

Appendix A:

Draft response to the Mayor's London Plan 2009

Dear Mayor Johnson,

Southwark response to the draft alterations to the London Plan 2009

We welcome your approach to prepare new London plan and your inclusion of many of our responses in 'alterations to the London Plan 2009'. Although we agree with most of your proposals there are some issues that we consider require further thinking through.

Significant issues

There are 5 very significant issues that we would like to raise to the draft alterations to the London Plan 2009:

- As much as we would like to achieve the suggested housing figure of 2005 in the London Plan. We do not consider that this is possible. There are a number of reasons for this. These include the high level of small completions that may not be able to be continued forward. There are a large number of potential sites that could be developed, however in our experience from completion surveys we have found that a considerable number do not come forward for a wide range of reasons. It is not possible to take out specific sites, instead we would like the contingency for sites not being built increased. A considerable number of easy sites have been developed so the sites remaining become more difficult. We are currently in a recession therefore the next few years are likely to deliver less housing leaving a higher number of units to be delivered in the future years. We are suggesting that continuing our current annual target of 1630 is ambitious and we will be working with our partners and as a land owner to develop as many sites as possible to provide as many homes as possible in Southwark.
- Although we support the provision of intermediate housing as an important aspect in providing homes in Southwark. The requirement for 60/40 social/intermediate housing increasing the level of intermediate housing by 10% would be very difficult to achieve. This is because in practice intermediate housing is very difficult to make work as there are few mortgage options. This is a nationwide problem that needs to be addressed at a national and London level. In addition reducing the level of social housing will reduce the provision of social housing to move people into homes where we are regenerating areas. This will have knock on impacts on Elephant and Aylesbury regeneration programmes. It will also reduce our capacity to provide affordable housing in general and to re-house homeless people.

- The density zones should be left as broad boundaries rather than being split by Public Transport Accessibility Level. The addition of an arbitrary transport measure means that some schemes which would be in character with the local area in areas of good transport such as Wooddene, Silwood and Aylesbury could be too dense. These higher densities are necessary to make the schemes viable so that they can provide new homes and affordable and family homes which are essential to meet our housing and affordable housing targets.
- A requirement for the replacement of 100% affordable housing would make redevelopment of some housing estates such as Wood dene, Silwood and Elmington unviable. This would prevent provision of new housing and affordable and family housing which are essential to meet our housing and affordable housing targets.
- A requirement for housing in the office locations as part of any additional floorspace is detrimental to the provision of employment in the central activities zone. There is no need to provide housing in the areas where we have clusters of offices and it does not make sense to require affordable housing in buildings where businesses would like a whole block of office provision. Mixed use blocks with housing and offices can work and should be allowed. However if a proposal is made for a development of offices with no affordable housing then this should be allowed to strengthen our clusters of good quality, desirable, well functioning offices.

We provide further detail below:

Strategic issues

We are unclear where Southwark fits within the Mayor's vision for London. Many of the policies are confusing as they say 'normally', 'where appropriate' or unless conflict with other policies'. Section 38(6) of the Planning and Compulsory Purchase act allows for all of these situations and therefore there is no need for the confusion provided throughout the plan by these phrases. There are many important issues where evidence is going to be provided and SPDs are going to implement policy. These need to be available for us to evaluate the plan policies and effectiveness. Furthermore there needs to be a risk assessment and alternatives provided particularly for housing where the provision is so changeable at present.

Chapter 2 London's places

Policy 2.2 C says that boroughs should work on common approaches and cross border significance, however this issue does not seem to have been addressed in the plan. *We propose that the key cross border issues set out in our core strategy are included.*

Policy 2.5B and map 2.1 set Southwark within the central sub region, whilst in principle this is useful there are issues particularly for housing where we are in

a different sub region. This provides confusion and issues particularly over delivery and funding. *We propose that boroughs are set within regions as they work in practice for transport, housing etc.*

Paragraph 2.38 should ensure that character and not just public transport accessibility is an important factor in considering density. *We propose that character is provided with more prominence and that text is added to say that public transport is an indicator not a determining factor.*

