

**London Plan Examination in Public
Policy 2.14 – Areas for Regeneration
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INSPECTOR: Paragraph 6 of the panel note indicates – it outlines some of the points which are exercising the panel’s mind at the moment, and we’ve asked the Just Space Network to introduce the debate in this particular case.

Lucy Rogers (LR/SCA): Thank you very much for this extra session and I fully understand your comment about not repeating material that was gone over previously. I’d like to start by talking about the policies as a whole, which you do in your note. That was my starting point. To the extent that they may be coincident with Policy 13, so I’m going to talk about these policies as a whole and then in specific terms about the 2.14. Our major concern with these policies is, together, is that they are more about land assembly for investment than other policies in the plan and that this alone, as they’re written, is not going to do what it says on the tin. Or rather what the strategic point of the plan is in Chapter 1, which is to consider the quality of life across London for all. The policies don’t seem to have any new angles to add to former policies which might secure advantage and solve the problems that, as we all know, do exist. And answer the question why it is that areas that are regenerated, quote unquote, do not always achieve this for residents.

In the Spitalfields Community Association’s original statement, we pointed out an LSE note on the London Plan which talked about the causal connections between policies, processes and outcomes, and how better understanding of these should feed back into the plan’s revision process. And we consider this is one of these – almost not causal connections – but these connections of the policy as written with what actually happens on the ground. As one example, in counterpoint to the Earl’s Court speaker from the development of Earl’s Court, the Earl’s Court proposal will remove 700 houses and replace them with 7,000 houses, of which less than 5% would be social rented houses. But you’ll be hearing many more examples.

So the policies as they stand are, we think, acting contrary to the London Plan’s strategic aims, and again, on Day 1, the GLA assured us that these issues would be covered through policy. So based on all the possible evidence we have, we don’t believe this to be the case. We also would note the convergence, the idea of convergence, which might only mean the raising of property values across the whole of London, whereas it’s important that the convergence is obviously of standard of living and making sure that happens in parallel.

Where you talk about the desired spatial outcomes in Paragraph 2, there’s also a sort of danger that this means just that buildings are built, which does represent a form obviously of progress and economic benefit on one level. But many, many groups have always wondered about the word ‘regeneration,’ not wondered about it, just realized that it is used in many different ways. It means something different to different stakeholders. And so, where regeneration is used, along with spatial outcomes, it’s important that we know that that means regeneration of people as well as buildings. And we wondered whether they may be – could be – a definition of regeneration even. In the Tall Building’s Session 7.7, there’s a reference to regeneration and again, it would be possible to say that building has been – that the concerns about the physical nature of that building – have been offset by regeneration *if* that word did mean the beneficial social regeneration that we think it needs to be. Mr. Barry-Purssell said that, in the previous session of this matter, that opportunity areas and intensification areas and regeneration areas only differ in scale. That was what he said. And therefore, as being the major engines of change, which you also referred to, the engines of the change in the spatial planning, then they must all be consistent with the – they must all have identifiable social and environmental policy attached to them, not one having it and the other not.

INSPECTOR: Are you suggesting that there is a separate London Plan policy then for each of the areas, or am I misunderstanding you?

LR/SCA: Well, there is a separate London Plan policy, for example in 2.13 and 2.14.

INSPECTOR: Yes, I mean for each individual area.

LR/SCA: For each individual opportunity area?

INSPECTOR: You're not suggesting that, are you?

LR/SCA: No, I'm talking about the overall policy.

ABP/GLA: But you want to see a desired social outcome in all opportunity and intensification areas that will have regard to the fact that regeneration areas are involved and people need assistance in regeneration and not just property.

LR/SCA: Exactly. It's just that, what we pointed out last time was that the opportunity areas seemed to be very much lacking those policies. The regeneration policy goes a little bit further towards it, although not quite, and then there's a strange anomaly in fact, which is that in Policy 3.7, Large Residential Developments, suddenly it says "Frameworks should be prepared in consultation with local communities and other stakeholders." Now that's actually the sort of thing that we're seeking for *all* the regeneration policies which, as you say, as the GLA says, [are] only [on a] different scale. So that's just an example of a slight inconsistency perhaps.

And just in parenthesis, that does go back to our issue with Matter 8, where that *could* be a place to hold these policies on participation.

INSPECTOR: You will have seen the most changes to Paragraph 8.1 in particular.

LR/SCA: Since our session? No, I haven't, sorry.

INS: I wondered just by way of interjection whether it might be possible for a copy of those changes to be made available, so it's clear to everybody what they are. The changes are which were introduced on participation in Chapter 8...

ABP/GLA: I think at the risk of being confused, these are changes that we discussed earlier in the week in relation to the first part of Chapter 8. It's not the policy that we're talking about at the moment.

INSPECTOR: No, but it's an overarching publicity on consultation approach, which is being talked about here, and I just wanted to make sure that people were all aware that that change had been made to *that* section of the plan, which will have a bearing on this, presumably.

LR/SCA: If you're referring to the material that we did see on that day, then we're aware of that. It was the extra paragraphs put in.

INSPECTOR: That was what we are referring to.

LR/SCA: In that case, we are aware of it, sorry for that. But our major point on that day was that the paragraph text isn't sufficient for the Plan, to just be in the paragraph text. And that's why I'm just pointing out this sort of phenomenon whereby suddenly in 3.7, something in the strategic policy comes in which is very good and which should really be elsewhere. This all comes back to the fact that when we were talking about the opportunity areas before and talked about participation as a key element of it, the GLA said not to worry, Chapter 8 would contain that sort of policy. But when we got to Chapter 8, we didn't find that that was sufficient. So that's why we've sort of come back, as I said, it's a sort of batting the ball, but that's the sort of explanation for the connection with Chapter 8.

So what could be required in these policies? Well, we've already put Opportunity Area 2.13 changes in, so regarding Regeneration Areas 2.14, it's a pity that the original April 2009 text has not made it's way into the Plan, [as it] was good. It specifically talks about community strategies, more positive contribution to local regeneration, and in the actual blue box, which is what the Mayor proposes, he says to provide the strategic framework to support *local community-based regeneration*.

That's paragraph 92 and 93, and the text box accompanying it. So that is just the sort of wording that's important, and we would like to see that reinstated as opposed to what has been, because I would like to point out that the GLA's addition of the word 'local' – sorry, the wording you've just pointed out – I don't think is the same as 'local community-based regeneration,' it's actually more geographical than specific to community regeneration. So, the text in the April 2009 we felt was good.

The evidence of participation being a key strategic – not strategic, a key component – of good social development, is well known, and I don't think it's necessary to rehearse that again. So we just have to be convinced that the Plan contains the mechanisms by which those community involvement aspects can be part of the strategy and the awareness of how the regeneration happens to cause displacement and all the negative aspects.

I think we have some wording, but maybe it would be better to ask other people to speak and perhaps come back to wording following that for 2.14.

INSPECTOR: I'm content to deal with matters in general first and then come back to the specifics, so that is a helpful suggestion. The three areas that I flag up, and I just want to flag them up at this stage so perhaps we can give some further consideration to them as this debate goes along, is the extent to which regeneration areas and opportunity areas actually coincide, because that's not entirely clear from the Plan, particularly with relation to Map 2.5 and also paragraph 255 on page 48. The second point is one that has been a consistent theme of the amenity groups in parts of this inquiry. The outcomes which have been delivered—whether what is actually being delivered as a result of involvement in the regeneration areas—is actually providing what Londoners want. And the third question is this recurring one again, of consultation and publicity. The panel notes in which this was first raised was the original 2F1, which drew a parallel, if you like, with the process for local plan, or DPD, preparation. I must apologize if people have taken that on board as thinking it was a panel suggestion that the same process should be applied here. It was simply a matter of flagging up the processes through which proposals go at local stage, such as area action plans, to involve communities, and whether – as an aide-memoire, that was something which we ought to bear in mind when we were looking at what we are dealing with at a strategic level, in dealing with communities.

So, it's three basic points there which spring to mind. The relationship between opportunity areas, regeneration areas; the outcomes which are actually likely to be delivered or are being delivered from past experience, and whether that can be improved upon; and again this question of participation specifically for the opportunity areas.

And just by way of hogging the microphone for a bit longer while I have it, I'm very much concerned about the approach to sites which might be regarded, whether as opportunity areas or regeneration areas, as the flagship projects of the London Plan. Because if one looks at a strategic level, and compares it again with the DPD level, one is perhaps looking here at a suite of policies in the London Plan which are, if you like, designed to cover windfall developments as well as flagship projects, but the actual proposals – those where the Mayor is intending to take a lead on delivering development – are of course the opportunity areas and those where there are site-specific proposals likely to come forward – and it's that flagship prospect which I have in mind and I'm looking very closely at these policies.

Chair: So having just recorded those points, if we can then carry on with the discussion. London Tenants Federation next, thank you.

Sharon Hayward (SH/LTF): I'm going to talk specifically around Policy 2.14. My name's Sharon Hayward, I'm coordinator for the London Tenants Federation. We've got a couple of tenants here from different regeneration areas who have some specific evidence to give to the panel, who I'll call in a moment if that's ok. I think, given that – can I look at the text of 2.59 to start off with? The Mayor is committing to address social exclusion across London and tackling spatial concentrations of deprivation. I mean, on some levels, the two parts of that could mean the same thing, but in our experience, they could also mean two very different things.

I think one of our key concerns is obviously, in committing to addressing social exclusion, the evidence base must be strong. And unfortunately, we've been unable to find a strong evidence base, either at the grassroots level or in papers that have been provided either by the GLA or the CLG or anybody else, including academics. I think that given that the London Tenants Federation represents social housing tenants, mostly but not specifically council tenants, one would have thought that given the suggested benefits of area-based regeneration schemes, that this would be something that we would have lots and lots

of good examples of, and lots of tenants willing to champion the cause on this one. Unfortunately, that's not the case.

Social housing tenants represent the most excluded, those that this policy is presumably directly aimed at. The majority of our member organisations – and our member organisations are borough-wide organisations bringing together residents, tenants, and residents' associations, some of which are mixed, some of which include housing association tenants, some of which include private tenants as well – many of them see regeneration simply as gentrification. What happens in their area is more expensive housing, ultimately resulting in more expensive goods, services, and in fact many things in their area becoming less accessible to them, not more accessible. Some tenants – certainly in one of the examples that Victor will give from Newham, states clearly how some people are engaged initially in regeneration schemes, and then become rather feeling extremely let down by the end of it.

I think it's important for us here to ask the GLA what evidence they have, what direct evidence of benefit specifically to the socially excluded communities that are mentioned in 2.59 of this text. Because from ours, what we see is that generally, we're talking here about the kind of mixed-tenure, which has been pushed certainly by the previous government and a bit before that, from the government before that, is that this will be attained and achieved through delivering mixed-tenures...mixed-tenure communities, which obviously we'll talk about later on at the EiP.

But the key papers that we've looked at are those certainly that have been produced by Communities and Local Government, and I would suggest that...we've highlighted in other statements three particular papers that have been written by the CLG, which suggest that at best these policies [are] "faith-based" rather than evidence-based, and then there are academics such as the LSE's Professor Paul Cheshire, who record negative rather than positive benefits to support sections of communities when this policy is applied. And obviously a particular concern is the recent National Audit Office's report which shows very clearly that the gap between life expectancy in government designated areas of high deprivation and the national average has continued to widen. Which would question then on the evidence of actually using area-based regeneration to address this issue.

