

Towards a Community- Led Plan for London

Policy directions and proposals



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How to use this document

The community-led proposals are set out topic by topic, reflecting the current structure of the London Plan, though with a more integrated approach.

The policy proposals are contained in coloured boxes and some of these policy proposals are structured as per the current London Plan — **Strategic**, meaning policy for the Mayor to operate across London, **Local Plans**, meaning for Boroughs to adopt, and **Planning Decisions** to guide the decisions of both Mayor and Boroughs on planning applications.

The key area that the current London Plan falls down on is Implementation. We conclude with a section on how the London Plan is to be delivered or implemented, including the key tools of lifetime neighbourhoods, social impact assessments and community assets.

Just Space

Just Space is a community-led network of voluntary and action groups influencing plan making and planning policy to ensure public debate on crucial issues of social justice and economic and environmental sustainability.

Operating mainly through mutual support among member-groups but also through sharing of information, research and resources, we are now active at neighbourhood, borough and London-wide levels. What brought us together was a need at the city-wide level to challenge the domination of the planning process by developers and public bodies, the latter themselves heavily influenced by property development interests.

To us, the planning system pays only lip service to the commitment to community participation: the gap between policy and practice is immense where democratic engagement is concerned.

In response, the Just Space network has, over the last nine years, brought together and nurtured a huge amount of experience and know-how from London's diverse community organisations.

A year ago Just Space and its member-groups began to prepare contributions for a completely new London Plan which was going to be needed and commissioned by the new Mayor. Three major conferences and many working group meetings have got us to the present stage. This document reclaims planning in London as a means to secure a just London for all. In the 16-year lifetime of the GLA citizens have only had the chance to comment on draft plans prepared in City Hall; now for the first time we can propose our own.



Just Planning for London Framework

Introduction

This publication stems from a sense that now there is a huge opportunity for London to overcome the disenchantment with the planning system — with its failure to deliver economic, social and environmental benefits fairly. A new Mayor, Sadiq Khan, is in place, brought in on a wave of discontent over the housing crisis, but also in celebration of the rich diversity of Londoners. And the knowledge and creativity resting with London’s community organisations can be directly channeled towards new policy proposals and implementation plans for ‘our London’.

London’s fabled triumph as a “global city” and wealth generator for the UK masks the production of poverty through rising costs of housing and transport relative to incomes; air quality has worsened to become a major health hazard; burdens are imposed on those least able to bear them and inequalities are widening.

Far from achieving sustainable development and meaningful participation, planning and development in London has become increasingly subordinated to real estate and financial interests, who now have overwhelming influence on how the plans for London emerge and on whether they are followed. Financial “viability” has become the major criterion in planning decisions, prioritising landowner and developer profits at the expense of social and environmental needs. Meanwhile, national government has weakened the controls over change of use, making it harder — often impossible — to protect our workspaces and our community facilities in the face of inflated housing land values. Development has become geared towards market-sector housing, housing which fewer and fewer Londoners can afford.

- 6 These visible trends in London reflect and reinforce national trends. In the context of economic stagnation and deep-rooted inequalities, in the face of the housing crisis, environmental challenges and, for many, a deepening sense of disenfranchisement, there is an argument that there is a compelling requirement for a break with the past. The immediate downturn and future uncertainty from the Brexit referendum result is a further imperative for radical re-thinking: a diversification of the London economy, a re-balancing with the rest of the UK, along with a necessary deepening of participation.

The proposals and demands set out in this document aim at claiming rights to the city by and for those who don't have them under present conditions, those whose rights have been taken away or are under attack. Some already have the right to the city, are running the city now, have it well in hand. This document is asserting the rights to the city for the people and communities of London.

London Planning as it Stands

The first chapter of the existing London Plan sets out the Mayor's commitment to ensure that all Londoners have equal life chances and a good quality of life through access to housing, employment, social and green infrastructure and other services. One of the objectives is to address deprivation, exclusion, discrimination and social inequality.

But for many, these phrases in chapter one have not translated into reality. Working class communities, Black, Asian and Minority Ethnic (BAME) groups, Gypsies and Travellers, LGBT communities, the young, the unemployed, many social tenants, many private tenants, those with a range of disabilities are all, in diverse ways, disadvantaged by London's current development trajectory. There is no differentiation to recognise the specific needs they have and no foundations that create solidarities, that encompass a range of identities.

London scores badly on most socio-economic indicators: in recent years it recorded the lowest growth in economic inclusion, the lowest levels of reported wellbeing and life satisfaction, the highest level of income inequality in the UK, higher rates of in-work poverty than the rest of the country, high levels of inequalities for BAME groups and the list goes on.

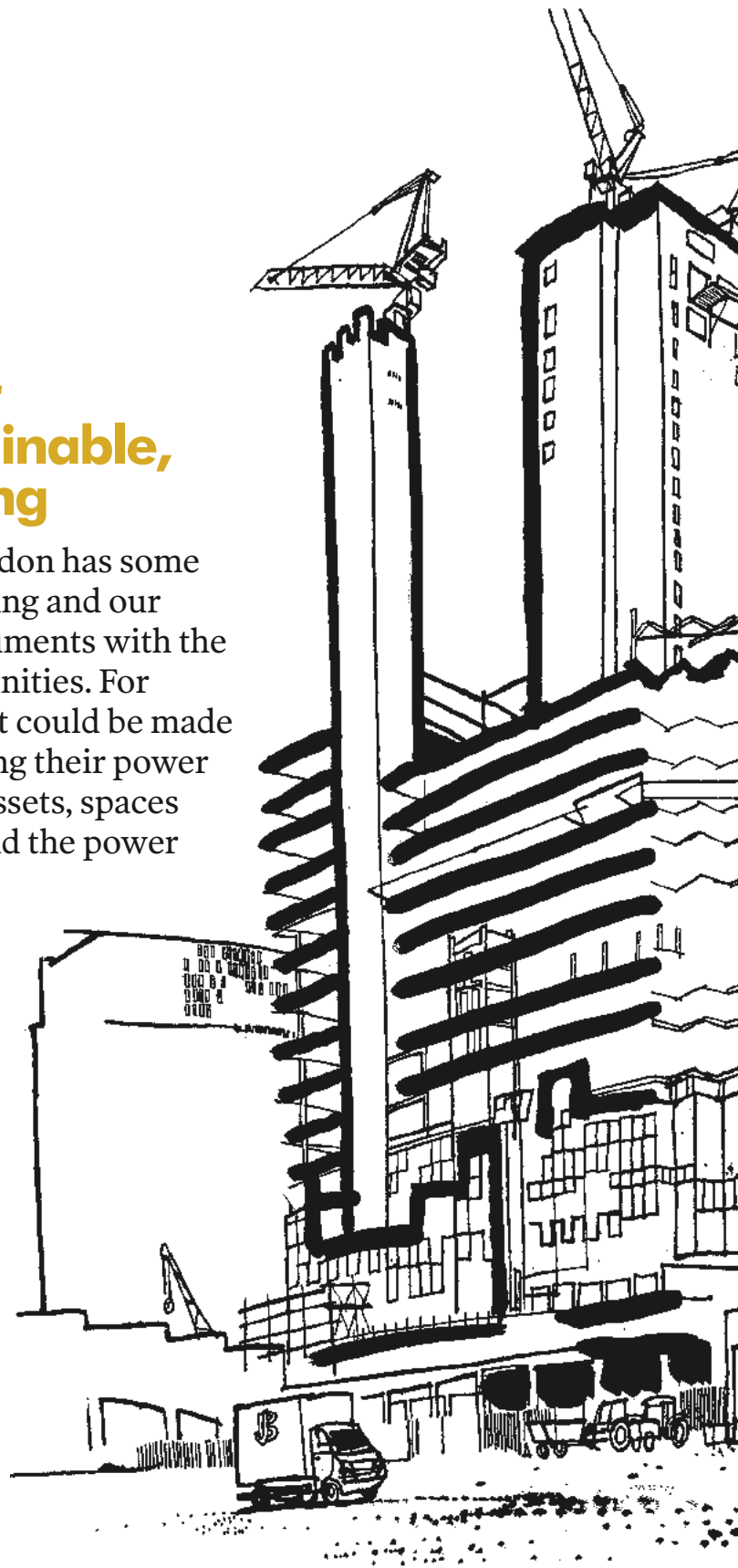
The chapters in this document offer critical accounts of how London's planning and development have worked in recent years. A key critique is the way in which the unquestioned pursuit of economic growth and its conventional measurement by Gross Domestic Product (GDP) and Gross Value Added (GVA) generates wealth in the financial system, in the land-owning and property sectors but disregards worsening environmental conditions like clean air, worsening public health caused by housing stress and the damaging effects of inequality more generally. Planning, which has historically alleviated many of these problems, no longer does so.

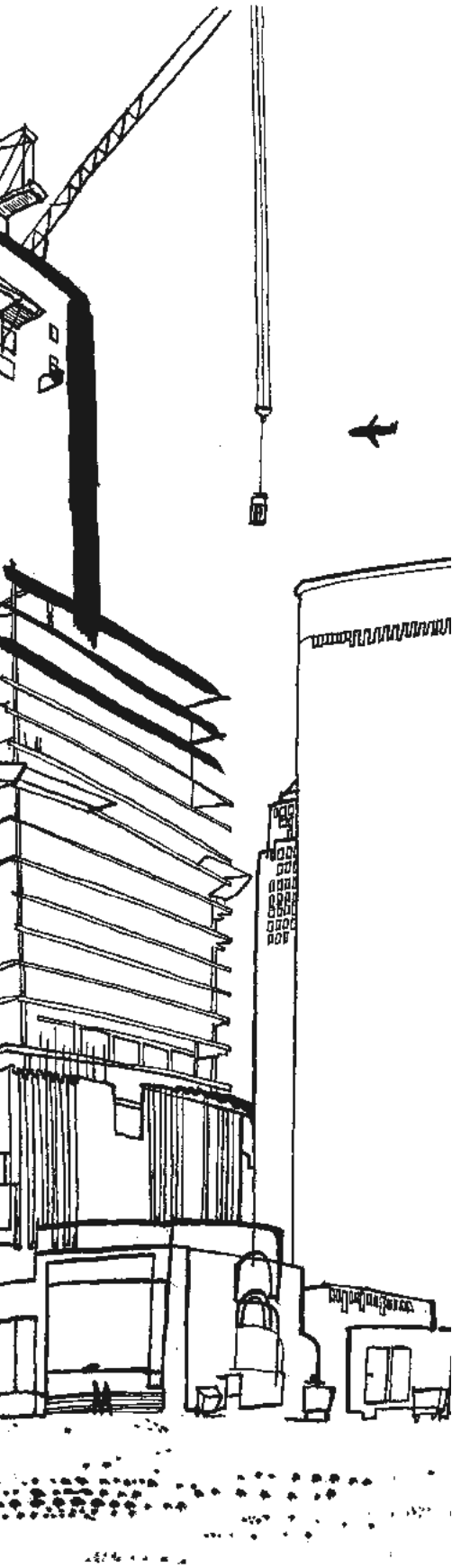
Part of the problem is the geography of London's development over recent years. Private corporations and major public bodies and employment growth have increasingly concentrated in the centre, with a growing labour supply travelling from ever further afield, overloading the transport network and requiring massive new infrastructure like Crossrail. At the same time, housing costs have forced low- and middle-income workers further out, while council estate "regeneration" displaces many more people. The traditional protection of work spaces has become ineffective, as employment land and buildings are sold off to house builders. The results of all this are to make it harder to find a job or services near home, increasing the need for costly travel and undermining the intrinsic benefits of local centres. This geography is a constant challenge and good planning is needed to get it right.



The Legal Framework for Londoners' Right to Sustainable, Inclusive and Fair Planning

The legal framework for planning in London has some useful instruments to support just planning and our proposals aim to reinvigorate such instruments with the involvement of London's diverse communities. For example, the promise of the Localism Act could be made relevant to all Londoners by strengthening their power to protect and acquire valued common assets, spaces and buildings and to set boundaries round the power of market forces in their localities.





1. The Aarhus Convention, ratified by the UK Government, establishes the right to access to information, public participation and access to justice in environmental matters including planning. It was referenced in the London Plan until 2014.

2. The Supreme Court in 2014 confirmed the ‘Sedley’ or ‘Gunning’ principles that consultation must, in order to be considered fair:

“take place when the proposal is still at a formative stage; that sufficient reasons for the proposal be put forward to allow for intelligent consideration and response; that adequate time be given for that consideration and response; and that responses be conscientiously taken into account”

and went a step further, extending the interpretation of fairness to include consultation on alternatives.