Policy 2.11 there are contradictions with policy 4.2b bullet 2 and policy 4.3Aa contradicts this approach by suggesting that developments where there are increases in office floor space should provide for a mix of uses including housing unless this conflicts with other policies. This does conflict and it also does not make policy sense as buildings rarely work with an active ground floor, office and then housing which would be required to meet the vitality policy. We do not need to encourage housing in office areas where we are aiming to protect and require more offices, at most this should be allowed. *We propose that the housing requirement should be removed.*

Policy 2.14A, B and paragraphs 2.59 to 2.61 we do not consider our comments to have been taken into account on the regeneration areas issue. We support the approach to understanding and planning for inner London and the area immediately around the Central Activities Zone. However the guidance for the inner London and regeneration areas is not clear. This is because in Southwark they will predominantly cover the same areas however map 2.5 does not illustrate this and there is no text setting out the policy relationship or a strategy for inner London regeneration. Also most of our regeneration areas are covered by action or opportunity area guidance or supplementary planning documents. Therefore this needs to be strategic where being part of London provides additionally. *We propose that in Southwark this will need to address the areas that have concentrations of deprivation and worklessness with no planned development or opportunities for large scale redevelopment. We need further clarity on how the new London plan approach to open up employment opportunities, especially to disadvantaged communities and strengthening neighbourhoods will work with the approach to regeneration areas. Therefore we would suggest that these could be a single framework for taking forward regeneration in areas where there will be little development as the areas within the inner London zone are so varied. Or this could be addressed through additional employment policies.*

Chapter 3 London's people

Policy 3.1 and the supporting paragraphs should set out how the Mayor will lead a strategic approach to tackling the issues around provision for specific groups. *As set out in our response to the last consultation, a more detailed review of how to tackle youth unemployment and crime with a focus on how provision of social infrastructure can be used to assist with a programme would be useful.* We did suggest in our original response that although places of worship are discussed as part of social infrastructure they have particular issues around the size of the space required, amenity and trip generation by

cars that need to be taken into account. A London approach to provision of places of worship would be useful.

Paragraph 3.13 'London should be treated as a single market' We suggest that as London has many sub-markets also, and different sub regions and boroughs have different characteristics and needs, which all need to be taken into account in the development of policy.

Paragraph 3.15 This borough in particular has many households in housing need and a high incidence of overcrowding. We suggest that the aim should be changed to address as much of the backlog of need as possible.

Policy 3.3 and table 3.1 set out that Southwark needs to meet a target of 2005 new units per year on average from 2011 to 2021. This is an unrealistic target that we can not meet. *We suggest that the current target of 1630 a year should be set rather than the higher target.* These need to be realistic for good planning and soundness of the core strategy, successful regeneration, reputational issues, also we receive funding at present for meeting our targets. The 2005 has been worked out using the government's required national methodology Strategic Housing Land Availability Assessment. There are a number of issues for Southwark with these figures for over 0.25 strategic, under 0.25 small sites. Over 0.25ha strategic sites:

- Southwark had a very high delivery, target and capacity for delivery relative to other London boroughs and extremely high in relation to areas outside London. This leads to a high level of risk and probability of sites not being developed.
- There are a very high number of private sites where we can facilitate through HCA funding, working in partnership and facilitation through policies however we do not have direct control and this leads to high risk.
- We have just met the 1630 in the last 3 years and we have met the 2211 2007/2008 prior to the impact of the recession taking hold.
- The credit crunch has severely impacted on our delivery reducing our numbers from 2200 2007/08 to an estimated 1350 2008/09.
- The GLA have included probabilities of sites not coming forward for development at 10%. Is it reasonable to assume that all of these sites will be developed or should we be adopting a more conservative approach? Less than a third of our proposals sites have been built within 10 years in the past as over half of our completions have been from the small sites.
- Our core strategy will require 10% larger unit sizes. This will provide better quality homes, however this will have an impact on figures as there will be 10% more of each site where there are replacement dwellings taken up to reprovide the homes that were there before we

start counting new dwellings. Only new dwellings count towards the target.

- We do not have any greenfield sites so all of our sites are replacing employment or housing. If we were to aim for the target we would need to lose sites that we currently need to meet our employment targets or we would need to build on open spaces.
- A large number of the easy sites have been developed. It is much harder and more complicated now, especially with even more power transferring to local communities as planning process evolves.
- We are very proactive in working in partnership to bring forward developments. We bring forward our own sites, work with developers, RSLs and others to bring forward development.
- We are preparing area action plans for Canada Water, Aylesbury and Peckham/Nunhead to stimulate development. We are preparing SPDs for Bankside, Borough and London Bridge and we have the SPD and SPG for Elephant and Castle to stimulate development. These provide certainty and encourage development through setting out capacity and providing a strategic approach to development that maximises the potential of sites.
- We are preparing a housing development plan document to provide certainty and stimulate development of non strategic sites outside the area action plan localities.
- We are working with the HCA to unlock development sites that have been stalled due to the credit crunch.