INSPECTOR: Can I just interrupt for a moment there and ask whether you are in fact endeavoring to challenge the approach of the Plan in identifying regeneration areas and advancing proposals to deal with them in the sense of, in some cases opportunity areas, in other cases locally-based plans and programs. Are you challenging that or are you suggesting that there is a different – that there ought to be a different way in which the plan proceeds?

SH/LTF: I'm not challenging the policies being there, I'm challenging the way in which they operate and which the evidence must be provided, some of which must be provided before the schemes go ahead, to ascertain the direct benefit to those communities.

INSPECTOR: So it would be fair to say that you're content with opportunity areas being identified and regeneration areas being identified?

SH/LTF: We're content with them being identified, but it's the way in which the particular item, as is suggested again, 2.59, the text – that it is committed to addressing the social exclusion across London, particularly in all of those areas, I would say. We have proposed before that there should be social impact assessments – they should be used in *all* instances. And we proposed that previously and the GLA rather dismissed that, saying that that would be covered in other reports, in other assessments. But the key thing for us is that if there isn't evidence of benefit, as yet, and it's not that this policy isn't repeating what we said in the previous London Plan – if the evidence is lacking, then what do we need to do in relation to 2.13 and 2.14 to show that what has happened or what can happen will benefit as is suggested. Because the real fear is if not, then actually the policies are in fact a smoke screen for something which is causing detriment rather than benefit to the communities that it is suggested will benefit.

INSPECTOR: Yes, this is the key point and we'd like to know from the groups concerned as to what else the London Plan could do to deliver the required outcomes. There may well be deficiencies in the outcomes, but we want to know how they can be addressed.

SH/LTF: Well, I think firstly that the inclusion in the policy that there should be social impact assessments should be carried out in all instances that will assess the direct benefit or negative benefit of any proposals – should be applied to both 2.13 and 2.14, and be included in the text of the policy.

I've given this such a broad overall, but I think it's very important, and certainly at the debates in Barking and Dagenham, the Mayor was very pleased to hear direct evidence from people that are of need. If you wouldn't mind hearing two examples, one from Barnet and one from Newham, we've got tenants here specifically who will talk about that.

INSPECTOR: I think if it could help us identify where it is that you feel it is the policies haven't worked in the past and what might be done to make them work better in the future – that is the panel's concern and I'd be very pleased to hear from your colleagues on that.

SH/LTF: They will give examples of where they feel it hasn't operated, and then if you don't mind, we come back and then talk about an example that we have where we think things have operated better, and how again that may be applied.

LTF/Derrick (DC): I'm Derrick Chung from West Hendon in Barnet, I'm also the chair of the residents' association of that area. About 1999, under the name of West Hendon Regeneration, Metropolitan Housing Trust and Barratt – they're the partners now – the commercial developers with Bellhouse Joseph, which I think still has a part to play in the Metropolitan Housing Trust Company. The proposal's by Barnet was to regenerate the area, which is only 10.5 acres of Welsh Harp area. We're between the A5, York Park and the Welsh Harp. Council homes, leaseholders, freeholders. They did understand that a consultation was supposed to have gone out to each person who was living there, but that was more of an ultimatum. You either take what you see, or probably there's a bus going that way. We were not given anything in terms of our comments being addressed. They were supposed to demolish 680 homes – I think there's about 658 because a few have disappeared – and to replace it with 2,171 new homes. Mixed-tenure at a ratio of three to be sold to the private sector to replace one council home. The mixed-tenure actually was very exciting because there's one million to 1.5 million pound penthouses to be put there. We're actually looking at 10-, 20- story tower blocks, I'm not quite sure where they're going to be placed, but the pledge that we had a look at, that they offered us, was to have the space standards that it is, plus 10%. They have minused 10% on those space standards, so the homes will be a lot smaller. There were also plans to have the local train station upgraded, new shopping centre (GP surgery, health and fitness club) and everything that would make it very, very good for the residents who are there at the time being.

The Welsh Harp is also a triple-SI area. English Nature, and the wildlife trust supports that. And on the pledge, we were originally offered like-for-like homes or better. And when we found out that the existing homes that we have would be probably 10% less, we decided that we would ask the developers in Barnet, who were supposed to be protecting the interests of residents there in the community – we did not have any answers to that because it's commercially sensitive. So there was a silence.

The social infrastructure is an issue already for the existing community. Local families can't get children to nurseries because there's none. And no additional is already included in the plans. Local schools are already full, so it's unclear as to where any additional children go. The local doctor's surgery, which is probably one, has a queue that is probably a hundred yards outside the door, and the new health centre that is supposed to be there – it would not be able to accommodate three, probably four times the existing population that is there now. We're looking at about 6,000 or more people with 15 to 200 parking areas.

Regarding the Welsh Harp, it's a designated area of special scientific interest with 170 hectares of open water, marshes, trees, grassland and valuable habitat for wildlife. Those are protected species but also there are birds and bees. This type of development is going to take everything away from it.

I suppose we had a look at the London Plan, where there was supposed to be environmental issues that were going to protect the green spaces. I think this is a top-down scheme. It's already going to fragment further the community and the existing infrastructure, and the surrounding community as well. It was fair to engage support from local people when they found out exactly what's going to be there. And there's no evidence of benefit to us. Anyone with a million and £1.5 million penthouse living there – they're not homeless. There's about 17,000 people on Barnet's homeless list. There's another question that we put to

them about affordable homes, because we were supposed to be experiencing affordable homes in replacement – who's it for, the landlord or tenant? And each time we put those questions about decant, where we're going to for 3 to 5 years, it's "commercially sensitive", so we can't answer that. So we're in the dark.

INSPECTOR: Can I just understand a little more? How much of this is actually happened and how much of the plans that you're concerned about are planned?

DC: Well, the plans are there. There's a PDA, (principal development agreement), that's been renewed about six times within the last three years. And I think that's breaking the law, for a start. And it doesn't commit, it doesn't consult with us residents' associations, or the tenants, or the groups that are there who are against it. It's because of the recession, depression, that I think the homes were saved.

INSPECTOR: So it hasn't actually happened?

DC: It hasn't actually happened, but there's determination to have it done. There's a kick start that the HCA gave about £1.3 million to have a sector which was freehold and two council homes there, and Barnet Council has actually contributed about £3 million plus to do a kick start. And within a small area that had 12 homes, they're proposing to put 200 flats there. So, there's something happening that we're not quite sure. For the folks who actually would benefit if they sell up and take the money and go, that's fine. But I think that 3 ratio against 1 is for folks who have money to invest to buy as a second or third home. I'm not quite sure how anyone with a million, £1.5 million penthouses is going to feel very comfortable living in a council estate when you have people downstairs on benefits.

INSPECTOR: Well, thank you very much. We'll presumably come back later to how that particularly relates to the policy and how the policy should be tweaked to try to prevent these sorts of problems happening.

VA: Good morning, my name is Victor Adegbuyi from Newham. Like Sharon has said, I'm from Newham, and a member of London Tenants Federation. In my area, I'm going to talk about regeneration in Custom House and Canning Town area. This is classified as one of the previous government's larger mixed-tenure regeneration schemes. If you remember in the last winter time, 1,650 homes were to be demolished and replaced by 10,000 new homes built, and only 35% of this amount of new build were supposed to be affordable homes, split 50-50 social rent: intermediate.

In terms of social rented housing, this means enough to replace the planned demolition and only 100 rooms additional.

In the area, there were originally 7 development sites in this area. But this subsequently increased to about 10 to 12. For example, homes in Area 3 were demolished although the primary school, Keir Hardie, and some shops were still there at the moment, and there were so many blocks, at least about three 10-story blocks were demolished opposite the station and some houses and maisonettes were demolished. This actually has added – those people that were displaced there – they're now added to the housing waiting list, which stood at 24,000 in 2007 to about 28,000 in 2009 and now about 36,000 households are on the waiting list in that area [Newham].

We're the residents, we're concerned about the fact that while flats are being decanted, squatting and subletting is occurring and making the area feel less safe. Residents in this area say that, this has resorted into stress and that their health is suffering as a result of this situation.

Many from the community have been dispersed, and some of the few residents left were unable to retain contact with old relations. From five or six years ago, all these people, they've lost contact and their family has been dispersed and then disorganized, disorientated. Those whose homes were demolished were told they would be the first back, but in reality, some years on, they still haven't settled anyway. They're still scattered all over the place. To date, only about 100 new social rented flats have been built in this area since demolition. The residents have been told that all the planned social rented housing are to be high rise blocks, above shops, while the new private housing is to be in smaller buildings(?). But my suspicion is that – we all know that – if you have commercial area, the market prices will not make it to be affordable.

So this will resort into a situation whereby we are saying affordable will be on top of the shops, tower blocks, but in reality, at the end of the day, commercial prices will rise up and people will not be able to afford it. It has resulted into residents setting up a TMO, tenants management organization, so that at least they can react collectively, because the authority ...the local authority initially were consulting the residents, but suddenly they started dealing with individuals instead of talking to the community as a whole together.

They started dealing with the... – and this resorted in the setting up of the TMO by the residents. Some of the residents assumed that they would move back to homes with the understanding that this – going back to their housing association group would return them – they've gone today – to their old communities and continue their existence. But they're worried that higher rents resulting from the new developments and many of the promised new affordable homes will be shared ownership which existing and current residents cannot afford. Residents say that some of the existing homes that are still left there, they're deteriorating. Obviously – work were carried out, and some were not carried out, some there were repairs done. But there are concerns, particularly for the elderly and disabled residents, who need accessibility, modifications made to their bathrooms to enable them proper use, but they're being refused. They fear that it could be another 80 years or longer before they are decanted.

There are two examples between 2006 and 2009. According to the last three Monitoring Reports of the London Plan, of the total 2905 homes built in Newham only, only 544 – which is the equivalent to 19% – was social rented, while the existing target is supposed to be 35% social rented homes. Huge numbers of families who are living in overcrowded homes have to wait for much longer periods for suitable accommodation as decants from demolished housing take priority under the local authority scheme. This causes additional stress and increased indication of deprivation. Between 2005 and 2007, Newham became more deprived according to December 2007 indexes of deprivation, with deprivation equally spread across the borough, and with the two wards of Canning Town North and Canning Town South being the 3rd and 4th most deprived wards in London. Canning Town was featured on the news-24 report after the recent publication of the National Audit Office showing that the gap between life expectancy in government designated areas of higher deprivation than the national average has continued to widen. Only on Tuesday, during the Mayor's consultation in Barking area, that the Barking and Dagenham Council Executive Councillor in charge of housing stressed that the reason why new build of council housing [is] not social rented – because he said he doesn't believe in the social rented because they are ... talking about council tenants ... so we asked London Tenants representing their council tenants, we feel that this is what should be happening. So regeneration should improve people's lives but not making them more stressful and then being deprived. [end 52:15]

INSPECTOR: That's very helpful, thank you.

