

London Tenants Federation - 2751 - M26 Redevelopment of existing housing and estate regeneration

Would Policy H10 provide a justified and effective approach to redevelopment of existing housing and estate regeneration? In particular would the approach to affordable housing be justified? In the light of policy H5, would the requirements be clear? In the context of local need and objectives for redevelopment of restate 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 that Londoners need?

Policy H10 is unjustified and ineffective.

- (i) It assumes that estate regeneration and redevelopment of existing homes are both the same thing (when estate regeneration does not have to include demolition and redevelopment).
- (ii) It refers to loss of 'affordable housing' but in relation to estate regeneration this is specifically social-rented homes, which have sometimes been replaced (in part) with other forms of 'affordable housing' that are unaffordable and inaccessible to social housing tenants (as well as market housing).

We propose the following changes:

- H10B Loss of existing **social-rented affordable** housing should not be permitted unless it is replaced by equivalent or better-quality **social-rented housing accommodation** providing at least and equivalent level of **social affordable** housing floorspace on an identical or equivalent basis. ~~50A. All such schemes are required to follow the Viability Tested Route.~~
- (iii) Given huge evidence of need for social rented homes in London, continuation of unnecessary demolition of social rented homes will continue to leave large amounts of precious grant funding used simply to replace existing social rented homes, rather than provide additional, thus failing to meet new and backlog need.

London Tenants Federation's document 'holding on to what we have now and why', an information document for tenants produced by tenants provides case studies on some estates: Woodberry Down, Heygate, Ferrier, Connaught, Morris Walk and Maryon Road, West Hendon, Coleville, Carpenters Estates, Canning Town and Custom House, Cressingham Gardens. The document also provides some more positive examples of regeneration without demolition. The London Assembly's Knock it Down or Do it Up 2014 reported that 8000 social rented homes had been demolished over the previous 10 years;

Policy H10 should be clear that this is ineffective use of grant funding.

We propose

- Add H10C **To make the most effective use of grant funding Mayor will not fund schemes that include demolition of social housing estates without evidence that this is a better option socially, economically and environmentally than refurbishment.**

- (iv) the requirement of the Mayor’s Good Practice Guide to Estate Regeneration to ‘put tenants at the heart of plans’ must be specified in policy H10.

We note that the Mayor’s ‘Good practice guide on estate regeneration’, would support this. Beneath the heading ‘*putting tenants at the heart of regeneration*’ it says “*But alongside these potential benefits, estate regeneration often involves disruption and change to established communities, sometimes over several years, and can result in disagreement between residents and their landlords. Any plan for major changes to a social housing estate needs to be treated carefully and sensitively, and carried out with the close involvement of residents.*”

We propose:

- **Add H10D – Social housing tenants must be empowered by putting them at the heart of any estate regeneration scheme.**
- (iv) Supporting text 4.10.1 fails to acknowledge that estate regeneration (or specifically demolition of social rented homes) has resulted in huge loss of social rented homes, displacement of tenants, breaking up of strong and stable communities, creation of hardship including detriment to health. (See section (iii) above). Current research being carried out by Loretta Lees, University of Leicester, funded by the Economic and Social Research Council (ESRC) show that a conservative estimate of 135,000 London council tenants have been displaced since 1997, through 54,263 council homes being demolished or slated for demolition in schemes of 100 units or more.

We propose:

- **Paragraph 4.10.1 should also highlight - estate regeneration schemes that have involved demolition have frequently resulted in displacement of social housing tenants, the breaking up of stable communities and caused detrimental impact to the health and well-being of social housing tenants and residents.**
- (v) Supporting text 4.10.2 does not make it clear that estate regeneration might entail refurbishment of homes rather than estate demolition. This is an option that most tenants would prefer. Evidence from academics such as Ann Power, LSE, say that in most instances, demolition is economically, environmentally and socially unjustified and indeed detrimental;
- (vi) Supporting text 4.10.2 also fails to focus on the need for estate residents to be at the heart of regeneration plans and so is inconsistent with the Mayor’s good practice guide on estate regeneration;

We propose:

- **Paragraphs 4.10.2 should add**
 - **“Estate regeneration is the process of physical renewal of social housing estates through a range of interventions – which at times have included refurbishment, intensification and redevelopment.**
 - **The Mayor believes that for estate regeneration to be a success there must be resident support for proposals, based on full and transparent**

consultation from the very start of the process, and meaningful ongoing involvement of those affected” – (from the Mayor’s good practice guide on estate regeneration).

- Text changes are required also to bring it into conformity with the Mayor’s good practice guide on estate regeneration – ‘The ~~aims objectives~~ of an estate regeneration project will **usually be to:** ~~typically fall into three broad bands.~~ These are:
- Change ‘delivering, increasing and improving’ to **deliver, increase and improve.**

(vii) The suggestion in the supporting text of paragraph 4.10.3 is that it is important that any scheme incurring loss and replacement of social rented homes should have existing *and new residents* in mind contradicts the text of the Mayor’s good practice guide to estate regeneration, which highlights specifically that any changes ‘*need to be treated carefully and sensitively, and carried out with the close involvement of residents.* Residents of estate regeneration scheme often fear that it is new wealthier residents whose need are at the top of the agenda. The good practice guide is positive in focusing on existing tenants needs and should be followed through in the London Plan.

We propose:

- Changes to 4.10.3 – ‘In some cases, **estate** regeneration will include the loss and replacement of homes and it is important that any such scheme is delivered with existing tenants ~~and new residents and communities in mind~~ **at the heart of plans.** This is particularly(2018)’.
- (viii) The Viability Tested Route (supporting text 4.10.4) will not necessarily ensure replacement of all existing social-rented homes nor the additional social rented homes required. The text refers to ‘affordable’ housing when to be clear this should specify social-rented housing.
- (ix) We do not support H5 A(4) footnote 41E which says separate affordable housing requirements apply to estate regeneration schemes on public sector land – on the basis that it does not fully support the evidence of need for social housing in London.

We propose:

- Change the first sentence of paragraph 4.10.4 ‘~~affordable~~ **social-rented housing**’ (since that is what is always the case in terms of estate regeneration / demolition) and add ‘**it is expected that any additional homes would be expected to deliver exclusively social rented homes in order to address the evidenced need for social rented homes.**
- (x) Supporting text 4.10.5 is not justified by the evidence of need for social rented homes and should be deleted.

We request that the following documents be added to the EiP Library:

- LSE Anne Power’s paper ‘Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability’.
- London Tenants Federation’s ‘Holding on to the homes we have now and why’
- UCL Engineering Exchange report Demolition or Refurbishment, a review of the evidence.