Under 0.25ha the average completions over the last 4 years are significantly higher than they were for the 6 years before. The target being set is over 10 years. If the last 10 years figures were used this would halve the current figure from around 860 to 440.

The non self contained is realistic at 130.

We would like urgent discussions with the GLA to work through the differences in the proposed housing targets before the consultation on our core strategy is completed.

Paragraph 3.18 sets out that the Mayor will produce SPD on implementing these housing targets. Are you confident that the plan is sound without this information on delivery? *We need to see this SPD to understand how the policy will work and how we are expected to deliver our target.*

Policy 3.4, paragraphs 3.22 to 3.25 and table 3.2 are too focused on PTAL and do not take character considerations into account enough. *The ranges should not be split by PTAL as in practice this will be taken into account but*

should not be a blunt instrument. Density should be more focused on character and should be a range as this is an indicator of whether development is within a suitable range. It should not be used as a specific measure to resist development proposals.

Policy 3.5 we support minimum space standards and resisting development in back gardens. *Minimum room sizes for student accommodation and hotels should be included.*

Policy 3.8d *we think that the 10% should all be provided as wheelchair accessible and should not be allowed to be easily adaptable as our experience is that this is never adapted. If the Mayor persists with this proposal that a clear definition of what constitutes 'easily adaptable' is given.*

Policy 3.8g *we would like some further explanation of how this would work as we have not been able to effectively require local student housing for local institutions.*

Paragraphs 3.38 and 3.55 we support the statement that there is a need for a more diverse range of intermediate housing products. There is a particular need to cater for those households who can afford to pay a little more than the costs of social housing, but who cannot afford existing intermediate products. There is a particular shortage of intermediate products for families. The current funding situation makes it difficult to produce these products. Single people with incomes of £61,400 could purchase homes on the private market for £184,200 if lenders allow three times their salary. There are many privately available, unsubsidised homes available for sale at this level. Similarly for those requiring homes with more than two bedrooms, a loan of three times salary would allow purchase of a home costing £292,000.

Paragraph 3.39 – ‘these requirements across London have little regard to administrative boundaries’ – Existing residents, particularly the elderly, and also families, often have a very strong attachment to their local communities, and therefore want housing solutions that meet their needs in the locality in which they currently live. *This wording should be deleted and there should be comments to facilitate local solutions.*

3.41 we support all efforts to increase the quantity of family housing. Our own recent research fully supports this, and suggests that the need for family housing may be even greater than has been identified here. Our own survey found that there were more very young [under 5] children living in the borough than population projections would have led us to expect. Furthermore existing research has followed CLG guidance, which states that each bedroom is suitable for two people, and that only those over 21 years require their own bedroom. In practice many bedrooms cannot accommodate more than one person, and many will consider that adults under 21 need their own rooms. This would be in accordance with housing benefit regulations, which suggest that a bedroom is needed for all adults over 16 years [excluding couples]. It is very possible, therefore, that more family homes are needed than have been estimated.

Paragraphs 3.44 and 3.45 there is a need for further London wide research into the housing needs of students, including concerning the needs of lower income students and the demand for further specialist accommodation during the recession. There is some anecdotal evidence that demand for specialist accommodation may have fallen. The costs of much specialised accommodation is beyond the reach of UK students, and many accommodation providers tends to focus on the international market. Student housing can provide very high returns for lower investment than conventional housing, which makes it attractive to many developers, and there could be a danger of over supply. There could be scope to require schemes to include some provision for students whose only income is the student loan. *We consider that all student housing should be subject to the requirements of affordable housing policy, to prevent any tendency for student accommodation provision to compete with the needs of the wider population. There should also be standards for student homes so that they can be converted if needs change.*

Policy 3.9 we welcome the strategic guidance and targets for the provision of pitches for Gypsies and travellers in London. We currently provide 38 pitches on 4 sites which is 7% of the London provision. This is the third highest in London after Bromley and Brent. We currently consider this to meet our targets for provision and we do understand the need to play our part within the London context.