SH/LTF: I would say that these are not isolated cases, and I think probably that the Newham one is quite extreme, but this kind of people being moved out of homes, being promised they'll be moved back, and then actually big gaps of five or more years occurring and then people not even being given the opportunity to move back – means that communities are being dispersed and just completely wrecked. That isn't supporting communities, that's not helping communities, it's moving people on and away from areas where they have very strong networks. Be it that they're poor, they have very strong networks and community relations and actually it's within social rented housing that there are stronger and longer-term communities, probably than anywhere else in London and I think there's not a council estate in London where people are not complaining of where right-to-buy people have moved in, that they have a continual churn of private rented tenants – actually makes their life more difficult, not stronger, not more stable, and not being able to support one another.

The London Tenants Federation would argue that we need a different way around looking at regeneration, and there are indeed some good examples. But I would say the majority that people talk about at London Tenants Federation meetings are negative. But we have also had examples of good ones, a couple for example in Haringey in the past, and the one I'm going to talk about here relates to a part of the New Deal for Communities area in Hackney, where they worked very, very carefully first with the local authority tenants in building up something which has grown.

Fellows Court Estate, the scheme started with some kind of small bits of renewal and upgrading on the estate, which was very much community-led. It was a tenant-led scheme where they identified needs around estate security and they were small bits, but with the intense engagement of the tenants in that particular area meant that it drew more people in, people felt confident, the scheme really was going to benefit them rather than not benefit them. It meant that the improvements that have been made are longer lasting, that they've been able to follow on with further improvements, and it's a very good way of engaging and bringing tenants in. Since then, they've had an upgrading of a very large community centre, which the tenants run. They held all sorts of meetings and events there, some of which are open to other organisations to rent out, they have a community kitchen there, so it's the residents running that, and they cater for different events that are there. They run a dining evening for residents, so residents can come down, dress up, and go to a restaurant held on the estate which is at cheaper prices than anywhere else. They've got a garden, they've got an estate garden. Again, I think this is all being supported through regeneration funding. The garden involves people there again, I think that there's some training connected with it, the garden supports the kitchen, and again, because residents were so intimately involved from the beginning in drawing up the plans, rather than being presented with a fait accompli, as seems to have occurred in the two examples that have been given here. Residents certainly feel that there's longer term sustainability, and they're tackling issues that *they* identify that their communities need, rather than it being dealt with in a top-heavy and top-down kind of proposal. [end 56:30]

INSPECTOR: You'll appreciate obviously that, as a strategic scale through the London Plan, we're dealing at a level which is much above, if you like, local estate renewal schemes.

SH/LTF: Indeed. But somehow we have to get that, how that operates, into the strategic level. Otherwise, at the strategic level, the evidence that we have, it's benefit isn't being gained, in this kind of way, in practice, in the majority of schemes. So I would say at the strategic level, we do need, and referring back to the sort of stuff that Lucy was saying, we do need to ensure that at the strategic level, we're saying there needs to be that engagement of residents in building bottom-up and in an accountable kind of fashion, to the people who are supposed to be benefiting. Because if it doesn't, again, why is the policy there? If it's not achieving what it is suggested that it will do, then why is the policy there?

INSPECTOR: And your solution is to enshrine in it community consultation, participation and some form of social appraisal, social audit, into the devising of the scheme and the monitoring of the schemes.

SH/LTF: I would suggest that that would at least benefit, yes. Yes, I think – if we're serious about addressing the evidence base of this policy, then we must attempt to do those things, yes.

INSPECTOR: And by saying the evidence base of the policy, you are not disputing the evidence base which helps the authorities involved to identify the areas in need of regeneration – it's evidence base as to what the outcomes will be.

SH/LTF: What the outcomes might be, yes. [end 58:20]

INSPECTOR: You've been waiting a long time, North London Strategic Alliance, I'll take you next.

The representative responded to the three 'threads' identified by the GLA earlier.

1. *Relationship between regeneration areas, opportunity areas, and intensification areas. Must take a holistic view of: housing, regeneration, economic, so on and so forth – these things cannot be split up. If these aren't joined up, are looked at in isolation, you don't get the outcome.*

Provided two examples in Enfield. Both fundamentally housing redevelopments that now contain areas with the highest unemployment rate in North London. What we need to see is to understand what regeneration means, and how the opportunity areas and areas of intensification relate to it, because they can't be separated out. At the moment, the Plan is relatively weak in looking at how the social and economic are intertwined, in providing a thread through the different sections of the Plan. This approach is necessary for successful outcomes.

Social impact assessment would find favour with the NLSA.

2. *Outcomes. Agree that social exclusion and spatial deprivation are two different things. Need to be clear about what the outcomes really are. Addressing issues of poverty, employment, and economic issues alongside social issues is of paramount importance and the Plan needs to be very clear about that.*

Consultation and Publicity: Lesson learned that unless you work with residents and with business and with those in the area through the process of regeneration and the transitions – how do you move, refurbish an estate – you can do more harm than good if you don't get it right. Need to identify some key principles.

INSPECTOR: Thank you. If I could just take this—drawing the threads together of our argument—a little further. When one looks at Map 2.5, which is headed Regeneration Areas, the key for it is effectively 20% most deprived super output areas (SOAs). The two are not exactly the same, are they? One is effectively an indication of what is there at the moment, the SOAs, the other is the policy response – regeneration areas, which you're going to regenerate.

When I look for where the regeneration areas actually are, one has to turn onto the key diagram, and there, faintly marked, but marked nonetheless, on that plan specifically has regeneration areas with a rather different symbol. With a planner's hat on, if you like, the first thing I would tend to look at with that sort of map is to try to work out how the regeneration areas relate to policies. And the policies on the key diagram are those that might be of relevance. So obviously the areas for intensification, the opportunity areas and indeed the growth corridors, and whether there is a mechanism by way of which the developments which is what is trying to draw together through those policies are actually linking through in a way which stimulates and enables regeneration to take place.

It's perhaps even more marked if you look at the difference between Map 2.4 and Map 2.5 as to the way in which the opportunity and intensification areas tend to span east-west along the river, with outliers to the north and the south, where there's a very clear pattern of regeneration areas or SOAs at least on Map 2.5, which has got a very heavy and dense concentration northwards in the north part of London. So there's a question as to whether or not there's a synergy here which could be recognized, which I would appreciate comments on.

In terms of the way in which one then moves forward, whether or not, bearing in mind what we've heard about the uncertainties which are caused over the length of time that regeneration takes, once it's first, if you like, mooted, and then the schemes begin to develop and then for whatever reason they get delayed, when you have existing tenants and residents in these areas, how there can be brought some certainty or coordination to the process in such a way that those communities who are affected are going to see some outcome within a reasonable period of time.

Now, as I say, we are dealing here in the context of the opportunity areas and to a lesser extent, the intensification areas, the flagship schemes, those which the Mayor is aiming to develop as London's new quarters or whatever to provide for Londoners for the next century. There must in some way, I feel sure, be a mechanism by way of which the progress which the Mayor wishes to seek on those sites is related in some way to ensuring that those in the most deprived areas do gather those benefits.

So when I look at the Plan again, for example – you kindly provided me with the opportunity area planning framework for the Nine Elms Battersea Area – I have that in front of me at the moment. If one looks for example at the opportunity area #28 on Map 2.4, and then tries to correlate that with Map 2.5, the scale is difficult. It doesn't seem to me that it is the intention that the opportunity area and the regeneration area, from the wording of the policy or the dispositions on the map, are such that the two are directly related. One is expected to assist in the other, but they might be entirely different areas. I'm just trying to wrap my mind around, as a planner, how the thrust of the Plan can be drawn together in a way in which ensures that the action that local people want actually carries forward. [end 1:11]

ABP/GLA: The way the discussion has gone so far is that we're considering in a sense two different policies. The primary focus of this morning is 2.14, which deals with areas of regeneration, but we're also touching upon Policy 2.13, which deals with opportunity areas and areas for intensification. And they are two quite distinct policies. The designation of opportunity areas and intensification areas is done on a quite different basis for quite different purposes than the identification of areas for regeneration. Without

wanting to completely reprise the discussion that we had on Matter 2F when we focused particularly on opportunity areas, the reason for the designation of opportunity areas and intensification areas is that they are the major reservoirs of development capacity and development opportunities in London. Some of them are in places where there's identified issues of regeneration, where there's a social regeneration need in the sense that we've been talking about it this morning. And you can identify those by looking at where Map 2.4 and 2.5 match. Some of them do not. Although I wouldn't say that there's absolutely no need for social regeneration in the Tottenham Court Road area for intensification, it's clearly rather less than it might be in the Lower Lea Valley, for example. So, it is right that they're separate, they address different points and they address them in slightly different ways.

One of the important distinctions in terms of addressing it in different ways is that the mechanism for dealing with opportunity areas and to a lesser extent, intensification areas, is through strategic frameworks which are either drawn up by the Mayor, drawn up by the Mayor and local authority acting together, or drawn up by the local authority working with the Mayor, and Opportunity Area frameworks tend to be in one of the first two categories. And areas for intensification tend to be in the third, usually because of the scale of the opportunity, but those rules aren't invariable.

That means that the implementation mechanisms are different. It also means that the issues around consultation and engagement are different. Because in areas for intensification, other than – and this gets to the point that you're raising – where there *is* an overlap, and the fact that there can be an overlap is identified in the new paragraph 2.60a that the Mayor has brought forward, the mechanism for taking forward regeneration in areas for regeneration, in terms of identifying need, identifying the nature of need, identifying the type of action that needs to be taken, and the management programs that should be put in place, are basically to be determined at the local level. As the policy says, the Mayor's not completely washing his hands of regeneration areas, but it says that the Mayor will work with strategic and local partners to coordinate renewal where he has *locus* to do so. But the main emphasis in Policy 2.14 is a local one, and it's on local matters, and on local mechanisms. And there, the main institutional tools for regeneration are the sorts of local strategies that we mentioned in Paragraph B of that policy. And there are of course well established, in fact legally enshrined, avenues for consultation and engagement with local people and local communities, dealing with local development frameworks, and taking planning decisions. And there are also consultation arrangements around some of the other tools that are mentioned there, such as community strategies linked in with the other mechanisms that the local authorities have in place for drawing those sorts of things up.

The only other thing I would say is that the maps in the Plan are not as I would have them if I had a free hand, but unfortunately we are constrained by regulation and by the circular in terms of the helpfulness of the maps that we can provide, as we're not allowed to put them on an Ordnance Survey base, so they *can* only be indicative. [end 1:15]

INSPECTOR: Yes, I accept that. The underlying point, I understand all of what you've said, but the underlying point is that the way in which regeneration is likely to occur from the spatial basis of the plan is from development – I mean, that is the main driver, isn't it? That's what the Plan is expected to cover.

ABP/GLA: I'm not sure that's altogether true, sir. In Paragraph 2.59, we talk about a broad front of economic, education and training, housing, social, transport, security developments, with added heritage and environmental measures. I think what's true is that in terms of how the Mayor's spatial development strategy is implemented – it's primary means of implementation is through the land use planning system and that is often about – that's not just about building stuff, it's broader than that. And there are other policies in the plan dealing with things like transport, which has an important facilitative role, not just for what we might call 'hard infrastructure.' We have policies about provision of training, Policy 4.12 for example. And I know I've wearied people by making the point, but it really is important that the Plan is read as a whole.