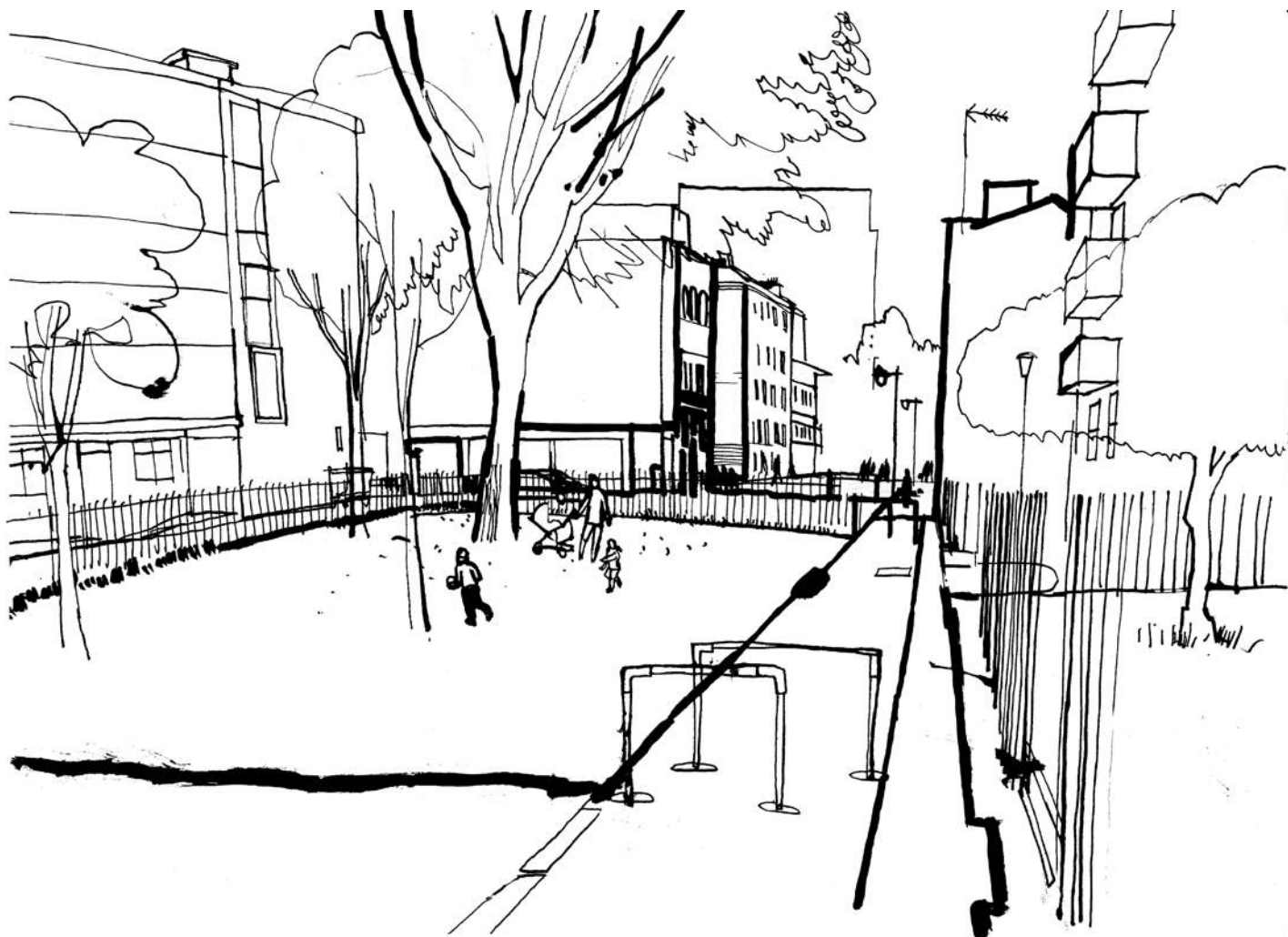
3. The Localism Act 2011 gives the community right to neighbourhood planning, the community right to bid (for assets of community value) and the community right to build.

4. The Equality Act 2010 sets out positive equality duties, including due regard to meeting the needs and encouraging the participation of those with protected characteristics.

5. Strategic Environmental Assessment requires plan makers to look at reasonable alternative options.

6. The Integrated Impact Assessment (IIA) addresses all of the Mayor’s legal duties to carry out comprehensive assessments of the London Plan. These include a Sustainability Appraisal (including a Strategic Environmental Assessment), Habitats Regulation Assessment, Health Impact Assessment and Equalities Impact Assessment.

7. The GLA Acts require, among other things, the achievement of sustainable development, the promotion of economic development and wealth creation, social development, and the improvement of the environment, addressing health inequality and promoting Londoners’ health, and equality of opportunity.



Key Principles and Themes Underpinning a Community-Led Plan for London

The principles of sustainable development and participation that underpin the legislative framework for just planning in London are central to the aspirations of many Londoners and their community organisations — including Just Space.

At the heart of Just Space is a demand for justice in the planning of London at the local and city-wide levels. For us, the word justice brings together the principles of fairness, recognition, inclusion and sustainability. It is also about the participation of all Londoners — including those under-represented or completely excluded — in the decisions that affect their lives.

We are calling for the principles of inclusion and fairness to underpin London planning. This means having the determination to recognise the different structural barriers that are preventing ‘equal life chances for all’. Additionally, it means recognising — and addressing — the impact of our development path on finite environmental resources, and the need to achieve sustainable development for London’s present and future generations. Such core principles run through the inter-related proposals for a community-led London Plan developed in the following chapters.

Themes

- **A fair, green, localised and diverse economy, that acknowledges the social and economic diversity of London as a strength and driver of the city's future well-being.**
- **Maintain and refurbish existing homes, with home energy efficiency an infrastructure priority.**
- **Make London a Blue Green City, placing value on the connection and interaction between London's blue and green assets.**
- **Support for well-functioning suburbs, providing many key amenities and job opportunities locally, thus reducing the need for costly and polluting travel.**
- **Delivery models for regeneration that prioritise social sustainability and social infrastructure, respecting and supporting Londoners' attachment to place and sense of belonging.**

Such proposals for a fair London come about through community-based, ground-level knowledge of London's socio-economic and environmental fabric. Ultimately, they rest on giving voice and agency to all Londoners.

The pages that follow provide details and strategies towards London becoming a vibrant and just city for all. Though presently arranged by themes, it should be clear that many of the problems Londoners face are cross-cutting, intersectional and require an integrated response.

Ultimately, fair and sustainable policy proposals and implementation will require the Mayor to commit to a continuous process of engagement with London's diverse communities. We are calling for a 'Social Compact' between Londoners and the Mayor — we are ready to co-produce our London!

Public Participation and Community Involvement in Planning



Community participation and the facilitation of the localism agenda is an essential strategic issue for the Mayor and the London Assembly. It is a London-wide issue not just about process, but is a policy and institutional issue on which the legitimacy of plans and decisions depends.

Participation of local communities in any planning activity is crucial for ensuring public support and the credibility of the democratic process. The right to participate is recognized by planning authorities and the courts. But in reality it is often undertaken too late and results in top-down consultation rather than a genuine effort to have local communities' input in the decision-making process.

Effective participation places value on local knowledge and experience in the formulation, design, and implementation of any proposal, plan or decision and its goal is to improve planning outcomes. For effective participation, communities should be involved from the very beginning, treated as equal co-producers of the plan, be provided with a full range of options for development, agree to the criteria by which choices are made and agree how community views are to be weighted in the decision, or if they are not to be adopted, given reasons why not.

Public Participation and The London Plan

Just Space has participated in all London Plan Examinations in Public (EIP) since 2007, for example in 2010 supporting 64 different representative residents' and public interest groups to present evidence at the EIP hearings. Some aspects of Just Space proposals have been incorporated into the London Plan as a result; however, Inspectors have not always been willing to admit community-based evidence at this stage. The EIP process can be seen as a quasi-judicial-style hearing on the soundness of the London Plan, but this is too limited a forum for effective participation. Moreover, while the Mayor has always consulted informally with big business groups, developers and institutional stakeholders giving them an early role in shaping the Mayor's strategic priorities and direction, there has been no attempt to include community groups at this early stage.

To remedy this unsatisfactory situation, Just Space proposes that the Mayor should:

- Enter into a Social Compact with Londoners agreeing to a programme of effective, meaningful and continuous engagement that enables all Londoners to work with the Mayor and officers in a spirit of cooperation and in co-production of the new London Plan and its related strategies.
- Develop a Mayor's Statement of Community Involvement, which will provide a formal framework for developing, implementing and reviewing effective and inclusive community participation.
- Provide resources to facilitate the informed involvement of communities and user groups to include training, learning and technical advice as well as administrative support, to enable more people to have influence over the development of their areas.

We also believe that deep changes in governance are needed in relation to London planning and decision making.

Some Key Principles of Effective Community Involvement

*Original source: David Farnsworth / Bristol Planning Network revised by London Tenants Federation.

- Early and continuous Involvement
- Inclusive invitations and out-reach
- Resourcing and support
- Regular provision of information and feedback
- Continuity, collaboration and co-production
- Presenting realistic and feasible options
- Proper assessment of current land uses and the full range of impacts
- Listening to and acting on
- Transparency and contesting confidentiality;
- Measuring, monitoring and evaluating the effectiveness of community involvement.*

Early and Continuing Involvement in the London Plan

The GLA should collaborate with London Boroughs to generate an open register of representative groups of residents, and community-based and public interest organisations who should form the core of a new participation agenda. There should be a level playing field of participation of all stakeholders in the London Plan — stakeholders should have equal access to informing the London Plan preparation process from its earliest stages. Appropriate technical support and resources should be provided to enable equal access to the London Plan preparation process from its earliest stages.

Metropolitan strategic planning presents its own challenges of scale and technical knowledge but there are examples of how to achieve effective public participation, including general public meetings for information; orchestrated city-wide early consultation on priorities to feed directly into the planning process; surveys to canvas public opinion; sector-based or topic-based open meetings; key stakeholder steering committee that includes representatives of different interests to enable ongoing debate of priorities throughout the process.



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Mayor's Statement of Community Involvement (SCI)

This would set a strategic expectation for standards of effective community involvement across London's planning system, including boroughs, neighbourhoods and development sites. In particular, it would apply to:

- The Mayor's Strategies, Supplementary Planning Guidance (SPG), Best Practice Guidance (BPG), research and toolkits.
- The Mayor's agencies fulfilling the statutory functions of the Mayor, such as TfL and the Mayor's Development Corporations, together with the various departments and units of the GLA, such as youth and education, health inequalities.
- The Planning Frameworks for Opportunity Areas and Regeneration/Intensification Areas.
- The Annual Monitoring Report (AMR).
- Major planning applications referred to the Mayor's Decisions Unit, including Section 106 negotiations.

The SCI should include: preparation of a database of consultees, and set out how the database will be developed and added to; a statement of engagement methods appropriate to the needs of different groups (such as Gypsies and Travellers, young people and local businesses) and different levels of involvement; the resources that will be available to ensure everyone who wishes to have the capacity to participate, such as administrative support and access to technical advice and training.

Monitoring and review of the SCI through the London Plan's monitoring mechanism of Key Performance Indicators (KPI) and Annual Monitoring Report (AMR) should include a voluntary and community sector perspective. The principles of early and effective participation should be applied not only to the preparation of the London Plan, but should continue throughout its implementation.

A Deputy Mayor would need to have the role of overseeing the SCI and co-ordinating the dialogue between the public and City Hall.

Proposed Policy: Public Participation

Social Compact

The Mayor agrees with Londoners to a programme of effective, meaningful and continuous engagement that enables Londoners to work with the Mayor and officers in a spirit of cooperation and in coproduction in the new London Plan, its evidence base and its related strategies.

Strategic

Through the Mayor's Statement of Community Involvement and the principles of effective involvement that it will apply, the Mayor will ensure that planning and development are underpinned by, and show due regard to, the participation of all Londoners at all stages of strategic and local planning and decision making, particularly at the formative stage.

Planning Decisions

Statements of Public Consultation submitted with development proposals should explain how the principles of effective involvement have engaged communities and relevant user groups, and how the results have been integrated into the proposed development. Relevant community and user groups should be enabled to submit their own statements regarding public consultation on development proposals.

Local Plan Preparation

Boroughs should develop detailed policies and proposals with the participation of communities and user groups, ensuring that the principles of effective involvement are adopted at the formative stages of the planning and development process, including drawing up masterplans, area planning frameworks, development briefs and mechanisms for implementation

This is the over-riding approach. Further elaboration around the needs of particular groups can be found under each theme.



An Economy for London. What is the Economy for?

The London Plan needs to support an economy that delivers human wellbeing and tackles growing inequalities, all within environmental limits. To do this it is necessary to question the way London's economy has been framed so far, what and who it is for, its role in the UK and beyond.

The economic predominance of banking and financial services in London (and the UK) has grown since the mid 1980s, along with a related set of legal, accounting and consulting services. This concentration has long been controversial because of its role in generating inequality and diverting investment and skills away from more productive activity. The financial crisis of 2007/8 and the enormous bail-out by government has imposed heavy costs on all UK people. It has also clearly become a fragile basis for the economic and social life of the city as the immediate aftermath of the Brexit referendum is demonstrating. Whatever the outcome, London badly needs to enable other sectors of its economy to become stronger: manufacturing, repair and re-use alongside services for London and wider markets, less dependent on global financial relations.

The policy focus over the last decades has been on growth of economic output through the agglomeration of a small number of economic sectors — mainly finance and business services including IT — in a small part of the city, particularly the Central Activity Zone (CAZ) and Canary Wharf. While the benefits of this type of growth can be measured in simple terms, the negative impacts it has had on other parts of the economy are being ignored and left out of the equation. The interplay of property market pressures and public policy are damaging the built environment and social fabric, delivering housing that most citizens can't afford, displacing communities and the workspace needed for a diverse economy,



20 increasing in-work poverty, encroaching on green and open spaces, worsening air quality and creating ‘centres’ devoid of character and life.

