

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M26 REDEVELOPMENT OF HOUSING AND ESTATE REGENERATION

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?

1. The redevelopment of existing housing and estate regeneration can increase the supply of high-quality additional new homes, improve the quality of the existing stock and lead to wider social and economic improvements for the local community. However, estate regeneration is a time-consuming, resource-intensive and costly process, which is often delivered over the longer term and carries greater risk than conventional development. M10 could better reflect the reality of such development in order to support the viability of such regeneration schemes.
2. By way of context, in January 2017 London First published *Estate Regeneration: More and Better Homes for London*. The report identifies that the challenge for London is to get more of the typically long and complex estate regeneration schemes to happen, thereby improving the quality of life for residents, while also ensuring that such schemes are playing their part in the much broader effort required to increase housebuilding.
3. We welcome the revised text in H10A that states that existing housing should be replaced by new housing at existing or higher densities. However, this should be strengthened in order to help deliver H10B, which requires that the loss of existing

affordable housing should not be permitted unless it is replaced by equivalent or better quality accommodation.

4. H10B has significant implications for the viability of estate regeneration schemes, which, in many instances, are only viable with grant and/or a significant amount of cross-subsidy through the provision of new market sale homes. While this model of development has proved to be successful in the current market cycle, it is not without its challenges, especially for longer term schemes where changes in the external economic environment can impact on the ability to cross subsidise a scheme. One sensible way to mitigate these challenges is to encourage, through planning policies, the provision of a broader range of tenures in an estate regeneration scheme, such as market sale and build to rent in addition to affordable housing. Such an approach would have wider long-term social benefits, creating sustainable and balanced communities.
5. We welcome the removal of H10C in the August 2018 minor changes, however this has now been moved to footnote 50A and therefore remains relevant to H10. We believe this should be removed altogether. Estate regeneration is a long-term investment in a community and can take upwards of 20 years; the viability of schemes will fluctuate over this period. It is therefore essential that a pragmatic, scheme-specific approach should be taken, which prevents the loss of affordable housing and increases levels wherever practicable.
6. As stated above, with regard to the relationship with Policy H5 in the draft Plan, the redevelopment of existing housing and estate regeneration can be complex for various reasons. Expecting the same levels of affordability to be delivered in the same way as new build schemes is potentially unhelpful. Estate regeneration schemes should provide the same level of affordable homes as previously existed on site, and any additional affordable homes provided should be agreed with the local authority according to need, viability, and local circumstances.
7. In terms of proposed amendments to Policy H10 in the draft Plan, and taking the above points into account, we recommend that a new H10C should be inserted as follows:

C Proposals for estate regeneration schemes must seek to maximise the density of development through the addition of well-designed and good quality homes. Proposals should consider a range of tenures to help support the viability of the development.

8. We further recommend that Paragraph 4.10.2, focusing on the aims of estate regeneration, should include an additional category as follows:
 - seizing opportunities for positive change and transformation through new building forms and typologies in accordance with Policy D1 and paragraph 3.1.2A.

9. Paragraph 4.10.5 of the supporting text states that where a borough is redeveloping an estate as part of a wider programme then it may be possible to re-provide a different mix of affordable housing on the estate if the overall level of provision is maintained across the programme. London First believes that this should not be limited to the boroughs alone. Housing associations also own portfolios of land and would benefit from the same general provision. On this basis, the following amendment should be made to paragraph 4.10.5:

*4.10.5 Where a borough **or housing association** is redeveloping an estate as part of a wider programme then it may be possible to re-provide a different mix of affordable housing on the estate... affordable housing is being delivered.*

10. Finally, London First considers that an additional paragraph should be inserted in the supporting text to H10 to emphasise that the re-provision of affordable housing floorspace should not be the only baseline measure of acceptability of a housing regeneration scheme. Weight ought to be afforded to the provision of other types of affordable accommodation that also meets a defined and underprovided need. For example, larger units (4 bed+), supported housing and extra-care housing are all more expensive to provide; therefore, these should not be assessed purely on the basis of quantum of floorspace. The provision of these types of accommodation should be afforded special qualitative consideration where an equivalent level of affordable housing floorspace cannot be provided.