

## **Response to the consultation on the Mayor of London's Draft Good Practice Guide to Estate Regeneration**

***By Emily Jost on behalf of myself and the tenants and residents of Northwold Estate, Clapton, London E5.***

I am delighted that the Mayor of London, Sadiq Khan desires feedback on his draft document. Having studied it in depth, there is a great deal to feed back on, all of which I trust will be fully taken into account when the final guide is published. As a resident of an estate under threat of demolition by Social Housing Provider the Guinness Partnership, I can speak from a position of knowledge and direct experience on the contents of the guide as it stands, and it is this experience I bring to this document.

All of us many Londoners on the frontline of the struggle to defend our homes and communities and rights to live in our city are by sad necessity experts on the so-called housing crisis and all its attendant issues of social cleansing of the working class and ordinary Londoners, and the profiteering of developers, housing associations and councils. I am sure many of my fellow-campaigners will have much to say on this draft which frankly must be written again from scratch, having spoken to the Londoners the mayor was elected to represent, many of whom will have voted for Khan as mayor on the promises made around housing.

While the guide's forward states positive notions such as "we must protect existing affordable housing"; that "social housing [provides] ... a foundation of our mixed city" and that "tenants and leaseholders on the estate are treated fairly", the contents of the guide counter these statements in a startlingly strong manner. For a very detailed and full response see Architects for Social Housing's thorough critique of the guide. The main issues I would like to raise on behalf of Northwold Estate residents are as follows:

1. The Londoners in the document's title are barely acknowledged anywhere in the guide. This is not a document for the people, like me and my neighbours in the 580 homes of Northwold estate, but for the local authorities, housing

associations and developers with designs on the land we inhabit. Estate "regeneration" is not only about bricks and mortar, or numbers on a spreadsheet, but about people, families and communities. Prioritising residents must be paramount in all proposals for any type of change on estates. Any exploration of any change to any estate must start with its residents. In this draft, residents are shockingly put last and treated as an inconvenience who may be in the way of "progress". Londoners need the mayor to represent their interests above those of business, profit and homes for the rich.

2. The social impact of regeneration is enormous and extremely serious for individuals, families and communities (see UCL Engineering's Urban Lab publication: Demolition or Refurbishment of Social Housing 2014). Homes in estates are just like any other home in a house on a street and are places where people invest emotionally and financially, often over long periods of time and over several generations. Peoples' homes are connected to where they work, volunteer and where children and young people go to school. All of these social and economic aspects of peoples' lives are threatened by estate regeneration and this must be acknowledged by the mayor. On our estate there are several families with three or four generations living close to each other, some of whom were born on the estate. Shifting people out of their homes will break up families and communities, networks of social support and genuine community.

3. This being London, this issue for Londoners is their right to live not just in their homes and communities but in this city at all. The implication of estate regeneration for many tenants and leaseholders is that the process will force them to leave their neighbourhood, community, support networks, place of employment, children's schools and even to leave London altogether. People living on estates are the people who have made London the great place it is and continue to work hard to contribute to its success as a multicultural, vibrant, mixed, inclusive and welcoming city. The message estate residents receive when their homes are under threat, and in this guide, is that they no longer deserve to live here and this must be completely rewritten by the mayor. See Heygate for how far and

wide former residents were scattered by the profiteering of Lendlease and the complicity of Southwark Council.

4. Most housing estates have been deliberately neglected in a process of managed decline over many years despite vast incomes from rent and service charges and must be maintained properly. This is mentioned nowhere in the guide and yet is a statutory requirement of all councils and SHPs. It is offensive to residents that their homes may be threatened with destruction when the place they live has not been properly looked after by its owner. The guide must enforce this duty as essential long before any consideration of demolition occurs. Allowing housing stock to decline as a means of providing an excuse for demolition is corrupt and abusive to residents; mismanagement of public or social housing stock must be classed as the offence it is.

5. As was promised in Sadiq Khan's election manifesto, all residents should have the right to decide the future of their homes and communities, and this must be done by ballot. The guide recommends against balloting residents, suggesting residents don't understand enough to be able to vote, and that the decision is too complex to amount to a yes/no ballot. Yes demolition or not-demolition is a binary decision. This is insulting and patronising as it is their homes, lives and futures under threat. Any proposal that involves change to an estate including demolition must only go ahead with the explicit agreement of the whole community.

6. The guide suggests that social housing must not be lost, and ideally be increased but where is the minimum of 50% increase in social homes as stated in Khan's election manifesto? The only possible justification for demolition is to genuinely address the massive waiting lists (350,000 families according to the GMB) for Londoners in need of social housing. Furthermore, the guide provides a get-out clause for developers that a loss of social homes is acceptable "where all other options have been exhausted" or if it is "replaced with better quality homes at existing or higher densities with at least the equivalent amount of floorspace." This is giving carte blanche to councils, housing associations and developers to build luxury apartments, expensive shared ownership, expensive "affordable" rented or for sale homes none of which address the needs of those on the

waiting lists. Or anyone on a normal salary in London. In effect, this draft guide allows the complete obliteration of council and social homes from London.