3.49 we assume that 'pa' in line 6 is a typo.

Policy 3.11 We would reiterate our comments on the London Housing Strategy. Southwark has agreed its affordable housing targets with the Mayor. While supportive of proposals to increase intermediate housing, particularly as a stepping stone for social housing tenants wishing to enter into home ownership, it should be noted that Southwark households have very low average incomes. Half of Southwark's residents have household incomes of less than £16,800. For council tenants, this figure is £9,800 and it is £14,300 for RSL tenants. Currently a high proportion of Southwark residents cannot afford any of the existing intermediate housing products, particularly if they are resident in social housing. *We would therefore wish to see developed products which are affordable to those on low incomes as part of the implementation plan.*

Policy 3.12A we strongly support the targets being in absolute or percentages.

3.59 60/40% split between affordable and intermediate housing is unachievable as we do not have the products that make intermediate housing work. *Boroughs should be allowed to set their own percentages.* In the current economic climate this split cannot be achieved, and can only be achieved if there are more affordable intermediate products available [see comments on 3.11]. We welcome the statement that priority should be given to affordable family housing. We support the emphasis of particular focus to stimulate the development of more intermediate options and family sized housing. The

introduction of policy and programmes to enable the provision of affordable housing other than social housing for key workers, lower and middle income families is a key factor for successful regeneration, not least because it provides opportunities both for current social housing residents to move into shared ownership and for new residents on lower and middle incomes to move into an area, creating more economically mixed communities.

Paragraph 3.67 We support this paragraph that says that provision is normally required on site, in exceptional circumstances it may be provided off site or through a cash in lieu contribution ring fenced and if appropriate pooled to secure efficient delivery of new affordable housing on identified sites elsewhere. These exceptional circumstances include where the developer has a site and can secure a higher level of provision, better address priority needs, secure a more balanced community, better sustain a strategically important clusters of economic activity eg in CAZ.

Policy 3.15 we do not consider the resistance of the loss of affordable housing and housing unless this is replaced at existing or higher densities with at least equivalent floor space to be clear or to have taken into consideration viability of redevelopment of large estates. It also says that boroughs should promote efficient use of the existing stock by reducing the number of vacant, unfit and unsatisfactory dwellings. *We suggest the wording is changed to enable us to apply our policies to the total number of units and not automatically require 100% replacement of affordable housing on all large estates as this may prevent regeneration and provision of new, affordable, family and high quality homes.*

Paragraph 3.72 says that maintaining and improving the quality and condition of London's stock of 3.1 million homes is a continuing concern to individual Londoners and especially so for some groups. The planning system must support the largely managerial and investment based initiatives to target this issue set out in the London Housing Strategy. *There needs to be text to support this in policy 3.15.*

Chapter 4 London's economy

We would welcome the suggestion for a clear spatial context for the work of the London Development Agency and the London Skills and Employment Board in ensuring Londoners have the skills needed by their city's enterprises. We would like to continue to work with these organisations to ensure that Southwark's residents benefit from a strategic London approach.

We support the approach particularly the protection of town centres, the upgrading of Elephant and Castle and Canada Water to major town centres.

A minor point table 4.1 total needs to say that the measure is in sqm.

We support policy 4.2, b bullet 2 to consolidate and extend office provision focusing on viable, growth areas such as our central activities zone. We are concerned that policy 4.3Aa contradicts this approach by suggesting that

developments where there are increases in office floor space should provide for a mix of uses including housing unless this conflicts with other policies. *This does conflict and it should be removed*, it also does not make policy sense as buildings rarely work with an active ground floor, office and then housing which would be required to meet the vitality policy. *We do not need to encourage housing in office areas where we are aiming to protect and require more offices, at most this should be allowed.*

Policy 4.6B paragraph a sets out that culture, entertainment and art developments should follow the sequential test however this is not then mentioned in policy 4.7 which sets out the sequential test. *This should be included in policy 4.7.*

Paragraph 4.14 *could provide more explanation of how land use swaps and credits would work in practice.*

