

# 03

## Section 3. Policy

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This section sets out an overview of the key policy and guidance documents that have been considered as part of the Options Appraisal process. Relevant policies & guidance have been reviewed at national, regional and local levels. These documents take into account both planning policy and guidance on appraisals of this type. The overarching principles of the Green Book approach have also been considered in formulating and evaluating each option.

The alternatives considered within the Options Appraisal vary widely in scope. The policy documents therefore also vary, with some focussed on redevelopment / regeneration and others on more general issues.

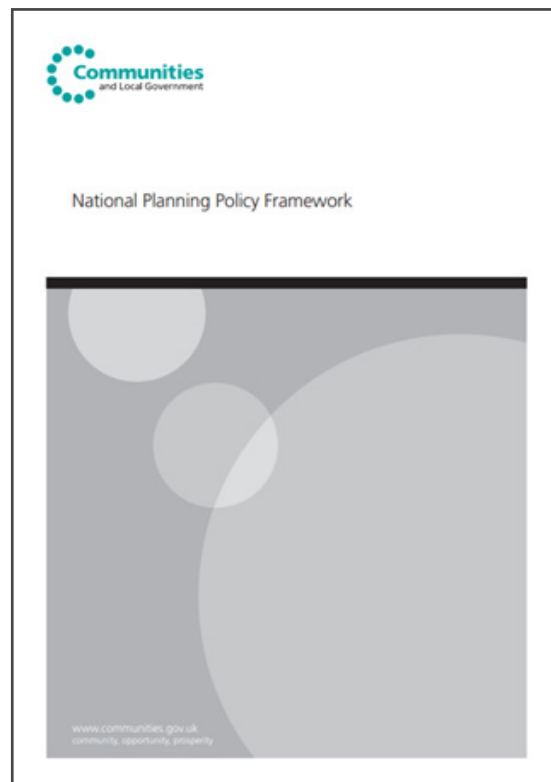
### 3.1 National Planning Policy and Guidance

#### National Planning Policy Framework (2012)

Paragraph 7 of the NPPF requires provision of new homes that meet the needs of present and future generations, by creating a high quality built environment.

Paragraph 14 of the NPPF states that there is a presumption in favour of sustainable development, which is a golden thread running through both plan-making and decision taking. With respect to decision taking, this means that proposals that accord with the development plan should be granted without delay.

Paragraph 47 of the NPPF goes on to state ways and means for Local Authorities to significantly boost the supply of housing, Paragraph 49 reiterates both paragraph 14 and 47, stating that housing applications should be considered in the context of the presumption in favour of sustainable development.



## Draft National Planning Policy Framework (2018)

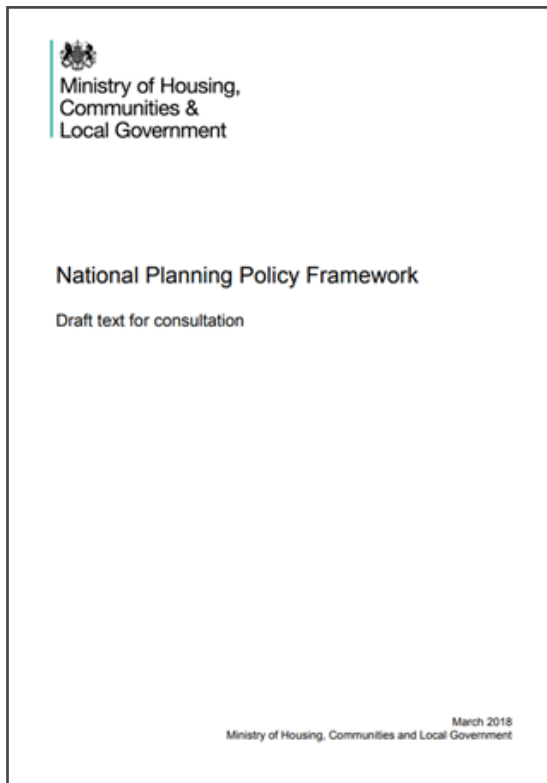
Draft paragraph 11 states that decisions should apply a presumption in favour of sustainable development through seeking opportunities to meet the development needs of the area.

Draft paragraph 60 also states that the NPPF has a role in significantly boosting the supply of homes in the country through a sufficient amount and variety of land allocated for this purpose.

Draft paragraph 62 also states that authorities should identify the type of housing that is required to ensure that there is a proper range of homes within an area.

Draft paragraph 94 reflects the housing White Paper proposal that policies and decisions should consider the social and economic benefits of estate regeneration, and that authorities should use their planning powers to help deliver estate regeneration to a high standard.

Draft paragraph 124 of the NPPF states that decisions should support the creation of high quality buildings and places where Plans have set out a clear design vision and expectations.



## National Planning Practice Guidance (2014)

Paragraph: 001 Reference ID: 26-001-20140306 states that good quality design is an integral part of sustainable development. It states that the NPPF recognises that design quality matters and that planning should drive up standards across all forms of development. It notes that achieving good design is about creating places, buildings and spaces that work well for everyone.