INSPECTOR: This would be in a sense one of the distinctions between opportunity areas, intensification areas and regeneration areas, that in the former, there is a distinct emphasis on new development, and in the latter, there may or may not be some new development, but it may be some of these actions that are really more non-physical development.

ABP/GLA: I think that's absolutely right, sir. Because in a sense, the opportunity areas and the intensification areas are, to a very large extent, defined by the scope of development.

INS: My last comment on that particular point, then, before we go back to the main thrust of the discussion, is the extent to which the opportunity areas may in themselves, simply by being close to areas of regeneration in some cases, provide some form of location, if you like, for those residents that are being displaced through the regeneration process.

ABP/GLA: That may very well be true. But we're getting into areas of detailed questions about housing management, which really go beyond the scope of the Plan, and straying into areas which really are the province of the Mayor's London Housing Strategy. I think we do pick up on some of these points actually, some of these points will come out again when we turn to Chapter 3, some of the questions for example around large housing development opportunities.

INSPECTOR: Yes, there will be ample opportunity to consider those questions then. So we'll carry on around the table now. London Forum next, Mr. Peter Eversden. [end 1:18:40]

PE/LF: Peter Eversden of London Forum. I think the evidence we've heard from London Tenants Federation is very clear. I welcome the Councils' comments too on the way in which we must consider the benefits of business work opportunities for these people. But the areas I visited where regeneration is happening, people said, "Why do they start with pulling everything down?" And it seems to me that some of these areas are being treated as opportunity areas, as though they're empty or meant to be empty, and then we'll get on with it. And in the opportunity and intensification areas, we're going to have exactly the same issues of existing communities that have to be dealt with.

I went to the South Acton Estate because it's within walking distance of where I live, and the people there were very, very unhappy. They'd had a new block put up, and they said that the flats have got fewer rooms in them than we had in present accommodation. The space standards are all smaller. And one of the women I spoke to, who was in tears about it, was an Indian lady who said, "They've given us kitchens with no windows." And they hadn't been properly involved in the planning, they didn't know what was going to happen next, and I think this is why – and you've reproduced this in your panel note – the views and the recommendations that we put forward. I won't labour them now. But we do need to get the policy to recommend at the local level before community engagement occurs, and also the impacts that all developments are going to have opportunity, intensification *and* regeneration areas are all fully considered for those communities. What impact, what benefit?

And in the LDF preparation section of Policy 2.14, transport proposals – well, transport's very important, but one of the *really* important things is the social infrastructure that we've been talking about in previous matters. So we would like to see transport *and* social infrastructure in there. And that's got to be part of the planning. I think many people might consider that they haven't been involved in the opportunity, intensification area planning, because that is treated as a major – the opportunity area frameworks are rather above their head, I don't think people in some of the boroughs have been introduced to it, and yet they progress quite far.

We would want to see every single opportunity and intensification area that can be used as a catalyst for nearby regeneration areas, taken up and incorporated, and those frameworks mustn't treat the OA and IA as something which has got a wall around it. Those areas could provide the new accommodation, replacement accommodation for people in social housing nearby, so they didn't have to move out of their community and wait to come back, and find it was years before they could. But they could move quite close to where they already are and they could be involved in the planning for the OA so that *it* ended up with the facilities they wanted because they were going to be part of it. Not, 'you've got to stay in the area you are, and you've got to have it rebuilt all around you'.

So I'd like to see those opportunities taken wherever possible by linking the planning for the OAs, IAs with the regeneration areas. Regeneration areas, I'm not sure that the map helps, as Andrew Barry-Purcell says, sometimes they have to be there, but what is it? It's not regeneration areas, its areas of deprivation. It maps the 20% most deprived LSOAs. We don't know the priority, really. I think we need – and I hope the boroughs are doing it – full analysis of which ones need the most urgent regeneration, how close are they to

other opportunities of development that could bring them benefit, and will that development that's going to happen bring jobs that these people can be equipped for by extra training and will it bring the social infrastructure, which is going to support and in fact close some of the gaps that we already have in the existing social infrastructure. So those are the key points that we wanted to see covered.

And we want to make sure that the housing that's being provided is suitable and now that we have new space standards, they're going to be really important. But in speaking to an officer in London Borough of Ealing, I got the impression that, 'well, this is all we can get from the builder', which goes back to the point of where's the funding coming from, how are we going to ensure that we take the opportunity to regenerate properly and not superficially, and link it to everything that is around these areas that could be taken into consideration. I think I'm beginning to ramble, so I'll stop. [end 1:25]

INSPECTOR: I was just about to suggest the same, but I'm far too polite to say so, Mr. Eversden. King's Cross Railway Group then, I'd be pleased to hear from you, Mr. Edwards, your group has obviously lived through one of these opportunity area frameworks.

ME/KX: Thank you very much. Michael Edwards, representing the King's Cross Railway Lands Group, which has been busy for 23 years now trying to secure community benefits from the development of railway land around King's Cross. I want to try to be helpful on a number of the points that have come up in the panel note and the discussion. First of all, I think KX, you could learn a lot from on this issue of the relationship between an OA and regeneration areas. As probably everybody will know, it's clearly an OA of enormous strategic importance in transport terms, surrounded by areas which are to varying degrees deprived. I think that Mr. Lavender asked what can we learn about the relationships between these two things? Well, I think in our case, there are 2 or 3 things to learn. One is that where borough boundaries enter the picture, which they do in KX, there is really no effective mechanism to ensure joined up thinking, and it can have a very poisonous effect. For example, in our case, where probably the majority of the negative impacts of the big development at KX lie in Islington, and where a lot of the potential benefits of the thing lie in Islington, the whole of the OA site, with a tiny exception, lies in Camden. And the primary leverage to negotiate a 106 agreement and to secure some mitigation of ill effects, traffic improvements, social infrastructure provisions are so forth, lie with the borough where the land is, but are really not effectively linked with the interests of people in the adjoining borough touching the OA. So that's a problem which I think makes it crucial that the Mayor, in exercising his strategic overview of all of this, really makes sure that the impact studies and the considerations of service provision, capital cost of service provision and the revenue cost of service provisions are properly handled on a cross borough basis. So that seems to be one tremendously important point.

The second point to make, which is really more an observation than anything else, is that a big OA, which promises to transform a bit of empty or underused land, can have immensely powerful effects on property markets in the surrounding area. And these can be appropriated as benefits by land owners years or perhaps even decades before the main development inside the OA boundary is finished or even, in the present economic climate, started. So at KX, we've got that fantastic King's Place development on the canal where the Guardian has its office and so on, concert halls, Regent's Quarter development and a lot of other less glamorous ones, all going great guns, reaping huge rents, doing extremely well, while the main opportunity area project, huge elephant thing, languishes and is very slow.

So there really are very powerful spillovers across the borders of OAs into the surrounding areas. Which of course was always part of the idea, that OA developments would have a catalytic effect on development in the surrounding areas. But to protect local residents and citizens and the networks which support and which people support each [other] in these conditions is very, very difficult. There's really no mechanism there to handle it, so I would strongly support, and all our groups, and KX I think would strongly support the calls that have been made by the Tenants Federation and the London Forum and Just Space – for a much more tough citizen ownership of regeneration areas and OAs. But it's not just regeneration areas, it's OAs as well. That's of enormous importance.

A second relates to implementation mechanisms, that again in our case, the local authorities of Camden and Islington set up a forum which – I mean, you couldn't call it a participatory forum, it's really just a consultation mechanism, but it *was* a consultation mechanism – for dealing with the OA, planning briefs

and then the applications. That worked tolerably well. As soon as the outline planning application for the KX OA had been granted to the developer, the local authorities decided to disband this whole mechanism. In fact, the forum refused to be disbanded and I'm glad to say it's going great, it's been a great success. But you actually do need strong frameworks with citizens actively involved to manage the long, slow implementation phase of all these projects, to make sure that the job opportunities *do* get offered to local people, to make sure that the recreation spaces are provided and staffed and managed, all those kinds of things. That is crucial. And I think it's a shocking thing when those kinds of instruments could be set up and then dismantled or attempts made to dismantle it.

In our submission in January (we haven't made a further one, because we didn't want to change our position. We stick by that.) we proposed some additional wording to Policy 2.13 and 2.14, the same changes necessary in both. We wanted to add to the end of those policies that 'the Mayor will consent to develop only when it has been shown that established populations living in and around the areas will benefit and will not be subject to displacement, or displacement pressures, except where there is full mitigation'. And I think as other speakers have said today, there's a big scope for mitigation by decanting in a planned way and replacement space for businesses and shops and households, opportunities which very often don't get used. And I think if the Mayor is going to have an influence on these mechanisms, he's got to ensure that the benefits really do accrue to the people in whose name regeneration takes place. It takes place in the name of people who suffer deprivation, but we have really no evidence that they get the benefits. The evidence base is incredibly flimsy through all of this. There's a lot of academic research casting doubt on whether regeneration really benefits the people it's aimed at, it's benefits may be largely picked up by buyers already there, by landowners in the surrounding area...

So I shall stop now. There are other points we could come back on, but I think the most important thing is this is a set of – the regeneration aspects of all of this, where regeneration is what is supposed to benefit deprived people is extremely unproven, often the outcomes may be the opposite of what was hoped for, and we've got no business to go on pursuing this kind of policy if that's the case. [end 1:34]

INSPECTOR: We haven't yet heard directly from a council, and I see the London Borough of Haringey is here this morning, so can I hear your views, thank you.

LBH: Joined up approach between the different types of areas (OAs, IAs, RAs). Need for prioritization of investment amongst the OAs. There is an analysis by the LDA looking at deprivation, unemployment, poverty, etc in OAs in London. Some are worse than others. The areas where there are opportunities for development and are relatively more deprived than other areas, these opportunities should be grabbed, and there should be some prioritization in the Plan to identify those types of areas. Could relate to Social Impact Assessment Appraisals. This makes the monitoring clearer. AMR for the London Plan is not always that clear as to what the outcomes are and how the investment relates to that.

INSPECTOR: Yes, thank you. We did cover the question of prioritization of OA frameworks in the last debate and GLA responded to that in full. The question does arise separately, however, in the context of areas of regeneration in the sense that in a 20 year plan without regeneration for residents who are perceived to be in a SOA that it could imply that there could be nothing happening for 20 years. And it's that which I think would cause, if you like, the Londoners affected, to be most concerned. But we can come back to that after we've heard the other contributions to the debates.

North London Strategic Alliance, you wanted to make a further comment?

NLSA: Relationship between opportunity and need is being severed in the way the two policies are emerging. Opportunity area which is not related to anything in terms of need – should that have a higher or lower opportunity in terms of what London should be concerned about? Or areas of need that are in no way related to an area of opportunity, then the comments by the Chair indicate that those areas of need remain areas of need for the next 20 years and fall into a deteriorating spiral. There is a strong argument to make clear the connections between regeneration which is related to need and where the opportunities are, and that those areas that can demonstrate that they have both need and opportunity should be given the prioritization within the London Plan to meet the needs of those communities. Otherwise, we set forward for the 20 years something that doesn't enable us to meet those difficulties and I'm representing an

area that is seeing decline and if we are cast into a situation that doesn't address that or the London Plan doesn't allow us to address it by linking opportunity and need and giving it the priority it needs to give it, then in a sense we are heading for a series of difficulties. Need to focus on all parts of London, not just the centre part – where the dissonance between opportunity and need, such as at KX, is at the heart of the problem. [end 1:42]

INSPECTOR: If there are no other contributions at this stage, then I'll come back to you, Ms. Lucy Rogers, from the Just Space Network.

