

Just Space Evidence base

Stronger community participation in regeneration: a paper to inform discussions with the GLA

The [Draft London Plan](#) acknowledges that ‘growth and change have not always benefited Londoners equally’ and that there are still many areas of deprivation in the capital (2.0.7). To address this, there needs to be a ‘strong focus on sustainable and inclusive regeneration’ and ‘the Mayor and his partners need to work closely with communities to bring about the right sort of change’ (2.0.7). These are worthy intentions but they’re not backed up by the policies in the *Plan*.

Although ‘regeneration’ isn’t defined in the *Plan*, it’s pitched as being a force for good that brings lots of benefits. For many Londoners, however, ‘regeneration’ has become a dirty word, in part because local communities don’t have a say in where and how it happens. If the Mayor is serious about sustainable and inclusive regeneration, strong community participation is essential in all schemes from the outset. This would go some way in restoring the democratic deficits currently embedded in regeneration policies.

This briefing document:

- summarizes [Just Space’s](#) demands for community participation in regeneration
- outlines what [Better Homes for Local People: The Mayor’s Good Practice Guide to Estate Regeneration](#), the [Draft London Housing Strategy](#), and [Homes for Londoners: Affordable Housing and Viability Supplementary Planning Guidance](#) say about involving communities in regeneration
- considers the absence of Neighbourhood planning in the *Draft London Plan*
- suggests how to strengthen the *Plan*.

Just Space’s demands for stronger community participation in regeneration

Just Space has been emphasizing the tensions surrounding regeneration for many years. In the Examination in Public on the 2009 *Draft London Plan* Just Space helped people put forward evidence about the negative impacts of regeneration, such as rising housing costs and communities being forced to disperse.

Just Space’s submission to the [Assembly Regeneration Committee hearing on Transport and “regeneration” in July 2015](#) highlighted one of the major weaknesses in regeneration policy: without long-term studies tracking the impacts of regeneration schemes, it’s impossible to find out whether it’s the original residents and businesses who benefit (or not) from changes in an area, or new people who move in as a result of regeneration. Three years on, these studies are still needed. This research gap goes to the very heart of plan-making and the soundness of the London Plan. How can the Mayor propose policies on regeneration without reflecting on or analysing whether or not previous policies have worked?

In a workshop on Regeneration and the *Draft London Plan* organised by Just Space on 20th January 2018, participants said they wanted clearer guidance on community engagement in the *Plan* so that communities have more influence at the moment of decision-making, a fund for community participation and a more level playing field for community developers (including funding and presumption in favour of community developments). They also called for Supplementary Planning Guidance on community engagement to promote a consistent and

meaningful approach to organising community participation on all spatial levels of planning by Mayor, boroughs and developers.¹

In *Towards a Community-Led Plan for London*, published in 2016, Just Space argued that the 'participation of local communities in any planning activity is crucial for ensuring public support and the credibility of the democratic process' (p. 13) and put forward *Some Key Principles of Effective Community Involvement*:

- early and continuous involvement
- inclusive invitations and out-reach
- resourcing and support
- regular provision of information and feedback
- continuity, collaboration and co-production
- presenting realistic and feasible options
- proper assessment of current land uses and the full range of impacts
- listening to and acting on
- transparency and contesting confidentiality
- measuring, monitoring and evaluating the effectiveness of community involvement (p. 15).

Although these refer to planning more generally, they could all be applied to community involvement in regeneration schemes – and could form the basis of *Supplementary Planning Guidance on community engagement*.²

Better Homes for Local People:

The Mayor's Good Practice Guide to Estate Regeneration

This document asserts that residents should be 'at the heart of' any estate regeneration process (p.8) and explains how this should happen. Here's a summary of the key points.

Residents should be consulted very early on about estate regeneration proposals, and involved in formulating the objectives of the proposal, evaluating the different options (such as refurbishment or demolition), choosing the design and deciding who will deliver the scheme (p. 10).

If demolition is an option, then alternatives should always be considered first (p. 8). The Mayor is currently consulting on the issue of mandatory ballots as part of estate regeneration schemes where demolition is involved (p.5).

Throughout the consultation process, councils, housing associations and their partners should share all their decisions with residents, engage with as many of them as possible and help people 'skill up' so they feel empowered to engage with the consultation process (pp. 10 – 12).

4. The different regeneration options available, and the way that options are chosen and discounted, should be open, transparent and accessible. Councils, housing associations and their

¹ The [latest amendments to the Town and Country Planning regulations](#) on local plans state that from 15th January 2018 all local planning authorities have to review local development documents, including the statement of community involvement, every five years, starting from the date when the document/statement was adopted. This means that a lot of boroughs will have to revise and update their statement of community involvement this year.

² In response to the Old Oak and Park Royal Development Corporation's (OPDC) draft Statement of Community Involvement (SCI), the [Grand Union Alliance](#) (a wide network of resident and community groups, individuals and small businesses) proposed some 'ground rules' around community involvement in the development of planning policy – some of which were incorporated into the final version of the SCI.

partners should assess all the social, economic, and environmental costs and benefits of different options (p. 13).

Some criticisms

The Good Practice Guide to Estate Regeneration envisages a high level of community participation in estate regeneration but it's always the landlord (such as a council or housing association) leading the process. It doesn't consider the possibility of community-led estate regeneration.