Map 4.2 area 2 *should be South Bank/Bankside and add in London Bridge.*

Policy 4.10 We particularly support innovation, research and green technology. We would like to understand whether we can work with you so that the plan includes these technologies to locating within Southwark as part of the strategy particularly in the Central Activities Zone and along the Old Kent road. *The plan should include these areas and how these technologies could be introduced.*

Policy 4.12 and paragraph 4.60 we support the approach to reduce worklessness and improve employment opportunities. *However the way that this is going to be implemented requires further explanation.*

Chapter 5 London's response to climate change

Policy 5.2 sets out the figures for improvement on 2006 building regulations and paragraph 5.27 sets out that the move towards CSH is set out in the Housing Design Guide. *Further clarity linking through to BREAAAM and CSH ratings is required. We would also like these standards introduced for all development not just publically funded schemes as set out in the design guide.*

Policy 5.2E *needs further clarity about where off site provision can be provided. Is this a borough or more local area benefit?*

Policy 5.17H we would like to understand why our comments have not been taken into account. The Mayor's Waste management sites have a very broad classification. *Either this should be reconsidered or the policy should be changed to cover only sites that provide for the strategic targets.*

Policy 5.3D we are asked to develop more policies and proposals based on the Mayors Sustainable Design and Construction SPD. We are concerned that the requirements are being requested as part of the design and access statement rather than within a separate sustainability statement without a

clear set of guidance on how this will work. The current SPD requires significant work to address issues such as transport, education, health, employment, community facilities and education. Therefore in practice the integration could lead to a watering down of sustainability issues. Ways in which this could happen include a focus on visual appearance and aesthetic, emphasis on short statements as a communication tool which is problematic with such technical information. Also clarity of whether policies have been met and understanding by the various consultants of what they need to do.

Policy 5.7 we would recommend that the 20% renewables requirement should be put back into the policy rather than moving it to the justification. This provides further weight as a requirement rather than being a reason for requiring renewables.

Chapter 6 London's transport

There seems to be a lack of linkages between a strategic vision and strategic locations that need investment such as the Elephant and Castle.

The focus seems to be on development management rather than the strategic leadership that should be provided by Transport for London. *The integration of the teams within TfL and how these can work with us to take forward transport improvements is essential to achieve change on this significant issue.*

Table 6.3 indicative list of transport schemes:

- *Needs to include the funding costs and where they will be from and match funding required. This should be supplemented in the infrastructure chapter with how the Mayor and TfL will leave to achieve this.*
- *Page 165 the northern line needs to provide for funding the new ticket hall at the Elephant and Castle in the next 10 years.*
- *Should include funding of the cross river tram to Peckham to provide for essential transport improvements to regenerate this area of south London.*

Chapter 7 London's living places

No specific comments.

Chapter 8 Implementation, monitoring and review

Paragraph 8.13 we support the proposal to establish an Implementation Plan containing the strategic actions required to underpin the London plan strategy. *This should include the projects where funding is required particularly for housing and strategic infrastructure and set out how the Mayor will fund them as there is no capital investment programme or emphasis on the single conversations with the homes and communities agency. This does not tackle*

the considerable problems of engaging infrastructure providers to ensure that there is provision for growth. These should be based on the growth areas in the London Plan and other large strategic projects. We would welcome the opportunity to work with the Mayor on preparing this guidance so that it links with local requirements. We question whether the plan is sound as this is being published separately as this is essential for consideration as part of the consultation on the London Plan as set out in PPS12. On a practical level we can not be clear how we will work well together or how we will work out priorities without all of the essential information.

The proposal to prioritise planning obligations to address affordable housing, public transport projects especially Crossrail, tackling climate change, learning and skills, health facilities, waste and childcare facilities causes concern. There is no consideration of the capacity of development to fund the physical and social infrastructure and how provision will be made if this is not funded through planning obligations. *The priorities for planning obligations should be made by boroughs based on their priorities.* Southwark has a detailed SPD that sets out our strategy for development with a tariff for development. Where these exist they should take priority over the London requirements. *Policy 8.2 could provide more clarity on how the Mayor considers that strategic and local priorities should be worked through to provide clear guidance on planning obligations that meet the tests of soundness such as being fair and reasonable in the amounts requested.*

Annex 1

Table A1.1 ref 18 *please can you add on Borough to London Bridge and Bankside opportunity area to call this Bankside, Borough and London Bridge.* This is in line with feedback from consultation locally and is confusing if there are different names in Southwark and London documents.