LR/SCA: Thank you, I hope I manage this, because I do think it's very complicated and we have thrown up questions – certainly the NLSA is throwing up questions. I think it's good to know that the GLA believes that regeneration isn't just about buildings and is about other things. That is a good starting point, because sometimes these things happen by people on their own and in a way, they bring an area up and then it is ripe for investment. So, the two things can be linked. One doesn't need to be driven by another. London First says that regeneration areas are strongly reliant on development to deliver the social benefits, but if we can see that differently, as being locally-based community initiatives at the heart of regeneration areas in deprived areas, then that doesn't have to be the deciding factor. I think what is concerning about the house builders, the developer approach, is that it's almost as if good development that does deliver what is needed doesn't seem viable to them. That is a big problem, isn't it? That's why we're just concerned that the plan should not be simply a map of where development can happen, regardless of the impacts. That's exactly what we're trying to bring, the socioeconomic arguments into the development agenda.

INSPECTOR: So your preference would effectively be to keep the two policies totally divorced so that one pursues regeneration in the ways that are most appropriate to regeneration, and the development market proceeds in its own way. Is that what you're saying?

LR/SCA: No, I'm actually just pointing out the element that comes in from London First on the regeneration area policy, saying that development is sure enough the mechanism, whose results we see do not always work. I was saying I was glad that the GLA thinks that regeneration is not just about buildings. So, where does that lead with these two distinct policies, or these two policies that have been separated out?

Yes, the scale as he said in the former session, is – it is scale. The smaller local scale is a different thing from the OAs. However, surely, with both of these, the bottom up approach and starting from the community and what it needs is surely the same. And therefore, I think that it's wrong for the GLA to separate these things out as was just done in the answer by saying that the mechanisms are different. Those mechanisms should both involve these other elements, such as the full involvement of the communities which are going to be affected.

There was a quote from the Earl's Court residents in their submission saying that in fact regeneration of their area was being jeopardized by the fact that they are being called an OA. So that is an interesting relationship between the two things.

INSPECTOR: That was why I was asking the question in the beginning as to whether there is a broad measure of support for the approach which the Plan is taking or whether there's some other approach which is being advanced, but it seems that on the face of it, people are generally content with the idea of it being OAs, regeneration areas, opportunity area frameworks. It's the way in which the process is then developed that is causing the difficulty.

LR/SCA: Yes, these are perfectly fine mechanisms. One mechanism deals with a large scale and one deals with – puts the boroughs more in control. But all these – if they are part of the Plan, the Plan should also recommend and be fully aware of the effects as has been said, and therefore should also put out in the policy at least the awareness of these effects and their possible mitigating mechanisms, too, such as social impact assessments. That's why – those components need to be added to these. In fact, I just wanted to point out in the Tower Hamlets Core Strategy with a list of negative impacts in the equalities impact assessment. Consultation was cited as a mitigating measure. More contact with the people who will be affected. That's just an aside. I'm sorry that the consultation thing comes back as a slightly distinct, separate thing, but I think all the consultation is, is a mechanism by which the people can say what is important and that is the information used as the basis for these schemes. I just wanted to quickly say that

the OA planning frameworks, which we have said to be important because of their cross-borough nature and so on, there is still great concern about these. I think that the GLA does need to take more responsibility for the mechanism. For example, I rang up Tower Hamlets to ask them what was happened to the City Fringe OAPF and the man told me that he thought that consultation was organised by the GLA but also that nothing more had been heard recently about it. So I think that their role as coordinating these things – if the Plan lays out these areas in this way as opportunities – then the Plan must also support that with the other component parts. [end 1:50]

INSPECTOR: Okay, thank you. Then I'll take King's Cross Railway Group next and then Mr. Eversden, I'll come back to you.

ME/KX: I just wanted to add one point to the discussion, which actually links back to yesterday's discussion on monitoring and key performance indicators. What a lot of us community groups and residents groups have been saying this morning is that problems in the urban regeneration process largely arise because those in whose name the whole business is initiated don't get the benefit and do suffer costs. This poses an enormous problem for monitoring. And we all know of cases where average measures of deprivation in an area can improve, or health disparities improve, but where that probably results from the replacement of one population by another, or the dilution of one population by another. It came up recently in the Evening Standard, and it's coverage of expectation-of-life statistics for boroughs, saying the only borough in which there seems to have been a significant narrowing of the differentials at a borough level was Tower Hamlets. But, said the Evening Standard, showing great social science sophistication, they said, "But of course this may be just because the poor people of Tower Hamlets have been gradually pushed out and replaced by the rich, and they are healthier and live longer..." and the statistical change is a result of the turnover of population rather than benefits accruing to those who were originally there. Now this means that effective monitoring of whether people suffering deprivation actually get anything out of it, does require some quite careful research. Not something you can do just by comparing this year's cross section data with last year's cross section data. I started such a project myself in the University at King's Cross in 1999 with funding from an SRB, we were going to survey the population in a certain year and then come back to it many years later, and see if the same people were still there or different people and what had happened to them, but unfortunately, the London Development Agency took over responsibility for this, decided to chop the project halfway through because they said it was all too slow. But it is inevitably slow because you're trying to measure changes over a historical period and see who benefits. It is going to take time, and I think it's a real challenge. And that's why we didn't propose yesterday a very precise measure for monitoring of regeneration benefits. But I think we need to work towards that very much. [end 1:54]

INSPECTOR: That's a helpful contribution, thank you. Mr. Eversden, then.

PE/LF: A glance at the map of the OAs/IAs shows that about 22 of the 43 touch a boundary of a borough. I wonder if we could build on the points that Lucy Rogers was making by seeing what, again, what can they contribute. I wonder how many of the frameworks for those have in them an analysis of what is around them and what benefit could be brought to them and then we might be dealing with a certain number of the areas that need regeneration in a development-led way but with full community involvement. But we then might be left with areas that, I think you mentioned in the Lower Lea Valley, where there isn't that kind of opportunity. But because of the extreme concentration there, whether we should have a major project which was a regeneration project covering a larger area there, and not let it all be hope on an individual borough-led, community-led basis, but we have a larger GLA-led project. The elected Mayor of one of those boroughs was recorded in the press as saying that he had enough poor people and he didn't want anybody else's shipped in. And this concentration is a problem, and I think some people might want to move out of an area where they are, but basically, people want to stay. It's their community, they want it upgraded, they want more facilities. So, let's have an opportunity area-led look at regeneration and let's...everything around such an area...and let's consider whether we need a project to deal with zones where regeneration is really vital.

INSPECTOR: Thank you, that's a useful contribution. North London Strategic Alliance.

NLSA: Relationship between what we define as regeneration areas/regeneration and how the OA's and IA's play into that. What is the goal and what are we trying to achieve? The notion of where you put things and where the benefit is, is much wider than what we're talking about. There is a need to understand the relationship between regeneration and need, and how the OAs actually help to support it, where and in what way it is appropriate to support it. They shouldn't be two separate sets of policies. Need to make clear and explicit how opportunity areas can be leveraged to meet need – in the London Plan, opportunity level plans, and at the borough level. [end 1:59]

INSPECTOR: Thank you. London Tenants Federation.

SH/LTF: I think we would support that. I think if you look at some of the big areas of opportunity, if we look at Elephant and Castle in Southwark is a key example really, where there's very high levels of poverty and the plans there for demolition, as people probably know, the Haygate Estate there, which has 900+ homes, people have been moved out, they have no right to return, there's been something like 2,000 new homes built or have planning permission at the Elephant and Castle, only 4% of which will be social rented. The connection there between what the existing population needs...needed, because lots of them have gone now...and what's being brought in, is actually shifting aside one population to bring in another, and those connections are just not clearly made.

The North Deptford example is probably another one – the Pepys Estate, which of course was subject of *The Tower* on the BBC some time ago, where in a previous SRB, Berkley Homes took over a tower block of the estate with penthouses on top, and the community there has had some things out of the SRB. They had a community centre, they have a good youth centre, they have a Sure Start centre – and the plans for what's happening along the whole of the riverside there are all massive development sites, developer-led, which appear to provide little or no benefit. There will be some social rented, there will be some affordable housing, but it's unclear in terms of the number of jobs, and people there feel – local people in that area – feel that these would be further exclusive developments along the river that will give problems for their sight lines through to the river, that will dominate the area, leaving their needs unmet. And their needs currently are that they have some of these community buildings, but without the revenue to support them, so a lovely community centre but that doesn't actually have revenue to support and bring the things together that, for example, are happening at Fellows Court, in the example that I had previously on Hackney, just aren't happening. And it would seem to me that unless that direct benefit is coming from the OA, then people will just see this and what will happen is the dispersal of both communities in favour of those who are actually a lot wealthier. And it is just developer-led, it makes no connection. That's why we would support the argument put forth by the North London Strategic Alliance. [end 2:02:30]

INSPECTOR: Ms. Rogers, we return to you, perhaps this time I think to finish the debate.

LR/SCA: Certainly. I just wanted to say sorry, it was a bit messy, not very well summed up because, as I said, I think it's difficult and also I get distracted by responding to the GLA, which is obviously part of the discussion. But perhaps what the North London Strategic Alliance says, I obviously, I think it's very good, and perhaps what it means is that regeneration is the primary policy that is about assessing what the needs are, where the needs are, and the principles of carrying out development according to that. And OAs are simply a sort of subset of that, or just geographical larger areas, but which –

INSPECTOR: I think that would be a difficult concept to adopt in a London-wide context, because the purpose of the OAs is obviously to provide for London's future development needs, whether economically, in housing, or whatever, by way of growth. That is what they're about, rather than the regeneration aspect. I don't think you could advance one in preference to the other in that way, but there are synergies, undoubtedly, which various parties have referred to this morning.

LR/SCA: Yes, I suppose I was just saying that the OAs still have to be as a result of what's needed, be it now, in the future, but still have to be as a result of essentially the regeneration principle and the benefits that it is based around.

INSPECTOR: I think earlier you did suggest that you had some wording that you wanted to introduce. So that might help us move forward.

LR/SCA: *Following changes were proposed.*

Policy 2.4A – “Within the areas for regeneration shown on Map 2.5, the Mayor will work with boroughs, voluntary and community organisations and strategic agencies to address social deprivation by prioritizing them for community-based action and investment.

And in LDF preparation, added to the end of B – “Regeneration should be a participatory, bottom-up process, or owned at grassroots level, ensuring that the needs of existing local communities are listened to and addressed and avoiding displacement or social deprivation.”

INSPECTOR: Have you actually put that into us already, that wording? If you haven't, it would be helpful if you did.

LR/SCA: I'm not sure, actually, possibly not, so we will send that at the end of today. [end 2:06:40]

Closing Remarks

ABP/GLA: ...I'm going to be responding to several hours of debate in which a great number of points were raised. I hope the participants will understand if I don't deal with everybody's point by name.