With an unprecedented population growth that places increasing pressures on housing, infrastructure and natural resources, there is a need to consider London’s economy beyond growth of measured output (GVA) and acknowledge that the reliance on the financial and real estate sectors is a risk to the city’s sustainability, with repercussions in other UK regions as well as London. These concerns need to be debated openly and the Mayor should involve a broader constituency of people who make a contribution to the economy: local businesses, social enterprises, public institutions, public service providers, civil society all need to have a say.

It is essential to broaden the scope of **plan-making**, in which the strategic vision tends to have the same narrow focus on the growth of the sectors with the greatest GVA. For example, the planning of the City Fringe has so strongly prioritized City functions that some neighbourhoods are now unrecognizable. In planning decisions, there is a clear bias against the existing local economy in favour of incoming global businesses.

It is also essential to make plan-making and planning decisions more accountable to everyone. Accountability is lacking, for example in the viability figures that cannot be seen by the public and the disregard of activities squeezed out. Local businesses, social enterprises, voluntary and community sector and public service providers should be involved in these processes, in line with the policies in the **Public Participation and Community Involvement in Planning** chapter. Monitoring London’s economic development should be more transparent, and a new

range of indicators and measurements are proposed in the **Implementation** chapter.

To ensure that policies and decisions reflect the reality for people on the ground, the London Plan should now consider the diverse local economies across the city as a strategic part of the economy of London, and carry out evidence-gathering. The monitoring of economic development should be more transparent and fine-grained and a new range of indicators is proposed in the **Implementation** chapter.

A new and bold vision is needed to rethink London's economy and enhance its multiple strengths, ensure it benefits all those who live and work in the city and provide the means for future generations to thrive.

The following three strategies would contribute to achieving a fair, green, localised and diverse economy:



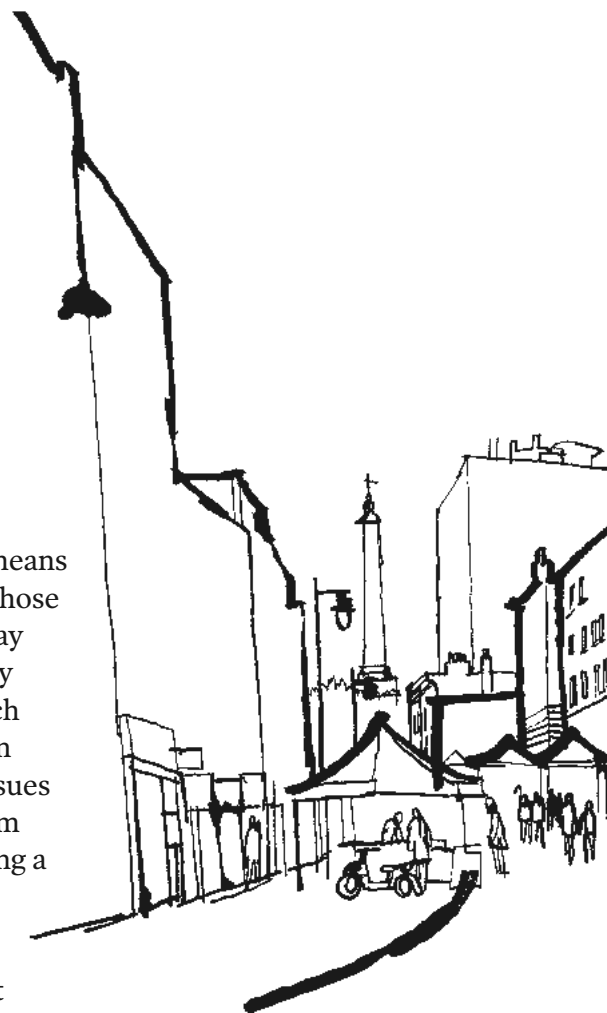
1. A Fair City

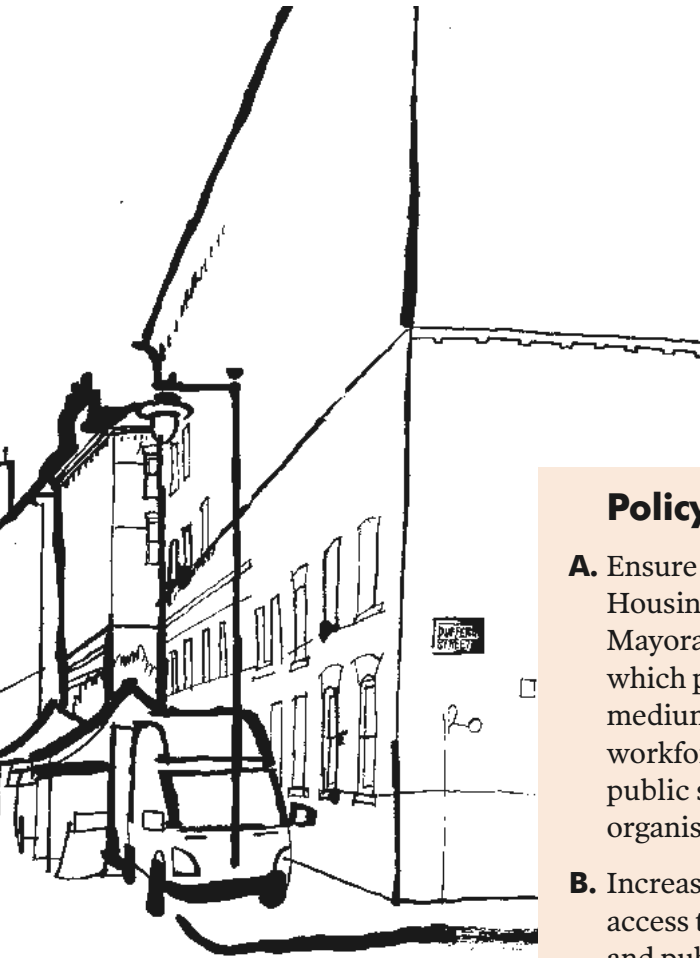
London's economy should first and foremost be fair, providing the means for all Londoners to benefit fully from the city's success, especially those who are low paid and unpaid. The disconnect between the day-to-day economy and the affluence generated through financial and property sectors has generated a growing inequality and is the subject of much debate and research. For example, the London Fairness Commission emphasised the need for leadership from the Mayor on a range of issues such as reducing the cost of living, setting a higher London Minimum Wage, ensuring better opportunities for young people and developing a 'London Fairness Index'.

Research shows that London fares badly on most socio-economic indicators. For example, despite increases in prosperity over the last decade, in-work poverty has increased by 70% and, after allowing for housing costs, Londoners' incomes have had the slowest recovery from the 2008 crisis of any UK region. Low pay disproportionately affects women, young people, people with disabilities, black and minority ethnic groups, households in rented accommodation and those working in the hospitality, food and retail sectors. Of special concern is the future of paid and unpaid caring activities, which predominantly employ women; these need to be transformed from a patchwork of low-pay insecure jobs to a more highly skilled, respected and non-exploitative sector.

The Mayor and London Boroughs could look at examples of good practice from other UK regions which seek to address these issues, such as:

- The West Yorkshire Combined Authority Area Low Pay Charter which sets out policies in the following areas: living wage, pensions, skills and progression, employee benefits, health and wellbeing, Social Value, zero-hour contracts and 'good growth'.
- The Salford Social Value Pledge and Toolkit which seek to embed the Social Value Act in service delivery, commissioning and procurement, measuring success in terms of happiness, wellbeing, health, inclusion, empowerment, poverty reduction and environment.





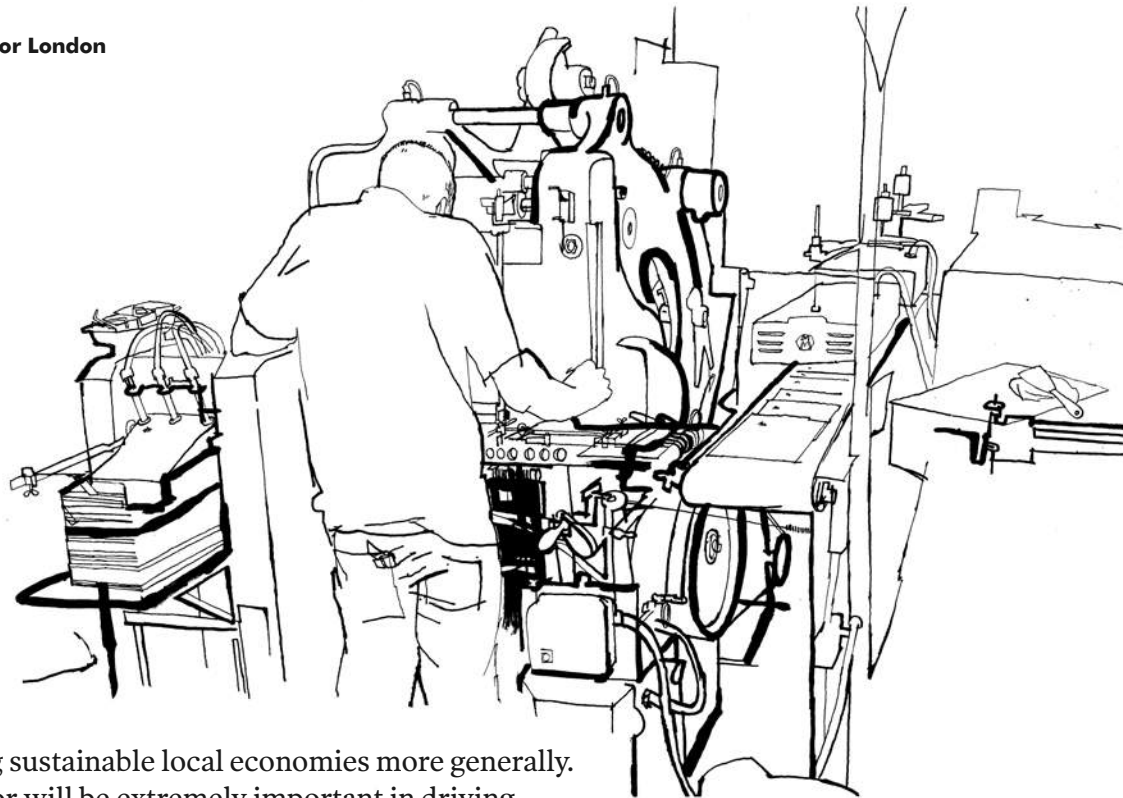
Policy Proposals

- A.** Ensure that in major new developments in Opportunity Areas, Housing Zones, Intensification Areas, Regeneration Areas and Mayoral Development Corporations, secure jobs are created which pay at least the London Living Wage and provide a medium and long term plan for local employment, training and workforce development in partnership with Local Authorities, public service providers, voluntary and community organisations, higher education institutions and colleges
- B.** Increase the productivity of low pay occupations through access to affordable workspace, business support, training and public sector contracts. Developers should give priority to local businesses in tendering for contracts and work with potential tenants to produce a long term plan which helps local enterprises to be part of supply-chains for goods and services.
- C.** Protect existing premises used for low paid, unpaid and voluntary care and secure the provision of new facilities as part of new developments, with investment for organisations delivering all types of care, advice, training and skills.
- D.** Explore innovative models of community-led economic development which enable low and middle income communities to participate in local business ownership and investment, community finance and local exchange trading schemes (local currencies).

2. A Green and Localised Economy

To ensure that economic development works within environmental limits the London Plan needs to mainstream the principles of a green, circular and localised economy which would ensure better use of resources and a more dispersed pattern of activities, building on London's thriving local economies.

It will be essential to ensure that all enterprises in London have the means to become greener and to take part in a circular economy, minimising their waste and energy consumption and promoting reusing, repairing and recycling. Energy production at the ultra-local level could be an integral part of a more secure and resilient energy system and



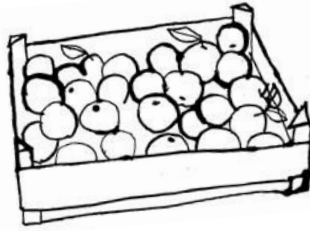
instrumental in developing sustainable local economies more generally. The role of the public sector will be extremely important in driving innovation, research and development.

The GLA and London's public institutions should plan for and invest in the future of activities with low environmental impact, especially aiming to increase the productivity of low wage sectors.

Car travel, long commutes and long-distance deliveries can be reduced by ensuring employment and amenities are available and accessible across London's neighbourhoods and that businesses are interconnected. A more localised economy will move away from the current over-reliance on the Central Activities Zone and the town centre hierarchy, towards a more poly-centric distribution of local centres that often include high streets, shopping parades and street markets. These provide local jobs, low cost workspace and a variety of products and services, as well as essential social infrastructure.

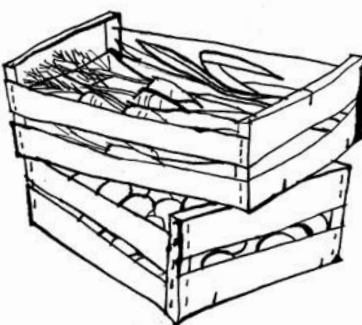
More than two thirds of London's jobs are located outside the CAZ and London's 600 high streets represent some of the most important spaces in the city for the local economy; they have proved to be resilient over the centuries, adapting as circumstances change. Trading in street markets and covered markets, the oldest form of retail trading is increasingly under threat. Many of our markets are especially valuable to low-income communities and the low cost of pitches and stalls support entrepreneurship and family businesses. A rich mix of economic activity contributes to increased wellbeing, security and support especially for those who are most disadvantaged. Local jobs are particularly important for those with child-care or other caring responsibilities especially when part-time work is scarce.

