levels.
10. We acknowledge that the Plan needs to be sufficiently flexible to respond to changes in the external environment, but are concerned that the 50,000 target “will be reviewed in the light of available

resources". London needs more affordable housing, in particular to accommodate many of the lower income workers vital to the capital's economy and key services and in London retaining its status as a world-class city.

11. We note that all new development will be expected to provide the fullest amount of affordable housing based on what is financially viable. As we documented in our response to the Mayor's draft housing strategy, the economic downturn has provided an opportunity to re-evaluate the models for delivering affordable housing. G15 Chief Executives have met the Mayor's Housing Director, Richard Blakeway, and briefed him on their proposals (the "fourth way for the third sector"), centred around:

- Higher grant rates - the current sales / low cost home ownership cross-subsidy model does not work in the current environment
- Increased flexibility on rents.
- Creation of mixed communities by stimulating new, intermediate rent housing which offers a range of rents to people on different incomes.
- Not encouraging home ownership for those who can barely afford it, but allow people the flexibility to move between ownership and rent, as their circumstances change.
- Offer people the option but not the obligation to buy at some time in the future when able to do so, as well as provide the option to move from ownership into rent if those circumstances change.
- Re-examination of the nature of government investment.
- Responsible lending to the sector.

We are encouraged by the early direction of the London HCA and their willingness to consider new and flexible approaches.

12. We welcome the recognition that London needs mixed and balanced communities and that a mix of tenures in new developments has a key part to play. We would welcome more details on how the Mayor believes this might be achieved in existing communities and developments.

13. We welcome the commitment to provide more family-sized affordable homes, but would also emphasise housing need across other sections of the population. Demographic forecasts point to an increase in the number of lone-person households and this needs to be taken into account.

London's Housing Quality

14. We agree that good housing design can contribute to quality of life. The Mayor encourages the use of the forthcoming London Housing Design Guide to drive up quality standards and to inform decisions. We are keen to see a 'level playing field', where private developers and housing associations are required to meet standards.

15. We welcome the commitment to improve overall space standards across all tenures, but would like to see a financial commitment to ensure that this can be achieved.
16. We are pleased that the Plan recognises the importance of open, green spaces – to improve quality of life and to contribute to wider environmental objectives.
17. We agree that designing out crime is a key priority. New homes need to be supported with infrastructure to help reduce the risk of crime e.g. youth services.
18. The Mayor promotes the use of the Lifetime Homes Standard and wheelchair accessible housing in new developments. We recognise the value in this ambition, but would like to see a financial commitment to ensure that this can be achieved. We would encourage the Mayor's team to engage in further debate with the sector around standards.

London's communities and social infrastructure

19. We recognise the importance of good quality social infrastructure in creating thriving communities and life chances for Londoners. Across each of the elements highlighted by the Plan (paragraph 123), we feel that technology also has an over-arching role in providing the 'glue' that can bind and strengthen local communities.

Chapter 4 - London's Economy

20. G15 welcomes the Mayor's aim to support the availability of a range of jobs, skills and other opportunities meeting the needs of all Londoners. G15 has considerable experience of delivery education, employment and skills training to hard-to-reach communities across London. We would welcome further engagement with the Mayor on the opportunities, challenges and barriers to success in this area.

Chapter 5 - London's response to climate change

21. We are committed to doing everything in our power to meet the Greater London Authority's target of cutting carbon emissions by 60% by 2025. This is vital if social housing communities are to be sustainable, thriving places to live and our low income residents are to avoid increasing fuel poverty.
 - We believe that London's social landlords face a bill running into billions of pounds if they are to meet this target. This is over and above their existing planned expenditure on improvements. It is clear that this cannot be delivered without a commitment to provide the necessary financial support – very few housing associations have the financial capacity to achieve this without government funding.

- This is a challenge that can only be met by powerful partnership working from social landlords, national, regional and local government, utility firms and residents themselves. We would like to see a commitment to engaging and mobilising all partners who need to come together to achieve this.
- We would like to see a commitment to ensuring that people living in London have the information and motivation to change their behaviour and adapt their lifestyles to take action to reduce energy consumption.

Chapter 7 – London’s Quality of Life

22. We support the objective to increase opportunities for Londoners to participate in their communities and note the proposal to extend the Lifetime Homes concept to “lifetime neighbourhoods”. We applaud this ambition and recognise the importance of providing welcoming, permeable communities, which cater for all. We question how the Mayor will define ‘standards’ when local needs and mixes might vary greatly and we encourage engagement with housing associations, which offer valuable insight into community life across London.