

Supplementary proof of evidence of Michael Edwards (amended)

This document responds to the Inspector's Pre-Inquiry Briefing Note and should be read in conjunction with my primary proof of evidence.

1. Local Housing Market Area

1.1 Scholars and analysts of housing would agree that 'market areas' cannot meaningfully be defined for small subdivisions of metropolitan areas. London's housing market can be seen as a large series of overlapping sub-markets across the capital.

1.2 However, in the non-market forms of housing provision (especially council housing and other forms of social housing to rent), borough boundaries are important because borough councils have important powers as landlords, statutory responsibilities to meet certain housing needs and also nomination rights to RSL stocks.

1.3 Furthermore, London Boroughs are required to produce Assessments and Strategies covering all forms of housing in their boundaries, the precise names and requirements of these documents changing from time to time. In what follows, some use if made of such documents for Camden and Islington, though these have to be read in conjunction with other sources, especially the annual Monitoring Reports on the *London Plan*.

2. Housing, and especially 'affordable' housing, needs

2.1 In the *London Plan*, King's Cross is an 'Opportunity Area' and the plan provides for the delivery of a minimum of 2250 additional homes (of all tenures) in the period 2001-2026 (*London Plan* FA table 5B). The main site permission provides for a maximum net additional construction of 1626 units on the Main Site (*LBC OR 17-02-06* §7.2). Taken with the 246 units in the Triangle proposal, the total would be 1872—well short of the 2250 foreseen in the *London Plan*. The 'Opportunity Area' only has one area left where new development could be proposed. This is the 'linear lands', called sub-area 6 in the *Planning and Development Brief*, which is unsuitable for housing.

2.2 The Panel appointed by the Secretary of State to examine the draft housing alterations to the *London Plan* reported in September 2006. It specifically refers to the Kings Cross Railway Lands Group's concern that housing needs are being overlooked because of

commercial regeneration and the way outline planning permission had been granted (by Camden on the Main Site). The Panel recommended that the Mayor's Statutory Housing Strategy give special consideration and offer appropriate guidance so that the issues raised in respect of the King's Cross area do not recur (*London Plan Early Alterations EIP Panel* report § 2.41 and Recommendation H18). [LP EIP extract.pdf]

2.3 The *London Plan* also takes a strong line on schemes like King's Cross when it stresses that on high value sites more than 50% should be affordable (LPFA § 3.42).

2.4 We urge the Inspector to uphold local and regional policies on this issue and require that 50% of any housing on the Triangle should be affordable.

3. The balance between social rented and intermediate housing

3.1 The *London Plan* (3.38) seeks a split between social-rented and intermediate affordable housing of 70% to 30%. Camden's *UDP* policies H2 and KC4 require the same split.

3.2 I cannot stress too strongly the importance of genuine affordability if housing provision here is to contribute realistically to local needs and refer to it in my main proof of evidence (§5).

3.3 LBI's latest *Housing Strategy* (2004–7) says they need to produce 1815 affordable units per year over next five years. The last *LP Monitoring* report (2007) shows that total affordable housing units produced in LBI was 491, of which 310 were intermediate and 181 social rented. Thus Islington is falling short of its own target for affordable housing in total and especially in social rented housing.

3.4 To be more precise: affordable housing of all kinds represented 67% of all completions in Islington in the latest year (05/06), 29% in Camden and 49% in the two boroughs combined. (*LP Annual Monitoring Report 3*, tables 16 and 17).

3.5 However far too low a proportion of that housing was social housing to rent. The social rental proportions were: 47% in Camden and 36% in Islington, which is 40% in the two boroughs combined, very far short of the target 70%. (Same source). It should be noted that the continuing loss of social rented units through the Right to Buy are ignored in these data, which therefore overestimate the growth of the social rented stock. Indeed new social rented homes may not be enough to compensate for the

losses. In Camden the 84 units of social rented housing achieved last year compare with Camden's estimate of 100-150 RtB losses per annum (*LBC Housing Strategy*). No data can be found for losses via right to buy in Islington, so the estimates cannot be repeated.

3.6 Islington is the sixth most deprived borough in the country, and the neighbourhood adjacent to this site is one of the most deprived in the borough. Housing need is acute and the Council has 8566 households in significant need on its list. (*LBI Housing Strategy*, p.18).

3.7 Camden also contains severely deprived wards, the worst of which are clustered in the centre and south of the borough. Camden's waiting list is also huge: 10,442 households at April 2007 of whom 7825 are described as having 'reasonable preference category' [*LBC Housing Strategy Statistical Appendix*, Table C]. The Council housing stock in Camden has fallen from 34,000 units in 1980 to 'around 24,000' (*LBC Housing Strategy 2007 update* §1) and

The last Housing Needs Survey for Camden (2004) estimates that an additional 5,187 units per year (over and above current supply) are needed to meet all of the current and projected need for affordable homes until 2009. (LBC Housing Strategy 2007 update §3.1)

3.8 Finally, in defence of the 70:30 split and the 50% affordable requirement, it is necessary to dismiss the Appellant's argument that an unusually low proportion of socially rented housing would be appropriate here because the locality has an 'unbalanced' mix of tenures and that a higher proportion of intermediate housing would assist the stability of the community. (Dickinson proof pp 27-30). There are a number of reasons why this argument should not be accepted:

(i) At a formal level, such arguments cannot be advanced for schemes larger than 1000 dwellings (Mayor of London, *Housing SPG*, §18.9) and the Appellants insist that the Main Site and the Triangle should be considered together. In a legalistic sense this argument thus cannot be accepted.

(ii) The strong representation of social rented housing in the adjoining wards and CIZ is certainly being steadily reduced through the right to buy and we consider that the maximum possible provision on the Triangle site is required to help offset the current and likely future decline of the tenure in Camden and Islington.

(iii) There is no reason to suppose that social housing tenants would provide a less stable, less sustained, community than occupants of

intermediate or private market housing. Quite the reverse. In this part of London social housing tenants tend to be very settled and the most rapid turnover of population occurs in private renting – which in this case would arise in the market sale housing and perhaps any intermediate units which were sub-let. See Annexe.

(iii) Our actual experience is that all of the estates nearby exhibit quite a strong mixture of ethnic and class groups. There is certainly poverty but there are also professionals and middle-income people living on these estates, as council tenants, as leaseholders and as private tenants of leaseholders. Indeed Ms Dickinson notes that there is a

...seam of middle income earners. Unexpectedly there was evidence of a substantially higher number of households [with] middle incomes than would be expected given the concentrations of social rented property.... (Dickinson proof §6.6)

The argument is based clearly on a stereotype of the 'sink estate' which simply does not apply here.

ANNEXE to supplementary proof of Michael Edwards

Households in King's Cross (approximately the Wider Impact Zone)

Length of residence in 2000, by tenure

	All households	Owners	Council tenants	Hsg Assn tenants	Private renting
	%	%	%	%	%
How long have you lived at this address?					
Recent (up to 2 years)	27	17	18	28	70
Medium (3 to 9 years)	31	29	32	37	18
Long term (10 years or more)	42	54	50	35	12
Total	100	100	100	100	100
N(Population)	386	69	172	94	33

Note that a high proportion of owners were households which had exercised the right to buy.

Source: extract from:

Report on the Survey of Households in King's Cross, 2000

Dr Emmanuel Mutale and Michael Edwards, UCL, 2003, Statistical appendix.

<http://www.bartlett.ucl.ac.uk/research/planning/kx>