However, the historic diffusion of business spaces across London in most neighbourhoods and districts is disappearing due to the scale, density and nature of residential and current forms of "mixed-use" development. The pressure on local authorities to sell off public assets including libraries, markets, community centres and leisure centres has accelerated the loss of social infrastructure, employment and affordable workspace of all types.



Policy Proposals

- A.** Encourage changes in consumption and production to achieve a circular economy, setting targets to reduce all types of waste, supporting reuse, repairing and recycling activities (for example through networks connecting surplus food, building materials, furniture, IT equipment etc with people in need). Ensure support and funding schemes are easily accessible to SMES, social enterprises and local community groups for education and training programmes (for example, waste management, resource-efficiency, accessing local supply chains).
- B.** Raise the environmental performance of the building stock (see **Housing** chapter) and re-configure settlement and urban patterns to reduce the need for travel (see **Transport** chapter) and the reliance on non-renewable energy sources (see **Environment** chapter).
- C.** Protect London's poly-centric economy by supporting development which does not compromise the economy and diversity of local high streets, town centres of all scales, local shopping parades, markets and shopping centres, particularly outside the CAZ.
- D.** Support development which fosters Lifetime Neighbourhood principles, as defined in the **Implementation** chapter, with a focus on creating well-paid and secure local jobs and access to local amenities and services affordable to everyone.
- E.** Planning applications for major new development will take into account the need for new workspace to accommodate a mix of economic activities in all sectors, including community and voluntary organisations, social enterprises, education, play, religious, health and care facilities.
- F.** Recognise and protect street and covered markets as A) a source of healthy and cheap food and other goods B) a social benefit C) a source of independent business and local supply D) providing local employment E) an opportunity for start-up businesses. Local authorities should seek to retain control of management and rent-setting and must consult with traders and customers on future proposals. The London Plan should include a database of protected markets.



26 3. Diverse Economies

London's often ignored diverse industrial economy is returning to growth after many decades of decline and represents 11% of all jobs and 16% of employment outside the Central Activities Zone (CAZ), despite the loss of much of London's industrial land. Small and Medium Sized enterprises — the engines of entrepreneurialism and innovation — are dispersed across the city in industrial estates, high streets and residential areas in workshops, light industrial units, wharves, warehouses, studios and sheds. Industrial occupiers pay good rents and industrial premises make good investments.

The 'decline' of London manufacturing has been due in no small measure to enforced removal of businesses when industrial land is lost to housing.

A 2015 study commissioned by the GLA reveals that the loss has accelerated between 2010–2015, with a rate of release 2.7 times higher than that recommended by the GLA. Permitted Development has intensified the problem, with planning permission no longer required for the conversion to housing. Meanwhile, replacement workspace is often not delivered or is not designed to accommodate the kind of businesses that are being displaced.

There is a need to document and analyse London's diverse economies and clusters of interdependent activities, to understand the relationships between them and how productivity, wages and the success of supply chains can be increased. This would highlight, for example, the importance of nearby lift repair depots to the functioning of major buildings, of food preparation to restaurants, shops, and institutional caterers, of model-makers to design professions. The booming logistics and delivery industry now spans large enterprises through to private cars and bikes with travel distances needing to be minimised, yet depots are being pushed towards outer London and beyond, lengthening delivery trips.

The social and cultural diversity of London's enterprises is important. A significant proportion of start-up business owners are from ethnic minority backgrounds and in 2010 a report commissioned by Ethnic Minority Business Advocacy Network (EMBAN) estimated that ethnic minority businesses contribute £25–£32 billion to the UK economy annually. These businesses often provide important spaces for social interaction, support networks and community cohesion and they play a vital role in giving communities and new arrivals local identity



and a sense of place. They foster a spirit of entrepreneurship and are significant local employers who help to address the disproportionate economic and social inequalities facing many ethnic and migrant groups.

However, in very many cases regeneration has resulted in the displacement of Ethnic and Migrant Businesses. The same businesses also face insecure tenures and a lack of support from local authorities, coupled with the usual pressures of business readiness, the upkeep of premises, language barriers and having to compete with chain stores.

Policy Proposals

- A.** Recognise and promote the diversity of London's economic activities and the contribution they make across all sectors and scales. Evidence, case studies and a collaborative approach should form part of the Economic Evidence Base, Economic Development Strategy, Town Centre, Retail and Employment Land Reviews.
- B.** Planning decisions should recognise and take account of existing local economies and require detailed evidence of the reality on the ground, including for example business audits, mapping supply chains and business connections, interviews with business owners, as well as assessments of local labour markets.

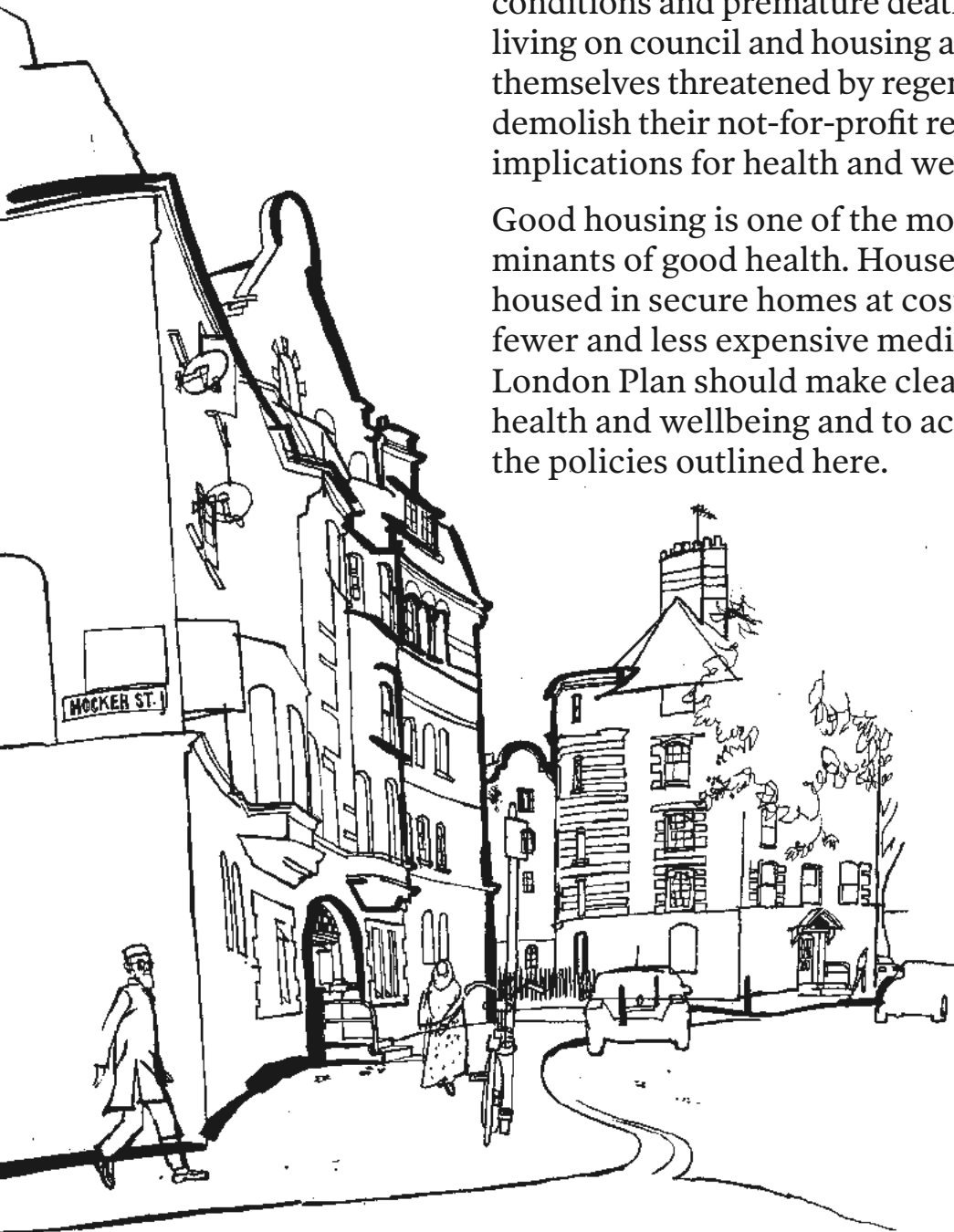
- C.** The London Plan should no longer set targets for managed release of industrial land. There should instead be a presumption against further loss unless a case can be made to the Mayor demonstrating genuine long-term vacancy on specific sites.
- D.** Address the cumulative loss of workspace by working to increase capacity suitable for a diverse range of economic activities, including but not limited to: workshops, studios, small retail units, industrial units, yards, sheds, warehouses and wharves.
- E.** Foster innovations in the design, finance and management of development schemes so industrial and residential uses can co-exist, for example when single storey commercial buildings are replaced with multi-storey residential and workspace buildings.
- F.** Plan for the long-term infrastructure needs of industry. The London Infrastructure Plan 2050, London Energy Plan, Transport Strategy and other related strategies will assess and address the infrastructure needs of businesses in all economic sectors.
- G.** Protect clusters of small and independent businesses and ethnic and migrant traders which have a unique and irreplaceable character and assist communities to be resilient in the face of rapid change, particularly in areas undergoing regeneration and growth
- H.** Support capacity building in London's diverse business communities (industrial businesses, Small and Medium Enterprises, Ethnic and Migrant Businesses, market traders) to encourage business-led solutions to redevelopment and change, such as in Opportunity Areas, regeneration areas and business-led neighbourhood forums.

Housing, Health and Wellbeing

It has become clear that London does not contain enough housing that people can afford to live in and that this is having serious social and economic consequences, including for the health of the city. Dark, cold, insecure, overcrowded, cramped and unaffordable housing is linked to worsening physical and mental health conditions and premature death. Meanwhile, Londoners living on council and housing association estates find themselves threatened by regeneration schemes which demolish their not-for-profit rented homes, with serious implications for health and wellbeing.

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Good housing is one of the most fundamental determinants of good health. Households that are adequately housed in secure homes at costs they can afford require fewer and less expensive medical interventions. The London Plan should make clear links between housing, health and wellbeing and to achieve this we propose the policies outlined here.



Caring for Existing Homes



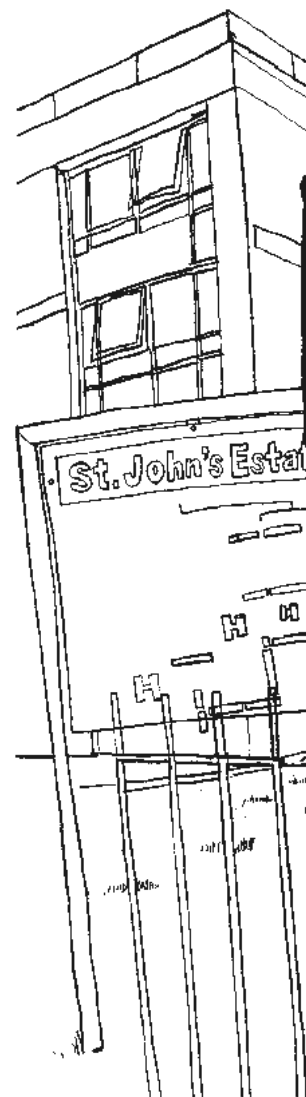
It is essential to maintain and refurbish existing homes, not knock them down. Given the material loss of social housing, it should be a high priority that existing social rented homes are protected and this requires changes to the current model of estate regeneration.

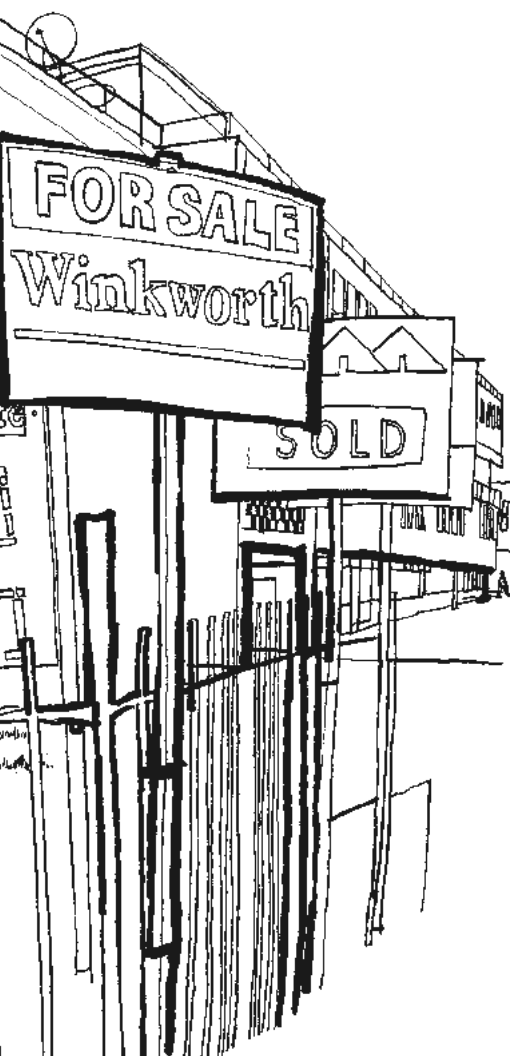
Of particular importance are high levels of fuel poverty; the UK has one of the least energy-efficient housing stocks in Western Europe*. The solution is for the Mayor to designate home energy efficiency as an infrastructure priority. Retrofitting on a large scale would provide jobs and consequent economic benefit, and reduce energy consumption and environmental degradation.