I think the starting point really of the comment in considering this policy and – it's worth just reminding ourselves that we are addressing Policy 2.14 this morning, really is the points I made to you in answering your question earlier on. 2.13 and 2.14 are different policies, they are aimed at different things, they're talking about different sorts of areas for different sorts of purposes, and that being so, it is right that the mechanisms both in terms of the planning tools which are identified for each, and the processes and procedures which are used in each, are different. It is one of the major factors behind that is that – as I said in answering Mr. Lavender, the Mayor's own role in the different type of area is different. It will tend to be a much more direct role in the OAs, both through the Mayor's planning function with opportunity area planning frameworks, but also through the investment work that's carried out by the London Development Agency at the moment and Transport for London, through his functional bodies.

It is true, again as I said earlier on, that there are obvious links between the two. And in a sense, I'm not sure it's as helpful as trying to draw a hard and fast distinction, although we use the words 'needs' and 'opportunity'. There are different types of needs and different types of opportunity in both types of area. And one of the things that the Mayor has to be mindful of against the strategic background that's set out in the Plan – for example, the pressing need that we'll be discussing when we come back in a fortnight's time to provide a sufficient housing for the growing number of Londoners – the Mayor has to balance the needs of different groups within London, including those yet to be born, particularly when you're planning over a 20 year process.

That makes planning for both these sorts of areas a complicated matter, and what it means – and I'll go into more detail in a moment – it means that there is no one model that can be applied to all of them. It has to apply the right method, the right technique and engage with the right people depending on the circumstances of each particular area. And that is why, in a nutshell, we would resist the wording change that the Just Space Network has brought forward, because they do seek to impose – and I think they've been quite clear about it – a particular framework to apply in all circumstances.

So considering these policies, one of the things that I think is important for everybody to bear in mind is that there is nothing in Policy 2.14 – actually nothing in Policy 2.13 either, that disappplies any of the other policies in the Plan. And a lot of the issues that have been raised this morning are actually dealt with in policies elsewhere in the Plan. If I can just run through a few examples –

Policy 3.7 dealing with large residential developments – some of the issues that have been raised are picked up there. Policy 3.10 on ensuring mixed and balanced communities. Policy 3.15, which deals with existing housing and talks about trying to avoid the loss of housing. I particularly draw your attention towards the

paragraph 3.75. Policy 7.1 talks about shaping neighbourhoods and engaging communities in shaping neighbourhoods, and in particular what's said in paragraph G of the policy. And the policies that run throughout Chapter 7 about design, architecture, the urban realm, tall buildings, to pick up on a point we just heard from the London Tenants Federation. The policies dealing with social infrastructure, Policies 3.17 to 3.19 in Chapter 3. All of these policies will apply in work that's done in opportunity areas or areas for regeneration, just as they would anywhere else.

The fundamental issue that we have in considering a city like London and the sorts of places that we're talking about, London is a city that over the years has changed fundamentally, and the nature of neighbourhoods has changed fundamentally. My distant relatives who came over – were Polish Jews – who settled in Whitechapel, which is now an area that is substantially settled by the Bangladeshi community. Communities do shift over time, that's the nature of a dynamic city. And as I've said, the Mayor has to balance – thus look at both. The concerns of current Londoners and people who live in neighbourhoods at the moment, and future Londoners, people who will live in neighbourhoods in the future. And that's recognised in the London Plan, particularly as I said, in Policy 7.1, some of the text that supports that. And also, there are parts of London where change is positively desirable. An example of that is situations where at the moment, are situations which the Mayor seeks to address in terms of promoting mixed and balanced communities through Policy 3.10.

It is right, and I've said this before so I won't belabour the point, that the policy and indeed all the policies throughout the Plan, do bring in a wide range of factors beyond simply ensuring that development in London is profitable. The social and economic, the aesthetic, and others. But having said that, it is important again to remember a fundamental fact about the London economy- that it is substantially driven by the private sector. And while there will be policies, initiatives and programmes to develop the places that are based on public funding, the constraints, even in good years, on public funding – we all know, because we've had this discussion before – is likely to become even tighter. I think we're then to go on being dependent on private development. Even where things are funded by the public purse, it is wrong... you still have to consider questions of cost effectiveness and getting the maximum benefit from the amount of money that's spent. And I think we do have to be realistic in looking at these issues about how the sorts of improvements that everybody wants to see are going to be funded and delivered on the ground. And sometimes that does mean by private investment, and we do have to therefore think about whether the policy framework that's in place is such to support that. Yes, admittedly, shaped in ways to secure a whole range of benefits a plan seeks to do. But we have to remember that that, in many cases, will be the dynamo behind what happens. [end 2:15:40]

So, it is right that we look at the burden that's placed on developers, again, remembering that developer doesn't always mean people in the private sector. That is one of the reasons why, as we said when we discussed the question of social impact assessments earlier on, the Mayor does not favour them. He considers that they would be an unnecessary burden on those bringing proposals forward against, say public and private sector, they wouldn't add very much to the information that already has to be provided to support a planning application. I suspect that people would press for them to go into detail that goes beyond the scope of the planning system to address. I don't know how many people – my experience with integrated impact assessments tends to bear this out – how many people there are who could actually prepare such a document on a meaningful basis. Or whether boroughs or other decision makers would have the resources to do something useful with them. So, for those reasons, the Mayor does not support... doesn't think that the additional burden that social impact assessments would bring, would be worth any benefit that they would give.

It's also important that we bear in mind the nature of the documents that we're talking about. I know that it's called a spatial development strategy and I know that the concept of spatial planning means that we have to look beyond the solely land-based, but we do have to recognize that the Plan primarily acts... has its effect through the planning system. We've heard a lot of detail about local, about particular schemes in different parts of London at different scales, a good many of them on a scale too low to be something that would come forward to the Mayor. But many of the points that have been raised have been things about questions of housing management, for example, or local management of services, which really do go beyond what the scope that the Plan can sensibly address.

We have had this discussion – I think that the speaker for the Just Space Network made was that it's now becoming a rather tatty tennis ball, and believe me, I'm beginning to know how that ball feels. But we have

made the points that the Plan is not a form of development procedure order. It does deal with questions of substance. There are well-known legislative and other requirements about consultation, engagement, surrounding the planning system. And we don't think that anything would be added by putting large amounts in the Plan dealing with best practice in consultation. The other point of course that we have to bear in mind is that we all have to be mindful of the principle of localism, which the government is very keen to press, and we were taxed at the beginning of the examination by representatives in the boroughs about not putting in unnecessary levels of detail in the Plan about things that they think are primarily their business.

Having said that, the Mayor does encourage consultation and engagement when opportunity area planning frameworks are brought forward. I have a little note here dealing with a couple of recent examples. For example, one Park Royal, where an OAPF has been brought forward, the GLA – we ourselves consulted a list of key stakeholders provided by the boroughs and by the Park Royal partnership, about 180 in all, and in addition, consulted 2,500 residents. We also held an all day drop-in session at which my colleague notes, rather wistfully, only 30 people turned up.

For Vauxhall, Nine Elms and Battersea, another recent example, and the example that we provided, we consulted in the same manner and in addition, attended a series of public consultation groups with local amenity groups from both boroughs, Wandsworth and Lambeth. We had 150 people turn up at one, and 80 at a follow up. We also presented the proposal to cabinet members from both boroughs, in addition we published information on the website. Again, contacts were provided by the borough. We consulted as widely as practically possible.

INSPECTOR: I'll just make a comment if I may in passing on the Vauxhall, Nine Elms and Battersea OAPF, of which you kindly provided a copy for me. The consultation process doesn't spring out from that very clearly. It advances a document for consultation, rather than containing the explanation of what's gone on, which I think might help people understand what has actually been going on there.

ABP/GLA: That's a point, it's a point well made, and I will have great pleasure in passing it on to my colleagues who's responsible for such things. I mentioned earlier on the case studies that we've been given. The only point that I would make is that borough councils in the areas concerned against whom things have been said, of course, are not here to put their side of the argument. Nor are the developers. We have only heard one side of the case. In fairness, I think, had they been here, they would no doubt have wanted to have made points in response to what's been said. There also tend to be things which have either not yet come to the Mayor or have been through the Mayoral planning process, and there are issues on which I can't comment. I simply don't know enough about the background of the instances which have been brought forward. Beyond saying – and this takes me onto my next point – that the very nature of regeneration and the nature of the issues which are faced in several of the areas which are covered by regeneration area designations, tends to be that they are very complex areas facing complex challenges.

That takes me to the question of what regeneration means. I've been personally involved in I don't know how many discussions, where people have sought to come up with definitions of regeneration. It's a very elusive concept, and it's a concept which differs often according to context and according to the place that you're talking about. And that's why we don't think it's terribly helpful to try and include a definition in the Plan of what constitutes regeneration. Because it will be so different. I suspect any definition that we would put in the Plan would be so wishy washy and vague that it probably wouldn't be worth the paper that it's written on. You ought to get a rich and full understanding of what regeneration means – you have to look at it in context. What it means, and how it's implemented – it follows from that. It really has to be decided in the light of each case, and the emphasis on that means that it has to be decided locally, as close as possible to the communities who will be affected by the people who know which communities will be affected and who understand how those communities can be engaged with and consulted. And that's why the emphasis in this policy on local action is right, and why it is that it would be wrong for us to seek to try to impose a single model on boroughs and other local actors. [end 2:23:45]

We, at the GLA, follow a similar approach. And it follows from the sort of bespoke approach we have to opportunity area planning frameworks, which take different formats in different places and are prepared in different ways and in different places. And I think why the approach we take with the plan is right, which is to set up the general principles, and then leave actual implementation for local action.

A number of participants have talked about the question of prioritization. And I think the point I've made on this point on a number of occasions – the Plan is not a costed and timed action plan. It might be that we can pick up some of the points about prioritization in the implementation plan, which is probably a more appropriate place than the annual monitoring reports. But this is not simply a matter... even with opportunity areas, we have a much more limited number, of going down the list, as I think some of the Lea Valley Authorities were urging us to do, saying that, "Fine, the Olympics is the Mayor's number 1 priority, the Upper Lea should be the Mayor's number 2 priority." It simply doesn't work like that. Different opportunity areas have different issues. The opportunities in them are different. The level of market interest is different. And it might well be that in an area that doesn't need public sector intervention, there may be private developers that are straining at the leash for something to happen, and it would be right for us to prepare an opportunity area planning framework to address that situation as a matter of priority. That would be far better, surely, than allowing that sort of development to go forward without a strategic plan. What the London Development Agency has done is to go through a process of prioritization to decide where it's best for them to focus their resources. And that prioritization exercise was informed by the draft Plan, and as some of the text we added to the supporting text of Policy 2.13 says, much of that is in East London, the Olympic Area, and the Thames Gateway.

The North London Strategic Alliance, in their parting contribution, said that we need address both opportunity and need and that the Plan needs to set a framework for doing that. Well, that's what we say that the Plan precisely does. The important thing, however, and which we didn't hear, is whether there's anything in the Plan that militates against that happening, or whether there is any omission in the Plan that... something that could be there, which could make doing that easier. So those are the general points that I make.

I will try to respond briefly to the questions that have been raised. I think I've already dealt with the question that Just Space raised initially about policies being more about land assembly and investment. I think it's clear from the wording of the policy and the supporting text of Policy 2.14 that that's not true. It's certainly – that point is reinforced when you look at other policies in the Plan. We would not agree with the criticism of the Plan that the academics from the London School of Economics made about there only being a casual link between policy and implementation. The fact that there is sometime... actually, I think particularly with the tripartite division we've tried to have in policies by flagging up those aspects which are primarily to be picked up through LDF preparation, those which are primarily to be picked up through development decisions – I think we've made that connection quite a bit clearer to the extent that it is possible in a document of the kind and the type of the London Plan, which is a fairly high level strategic one.

