

Redevelopment of Housing and Estate Regeneration

Inspector's questions on M26:

Would Policy H10 provide a justified and effective approach to the redevelopment of existing housing and estate regeneration? In particular, would the approach to affordable housing be justified? In light of Policy H5, would the requirements be clear? In the context of local need and objectives for redevelopment or estate renewal, would it be effective? What is the justification for provision of affordable housing floorspace rather than units? Would it provide sufficient flexibility to reflect local circumstances and support housing and estate regeneration? Overall, would the approach taken meet the objective of Policy GG4 in delivering the homes Londoners need?

The key issue is the shrinkage of the social housing stock under the guise of "estate regeneration".

Tens of thousands of social rented homes have been lost to regeneration schemes with whole communities broken-up and displaced, often moved outside of their home boroughs or even further. See maps of the Heygate Estate Diaspora (Southark). Will Policy H10 allow local authorities, housing associations and their private developer partners to continue demolishing estates?

The issues raised in estate regeneration are of concern to **all Londoners**, not just those located on and around estates. Council and housing association estates are now the main social institution securing one of London's unique features among world cities: the sustainability of mixed communities throughout the metropolis – mixed in terms of social class, culture, income, ethnicity and household size and sustainable between generations.

The more estates are eroded, the more London becomes segregated with the most central and 'desirable' areas reserved for high income and wealthier groups, others being increasingly pushed to the margins or beyond, especially large families and those depending on benefits. Along with these displacements of people goes a damaging displacement of the services, businesses and jobs on which many Londoners depend. Alongside the social damage there can be severe effects on the structure of the economy and on the environment – especially though the embodied carbon in demolished structures, through the truck movements of spoil and changes in the need to travel as households and firms moved further out of London often have longer journeys. It is thus everybody's business.

As we said in our Community Led Plan policy recommendation D (August 2016 page 31):

Proposed regeneration of council or housing association estates should require comprehensive, independent analysis of social, environmental (including embodied carbon) and economic benefits of all proposed options and a ballot of tenants and leaseholders. Options should always include refurbishment.

Sadiq Khan's manifesto (2016) said that the Mayor would; '*Require that estate regeneration only takes place where there is **resident support**, based on full and transparent consultation, and that demolition is only permitted where it does not result in a loss of social housing, or where all other options have been exhausted, with full rights to return for displaced tenants and a fair deal for leaseholders.*'¹

However, Policy H10 still tends to presume that demolition will be the default plan for estates. We absolutely oppose this, on economic, social and environmental grounds.

Refurbishing and upgrading existing homes should be the first and preferred option rather than demolition. Do not demolish good homes! There should be no exceptions to this.

We would also propose as key criteria the following :-

- The Mayor must insist that environmental impacts are fully reflected in decisions – particularly in relation to the demolition of social-rented homes. Our work with the UCL Engineering Exchange² and other research shows how valuable refurbishment can often be in terms of embodied and lifetime energy/carbon implications.
- Social and environmental impact assessments (including equalities assessments) must be carried out on any estate where redevelopment / demolition is proposed, and published at an early enough stage to inform consultations.
- These assessments, together with financial and technical evidence must be placed in the public domain at a stage early enough to inform consultation at each stage of decision / planning.

¹ <https://www.london.gov.uk/node/33508>

² UCL Engineering Exchange with Just Space and LTF ***Demolition or refurbishment of social housing*** <http://www.engineering.ucl.ac.uk/engineering-exchange/files/2014/10/Report-Refurbishment-Demolition-Social-Housing.pdf>

Policy H10 must refer to the importance of full engagement with tenants and residents and set specific criteria. Surely this is the key lesson of Grenfell, and a central theme of the Shelter Commission report. Without it no grant or required consents should be given.

Firstly, it is worth re-stating the “Gunning” principles, re-affirmed by the Supreme Court. Consultations must be supported by transparent information and take place when proposals are at a formative stage. All **residents** whatever tenure should have a say at every stage of any redevelopment.

Secondly, there is the importance of sustained community development that is supportive of bottom-up tenant and resident involvement defining what they want from the regeneration, including a community led vision for the estate.

Thirdly, any regeneration scheme which would involve demolition or displacement must be supported by a majority in an independent ballot of residents.

For Policy H10 to be effective, it must include No (net) loss of social housing units (including council and housing association for rent or lease) and rents to stay at council 'social' rent levels.

There also needs to be reference in the text to the precarious situation facing leaseholders when estates are demolished and to the establishment of Special Development Vehicles or other companies or partnerships which can circumscribe the regeneration options and rights of people affected.

Given the lack of data and longitudinal studies on what is actually happening to residents and businesses in and around regeneration areas we propose that Policy H10 supports a stakeholder body to monitor, evaluate and research regeneration in London. This could be an *Estate Regeneration Board* (to join the other Boards and Commissions in place at City Hall) with an oversight role and a strong research emphasis, led by academics and with representation from community and tenants groups and other stakeholders.