*21 million UK homes have the rating Band D, E, F and G. In England the average UK home has a rating of Band D. The 6.6 million most energy inefficient homes have a rating of Band E, F and G. The majority of these are privately rented or owned (Association for the Conservation of Energy, *The Cold Man of Europe* 2015).

Policy Proposals

- A.** The Mayor and the boroughs will support maintenance and enhancement of the condition and quality of London's existing homes to ensure that new homes delivered are additional to existing stock rather than replacements. This will include designating energy efficiency as an infrastructure priority and using infrastructure funds to deliver stable, long-term investment to implement a locally-led programme for the upgrade of all existing London homes to B and C on an Energy Performance Certificate.
- B.** Boroughs should develop policies and proposals to reduce environmental impact, particularly lifetime and embodied carbon emissions, through the sustainable retrofitting of existing homes. In particular they should:
 - Prioritise adaptations to the homes of older residents.
 - Prioritise fuel-poor and vulnerable households .
 - Identify synergies between new developments and existing homes.
 - Though retrofitting of energy and water efficiency measures, decentralised energy and renewable energy options.

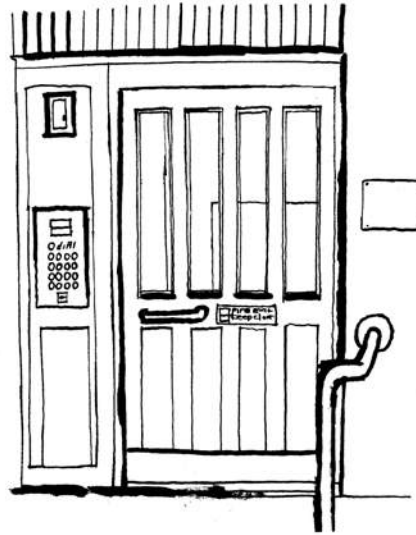




- Make the link with public health programmes (for example, a boiler on prescription programme for those most vulnerable).
- Include minimum energy efficiency standards as a condition of licensing in the private rented sector.
- Encourage energy rights initiatives and community based energy projects.

- C.** Refurbishment options for existing council or housing association estates should include proposals to retain, enhance or deliver green and garden spaces, play and youth provision and community space and buildings.
- D.** Any replacement of not-for-profit rented home should be carried out on the basis of like for like in terms of tenure, rental cost and size.
- E.** Proposed regeneration of council or housing association estates should require comprehensive, independent analysis of social, environmental (including embodied carbon) and economic benefits of all proposed options and a ballot of tenants and leaseholders. Options should always include refurbishment.
- F.** Social, health and wellbeing indicators of existing residents should be incorporated into decision-making around regeneration schemes. These should be routinely monitored post-regeneration, with tracking of those displaced. A model for this should be prepared or commissioned by the Mayor in collaboration with community, tenant and voluntary sector groups. To inform this, the Mayor should commission analysis of the impact of housing displacement on health and wellbeing.
- G.** The Mayor should commission analysis and monitoring of the relationship between income, poor housing, health and wellbeing.
- H.** There should be ongoing monitoring of poor health and wellbeing as a result of overcrowding.

32 **Quality of New Homes**



New homes should be delivered with full consideration of longevity and durability of construction. The health of residents should guide design, avoiding the negative impact of dark homes and outside spaces and providing sufficient communal areas. The GLA has permitted developments far above levels agreed in the density matrix, yet there has been no analysis of the effects on health and wellbeing of people living in them or affected by them.

The emphasis placed on access to public transport within the density matrix brings with it the danger that we lose sight of the higher goal whereby people can satisfy their daily needs of work, shopping and recreation within walking distance and only have to rely on mechanised transport for more occasional needs — the ‘walkable city’ concept.

Density levels should be sensitive to the needs of all communities and all communities, including all household sizes and incomes, must have the facility to live in all parts of London.

Policy Proposals

- A.** New homes should be built to last a minimum of 125 years. The design and construction should ensure adaptability so that retrofitting and rearrangement of internal spaces can occur.
- B.** New homes should be energy positive.
- C.** All homes should be built to lifetime homes standards.
- D.** Communal meeting spaces and green and play space with good natural light should be integral to the design of new housing blocks and estates.
- E.** A new more sophisticated density matrix that combines housing, social and community infrastructure should be developed. This will take into account household income, financial accessibility to transport, proximity of accessible (both in a physical and financial sense) sport and leisure, community, youth and safe play facilities, levels of overcrowding and preservation of local character.
- F.** The Mayor’s design team should review all major schemes from the point of view of good design and their advice should steer the GLA officers’ response.



Not-for-Profit Rented Homes

The misleading term ‘affordable housing’ should no longer be used. Apart from not-for-profit, social-rented housing, all other forms of what is described as ‘affordable’ housing, whether ‘affordable’ rent, shared ownership, or purchased with a mortgage, are actually unaffordable to the great majority of London’s residents.

The London Plan should set a separate target for not-for-profit (social) rented homes that genuinely reflects evidence of need. Local Authorities and other public bodies, particularly Transport for London, remain massive landowners and public land should be prioritised for not-for-profit rented homes.

Policy on Housing Types and Definitions

- A.** The London Plan should make clear to what extent, through reference to housing costs and incomes, the housing needs of households with less than median income levels will be addressed.
- B.** As most of the current London Plan ‘affordable housing’ products are not affordable to the majority of households in London, the term should be removed in any Mayoral or borough planning documents.
- C.** Assessments of the requirement for not-for-profit rented homes should be carried out and included in the London Plan.
- D.** Not-for-profit rented homes are defined as including community-led housing, which takes many forms, as well as social rented housing for which rents are ring fenced to cover the running costs of existing homes (management, maintenance and repairs).

Policy on Housing Targets

- A.** To meet existing need and to address London’s backlog of need over a five year period a target of 30,000 not-for-profit rented homes per annum would need to be set.
- B.** Targets should be set for three, four and five bedroom homes.
- C.** Targets should be set for reducing overcrowded homes.



- D.** Public land should be held for not-for-profit rented homes (this includes community forms of housing), with the land provided for free as a community asset transfer or long lease. This applies to all public bodies, including Local Authorities, NHS, Transport for London, Network Rail and Housing Zones.

Participation in London Wide Housing Policy

The Mayor has a duty to enable a wider range of Londoners to participate in making decisions on housing policy: engagement strategies need to recognise the tenants of 800,000 social rented homes in London, the growing numbers of private renters in the capital, connect with community-led housing schemes and be inclusive of groups such as Age UK and the London Gypsy and Traveller Unit that represent Londoners with particular housing needs.

Each group needs their own structure, focusing on their own specific issues, but as well as working in parallel it is important that there is an overarching Housing Forum for London that sits at a strategic level and is inclusive of all groups.

Policy Proposals

- A.** The Mayor will convene a Housing Forum (and a supporting community engagement sub-group of the Forum) that will ensure tenant engagement and input is at the heart of the housing strategy for London, its remit including policy, delivery and monitoring functions and with a full representation of council tenants, housing association tenants, community-led housing tenants, private renters and voluntary and community sector groups representing those with particular housing needs.
- B.** Given the Mayor's powers over housing in London, the Mayor should provide a grant funding programme to support the activity of tenants groups, renters groups and other community groups at local, Borough and London-wide levels. This could include the resourcing of a London Private Renters Forum, the existing London Tenants Federation and a London





wide Community-Led Housing Network to input into policy making at the GLA.

- C. The Mayor will encourage Boroughs to work closely with Tenants and Residents Associations and borough-wide Tenants Federations or tenants organisations to work in collaboration with Housing Associations around engagement of their tenants to recognise renters groups and to put in place consultative forums for private renters at Borough level.

Community-Led Housing Policy

Alternative forms of housing are distinguished by a community-led approach to housing production, ownership and/or management. They include housing co-operatives, community land trusts, community self build, co-housing, tenant management organisations and community-led housing associations (right to transfer). They help build strong and sustainable communities at a human scale, provide mutual support, have the potential to limit property speculation and for all these reasons they should be scaled up.

Local Authorities are required to maintain registers and allocate land for self build. The definition should be widened to include all community forms of housing and the GLA should maintain a register compiled from information supplied by the Boroughs that will show levels of interest and demand from across London.

Boroughs often lack expertise on community-led forms of housing. The Mayor will provide a knowledge bank so that Boroughs develop an understanding of the economics of alternative models of housing and their linkage with neighbourhood development. This will involve the use of information from umbrella organisations such as national co-housing and Community Land Trust networks.

Policy Proposals

- A. The Mayor will maintain a London wide register of available land for community-led forms of housing and ensure:
 - The register is fully accessible to community builders, neighbourhood forums and other community interests

- The register includes data on interest and demand for community-led housing, and how the sites on the register are allocated.

B. The Mayor will make available a package of support for community forms of housing that includes:

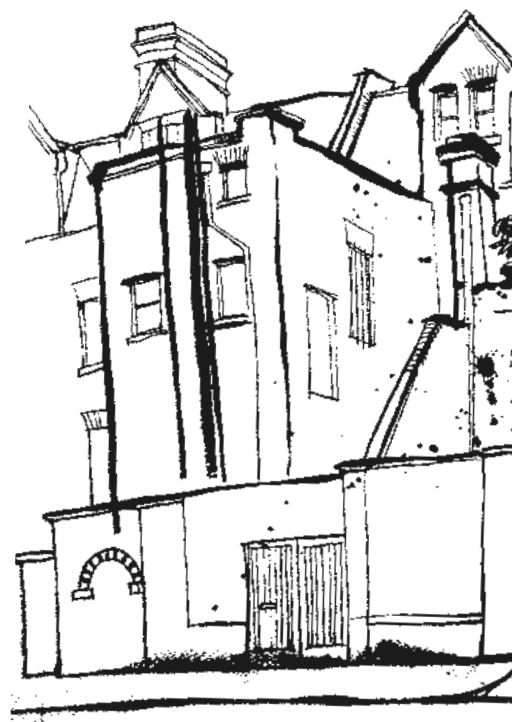
- Promote supportive financial institutions, such as Unity Trust, offering low cost loans.
- Local Authorities to identify land and do the appropriate checks (not placing the onus for this on the community groups).
- No requirement to tender to be the developer (EU regulations exemption).
- Community builders to be exempt from CIL and s106 they will provide community amenities/community benefit as a matter of course.
- GLA fund for a mentors programme, capacity building of community builders, expertise for feasibility or pre-feasibility studies, partnering with smaller housing associations.
- A knowledge bank to develop Borough understanding and retain the expertise of community-led housing groups.

Private Rented Sector

The private rented sector (PRS) has been growing rapidly in London and is predicted to grow as much as another 50% by 2025. Buying a home is not a realistic option for the vast majority of renters and policymakers now need to come to terms with the private rented sector as a permanent home for a significant proportion of the capital's residents, and make sure that it becomes "fit for purpose" now and in the future.

The British private rented sector is the least regulated in the rich world in terms of physical standards, health and safety, security from arbitrary eviction, protection from rent escalation and redress for aggrieved tenants.

According to the English Housing Survey, there are 2.7 million people in the private rented sector in London, more than 40% of whom are in poverty. Many private renters are in work but rising rents take up increasing proportions of wages leading to rising in-work poverty and



claims for Local Housing Allowance. 6–12 month tenancies are not fit for purpose for families, incurring costs of moving and stress.

Evictions are also alarmingly high. According to Shelter 22,376 private renting households in England were evicted in the last 12 months — almost double the number in the same period 5 years ago. Instability, population churn and displacement to Outer London Boroughs and beyond are likely to skew the social fabric of London away from the vibrant diversity that London celebrates, weaken local identification and make it harder for tenants to organise as tenants or local community members.

Practicable Measures

The Mayor needs to work out ways to raise standards on security of tenure and rent control. These methods should be designed urgently and implemented by encouragement and the example of pioneering ‘good’ landlords, pending statutory powers.

5 year tenancies are essential for security and stability, particularly for families, and would give all tenants a stronger bargaining position. This should be the default tenancy and assured shorthold tenancies should be phased out.

ACORN housing campaigners and Generation Rent propose setting a standard that permitted rent increases should be limited to inflation or the growth of median incomes (whichever is lower). The stabilisation of rent increases would discourage churn of tenants required to move due to unaffordability.

There are nearly 57,000 empty homes in London, a proportion of which could be brought into enforced private letting if the procedure for Empty Dwelling Management Orders were simplified and made self-financing for Local Authorities.

There has been a growth in London of large scale PRS development by institutional investors. The Mayor should consider this area of provision and stipulate planning guidance earlier rather than later. Larger institutional landlords could, in ideal conditions, be compatible with better security and conditions and be encouraged to provide family size homes and accommodation for people with disabilities and special needs. On the other hand, private rental housing can fall into the hands of hedge/private equity funds with the potential for evictions and aggressive rent increases for which preventative measures should be devised.