Within the ambit of planning law, and within the ambit of a complication model of governance that we have in London, where, beyond the statutory link between the London Plan and things that boroughs do – quite a lot of the objectives that are set out in Mayoral strategies have to be done by influencing and working with other organisations. We were asked whether convergence was only a matter about raising property values, and I'd refer the Just Space Network to Policy 1.1, Paragraph B, which makes it explicitly clear that it's about social and economic issues as well.

As far as the questions of consultation that were raised, I think I've dealt with that fairly substantially, but as I say, we consider that the current references, particularly with the words that we've added to Chapter 8, really address the point adequately. The London Tenants Federation said that there was no evidence base for this policy. That's not true. The first piece of evidence actually underpins Map 2.5, which is based on the index of multiple deprivation, which is a very widely accepted tool for identifying places that are in need, that suffer from deprivation and are therefore in need of regeneration in the broadest sense. But we've brought forward quite a lot of information of evidence during the course of the examination to deal with questions of deprivation and regeneration. And if I can mention just two that deal with different parts of London, the paper that we produced on Inner London, which is replete with information about the extent of deprivation, and the report of the Outer London Commission, which also deals with questions of deprivation in Outer London. And there are substantial amounts of information about areas that suffer from deficiencies in social infrastructure in the housing supplementary planning guidance, an early draft of which has been circulated. [end 2:30:38]

I've dealt with the point of social impact assessments...

If I could just turn to the points that Mr. Eversden made, and really, his contribution and the points he raised illustrates what I was saying earlier on about the way in which many of the points raised actually are addressed in other policies in the Plan. He dealt with the question of work opportunities – they are of course dealt with in Chapter 4, and in particular Policy 4.12, which deals with economic opportunities for all Londoners. He also dealt with the question of poor design and space standards in buildings that are built as a result of estate renewal, and the very points he raised actually are very important parts of the justification for Policy 3.5 on quality and design and the inclusion of space standards in that policy. And the only other thing I would say is that, although it is a document that's not formally part of the planning process, the Mayor has brought forward a housing design guide which deals with the design of homes that are built on London Development Agency land or which are publically funded. He also made the very important point that it's vital just not to build homes, but to link that with the provision of social infrastructure, and that indeed is what the whole suite of policies between Policy 3.17 and 3.19 and the additional guidance and support that's in the draft Housing Supplementary Planning Guidance, is precisely intended to meet. He asked, why start with pulling things down, and this goes back to the point that I made in my opening comments, that there are parts of London where change is positively desirable. We do have to recognize that there are bits of housing stock that simply need renewal and they may very well be simply no other way of doing it than pulling it down and starting again, but reflecting the concern for high quality and decent room sizes and all the other things which are set out in Chapter 3 and Chapter 7 of the Plan.

Mr. Edwards talked about the need for joined up thinking across boundaries, particularly in addressing... on the scale of opportunity areas. The Mayor, of course, would strongly agree with that, and that's one of the reasons why we have opportunity areas in the first place, and why Policy 2.13 is included in the Plan. But the fact that the Mayor may have a coordinating or leading role in producing policy for an area, and in working with boroughs to make sure that opportunities which can only be secured by cross-boundary activity are actually secured, does not mean that the Mayor should substitute himself for the borough either in terms of consulting and engaging with local communities, as I've shown in the two examples I've mentioned where we do engage with the community – it always has to be done either through, with, or with the assistance of the local authority. And he certainly doesn't want to... couldn't, and wouldn't have the capacity to substitute himself for borough councils in the management of local services and taking revenue decisions about what services should be provided. And he mentioned the concept of citizen ownership, and this really goes beyond the role of the Plan, and I'm not sure it's something that a spatial plan of the nature of the London Plan can really mandate. He also mentioned the point about displacement. I've mentioned the reference there is in Policy 3.15 Paragraph B, that talks about avoiding the loss of quantity of housing without re-provision.

Just Space Network, in their final contribution, flagged up the importance of bottom up approaches and community-based regeneration, and the Mayor agrees that both of these are likely to be important weapons in the regeneration armory. And that is precisely why he has brought forward Paragraph 8.2C in Chapter 8. But at the risk of being controversial, they are not mechanisms which [are] appropriate, suitable, or in many cases even possible to apply everywhere. As I said in opening, regeneration and how to bring it about in particular places is something that really has to be decided by people on the ground in the light of local circumstances, and it would be wrong of the Mayor to seek to say that you will use one technique, and one technique only, through the London Plan. Even if we did try to do that, I suspect that goes beyond the proper ambit of a spatial development strategy, and any borough would be able to look at it and say, "Gosh, how interesting," and go on and proceed in the way they intended to in the first place.

I'll conclude by addressing the points that North London Strategic Alliance mentioned, and I think I've touched on this already. The Plan does recognize, in Paragraph 2.59, that addressing the needs of people who live in regeneration areas, given the fact that they're not islands and they sit within a wider context, may mean taking action that is actually spatially outside that area. We were asked to ensure that the London Plan provides a framework that addresses both question of opportunity and need. I think, as I've tried to make clear in opening, it's not always easy to separate the two, and addressing opportunities is often a way of addressing the needs, both of the existing Londoners and future Londoners, and housing was the example I took. Given that complexity, given the fact that the two often overlap, and you only have to look at Maps 2.4 and 2.5 to see that that's true, but given the fact that they are clearly different, and given the fact that by necessity, the London Plan operates at a strategic level, we feel that the Plan does do exactly what the North London Strategic Alliance wants it to do, and sets an appropriate framework. I'd stop at that point.

INSPECTOR: Thank you for that. There's just two points on which I'd seek your clarification. Firstly is the point I made at the outset on Map 2.5, and we're to take it from your comments that, although that identifies the 20% most deprived super output areas, that that is also in fact the map of regeneration areas to which Policy 2.14 applies...

ABP/GLA: Yes.

INSPECTOR: ...so there's no subsequent of filtering of that...

ABP/GLA: No.

INSPECTOR: ...it's the whole lot?

ABP/GLA: I think that is the position that Policy 2.14 Paragraph A says. And although we've used local super output areas in this iteration of the Plan, and the published [2008] plan uses wards, that's exactly the same approach that's been taken in the previously published plan.

INSPECTOR: And lastly, you commented very fully on the question of prioritisation, both at this session and at the last session, for opportunity areas. Your comments on prioritisation of regeneration areas, some, were less clear. Can you just rehearse the points about the difficulty of identifying at least some way of prioritizing those areas which are identified and in need of regeneration for 20 years [and those] which might be towards the end of the pile?

ABP/GLA: I meant to do so, and said I was going to return to it, and never did so, I apologize for that, sir. The emphasis in this policy is on local action and local identification of priorities, and given the number of regeneration areas, and you can get some indication of the number we're talking about just by looking at the map, and for many of the same reasons that the Mayor has for not trying to put a 1, 2, 3 prioritisation of opportunity areas, we don't think it's possible at a London-wide level, a strategic level, to try and prioritise between them. In terms of...outside of the opportunity areas, where the Mayor would have a degree of direct interest for all of the reasons in Policy 2.13, identification of priorities really is a matter for boroughs and local communities between them to decide on. And it might be, for example, that that prioritisation, to use the word in a slightly different way, it may be because there are particular opportunities for something to happen in one of them or it may be about the extent of deprivation, either in terms of depth or breadth, that means action in a particular area is identified as being particularly urgent.

Unknown: Can I just pursue the prioritisation thing a little more? The document of the LDA that you referred to that did do some prioritisation, has that document been provided to us? Is that something we have already, or if it isn't, can we have it?

ABP/GLA: I will see if I can track it down. I'm not sure whether...it was a piece of work, I'm not sure it actually resulted in a final document, because it was mostly intended to help inform the economic development strategy and the preparation of the...an internal document to help their business planning process. But I'll make inquiries. [end 2:41:40]

INSPECTOR: Another three flags have gone up, so I'll just work through those in turn, beginning with King's Cross Railway Group, Mr. Edwards.

ME/KX: Thank you. I've got one tiny point and one important point. The tiny point is something on which I may have missed a response from the Mayor's team. In our January submission, we said from King's Cross that we were alarmed to see that in the schedule, the housing target for the King's Cross Opportunity Area had been reduced from 2,250 to 1,900, and we were terribly surprised and puzzled by that, because all of those...the higher figure...were embodied in the planning permissions, section 106 agreements, and so on and so forth. I'd be very glad to know if there is a reply to that particular query. That's just a loose end from July.

The major point I wanted to make is this: Mr. Barry-Purssell, in his I would say, very depressing (to us) response to all of these points, said the evidence base for all of this is strong. I think the point we've been trying to make is, the evidence base for the existence of deprivation is clear. There is massive evidence of

deprivation in London, we're well informed about it. What we are not well-informed about, is the outcomes, is who benefits, is that the medicine is appropriate to the disease. We know from the work of the investment property databank IPD that real estate / property performs substantially better in regeneration areas than it does in Britain as a whole – these areas do very nicely for property owners. But we don't actually have the evidence that there is substantial benefit accruing to the deprived people. That's where the evidential gap is, and I think that just needed to be reinforced.

INSPECTOR: Yes, just to take that point a bit further, given that these projects are likely to extend over a fairly lengthy period of time, what I suspect the Londoners affected would be most wanting to know is how the on-going processes is affecting them rather than what the outcome is, and what we might learn from it later. To the extent to which you don't dispute the approach through identifying opportunity areas, regeneration areas, or whatever they are – you don't dispute the approach. It's the process. Would it be something which would address your point to some degree at least, that there was a requirement within the process for monitoring as the schemes progress?

ME/KX: Yes.

INSPECTOR: ...and that might be a matter which could be addressed in the OAPFs than in the London Plan, would be my next point.

ME/KX: But I think we have been trying to argue that the London Plan as a strategic document should impose a requirement that those impact studies, and monitoring and evaluation, be done. Otherwise, we're never going to learn whether the medicine works, or whether the counterindications...

INSPECTOR: Yes, I have it in mind, that might be something which might be appropriate, but we'll give you an answer in ten year's time. But as far as the residents affected are concerned, if the scheme is going for example in the wrong direction, they want an answer sooner rather than later, so that adjustments can be made. And that would perhaps be a matter of the sort of process you have in mind, but at a much more localised level, and probably through the local process rather than through the strategic process. Just Space Network next, then.

LR/SCA: Thank you, again. Mr. Barry-Purcell has missed the point we were making on the causal links. It was again, the causal links of the effects that you don't necessarily see and the effects of the policies working, but I won't go through everything I think he didn't quite get. The main difficulty with what he says is that he's suggesting that we're talking about very specific place-based problems. No, not at all, far from it. We're talking about things that are happening across the board. And so when he says that it's wrong to deal with these issues at a strategic level, that is not right. If there is a regeneration policy, a word which he says himself can't even be given a description, but there's a policy called regeneration, then surely this policy should offer something strategic which applies to all of these areas, and that's what we are suggesting.