A general theme running through the NPPG is that Councils should plan for a variety of housing needs. This will include the needs of existing residents and a range of types and tenures of affordable housing.

The screenshot shows the GOV.UK website page for 'Planning practice guidance'. The page header includes the GOV.UK logo, a search bar, and navigation links for Departments, Worldwide, How government works, Get Involved, Policies, Publications, Consultations, Statistics, and Announcements. The main content area is titled 'Collection Planning practice guidance' and describes 'The National Planning Policy Framework and relevant planning practice guidance.' It includes publication information: 'Published 29 November 2016', 'Last updated 28 July 2017 - see all updates', and 'From: Ministry of Housing, Communities & Local Government'. A paragraph explains that the NPPF was published on 27 March 2012 and sets out the government's planning policies for England. There are two call-to-action buttons: 'Download the full policy document.' and 'If you'd like an email alert when changes are made to planning guidance please subscribe.' A 'Related content' sidebar on the right suggests 'Explore the topic: Planning guidance' and 'Policy: Planning system'. At the bottom, there is a section for 'Planning practice guidance categories' with a brief introductory sentence.

## Housing White Paper (2016)

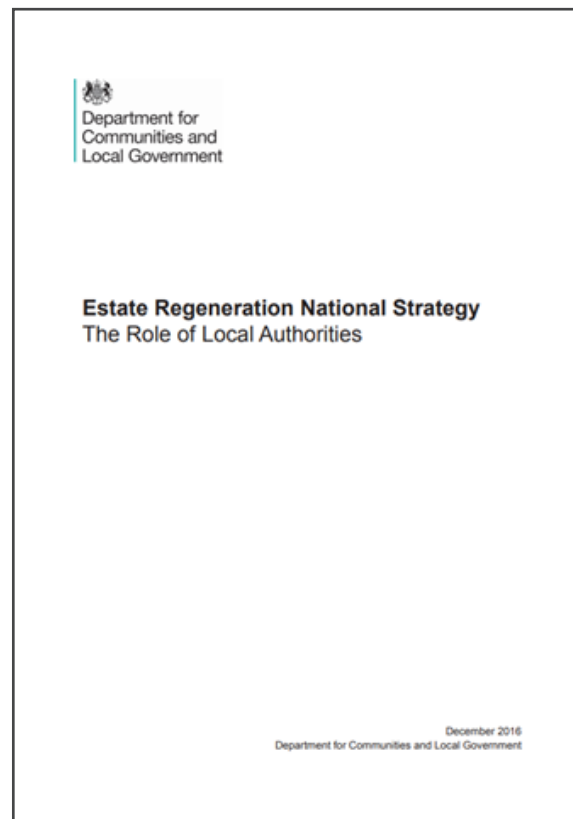
Chapter 3 of the Housing White Paper states that there is a need to diversify the market to achieve the required amount of homes with the right quality and choice of housing that people want. It also refers to the need to create a diverse range of homes from home ownership, homes for rent, affordable homes and starter homes.



## DCLG Estate Regeneration National Strategy (2016)

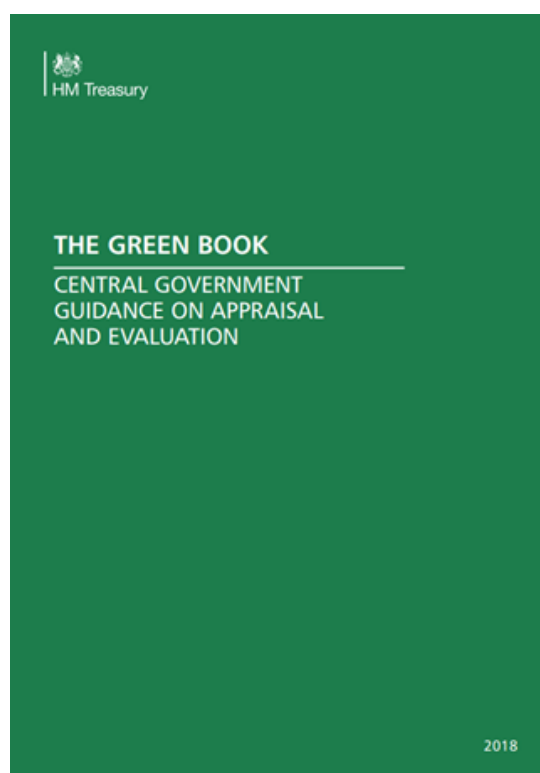
This document notes that place leaders and local authorities can maximise opportunities for estate regeneration, linking schemes to wider regeneration and housing delivery objectives. Local authorities can also play a key convening role in encouraging all public sector land holders to utilise their land and equity holdings in support of delivering housing.

Local authorities have a key role in considering how plans for estate regeneration can help to promote integration and create more cohesive, resilient communities. Local authorities are well placed to lead or support high quality community engagement, given their direct links through ward councillors and officers to communities and community groups.