Policy Proposals

- A.** The Mayor to provide support for Borough-run social letting agencies and landlord licensing schemes which should encourage landlords to offer longer term tenancies for private tenants in homes that are both energy efficient and meet decent home standards.
- B.** The Mayor should develop rent stabilisation methods for regulating changes in rents at the end of assured shorthold tenancies.
- C.** The Mayor to simplify and improve the policy on Empty Dwelling Management Orders. This policy permits Boroughs to municipalise the management of empty properties for compulsory private rental.
- D.** The Mayor to commission research into large scale PRS development and produce detailed planning guidance.
- E.** The Mayor to support a Private Renters' Knowledge Bank which would develop Borough and voluntary sector understanding and retain the expertise of private renter advice and support groups

Policies Dependent on New Legal Powers

The existing powers of the Mayor are inadequate to deal with the housing crisis. The Mayor should argue for the special circumstances pertaining to London and seek a London Housing Bill to devolve powers from central Government for London-specific housing reform.

Case Studies

— *One approach to the setting of rents which the GLA should examine is the “London Living Rent” scheme currently being developed by Matt Padley and other researchers at Loughborough University’s Centre for Research in Social Policy. This is work in progress, linked with the Minimum Income standard and aiming at rent schemes relating to local variations and also to the varying circumstances of households.*

— *Shelter, Generation Rent and the Highbury Group recommend that maximum rents should be set at 30% of the average or median net income of households (across each Borough). The average London rent is £1,500 a month (Generation Rent, 2015). In 2013, the Ealing Borough*

average income was £19, 958. Rent set at 30% would be £496.50 a month. A further form of rent control is put forward by Generation Rent. This version is different as it proposes giving Landlords a choice on charging a regulated rent or charging a market rent and paying into a pot that funds building social housing. Generation Rent views this as a way to bring down rents and sustain rebuilding.

— Berlin city government has set rent increases to a maximum of 10% above median rent of an area; Sweden uses a points system that depends on housing size and quality and the features it may have or facilities it has nearby; there is also the flexible model — voluntary rent cap but anything plus is taxed at 50% — so it is an incentive for landlords and anything extra collected would be used to pay for social housing. A wide range of practices are to be found across the world from which London can and should learn.

Section 21 is the provision under which landlords can get rid of tenants without court proceeding and without even needing to state any reason for terminating the tenancy. It is a great injustice and a major inhibition for tenants who, if more secure, might wish to insist on repairs or other rights they have as tenants. It operates only after the ending of a tenancy so moves towards longer tenancies would reduce its impact pending legislative changes.

Existing landlord licensing schemes lack resources and weak enforcement means these may not work properly. A GLA-supported Borough scheme is required.

Case Study

— Bristol City Council recently approved a landlord charter submitted to them by ACORN housing campaigners. ACORN is the Association of Community Organisations for Reform Now and led the campaign for Ethical Lettings.

Policy Proposals

- A.** The Mayor to seek devolved powers to introduce city wide rent control, based on a range of rent control methods on which research and development should now begin.
- B.** Repeal of Section 21 'no-fault' eviction should be urgently sought by the Mayor in his negotiations with government over devolved powers.

- C.** The Mayor to seek powers so that landlord licensing can be made mandatory across London with a commitment to ethical lettings, regulation of informal housing, minimum energy efficiency and anti-discrimination standards.
- D.** The Mayor to devise measures to regulate institutional ownership of housing for private rent (build-to-rent or existing buildings).

Further information

The Renters Index, which is a tool for renters to compare London boroughs www.rentersrightslondon.org/renters-index/

Guides to what each London borough is doing for private renters www.rentersrightslondon.org/renting-london-borough/

A 'mythbuster' about legal rights www.rentersrightslondon.org/your-rights/

Back issues of the newsletter described above www.rentersrightslondon.org/rent-book/

A collection of solid policy evidence from other credible organisations, that renters can use in their campaigning www.rentersrightslondon.org/evidence/

ACORN www.acorncommunities.org.uk/what_we_do

Making London a Blue Green City



*The Blue Green City is common in cities of the USA. Newcastle has been selected as a demonstration city in the UK by the Blue Green Cities Research Team.

The Mayor will make London a **Blue Green City***, placing value on the connection and interaction between London's blue and green assets. This will be achieved by bringing together the Boroughs, the voluntary and community sector and the private sector, including water companies, to build public awareness of the importance of environmental targets such as on climate change, air pollution, protecting nature and sustainable use of water resources and provide community involvement in the planning and implementation of policies to ensure environmental targets are actually achieved by the dates required.

Planning policy must integrate and deliver on environmental, social and economic goals in line with the principle of sustainable development. This internationally agreed principle stresses that we "achieve our goals of living within environmental limits and a just society, and we will do it by means of a sustainable economy, good governance, and sound science". Yet, we are not "living within environmental limits". London is not on track to meet even existing targets to control climate-changing emissions and is blighted by illegal levels of air pollution.

Policies have not proved adequate to address the deficiency of green space, the erosion of habitat and the protection of existing green space from commercialisation and development. The Plan has not adequately addressed how the food we consume can be healthy, affordable and sustainable.

We have seen serious exploitation of London's waterways, with a proliferation of waterside offices, restaurants/bars and tall buildings, and the absence of sustainable solutions for London's water-related environmental problems.

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Climate Change Targets

The Mayor must strengthen the Climate Change targets after the Paris agreement December 2015 and the aspiration for 1.5 degree limit to the global average temperature rise. This requires changes to energy generation, energy efficiency, and targets for renewable energy in order to achieve:

Policy Proposals

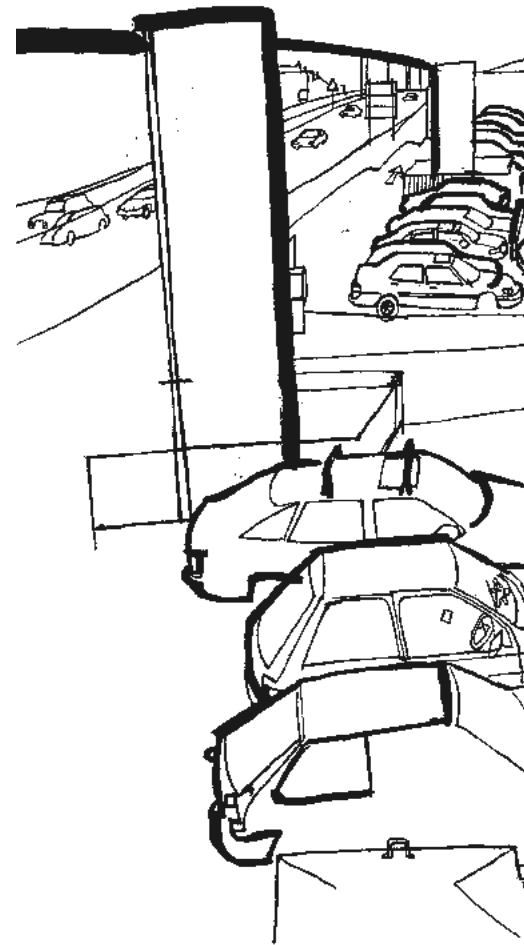
- A.** At least 80% cut in emissions by 2030 to have a strong chance to keep within the 2 degrees limit to global temperature rise based on 1990 levels.
- B.** Zero carbon new homes standard to be kept in London.
- C.** Solar panels on all new buildings and existing and new school buildings.
- D.** Increase decentralized renewables ten fold by 2025.
- E.** 100% renewables and 100% zero carbon by 2050.

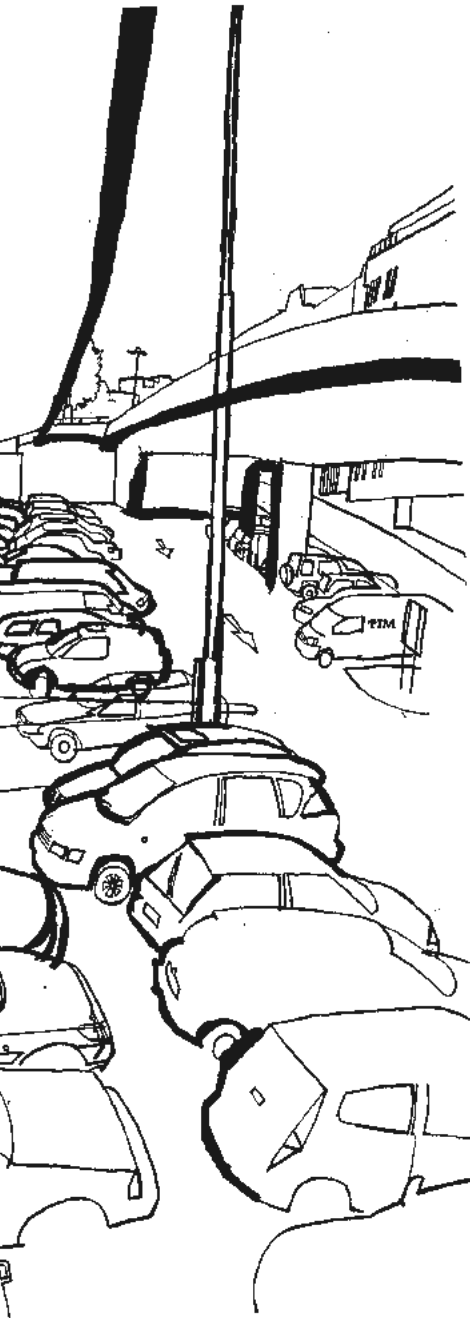
Energy Supply and Infrastructure

A shift is needed in London's energy infrastructure, to meet carbon emission targets, move away from fossil fuels and address fuel poverty.

Policy Proposals

- A.** To create a not-for-profit publicly owned energy supply company owned by London public bodies that is dedicated to cheaper, cleaner and more democratic energy.
 - This will open up space for discussion on energy strategy and turn energy supply into an issue on which the Mayor has some control, instead of being “beyond the Mayor’s control”. It can also contribute to addressing fuel poverty, but it is vital that other things are put in place too.
- B.** A major retrofitting programme for existing homes, with those in fuel poverty having their homes insulated first, and
- C.** The introduction of London wide minimum energy efficiency





standards in private rented homes, of Energy Performance Certificate C, by 2025.

- D.** All efforts should be made for pension fund investment from fossil fuels and reinvestment in renewables.

See the raft of proposals in the Housing section (the policy on caring for existing homes).

Air Quality

Nearly 10,000 Londoners die early every year due to air pollution (including from fine particles and the toxic gas Nitrogen Dioxide or NO₂ making it the biggest environmental cause of premature death). The capital suffers under illegal levels of NO₂ — EU legal limits set to protect health should have been met in 2010, or 2015 at the very latest, but are not due to be met till 2025 under current plans. Limits now have to be met in the shortest possible time, following a UK Supreme Court ruling, and all possible measures must now be taken so that our air is cleaned up much sooner. Road traffic is the biggest problem. The following policies are required:

Policy Proposals

- A.** New schools, hospitals or care homes should not be built in air pollution hotspots and schools near busy roads should be fitted with effective air filtration systems — as recommended by the House of Commons Environmental Audit Committee
- B.** London must be made to meet EU legal limits for NO₂ by 2020 at the latest — this is the date the rest of the UK will have to comply by, and Londoners should not have to suffer dangerous levels of air pollution for a further 5 years after the rest of the country.
- C.** London must set itself on a path to meet the World Health Organisation recommended level for PM₁₀ air pollutants. New limits for finer particles PM_{2.5} will be needed.
- D.** Reduce the need for people to have to travel, cut road traffic levels and ensure road vehicles are clean (which should mean phasing out diesel altogether), as set out in the **transport** section.



London's Water

The Blue Green City will ensure that water management plans provide the maximum green infrastructure benefits and that green infrastructure contributes to flood risk management. Key policies will include:

- Sustainable urban drainage
- Increase in river and canal transport for passengers and freight, including waste and construction materials

An important tool for achieving this cross-cutting policy approach is Integrated Water Resources Management for the Thames Basin and Estuary. IWRM is based on the understanding that water resources are an integral component of the ecosystem, a natural resource, and a social and economic good.

Sustainable Urban Drainage System (SuDS)

London is both a water-scarce area and an area which is subject to flooding. Extensive and continuing land cover by water-impermeable materials stresses existing drainage; this has been compounded by changes in rainfall, higher volumes falling in shorter time. Flooding in London has become a more regular occurrence. This leads to overflowing in the dual drainage system where high flows of surface drainage mixes with sewage flows and to consequent sewage discharge in to the River Thames. The construction of the Tideway Tunnel is recognised as a partial solution.

Covering of permeable surfaces and intensification of rainfall have contributed to the growing flooding problem. Densification of London's housing, by eroding existing open space, including brownfield space, is also contributing to the future problem of water scarcity. Again, rainfall intensification, short, intense showers, leads to run-off rather than retention. London lies in a water scarce area with similar rainfall volumes to parts of North Africa. Rainfall, here, is half of that falling in the driest areas of Wales.

SuDS offers a solution to this two edged problem — both sustainable drainage and water capture. There are many proven methods of ameliorating surface flooding: street tree planting to soak up rainwater, green roofs and walls, permeable pavement and road surfacing, green spaces that rainwater can sink into — rain gardens, swales to channel run-off and so on. Similarly, grey water could be harvested on large roof



areas and technology for harvesting, filtering and purification exists. Ideally this could be utilized in nearby housing, for toilet flushing, garden watering, car cleaning etc. Yet, these techniques are rarely used.