Table A1.1 ref 34 and table A2.1 ref 170 and A2.2 ref *please can you call Canada Water without Surrey Quays.* This is in line with feedback from consultation locally and is confusing if there are different names in Southwark and London documents.

Annex 2

Table A2.1 ref 206 Borough High Street should be marked for regeneration.

Annex 3

Table A3.1 ref 4 *can Bermondsey south east be called Bermondsey.* This is in line with feedback from consultation locally and is confusing if there are different names in Southwark and London documents.

Table A3.1 ref 50 *can Surrey Canal/Area (part) be called old Kent road.* This is in line with feedback from consultation locally and is confusing if there are different names in Southwark and London documents.

Annex 4

Clarity is needed on whether the breakdown titles for conventional supply etc are real targets or whether they are background information on the capacity that the Mayor considers boroughs could achieve.

Draft London Housing Supplementary Planning Guidance 2009

The SPG defines private garden land as the enclosed area within a dwelling curtilage from which the public is excluded. It points out that the loss of private gardens has highlighted the need for more clarity on implementing the London Plan policies. We welcome further clarity on this issue as it is one that affects Southwark, particularly in the south of the borough. The SPG sets out a number of London Plan policies which in appropriate circumstances seek specific protection of gardens. This includes cross referencing policies on increasing housing supply with policies on urban design, density and the environment. We welcome this approach that gardens can also contribute to the area's character and local distinctiveness and needs protection in some cases.

The SPG also sets out that gardens can enhance biodiversity including protecting trees, reducing flood risk and addressing the effects of climate change. The SPG states that boroughs should strike an appropriate balance between these needs and those of increasing housing supply. It points out that in most cases the wider objectives including biodiversity and preserving character of areas, outweighs the small incremental additional to housing provision. We welcome this clarification.

The SPG explains the London Plan's approach to density. It sets out that one of the problems with implementing the policy is that weight is often only given to the density matrix and not to the qualitative concerns such as local context. We welcome this explanation and agree that it is often the case that the density matrix is seen a minimum expectation of density rather than as a guide. We agree with the explanation in paragraph 3.6 that coming to decisions on housing density means having to strike a balance between a complex range of factors. However, as we put forward in our comments on the draft replacement London Plan, we consider that the density matrix should take more consideration of character and not be so focused on PTAL.

We welcome section 3.32 of the SPG which explains the importance of social infrastructure when establishing density ranges.

The SPG clarifies what comprises overall housing provision. We support this clarification. We welcome paragraph 4.6 which sets out that local targets can be expressed as either percentages or as absolute numbers. We also welcome the clarification in this section on PPS3 and then need for targets to be based on robust evidence of need, capacity and deliverability. We welcome paragraph 4.19's explanation that in the current economic climate, assessments of economic viability will be very important. We currently use the Three Dragons Toolkit to assess viability. We welcome the

encouragement for boroughs to work with the Mayor, London Council's and the HCA and we are working closely at the moment to bring forward as much affordable housing as possible in the current difficult market.

Paragraph 4.20 sets out that until new housing targets are formally published in the replacement London Plan, we should roll forward the first ten years of the current target. We agree with this approach in regard to overall housing supply. However, with regard to affordable housing we think that we should set out a new target if required to reflect what is viable for the next 15 years. This is the approach we have taken forward in our core strategy which will be submitted to the Secretary of State in March 2010.

We welcome the approach in section 4.26 that the London-wide objective of 70% social and 30% intermediate is one of 3 factors to be taken into consideration when setting targets. However, we do not agree with the third bullet point setting out that the Housing Strategy sets out a 60%/40% split. As in our comments on the draft replacement London Plan, this is not a viable split in Southwark and does not reflect our housing need.

Working together on new planning frameworks

Although our core strategy is developing local policies that generally support the strategic approach of the new London plan. We are concerned that issues set out in our response and the final preparation of the London plan could make our new core strategy for Southwark non-conforming. This is a crucial time for our core strategy and three area action plans so we are keen to make sure that they all work together. In this respect, we hope to build on our productive discussions with Deputy Mayor Simon Milton about advancing these and also the regeneration of the Elephant and Castle opportunity area.

Yours sincerely

Cllr Paul Noblet
Portfolio Holder for Regeneration and Neighbourhoods