

*“Men came together in cities in order to live.
They remain together to live the good life.”
Aristotle, *Politics**

Key points

CPRE London's [Campaign for a Liveable London](#) is currently in the research phase of a two-year project looking for people-centered solutions to London's housing crisis. Our early findings point to three inter-related issues that we argue need to be strengthened in the draft London Housing strategy:

1. Neighbourhood inclusion and wellbeing - stimulating community ownership through greater investment in community facilitators, community-led governance and participatory budgeting arrangements.
2. Devolving local powers – joined-up planning and community assets, housing choice, unlocking previously developed and stalled sites, repurposing suburbs, and land reporting.
3. Finance and quality of affordable homes - stimulating alternative and longer-term investment models, factoring in on-going maintenance costs, and creating a housing 'liveability league table'.

Cutting across each of these issues is the need to put people back at the centre of the housing strategy. Addressing housing needs requires targeted commitment and investment into working with local people to understand their needs and the best ways to deliver it, in active partnership with Londoners.

As the draft London Housing strategy states we need to avoid repeating the mistakes of the past and not simply focusing on a 'numbers game' of building more houses, this means focusing on the process of identifying who the new homes are for, where they are best placed and how they will best contribute to 'neighbourhood liveability' over time.

1. Neighbourhood inclusion and wellbeing

“Successful higher density housing has four key factors: location and sense of place, a successful allocation policy and occupancy, successful management approach, and good design.”

CABE and City of London Corporation, *Better Neighbourhoods*

1.1 Embedded engagement - promoting locally distinctive locations

There is a need to put people back at the centre of the London housing strategy – in the process of new housing development, regeneration and ‘place-making’ in general.

Supporting early and ongoing ‘user’ engagement (taking the conversation to people rather than expecting people to come to you) about community needs and preferences should be a central objective of the housing strategy. The current draft does not refer to the importance of community participation or provide a specific policy recommendation to address this issue. CPRE London argue it needs to be applied effectively and consistently to deliver a shift from ‘protest to partnership’ in the housing delivery, to seek joint solutions for delivering good quality well-designed homes that knit-in with surrounding neighbourhoods.

In relation to the draft housing strategy policies P42 – 48 (regenerating estates, opportunity areas, Housing Zones, new garden suburbs, housing developments on public land, high street renewal, and release of industrial sites), the London Mayor needs to prioritise the improved engagement of local groups, neighbourhood forums, residents associations, amenity societies etc. This is vital to drive better ownership of local plans, stimulate innovation, skills development and build trust. In that way key place-based priorities, specific to each neighbourhood, will also be better addressed, including issues such as accessibility to amenities, walkability, bikeability, and green infrastructure. Such issues need to be identified as a part of an open dialogue about new housing developments with local users.

The housing construction sector has called for greater investment in developing their capacity to deliver new homes. CPRE London calls for a similar investment to be targeted towards community actors and facilitators, including community-led design and review processes. Such facilitators help find common ground and language between those formally engaged in housing delivery i.e. planners, architects and developers and informal stakeholders or ‘users’ who have a direct interest in a development and impacts to the surrounding neighbourhood e.g. community actors, local businesses and residents.

Recommendation: Investing in community / neighbourhood facilitators.

The draft Housing Strategy should include a new policy under 'Improving design' section where the Mayor makes a clear commitment to invest in the enablers of 'place-based' and 'design-led' housing – trained intermediaries between developers and communities, to facilitate 'better' designed developments that deliver liveable neighbourhoods for the long term.

1.2 Community-led governance

The Mayor needs to encourage the greater uptake of community-led neighbourhood-level governance mechanisms within housing supply and management, including neighbourhood forums, co-housing and community land trusts, as well as a reinvolvement of resident and tenant groups.

Neighbourhood forums are slowly on the rise in London, particularly where a London Borough values and actively supports such groups e.g. Hackney and Camden. Significantly they can often focus on the public realm and the interface with the built environment, provision of amenities and infrastructure. There remains a considerable need to increase awareness, understanding and capacity to engage with the planning system to enhance the ability of such groups to take a positive and proactive role in housing in their local area.