We're suggesting a component of regeneration that could be useful in creating different results, and so when a developer picks up this and says, "Oh, well, I've seen an area is coloured red on the map, that's fine, that means that..." What else might he need to know alongside that, that the Mayor would like to point out, I think that's what we're trying to say.

INSPECTOR: Okay, thank you. Mr. Eversden.

PE/LF: Peter Eversden, London Forum. So, I conclude that all the policies are in place in the London Plan to make regeneration successful. We've heard that three boroughs have made a hash of it, and we heard that two others in South London had done the same during the opportunity area matter. So, there are some boroughs which may not be well-guided by the London Plan towards success on this subject. So, something has got to happen to prevent another set of failures. I don't know what it is. I leave the Panel to consider if anything that's been said could be incorporated into the Plan to try to strengthen it and its influence over the boroughs. But the Mayor would intervene if a planning application didn't accord with his policies. The Mayor might have to intervene if the regeneration aims and objectives are not being met by a scheme. Possibly our only way is to approach the Assembly and see how they could hold him to account in this respect. But what I've heard leaves me to think that more failure could happen.

INSPECTOR: North London Strategic Alliance.

NLSA: *Would like to send some words in to make the relationships between the policies more explicit. The Mayor clearly has a particular interest in the opportunity areas, but we need to be clear about what that relationship is with the regeneration objective. How do these things fit together? We need a generic statement and understanding about that, because at the moment, if the Mayor is coming from left field, and the boroughs from the right, then we have a recipe for the disaster that we've been talking about. Need some statements in London Plan that gives some guidance about how the Mayor is approaching the opportunity areas and how boroughs and others are addressing the regeneration need and how it all fits together, because it is a levels issue. If we don't have statements in both parts of the planning system – at the borough's LDF level, or anybody else's LDF/Core Strategy, and the other ones. Example in my area: Lea Valley Regional Parks Core Strategy, and N. London Waste Core Strategy, and three borough's Core Strategies, and what we blatantly understood, is that unless we can get some understanding and synergy between those, we fail to regenerate, and we fail to...sometimes it's not physical regeneration, sometimes it's social, sometime's it's just economic. But whatever the balance is, the goal in the end is to improve all of those particular situations, and therefore when you get another one coming in, such as the London Plan, at the level that's appropriate level for the London Plan, we have to make sure there's a synergy and understanding between them. The disaster in London is that in the past, we've got a history of things not fitting, everybody goes their own way. I think a scheme would help, and understanding of what we mean by regeneration in terms of the broad definition of it – my definition is socio-economic and physical improvement of an area, but the mix of that depends on the area, what's happened in the past, and so on and so forth, and then you move forward. Would be happy to submit some text about carrying that forward.*
[end 2:53:40]

INSPECTOR: We would need that quite quickly. That would be very helpful. Lastly, the London Tenants Federation.

SH/LTF: I would just say that your suggestion about monitoring is quite helpful. It's probably not just the monitoring along the way, but it is the end result that needs to be analysed here. Mr. Barry-Purcell answered something that I hadn't suggested in terms of the evidence base. The evidence base indeed, as Mike Edwards said, was not about the levels of poverty that exist in London, but how in fact it's being addressed and how that might be addressed through particularly Policy 2.14, and it is the evidence of benefit that is distinctly lacking, and in fact there's more evidence, both through CLG studies and academic studies, that would suggest that the opposite is occurring, and that is the issue that we need to ensure is not occurring as a result of the London Plan and the way that the policy is being implemented. And I think yes, the monitoring of this is very important, because then when there's a review of the London Plan, the next review of the London Plan, there may be some reanalysis at least of where exactly this policy is or isn't taking us.

INSPECTOR: Thank you. Mr. Barry-Purcell, do you wish to make a final comment on those points?

ABP/GLA: We have a reasonably small number, so I'll go through them in the order that it was raised. Mr. Edwards actually raised the question which has been picked up by a number of participants about the question of post-hoc assessment of effect, if I could put it that way. The immediate and quick answer to that is the scale and the nature of the opportunities, as I said yesterday, tends to mean that most of the opportunity areas which are mentioned in the Plan are actually works in progress, and I guess there is a question that isn't easily answered across all of them about when things are over, if you like, and when you actually start doing those sorts of assessments.

The only point that I would make is that the Mayor does provide a report on progress with opportunity areas through the Annual Monitoring Report. We do pick up...we do quite extensive monitoring of the additional homes and jobs that are provided as a part of our usual plan-monitor-and-manage approach, and it's not as if the Mayor is the only level at which this matter is dealt with. Of course, in drawing up LDFs, boroughs need to do the same integrated impact assessment that we have, and there is a whole range of things that they have to consider in dealing with planning applications. I'm not suggesting that looking back at experience about what actually happens in opportunity areas and whether early promises and early strategic objectives are actually delivered is a bad thing. It's a complicated thing to do, and I suspect it would be a rather expensive thing to do, and I suspect this is something which in the academic community, and the Mayor, and I guess boroughs too, probably will want to do in the future, probably more through the research side of monitoring rather than through the key performance indicators side of it. I don't think it

would be appropriate, sir, to say that there should be a requirement mandated through the Plan for post-hoc studies, which I'm not sure would be particularly helpful.

And this goes on to the point that he went on to, about the casual links between policies and effect. As I said, on a strategic level, we do monitor the additional homes and jobs that come forth in opportunity areas, we do it in the during-phase of it, as well as probably at the end of it, and evidence of that is the very detailed discussions that we have had during the course of the discussion on Policy 2.13, where we got into an awful lot of detail about the figures that were presented in Annex 1, and where we showed that we do keep in touch with what's happening on the ground and adjust the figures in accordance with what happens.

The other thing that I would point out in terms of outcomes, the desired outcomes are set out throughout the Plan. Just to give you a few examples, Policy 2.13 sets them, Policy 3.7, Policy 3.10, Policy 7.1, and I won't sit down and read out a list of them, but it is certainly not true to say that there is a casual link between the policy and no concern for effect. That isn't true.

The point that Mr. Eversden raised brings us back to the point of what the London Plan is for, and what the Office of the Mayor is for. The Mayor is not a London-version of the Audit Commission, whose role it is to keep an eye on what boroughs get up to and when he thinks that a borough is doing something wrong, to ride in and intervene. He has no power to do that. In fact, shortly the Audit Commission won't have any power to do that as the Coalition Government has announced that it's to be abolished. He's not the local government ombudsman, so he can't deal with cases of maladministration, which it sounds from the accounts that some people have given, may well be an issue in some of the particular situations which have been raised. And I would say again, we have only heard one side of those particular cases. In any event, even if the Mayor did have those powers, the London Plan is not the mechanism that could be used for an interventionist regime of that nature.

The North London Strategic Alliance pointed out how helpful the reference in Enfield Council's LDF...references to consultation...have been, and that's precisely our point. I think that statements of how to go about consultation made by local authorities who know their area and know how consultation is best done in order to reach local communities, is exactly the right way to address it. What is not the right way to address it, is for us at London-wide level, to seek to put in one procedure for consultation that we think is...or a standard for consultation which is appropriate across London in every place for absolutely every purpose. If we did that, I suspect that quickly boroughs would say we're telling them how to do things that they already know. And in any event, if we did such a standard, and the boroughs concerned didn't live up to it, it goes back to the point I was making to Mr. Eversden, the Mayor has no formal powers to step in and do anything about it.

The second point that the North London Strategic Alliance made was about how policies fit together, and again, at the risk of wearying everybody, it is important to read the Plan as a whole, and if you only focus on one particular policy, you do miss out one the whole suite of policies that have to be taken into account, both in terms of taking planning decisions and in considering LDFs, one has to look at the whole suite of policies across the document as a whole. In terms of the Mayor's role, I think that is spelled out with opportunity areas in Policy 2.13 and in areas for regeneration in Policy 2.14, but we've also brought forward a new paragraph 8.2A for Chapter 8, which seeks to set out in terms, what role the Mayor sees himself taking in the planning system in London. I think that the only point I would make – I've made the point several times – London is a complex place, and regeneration and development are often complex issues, and the needs and circumstances of particular places differ, which adds a further level of complication. What we wouldn't want to do, again, is set out a one-size-fits-all approach which would be unsuitable and wouldn't reflect that level of complexity.

I'm not sure I ever claimed that it was impossible to define regeneration, I said that it was difficult to do so meaningfully and in a way that was helpful in a document of this kind. And our colleague from North London Strategic Alliance gave us a definition of regeneration with which I think very few of us would quarrel, but he rather made my point, I think, when he ended it by saying, 'depending on the nature of the area.' And that's the dilemma. Is trying to set out a definition of regeneration in the glossary to the London Plan that means the same thing in every context it's used in the Plan. I don't think it's possible to come up with such a definition which reflects the complexity and the need to take account of local circumstances and isn't so general as to not take readers very much further.

Finally, the question of evidence, and I think I've touched on that. The way that evidence operates in Policy 2.14 is that it sets out the evidence for need, and on the basis of that evidence, it identifies places that are in need of regeneration and are called, as a result, regeneration areas. And what it says, is that in terms of the mechanisms that are to be identified and put in place to address that need, that is a matter that has to be decided locally. And the question of what evidence shows to be the most appropriate mechanism in a particular place really is for local people, local organisations, and local communities to take between them. If the Mayor had conversely done what's been urged on us, to set out a whole list of mechanisms that we think should be used virtually everywhere, then we would be open to the challenge that we haven't got evidence to show that a particular mechanism works everywhere and in all circumstances. That's not what we've done for precisely the same reasons which have been advanced.

So I think I've dealt with all the points except for Mr. Edwards' final point about the King's Cross Opportunity Area. We have submitted a paper, and I'm afraid I don't have the document [ED92], and I'll just read the paragraph about the King's Cross Opportunity Area:

At the EiP, the King's Cross Railway Lands Group objected that the current London Plan Homes Guideline, 2,250, has been reduced to 1,900 in the draft replacement plan. Data from Camden, Islington, and the London Development Database confirm that total approved units for the combined Argent and Triangle sites comprise 1,700 and 246 homes, respectively, or a total of 1,946 homes. The minimum 1,900 homes in the DRLP is therefore considered to be correct, the Mayor proposes no change to the figure in the Plan of 1,900 homes.

ME/KX: Sorry to have missed that, and glad to have it now. We'll pursue that by correspondence, if we may. It sounds very complicated.

INSPECTOR: Thank you for that. Just by way of a final comment on what you said, Mr. Barry-Purssell, if one were minded to seek to lend some clarity, or perhaps some confusion, depending on your standpoint, to the interpretation of the word 'regeneration,' would there be any merit in looking towards saying what the outcomes that were not sought are – so what it should exclude, rather than what it should include.

ABP/GLA: I think that is in sort of negative form, the obverse problem of what I've said would apply. Most of the negative things you wouldn't want are things that almost by definition you wouldn't describe as regeneration. But I'm not sure it would be helpful to try and set out a hard and fast menu of 'good' things and 'bad' things that regeneration should deliver, simply because of the need to recognize local diversity.

INSPECTOR: Yes, dispersal and displacement spring to mind as two things which perhaps might be avoided, but...

ABP/GLA: Sir, I can quite see circumstances in which dispersal or displacement might be something that communities actively pursue in some parts of London.

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