7. If not social housing, then who are all these new homes on former public land for? It is well-known that many luxury flats on former housing estates are owned by absent foreign investors (see Woodberry Down, Heygate and Colville where homes are currently for sale in Hong Kong), and it has now been shown that many of these are used for international money laundering. It is also well known that many luxury homes remain unsold as at Capco's Earl's Court development. When the level of homelessness has increased dramatically, house prices and rents have increased massively and people's real terms wages have gone down or their benefits capped or withdrawn, the need for social housing is greater than ever. "Affordable" is (up to) 80% of market rate which is far from affordable for the vast majority of people and is no solution to the housing crisis. Shared Ownership is likewise not a solution as being forced to pay rent and service charge on top of a mortgage and all repairs adds up to enormous outgoings and locks people into housing with no means to move on. Demolition of ordinary people's homes for replacement by luxury apartments, shared ownership homes or "affordable" flats is never justifiable. Once social homes have been destroyed they will never be replaced and we already have a very significant shortfall. The guide must enshrine protection of all social homes and promote a real increase in them if it is to address the needs of the capital's population in any way.

8. Residents are the experts in their own homes and surroundings. Those developers, councils and housing associations with plans to demolish them have often never visited the estates in question, don't know how people occupy them, what they like about them and have not stepped inside anyone's home. The guide is written from the point of view of these people, not the residents whose lives will be impacted by any changes to their estates. If changes are needed or possible without destruction, residents are the best people to decide what should happen to improve the estate and/or provide additional homes. The mayor will be aware that on many estates, residents have submitted alternative plans and yet this gets no mention in

the guide. Residents' own knowledge and expertise, along with the support of independent professionals are perfectly capable and should be encouraged to come up with their own plans that don't involve displacement, destruction and disruption. Grants must be made available to provide access to architects, surveyors and other specialists in order that residents' own visions and ambitions for their estates can be realised. It must be made essential that all plans submitted by residents are taken seriously and genuinely inform decisions and any change that is made to any estate. Stating that residents should be engaged in "shaping" the plans of their landlords is tokenistic and meaningless.

9. Sections in the guide on consultation are deeply troubling. Firstly the guide tells developers not to bother consulting residents on "non-viable" options. This assumes that the only party to decide on viability is the developer/SHP/council rather than the people who actually live on the estate. Viability is not just financial, as stated above it is social and environmental too. Residents must be asked what improvements they would like to see to the estate, and enabled to come up with their own ideas and plans before any consultation on options even starts. Secondly, "conflict" between residents and landlords is acknowledged, but it is not acknowledged that residents of many estates choose to resist demolition of their homes for extremely good reasons. In terms of consultation, the true views of residents are often dismissed as "resistance" yet any real consultation would make residents' views paramount in any proposal. This is the only way residents will receive the "reassurance" the guide is intended to provide. The guide requests that consultation must be "meaningful" yet only support the aims of the landlord. To be told things is not to be consulted. To appoint a consultation company or ITLA is not to consult. Their role is to facilitate demolition and to manage any resistance. For any consultation to be meaningful, residents' view would be sought before any architect, consultant, engineer or developer is employed. In other words there IS a right time to start a consultation process – and it certainly isn't when the plans have already been fully decided by the landlord. All Londoners undergoing the consultation processes currently in

use by councils, housing associations and developers will tell you that consultation does not consult with residents' view AT ALL. "Fun Days" organized by consultation companies on behalf of demolishers should not be cited as good practice. There is nothing fun about dealing with the prospect of one's home being demolished and being socially cleansed from one's community and city.

10. Refurbishment and infill will always be the least disruptive and socially and environmentally damaging way to improve estates and provide increased numbers of social homes. The guide must champion this approach in all cases and condemn all plans which involve people being evicted, placed in more expensive accommodation or socially cleansed from their community and city through demolition.

11. The environmental impact of estate regeneration is mentioned only briefly as a potential "disbenefit" to regeneration in this document. This has been shown to be enormous: the carbon release caused by large-scale demolition cannot be offset even by building "environmentally sound" replacements for many decades. See UCL Engineering Urban Lab Demolition or Refurbishment of Social Housing? 2014. With pollution and carbon levels in London already off the scale, demolition of housing stock that could be refurbished with genuine positive environmental impact instead is completely unjustifiable. Additionally, people living on estates which are being demolished or partially demolished and rebuilt are in effect being forced to live (and bring up children) in a toxic building site for many years which will have a detrimental effect on health (and the noise pollution will likewise have a proven negative impact on mental health). This is damaging to all residents and will have a particularly harmful effect on children. The guide must address this aspect of estate regeneration, stipulating that demolition must be avoided on environmental grounds.