Numerous housing cooperatives across London e.g. The Vine Cooperative (Vauxhall, Lambeth) and Coin Street (Southbank, Lambeth and Southwark), illustrate that lasting neighbourhood liveability can be achieved through greater community ownership. Housing cooperatives tend to remain fairly small-scale but perhaps that is part of their strength. Co-housing and Community Land trusts e.g. St Clements Hospital site, are alternative models that are still in the early stages of formation in London. However, they offer opportunities for greater user ownership and control. For example the Andover Estate (Islington) is working towards adopting the Community Land Trust model and residents have a wealth of ideas to enhance and improve the public areas around the estate e.g. local food production, new community-owned recreational facilities.

Housing Associations are shifting into private sector partnerships to deliver new affordable social housing alongside private rental and ownership schemes. It can be a tricky balance of interests, especially during drawn-out development and regeneration processes. It is vital associations re-emphasize the voices of their residents. Poplar Harcar offers an example of what can be possible, e.g. their [Youth Empowerment Board](#) gives 16 - 25 year olds a forum to present their views about the neighbourhood, as well as training and personal development courses to help residents engage.

Recommendation: Investing in community-led governance

Under the 'Increasing development capacity' section of the draft strategy the Mayor needs to make a new policy commitment to provide additional resources and support for

the establishment of good neighbourhood governance arrangements, appropriate to the communities within the different housing types (e.g. Arm's Length Management Organisations (ALMOs), community land trusts, cooperatives, residents / tenants associations etc), to help ensure an effective community voice as part of housing development processes. This could include the development of community toolkits or guides regarding the establishment and management of such bodies.

1.3 Participatory budgeting in social housing

Although still relatively in its infancy in the UK participatory budgeting has been applied effectively as a means to build community ownership and wellbeing outcomes. The Participatory Budgeting Unit refers to the steady (albeit small-scale) take up of this approach by housing associations in partnership with Arm's Length Management Organisations (ALMOs):

"Given that tenants will now be responsible for paying rent directly, involving them in decisions about their homes and estates is even more important – [Participatory Budgeting] is ideal in making the connections between rent paid and quality of service on estates, and encouraging regular rent payments."

The unit refers to the example of Cartrefi Conwy, which operates across Conwy County in North Wales. They adopted a 20/80 model where 20% of the budget is for community grants, and also used to inform a wider community priority setting process. It also informs how the remaining 80% of the environmental budget is spent on core service provision, enabling tenants to see a greater link between the impact of their decisions and what's delivered on their estates (Source [PBU](#)).

Recommendation: Participatory budgeting in social housing

The London Housing Strategy, in the 'Improving existing homes and estates' section should directly promote the wider uptake of participatory budgeting in social housing provision, including by housing associations. The mayor and London councils should identify resources to support strengthening of capacity in tenant groups to support their effective engagement in neighbourhood budgeting processes.

2. Devolving local powers

2.1 Joined-up planning and community assets

CPRE London welcome the draft housing strategy's call to build at higher levels of density along with meeting London Design Standards but new developments also need to blend with and 'add' to existing neighbourhoods, linking to local amenities and infrastructure. Well-planned housing can contribute to reinvigorated high streets,

benefitting the local economy, society and natural environment. Poorly planned developments, lack adequate infrastructure and amenities, and put pressure on existing services e.g. schools, public transport and raise local resentment.

Rather than looking at housing in isolation, London Boroughs need greater freedoms to encourage more outward looking housing supply that links directly with local plans and core strategies - tying housing into neighbourhood and LEP objectives, as well as core service provision e.g. health care, schools and colleges, as well as infrastructure (including transport) and other planning objectives, and especially in the regeneration of town centres and high streets. Delivery of neighbourhood liveability requires a more systemic and integrated approach (see Fig 1).

Councils need the freedom to encourage developers and contractors to employ local labour and use local supply chains, as well as allow mechanisms, such as the 'right to bid' across different sectors to pool budgets and targets in a complementary way, e.g. the [North Lewisham Links Strategy](#) connects possible new development sites with community facilities such as schools and colleges, town centres, parks and public open spaces.

Figure 1. Liveability framework (CPRE London)



London Boroughs need room to influence the type of housing supply so that it not only delivers a sufficient number of homes but also meets the needs of the local population. They also need greater capacity to borrow, and offer investment guarantees to help reduce developer risk and encourage smaller builders to engage.

Linked to the need for more joined up planning and community engagement, London Boroughs are taking a varied approach to responding to the Localism Act (2011) obligations as regards monitoring and support of Community Asset Transfer (CAT), including housing. For example [LB Camden](#) and [LB Lewisham](#) keep a public record of CATs whilst LB Tower Hamlets and LB Newham currently do not. A more consistent approach of monitoring and support by London Boroughs needs to be encouraged by the mayor. The Homes for London board might play a role in that process, through reviewing uptake within different boroughs.

