

Response by London Forum to the Early Minor Alterations to the July 2011 London Plan

1. The London Forum of Amenity and Civic Societies is a charity established 23 years ago to support and represent over 130 community groups in the capital.
2. We object to the proposed alterations to affordable housing in Policies 3.8, 3.10 and 3.11 of the London Plan because they do not fully address the different types of housing requirement in London. By coupling together social rented housing and "affordable" rented housing in the alterations, the Mayor would not be dealing with the individual needs of people on different incomes, nor maintaining policy for the delivery of the right mix of housing tenures to achieve London Plan Policy 3.3 for affordability.
3. Social rented housing costs should be below 30% of net household income, so such housing cannot be coupled with the higher priced "affordable" homes.
4. London Forum objects to the alterations to Policy 3.11 section 'A' and section 'B' and to paragraphs 3.65 and 3.66 that combine social rent and affordable rent. Such a change would negate the Mayor's policy to meet the housing needs of people on low incomes and his aims expressed in the London Plan for tackling deprivation and inequality among Londoners.
5. Alterations to paragraphs 3.44, 3.61 and 3.66 state that the new affordable rent product is aimed at the same target group as social rented housing. London Forum **objects** to those proposed alterations because the affordable rent of up to 80% of market rents is far beyond the financial means of too many people in the capital. By following the Government's policy in this respect, the Mayor would fail to provide the necessary number of homes for low income people in London where rents are much higher than in the rest of the country.
6. We object to the alterations being proposed before a new Strategic Market Housing Assessment (SHMA) has been performed which takes account of the Government's cap on housing benefit which will prevent private rented homes in Central and Inner London contributing to the needs of those requiring social rented housing, which had been assumed as a source when the latest London Plan was compiled.
7. Assessments indicate that more than half of the homes to be provided in London will have to be social rented ones and London Forum requires that the need is recognised and the Mayor's Housing Strategy, Housing Supplementary Planning Guidance and London Plan policies are developed to achieve it, with monitoring conducted of the separate delivery of social, affordable, intermediate and market housing to accord with PPS3.
8. The implications for London's transport system for those still able to afford to commute, and for its available workers, of forcing existing residents to leave London have to be analysed, understood and addressed by policy changes.