12. Who benefits from estate regeneration? Currently, the beneficiaries are developers, housing associations-turned-developers and their board member who are often CEOs of development or building businesses, councils who frequently use estate regeneration as a means to rid the borough of poor residents and change the demographic to one with lower

state/local authority dependence and higher rates of council tax-payers. The guide as it stands promotes all of these benefits to these beneficiaries and disregards the needs of people living in homes that happen to be on estates rather than streets. It must be re-written from the point of view of those facing social cleansing from their communities and city.

13. A clear and transparent definition of terms is required. It is well known to those of us occupying this frontline that the term affordable has changed meaning to mean unaffordable – i.e. it is anything up to 80% of market rent. Most so-called affordable new-builds are at 80% of market rent even though housing associations and councils could choose to charge less than 80%. The mayor must clarify what these and the new London Living rent etc. actually are wherever they are used in this guide and any other documents, otherwise they will be used by councils, housing associations and developers to exploit residents as much as they can get away with. See Betiel Mahari's situation at the hands of The Guinness Partnership who has been threatened with eviction for not being able to afford the "affordable" rent they have chosen to charge her. The mayor should reject this misleading term "affordable" when it means anything but.

14. The case studies used throughout are bizarrely positive considering what is known of social cleansing, displacement and poorly built, unaffordable, empty or foreign-invested that is the real result of estate regeneration. If case studies are to be included in this guide, they must be named. Furthermore they must be unbiased: in all those included the view is clearly from the local authority or housing association rather than the people affected by the demolition. Case Study 8 also summarises everything that is wrong with regeneration. The residents did not "choose to move off the estate"; they were clearly forced off by the regeneration which saw poor quality and presumably overpriced homes replacing an estate where people had been happily getting on with their lives and no-one wanted to live there. The answers proposed in the guide include "better marketing" and "design issues" being addressed – none of which would be necessary if people's homes and lives had been respected and the estate been improved rather than demolished. The "lessons learned" actually equal a large number of ruined

lives and this must never be allowed to happen again.

15. In a few places the guide mentions improved appearance of the estate and public realm. Appearance is subjective. Architectural fashions change. The resurgence of the tower block and the new selective appreciation of brutalism prove this. Many "improved" estates replace perfectly good homes with contemporary monstrosities (see Woodberry Down again) which are often very badly build (see Orchard Village). The public realm should of course be invested in regardless of estate regeneration to include good facilities, open spaces, trees and accessible routes. Appearance can never objectively be used as a reason to demolish people's homes.

16. The guide's mention of monitoring the outcomes of regeneration "projects" is insulting and laughable. Monitoring residents' health and well-being when their homes have been destroyed is pointless. If health and well-being is a concern, estates would be improved and refurbished, not demolished. I know from first-hand experience how detrimental even the threat of estate regeneration has on residents and I imagine that when people are either living on a building site, forced out of their homes, paying more rent and service charges or socially cleansed from London their health and wellbeing will be very poor indeed. I am sincerely concerned about the remaining leaseholders at Aylesbury estate who live behind barbed wire, having had their addresses deleted from the record. How is their well-being? Why isn't the mayor doing something to resolve their appalling situation? What would be the point in monitoring it when it's too late? The impacts on the health and wellbeing of residents of any estate plans are fully the responsibility of the landlord. A reminder: this guide is about people's lives.

17. Leaseholders are often the biggest victims of the realities of regeneration, and their situations must be recognised fully in the guide. Being offered a shared ownership or shared equity property when they previously had a mortgage or a paid-off mortgage on a leasehold property is a con and a rip-off. Many leaseholders bought through right-to-buy having been encouraged to become owner-occupiers by the government. Other leaseholders bought ex-social or council flats as an affordable option in an extremely expensive market. For these

people, being forced either into enormous debt, or out of London is an extremely detrimental situation to be forced into. The guide suggests that leaseholders may "choose" not to return but it is no choice if the resident cannot afford what is being offered. Leaseholders chose to buy their homes: regeneration removes all choice. It is well-known that leaseholders are not compensated adequately enough to buy another property in the same neighbourhood when their homes are demolished. The guide must address this, ensuring that developers, councils and housing associations pay leaseholders enough money for their properties to purchase another home in the same area in the event of their home being demolished. "Other innovative ways to support leaseholders" is not adequate as a statement to address this very serious issue of social cleansing.

18. Housing needs must be addressed in the guide. Many families on estates are in overcrowded conditions. Landlords must address this along with under occupation and accessibility needs in any change made to any estate, and this must be made clear in the guide.

The mayor of London represents the 8+ million inhabitants of this city. He must show through this guide that he is on our side, not the side of those who seek to profit from demolition of our most precious housing assets. Profiteering by developers, social housing providers and councils must be condemned and prevented and the human rights of Londoners must be maintained at all costs, or London as we know it will be gone forever.

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