Recommendations

- Local autonomy and joined-up planning: CPRE London thoroughly supports P37 of the draft London Housing Strategy in seeking greater local government and GLA financial autonomy. We would like such increased powers to be used to support housing that is better linked with other Local Plan and infrastructural priorities, as well as assist the creation of new social housing, wider adoption of participatory budgeting (see 1.3 above), and tax incentives to kick-start developments on stalled and previously developed sites (see 2.3 below).
- Community Asset Transfer mapping: the Mayor should require the Homes for London board to undertake Community Asset Transfer review and mapping exercise to examine the uptake of housing CAT, emerging Community Right to Build initiatives, and to encourage wider political support from London Boroughs.

2.2 Rebalancing housing market choice

CPRE London welcomes the draft strategy proposals to free up more public land and old industrial sites. In that process and in the creation of the new Homes Zones and other housing developments CPRE London would like to see London Boroughs help open up the market to smaller builders/developers, community groups and self-build opportunities. We can look to [Vauban District](#) in Freiburg, Germany as an example.

Freiburg City Council insisted that the main site (an old army base) be divided into plots available to developers of varied size and character. It resulted in a site with 2,000 homes of medium density (50 dwellings per ha) with high environmental standard. The land was sold by the council to resident-led 'construction communities' and small builder/developers. Each plot was fairly small (usually 10-20 homes in an apartment block or terrace) and sometimes there were stipulations on the sort of homes that should be built e.g. homes for families or apartments for older people. Two thirds of the homes were built by construction communities/cooperatives and about a third by private builders/residential developers. The overall costs for buildings are lower than with a private developer – typically about 25% cheaper. This has enabled people on lower

incomes to become home owners. The financial risks were shared by all the members of each construction community; but they also share any financial benefits. About 10% of the 25% cost saving is the profit that a developer would normally make on a project like this.

Recommendation: Parcelling of public land

To support the delivery of P50, the London Housing Strategy should further guide London Boroughs to adopt 'parcelling' of land to ensure a better mix of developers / smaller builders / community / self-build in relation to the regeneration of estates (P42), opportunity areas (P43), Housing Zones (P44), new garden suburbs (P45) and other housing developments on public land (P46), along with high street renewal (P47) and release of industrial sites (P48), to allow for greater diversity in market engagement and choice.

2.3 Unlocking land, repurposing suburbs, and land reporting

CPRE London welcomes the mayor in continuing to focus on brownfield sites first (Previously Developed Land) and intensification sites within the draft housing strategy. Assessments of housing viability rarely factor-in social and environment values of development at particular sites, resulting in an imbalance in the conversation about developing on open spaces and Green Belt as compared to more 'costly' previously developed sites. Housing development must not ignore the multiple functions of Green Belt (in preventing urban sprawl and retaining openness) and open spaces (providing multiple ecosystem services including flood protection and wellbeing benefits).

CPRE London does not believe that opening up the debate about London's Green Belt boundaries will produce a change in the rate of house building or improve the quality of life for Londoners or the surrounding regions. Planner Andrew Lainton's [review](#) of the Green Belt within the M25, examined what Green Belt land would be viable to develop on for housing, and found only a very small proportion would be suitable (approx. 1km²). We argue that London must continue to protect the core aims of the Green Belt – preventing urban sprawl and keeping a clear separation between rural and urban areas, as well as adjoining developments - are as relevant now if not even more than in the past. As indeed is the need for effective open space provision and connectivity, in accordance with the principle of the All London Green Grid.

We agree with the Mayor that there are still considerable opportunities to increase London's density in the right places, involving local people in the process of intensification and re-design to ensure good quality liveable neighbourhoods. The LGA and London Boroughs have called for greater powers e.g. Compulsory Purchasing Orders (CPO) to unlock stalled sites and to set time-bound commitments for development on sites with planning permission. We support this along with the call to impose additional charges on empty homes. CPRE London also supports the recommendation to further incentivise development on Previously Developed Land

(PDL, or 'brownfield land') such as through reducing the Community Infrastructure Levy charges imposed.

CPRE London is not supportive of the 'New Garden Suburb' proposal (P45), if it means low density and inefficient housing developments that are disconnected from infrastructure, amenities and surrounding neighbourhoods. Rather we would like to see investment in the repurposing of existing suburbs – areas that vitally need investment to enhance their sustainable compact design and liveability - and ensuring that sufficient infrastructure and amenities are in place *ahead* of new developments.