## The Green Book – Central Government Guidance on Appraisal and Evaluation (2018)

The Green Book notes that the role of appraisal and evaluation is to provide objective analysis that supports decision making. The appraisal is in place as a process to assess the costs, benefits and risks of alternative ways to meet objectives. It helps decision makers to understand the potential effects, trade-offs and overall impact of options by providing an objective evidence base for decision making.



## 3.2 Strategic Planning Policy and Guidance

### Draft London Plan (2017)

Draft Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites. The supporting text also refers to schemes having the expectation that the provision of affordable housing is maximised, making the most efficient use of available resources.

Draft Policy H10 of the London Plan states that a loss in existing housing is generally only acceptable where the housing is replaced at existing or higher densities with at least the equivalent level of overall floorspace. With respect to estate regeneration, schemes with existing affordable housing floorspace should be replaced on an equivalent basis. Where social rented floorspace is lost, the London Plan states that it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing should be maximised.



### Home for Londoners - GLA Draft Good Practice Guide to Estate Regeneration (2016)

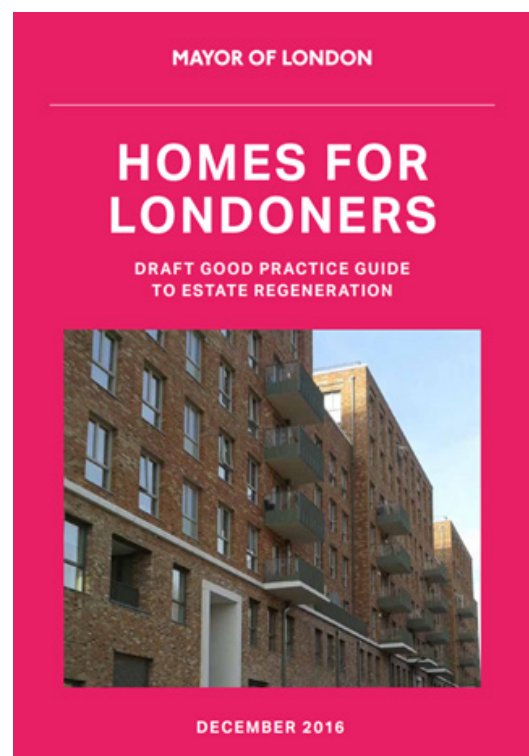
Paragraph 8 of the London Mayor's draft Good Practice Guide states that there are many options for physical intervention including full demolition and rebuild, refurbishment and infill and some may combine approaches, for instance by refurbishing a number of existing homes whilst demolishing and rebuilding.

Paragraph 9 and 10 states that where demolition and rebuilding is chosen as part of an estate regeneration seeking funding from the GLA, this should only happen where it does not result in a loss of social housing, or where all other options have been exhausted.

Even where GLA funding is not involved, current London Plan policy states that the loss of affordable housing should be resisted unless it is replaced with better quality homes at existing or higher densities with at least the equivalent amount of floor space.

Paragraph 11 states that the Local Planning Authority and others should consider how the estate interacts, both in built form and accessibility, with the surrounding area as estate regeneration can be an opportunity to re-integrate estates with their surrounding neighbourhoods and to deliver wider economic, social and physical regeneration.

With respect to the delivery of different tenure types, the Guide refers back to the adopted London Plan Policy 3.9 which states that there should be an emphasis on encouraging a mix of tenures and household incomes.



## 3.3 Local Planning Policy and Guidance

### Camden Local Plan (2017)

Policy H1 of the Local Plan seeks to increase housing supply within the Borough in order to meet the needs of existing and future households. Policy H3 goes on to state that the protection of existing homes is paramount and notes that the Council would resist development involving a net loss of residential floorspace. Policy H4 seeks to maximize the supply of affordable housing focusing on the creation of new socially rented and intermediate homes.

Policy H5 goes on to promote the protection and improvement of affordable housing through regenerating existing estates. It also states that policy will protect existing affordable housing floorspace of all types. The council recognises the benefits of estate regeneration given it can deliver wider benefits such as tackling health inequality and helping local residents to gain employment.

### Camden Goods Yard Framework (2017)

The Framework notes that at the existing housing estates of Juniper Crescent and Gilbey's Yard, the Council will support measures to improve the relationship of the estates with their surrounding environment and where possible to deliver additional homes. The Framework also states that the Council supports the exploration of a range of options from repairs, servicing and public realm improvements, to partial or full redevelopment.

The Framework goes on to state that if full redevelopment is proposed, the Council expects the re-provision of homes, with no net loss of residential or affordable housing floorspace including no net loss of socially rented floorspace.

Alongside the re-provision of existing homes, redevelopment will also be expected to provide additional homes (including the maximum reasonable amount of affordable housing). It finally states that development should contribute towards an improved mix of housing types, sizes and tenures to promote mixed, inclusive and sustainable communities.

