

Examination in Public of the draft London Plan: Written submission by CPRE London (1142) to the EIP Panel, December 2018

MEETING HOUSING NEEDS: REDEVELOPMENT OF EXISTING HOUSING AND ESTATE REGENERATION

Matter 26: 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?

1. CPRE London welcomes recognition in the draft Plan of the need to redevelop and renew existing housing estates in order to improve and increase affordable housing provision. We are concerned, however, that Policy H10 is not sufficiently robust to ensure that such schemes actually result in an increase in provision of affordable housing units, or that this is provided in a sufficiently timely manner. We are also concerned that there are insufficient controls over the extent to which higher densities can be achieved without an overall loss of amenity and open space, as implied by the minor suggested changes to paragraph 4.10.2 (MSC 4.108)).
2. We recommend these potential weaknesses are addressed by:
 - Inserting the words 'while maintaining provision of open space' after 'higher densities' in H10A
 - Deleting 'where viable' at the end of H10B (MSC 4.107))
 - Applying a reasonable limit on the length of time tenants with a right to return are placed in alternative temporary accommodation.
3. Without these improvements, we are concerned that the objectives of Policy GG4 would not be met.

CPRE London

December, 2018