Further, there is a need for greater transparency about public and private land use and availability for housing. The GLA's 'London Land and Property' database currently reports on GLA, Met Police, London Fire brigade and TFL owned land. The database could be extended to include London Borough owned land, as well as potentially private land data.

Recommendations

- Tax incentives: Under the 'Increasing development capacity' section of the London Housing Strategy there should be a clear policy commitment to support increased adoption of CPO, and application of tax incentives enabling build on PDL.
- Empty homes tax: P10 of the draft Housing Strategy regarding empty homes should be given greater weight by proposing a levy on homes that are empty for more than six months.
- Re-purposing suburbs – rather than support New Garden Suburbs (P45) the Mayor should prioritise the intensification and enhancement of existing suburbs.
- Land reporting: We call for greater transparency regarding public land use and availability from London Boroughs, as well as private land owners, via reporting to the London Land Database, as per the GLA and Transport for London.

3. Finance and quality of affordable homes

'...market forces and related architectural trends have gradually shifted focus from interrelations and common spaces in the city to individual buildings...'

Jan Ghel, *Cities for People*

3.1 Stimulating longer-term quality through sustainable investment

CPRE London recognises the need to help people access the housing market (for rental and ownership) and we welcome initiatives like First Steps (P11) and promoting extended rental tenancies (P29). The Mayor rightly places greatest emphasis on increasing the supply of housing in the draft strategy, which we agree remains the fundamental crux of the problem regarding London's increasingly unaffordable house prices and rentals. However pressures to deliver higher numbers of affordable homes in short time-frames and at low cost, comes with the risk of driving down quality to

minimum standards and reducing long-term neighbourhood investment. A number of parties that CPRE London has consulted have referred to failures in regard to addressing the on-going maintenance costs of affordable housing and 'place-making'. These costs need to be factored-in upfront. Therefore the London housing strategy needs to make a stronger emphasis on mechanisms that will supply lasting quality (as well as quantity).

Some investors/developers are already shifting their model of engagement with the housing sector towards a longer-term approach. Examples include Lend Lease in Elephant and Castle (mentioned in the draft strategy) or at a smaller scale Igloo's Sustainable Investment Model. Along with longer-term financial engagement comes a clearer incentive to focus on design/build quality, including understanding the user experience. The Mayor should encourage housing investors to consider longer-term engagement mechanisms, with the benefit of greater returns over time and critically greater 'vested' interest in supporting the wellbeing of residents.

Recommendations

- Factoring-in maintenance costs: The Strategy needs to directly refer to the importance of long-term housing quality and in particular the need for housing suppliers to have strong financial plans that detail how long term site maintenance and enhancement costs will be covered.
- Stimulating Long term investors: In relation to P49, the Mayor should seek to leverage support from longer term and progressive investors/developers who will place greater importance on returns over longer timeframes. This could include targeting pension funds, the use of investment criteria regarding the release of GLA land, as well as identifying opportunities to leverage long-term investors via the London Housing bank proposal.

3.2 Incentivising quality in affordable homes – Liveability league tables

CPRE London supports the proposal to encourage developers to adopt London Housing Design Guidance and Decent homes targets but we would also like to see more integrated tools that promote long-term quality of life in social and affordable housing. CPRE London calls for the creation of a 'liveability league' highlighting performance in housing – in terms of the user / resident experience post-build.

Various design / architectural awards act could be argued to act like league tables already. However none of them offer an independent 'post-occupancy' neighbourhood assessment of user experience and quality of life. A publically-funded neighbourhood liveability league could review housing sites one to two years after construction to see how they're performing in reality. The league could be used to help the GLA and London Boroughs decide who is best to work with on releases of public land, and directly incentivise better performance. It would need to be designed to include a separate smaller developer and self-build league, to avoid these groups being excluded.

CPRE London is currently piloting a post-occupancy neighbourhood assessment tool in three London sites as part of our [Campaign for a Liveable London](#). We are using a bespoke version of an online tool called 'Commonplace' to engage with local residents on these sites. We will report on our initial findings in April 2014.

Recommendation: London Liveability League tables

The Housing Strategy should propose to create a set of 'London Liveability League tables' for housing developers, including 'large developer' and 'small developer' leagues, as well as potentially a 'private rental' league, to incentivise better post-occupancy neighbourhood performance and long-term quality in affordable housing.

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