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Policy proposals

- A.** The Mayor will produce a suds Supplementary Planning Document to give guidance on practical measures and provide a knowledge bank for Borough planning officers, alongside programmes to achieve community involvement in their implementation.
- B.** The Mayor will make the case for suds to be a mandatory planning requirement for water companies and new development, within new devolved powers for London.
- C.** Planning decisions will use planning conditions to require developers to address sustainable drainage and rainwater harvesting, including a statement of where the rainwater will go and how water will be captured.

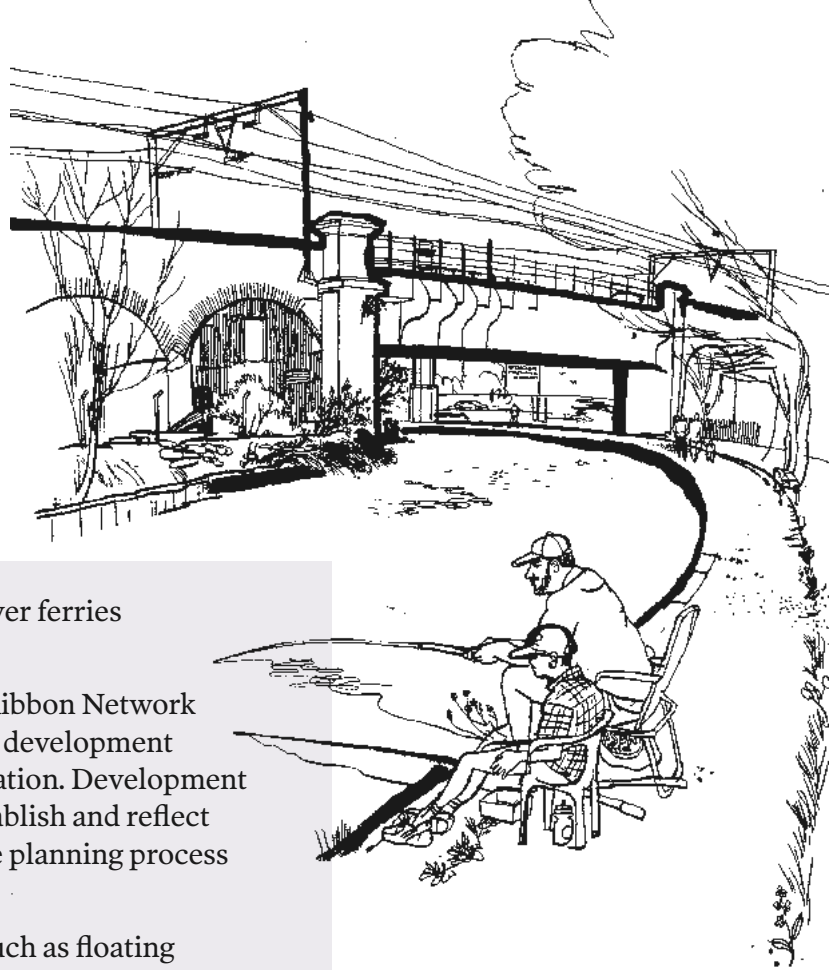
Blue Ribbon Network

London's Blue Ribbon Network is the Thames with its tributaries, the canal network and open water spaces such as docks, reservoirs, marshes and lakes.

It is an important resource for London — for transport and commerce, leisure and recreation, as well as biodiversity and as a principal component of London's public realm. The Blue Ribbon Network (BRN) policies in the London Plan reflect its strategic importance and must ensure its future protection and enhancement.

Policy Proposals

- A.** Through the BRN policies the Mayor will designate the Blue Ribbon Network as 'open space' giving the waterways the status, as well as protection, of a park.
- B.** Support the expansion and full development of London's water freight industry and wharves, not only on the Thames but for localised goods and services on the extensive canal network.



- C.** Increase passenger transport and cross river ferries on the Thames.
- D.** Require that the land alongside the Blue Ribbon Network should concentrate on activities, uses and development which specifically require a waterside location. Development in the vicinity of the waterside should establish and reflect a relationship with the waterways, and the planning process and design should start from the water.
- E.** Will not permit property development (such as floating villages and islands) and land-based uses (airport facilities, cycleways, soccer pitches, boardwalks etc) in the water space.

For assurance that “London’s waterways are in good hands”, the Blue Ribbon Network policies should be more closely managed through the London Waterways Commission, with direct involvement from local authorities and community interest stakeholders in a Waterways Steering Group.

Green Space and Infrastructure

Implement policies, proposals and minimum standards which will effectively protect and enhance the amenity, recreational and nature value of green space and remedy deficiencies in quantity, quality and accessibility.

Policy Proposals

- A.** Green space categorised as brownfield land (including communal green space on housing estates) needs to be protected, especially where there is a deficiency of green space. These should be designated in Local Plans and registered as assets of community value.
- B.** Green space intersects with water, food growing, biodiversity and makes a contribution to reducing air pollution. Deficiencies in all functions of green space must be addressed.
- C.** An implementation strategy to ensure every Londoner lives within 400 metres (10 minutes walk) of each type of green space, as described in the open space hierarchy. This is

particularly important in areas of deficiency and areas of high density living.

- D.** To counter the trend of passing public land to private ownership for public use, policy needs to refer to publically owned as well as publically accessible space.
- E.** Recognise that green space also includes common land (commons) held in trust for future generations.
- F.** Ensure sufficient resources for the maintenance of green spaces; encourage and support friends of parks groups that provide stewardship, not only of parks but a range of community facilities and infrastructure.

Biodiversity/Looking After Nature

Counter any decline in species and habitat, with strengthened policies that improve designated habitat areas; enhance, increase and create new habitats; and make adaptations to the built environment so that everyone has access to nature. To achieve this,

Policy Proposals

The Mayor will review his Biodiversity Strategy 2005 which is out of date and require:

- A.** A joined up approach to green corridors, so that they are also routes for nature.
- B.** Protection of the habitat that nature relies on (eg hedges, woods and wild meadows) and increase pollinated friendly planting including bee-keeping.
- C.** New build and existing buildings requiring change of use should have green / brown roofs for wildlife, water retention and insulation.
- D.** TfL land should be used for habitat, as previously with the Capital Bee Line.
- E.** Both protect and plant trees as an essential part of re-greening the city. They provide multiple benefits, such as drainage, capturing air pollutants and cooling and shading.

Community Food Growing and Food Production

This policy has reached a very detailed level, a reflection of the creativity of the Food Panel that met at City Hall on 4th February 2016 and the many meetings of a working group that included Community Food Growers Network, Sustain, Women's Environmental Network and the Federation of City Farms & Community Gardens.

A just food system allows everyone access to good food and food growing spaces. It is also about granting growers long tenure-ships, not just meanwhile spaces. Food is inter-connected with London's other needs, for instance the need for housing. The proposal is to have food growing space in all new housing developments. There is also an economic need to train people for new jobs and shorten the food mileage and food chain.

Policy Proposals

Strategic

- A.** Land will be available and protected to support community food growing and food production enterprises in order to meet the longer term goal of achieving a resilient food system and providing fresh, nutritious food for Londoners. This will contribute to enterprise, job-creation, training schemes, and London's efforts to address climate change.

There will be an increasing amount of sustainable and locally produced food consumed in and around London, through development of strategic partnerships between land owners, and urban, peri-urban and rural food growing projects.¹

Food growing and production and distribution are closely related to housing, health, the economy and the environment. It is essential to adopt an approach that is intersectional, participatory and inclusive for consumers, producers and distributors. Food production provides employment and training and contributes to sustainable economic development.

- B.** The amount of land in use for growing food will be increased in all urban communities in both inner and outer London, via:
- Integration of food growing space as a requirement in





all new housing developments with utilisation of green roof methods and potential for training and enterprise opportunities.

—Partnership between the GLA, Sustain, Local Authorities and established food production enterprises to identify food production sites on GLA and local authority-owned land for new entrants in the sector. This will use best practice models between local authorities and food growing enterprises.

—Career-long agricultural tenureships offered by local authorities and GLA for food production sites, to provide sufficient time to develop financial viability, benefits of biodiversity and community development, and soil replenishment through organic food production.

C. Local Authorities to foster a new generation of London food producers to work in a globally innovative urban food system by funding and supporting:

—Accredited training in organic food production.

—Paid work placements — apprenticeships and shorter-term placements (e.g. 6 months) that support (young) people to further develop skills in the work environment and provide sustainable employment opportunities.

—Associated “next steps” training — e.g. enterprise training, community development training.

D. The Mayor will promote and enhance the London Food Strategy. This will be implemented through the London Food Board, which will include representatives from London’s community food growing and sustainable food production sector.

Local Plans

A. GLA and borough councils to integrate food production into strategic assessments, funding streams and new developments in recognition of the various benefits of the sector and positive land use activity including; access to green space, mental health, enterprise generation, training, personal development, community well-being, access to fresh and healthy food, reduction of carbon footprint in food industry

- B.** Local Authorities must identify and safeguard land and Infrastructure for commercial food production and community gardening, including allotments, parks, orchards, schools and large commercial small scale glass houses. Local Authorities to make accessible a public register of available land e.g. park land, housing estates, brownfield sites or temporarily available sites and to administer a list of interested parties looking for land for production and marketing of food for London.²
- C.** Food growing and food production should be considered as a priority use for public land that is underused or vacant, particularly where not suitable for housing, on a long term basis under the Community Right to Reclaim Land, (Localism Act 2011), or where not possible then temporarily (meanwhile use).
- D.** Food production enterprises and community gardens to partner Councils in local forums to implement the ‘London Food Strategy’ (2006), ‘Cultivating the Capital’ (2010) and the ‘Milan Urban Food Policy Pact’ (2015).³
- E.** Agriculture land uses should be prioritised in Urban Fringe & Green Belt areas.⁴ Boroughs in the urban fringe of London to provide land through National Planning Policy Guidance for development of farm enterprises and farm-to-table housing communities.⁵
- F.** Local Authorities will support food producers by investment through Section 106 and the Community Infrastructure Levy, specifically to support food growing activities to take place in lands held or acquired by private bodies for ‘development’. Examples include the establishment of mini-allotments in housing estates, Community Asset Transfer, and rent reduction for initial set period.
- G.** GLA and Local Authorities to independently purchase at least 15% of their total supply of foodstuffs from small-scale, non-chemical producers located in and around London by 2020, 25% by 2030 and 30% by 2036 — to increase demand for short supply chain and build sustainable local economies.

REFERENCES:

1. Urban, peri-urban and rural food growing are characterised by the areas in the city, between the city and the countryside, and the countryside, respectively.
2. The city of Almere (Netherlands) is an example that demonstrates how urban agriculture can become a driver for regeneration. The Dutch University in Wageningen designed a virtual rural-urban city district called “Agromere”. In this virtual district, agriculture and urban living merge with each other taking into account the need of all parties involved. This project inspired the city of Almere to implement urban agriculture in its development plans. The draft structural vision “Almere 2.0” allocates land for 15000 new homes with urban agriculture as a main element of the green infrastructure.
3. “Since food policies are closely related to many other challenges and policies, such as poverty, health and social protection, hygiene and sanitation, land use planning, transport, energy, education, and disaster preparedness, it is essential to adopt an approach that is comprehensive, interdisciplinary and inter-institutional”. Taken from the Milan Urban Food Policy Pact (2015) which was signed up to by the Mayor in 2015 and its points are to be incorporated into the enhanced London Food Strategy.

4. Around 15 per cent of the capital's total area is agricultural land mostly in the Green Belt — less than 10% is actively farmed. (Cultivating the Capital, food growing and the planning system in London. January 2010 London Assembly)

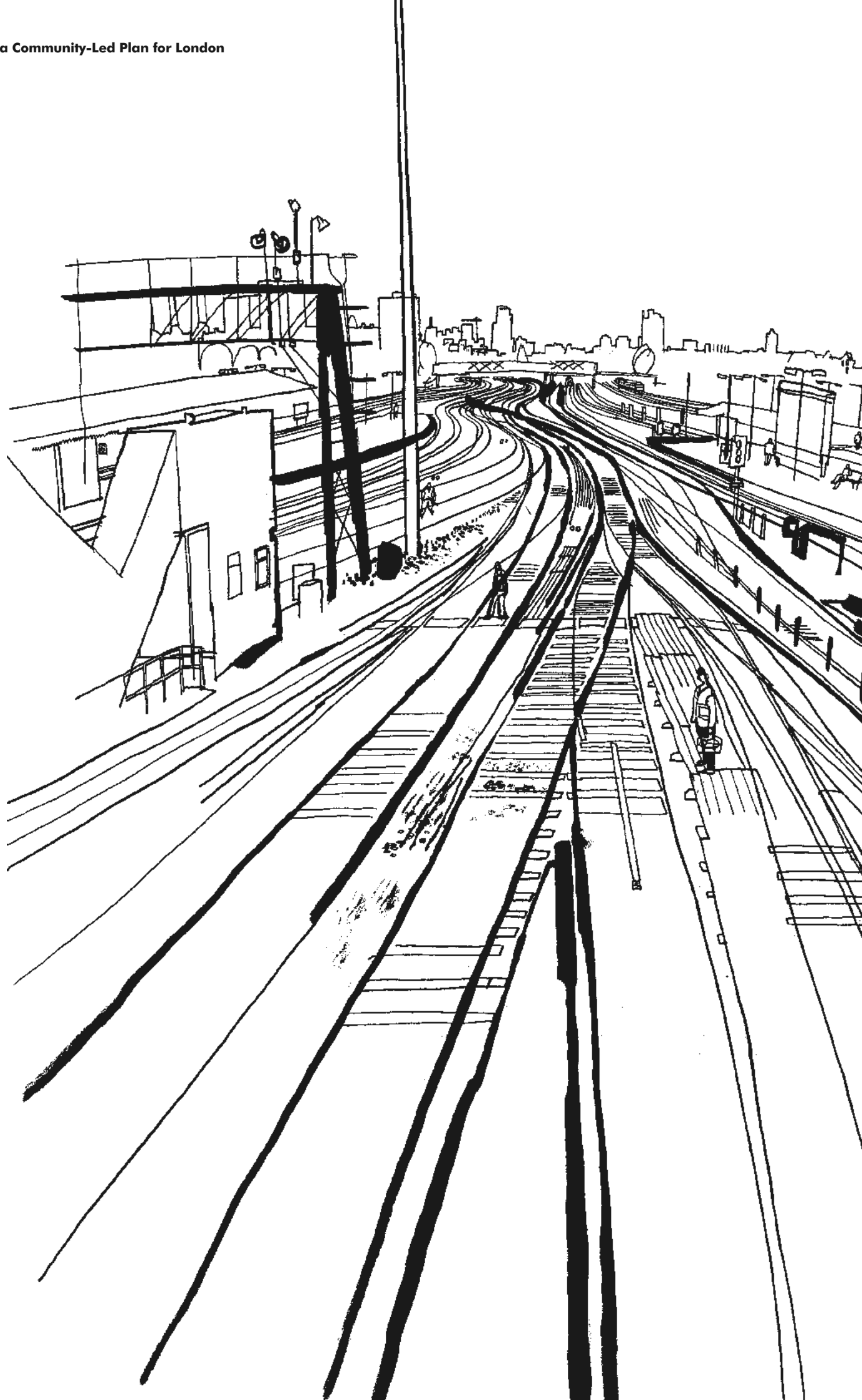
5. Agriculture is one of the few land uses permitted in the Green Belt through National Planning Policy Framework (para 89) but it is often given a lower priority.