The Mayor's support for ballots as part of estate regeneration schemes is welcome but they will only be mandatory when his funding is involved – they won't be a tool all residents will be able to use to block demolitions.

Can this guidance be enforced? The Mayor says he'll use the planning and funding powers he has to encourage the adoption of these principles (p. 2), but he has limited powers to get involved in estate regeneration. In their [response to the Draft London Housing Strategy \(LHS\)](#), Just Space argued that it needs to be clearer on how it is going to implement *The Good Practice Guide* and the extent to which it is statutory (p. 17).

The *Draft London Plan* needs to be much clearer on this too. In Policy H10 Redevelopment of existing housing and estate regeneration there's no mention of community involvement. All of the principles outlined in *The Good Practice Guide* should be explicitly included in Policy H10.

But, despite these criticisms, community groups can use *The Good Practice Guide* to call for stronger community participation in all forms of regeneration outlined in the *Plan*. If such a strong degree of community involvement is possible in estate regeneration, why not in wider policies on Opportunity Areas, Town Centres and Strategic and Local Areas for Regeneration?

The Draft London Housing Strategy

The consultation for this has ended, but the draft strategy outlined plans for a new Community-Led Housing Hub, funded by the Mayor. It's mentioned in Policy 5.3 Community Support for Homebuilding and then described in a bit more detail in Box 10 (p. 152).

This hub could, potentially, be one way of implementing *The Good Practice Guide*. However, as Just Space pointed out in their [response to the Draft LHS](#), it's not clear how the hub will be set up or run, or what it will cover (p. 14). It ought to be a resource for tenants and residents of social housing estates who want to initiate community-led regeneration, not just communities who want to get involved in building houses (p. 15).

This improved version of the Community-Led Housing Hub should feature in the *Draft London Plan* (it's currently not mentioned at all) as a means of implementing the principles of community involvement outlined in *The Good Practice Guide*.

Homes for Londoners:

Affordable Housing and Viability Supplementary Planning Guidance

The Mayor's desire for 'more openness and transparency in the planning system' is a worthy ambition and would benefit communities: we can't have effective engagement without transparency. But this should extend to the Community Infrastructure Levy (CIL) and Section 106 agreements. These are valuable resources for communities because they fund social infrastructure (like health provision and recreation facilities) and affordable housing.

Community groups are consulted when the CIL is introduced, in broad discussions on topics and priorities. But they are usually excluded from talks at the local level, which means they don't get a say on what the specific benefits of a CIL are. Section 106 agreements are currently relatively closed negotiations between local planning authorities and developers. Community groups struggle to have their voices heard, and consequently have little or no influence on the scale and nature of the affordable housing that London so desperately needs.

*Both the CIL and Section 106 process could be used to support the sustainable and inclusive regeneration the Mayor claims he wants. But to do this they have to be included in the relevant policies in the *Draft London Plan*, not simply be referred to in the text.*

Neighbourhood plans

The Localism Act 2011 paved the way for communities to draw up neighbourhood plans for their area and created a three-tier planning system in London. This third tier – neighbourhood planning is – is the one that local communities have the most power to shape and influence. And since 2013, neighbourhoods that draw up a development plan and get the consent of local people in a referendum, are entitled to 25% of the CIL from the development they choose to accept.³

*However, [Neighbourhood.Planners London](#), a voluntary initiative supporting and raising the profile of neighbourhood planning, argue that neighbourhood plans haven't been taken up much in London, compared with the rest of the country. In [their response to the Draft London Plan](#), they raise concerns about the lack of attention given to neighbourhood planning in the *Plan* and the apparent lack of interest from the Mayor and the GLA.*

Neighbourhood planning should be more widely known about in London, and be better supported, as it gives local communities more of a say in the future of their area.

Conclusion: Strengthening the Draft London Plan

*If the Mayor is serious about working closely with communities to bring about sustainable and inclusive regeneration, the **policies** in the *Plan* need to spell out how the community is going to be involved in a consistent and meaningful way.*

³ NEIGHBOURHOOD ELEMENT OF THE COMMUNITY INFRASTRUCTURE LEVY: The London experience, a report from Neighbourhood Planners.London September 2016

[http://docs.wixstatic.com/ugd/95f6a3_684e0bae1dec48c9a7edd92f485a0bee.pdf]

The Mayor should:

- *explain how the Mayor is going to implement **The Good Practice Guide to Estate Regeneration***
- *make explicit reference to all of the principles outlined in **The Good Practice Guide in Policy H10 Redevelopment of existing housing and estate regeneration**, and allow for the possibility of community-led estate regeneration*
- *include similar principles in all of the other policies concerning regeneration: **Policy SD1 Opportunity Areas; Policies SD7 Town centre network, SD8 Town centres: development principles and Development Plan documents and SD9 Town centres: Local partnerships and implementation; and Policy SD10 Strategic and local regeneration***
- *outline the role the **Community-Led Housing Hub** could play in strengthening community involvement in both estate regeneration and wider regeneration schemes*
- *highlight the role that neighbourhood planning could have in involving communities in regeneration schemes*
- *specify in all relevant policies that communities should be involved in every level of **CIL and Section 106 consultations and negotiations***
- *include **Supplementary Planning Guidance on community engagement**.*

*Without these policy commitments to ensuring community participation in policy, the regeneration policies outlined in the **Plan** will only result in more of the same for Londoners: rising housing costs, communities being forced to disperse and the loss of valuable social infrastructure.*

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