See p31 and Appendix 6 — *Cultivating the Capital: food growing and the planning system in London, 2010, London Assembly.*

Planning Decisions

- A.** Development that increases or enhances land for food production for community use will be supported. Consideration should be given to growing space that will be suitable for communities needs, water requirements, grey-water recycling for irrigation, considering sunlight and access needs. Growing space could be part of the soft landscaping strategy or part of the green space provision, or use more innovative solutions such as roof gardens.
- B.** Support should be provided to planning applications related to food growing for vital infrastructure such as large scale glass houses, coldstores, containers, packing areas. Moreover planning should consider local distribution of produce, providing suitable office space and creating local distribution hubs. Local authority planning should draw upon the knowledge of successful food growing enterprises and be part of wider strategically zoned planning that includes Urban, Peri-urban and Rural food growing sites working together to provide food for the city.





Reducing the Need to Travel and Making the Transport System Work Better

London's population is predicted to increase considerably, but the London Plan has not been doing enough to reduce the need for people to travel and to maximise uptake of walking and cycling before bringing forward mega transport projects. It is even pursuing new roads and river crossings for vehicles, which would add to the problems of traffic congestion and pollution, without non-road alternatives being properly considered. Poor attention has been given to social and environmental factors, such as carbon emission targets, air quality, public transport fares and local employment.

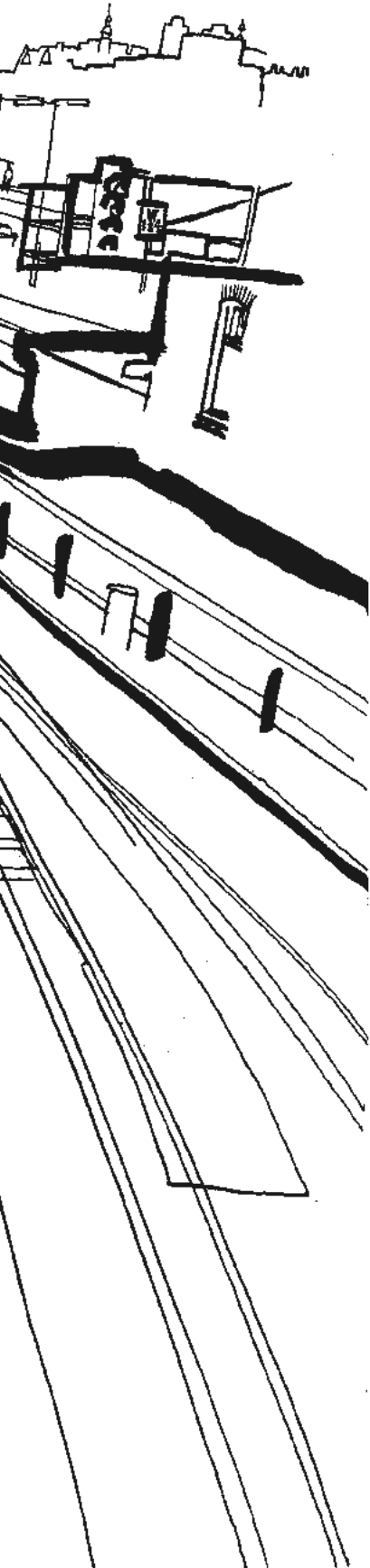
The London Plan and the Mayoral Transport Strategy need binding policies to bring essential changes in our transport habits.

Transport Objective A

Reduce Need to Travel by lifetime suburbs, providing key amenities and job opportunities locally and Plan and Make the Transport System Work Better with smaller scale changes balanced throughout London and greater public participation in transport planning.

Outer London needs lifetime suburbs — mixed communities of jobs and homes with everyday facilities & services — to scale up lifetime neighbourhoods going beyond the small planning unit of the neighbourhood. (See Case Study on Transit Orientated Developments). There needs to be a real mixed development strategy for Outer London. This would reduce the need for travel, the length of travel, and overdependence on the centre of London (CAZ Central Activities Zone) by a greater share of economic opportunity, jobs and homes. Note that industrial and transport land needs to be protected to ensure the proper functioning of London including its local/real economy.

Planning London's transport system inevitably identifies a catalogue of generic programmes and specific projects. These should be designed to make the system work better. For example, by promoting the exploitation of counter direction radial route capacity; the creation of interchanges to enable a wider range of destinations; and recognising air quality as a fundamental determinant of policy and practice. Any/all



54 proposals should be ‘future proof’ by ensuring their passive potential for further adaptability and extension/expansion/integration. All project options should be open to debate and their impact assessments available for scrutiny to ensure user consideration and suitability for local communities.

Local Implementation Plans (borough transport plans) lack weight and cross-boundary projects. A more sub-regional approach to the planning of transport is required. This should be in the public arena by harnessing existing sub-regional partnerships and TfL’s sub-regional strategies which presently avoid public examination.

Transport Policy A1. Lifetime Suburbs

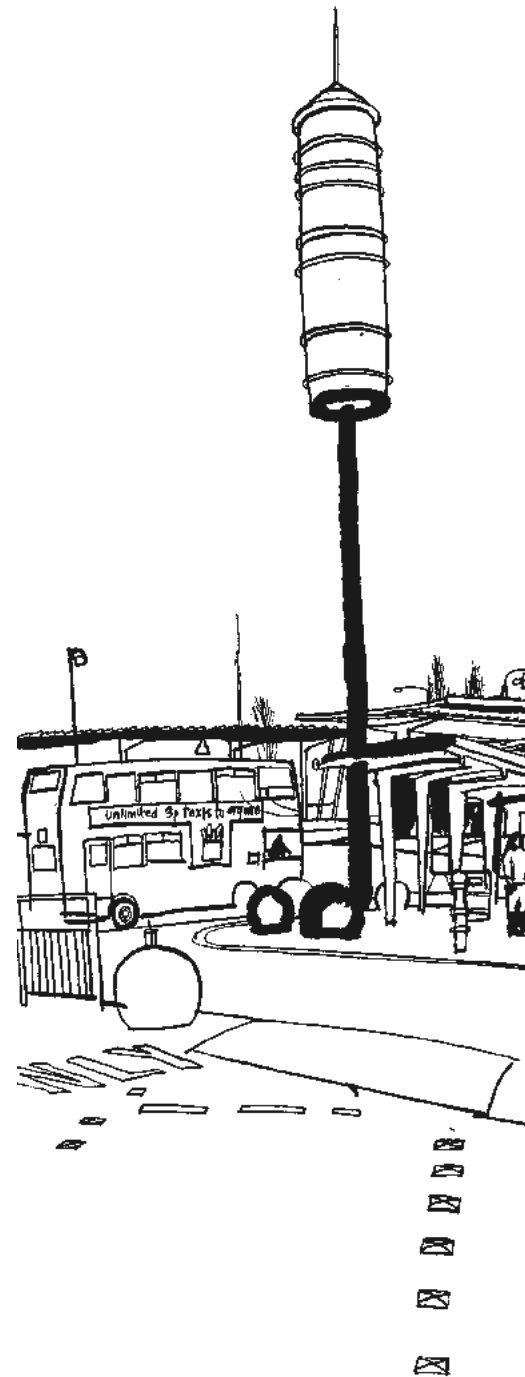
Introduce lifetime suburbs in Outer London, scaling up lifetime neighbourhoods, to reduce the need to travel by greater share of jobs, services and homes.

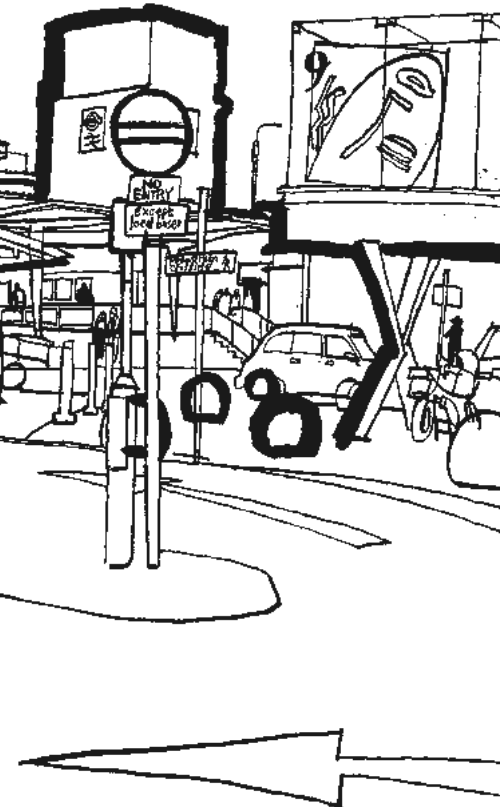
Transport Policy A2. Planning and Making the Transport System Work Better

A suite of measures, mostly small-scale, but targeted to achieve in an incremental way a denser coherent and convenient travel network. Mayoral Transport Strategy should have expression not only London wide but also at sub-regional level ensuring that sub-regional plans are open to public scrutiny.

Case Study: Transit Orientated Developments

There are international examples that may usefully inform the implementation of Transport Objective A. Transit Oriented Developments (TODs) are planned integrations of neighbourhood service and employment hubs around rapid transit stations together with higher density development that has low levels of car usage. Tokyo’s railway station areas can be seen as good practice. Across a wider scale, Malmo’s Comprehensive Plan 2014 plans growth in urban multi-function concentrations around public transport nodes. Existing London Plan policy using the Public Transport Accessibility Level (PTAL) matrix promotes transit adjacent development, namely higher density development without the full realization of the sustainable development benefits of TODs. There is a need to challenge the current use of PTAL for density studies with new more sensitive assessments that analyse transport connectivity to, for example, employment opportunities, door to door accessibility, factoring in ease of travel etc.





Transport Objective B

Promote Active, Affordable, Integrated and Accessible Travel that is the alternative by choice to car dependency: more investment throughout London in walking, cycling and accessible transport, and in Outer London in public transport services, particularly bus services and Orbital Rail.

There is an important social dimension to transport, which, if it is to effectively contribute to proper planning of London and the achievement of sustainable development, should address affordability and accessibility. These are often of great concern and the present access upgrade programme is lamentable. All elements of public transport should be planned and operated in an integrative way with fare structures, tariffs and facilities that enable all to readily access those services most appropriate to use. A recent report, 'Living on the Edge' by London Councils et al, Dec 2015 revealed that low paid workers are disproportionately affected by rising transport costs.

Planning should start with reducing the need to travel and to promote active travel, namely, walking, cycling and public transport — sustainable modes of travel. This requires greater attention to facilitating walking and mainstreaming cycling. (See Case Studies on Walking & Cycling). The benefits include those for health, the environment and tackling congestion. Cars and HGVs (Heavy Goods Vehicles) are a dominating influence on London whereas car sharing, cycling and walking are liberating. Amenity, the environment and users should not be sub-ordinated to the demands of road traffic, but should be enhanced by appropriate levels of connectivity with the emphasis on the sustainable modes of travel. Reallocation of road space between users would ensure fairer share of space for cyclists, buses, pedestrians and public realm. Specific implementation proposals could include more segregated bus routes to overcome congestion delays; a focus on cyclists and pedestrians; a wider adoption of 20mph speed limits. The aim is to achieve liveable attractive places and spaces for all parts of London, not simply the iconic destinations, and for all, including, for example, children, not just active adults.

London's predicted population growth will sustain improved levels of service and patronage. This will make feasible the creation of Outer London Orbital Rail and long distance limited stop bus services. London's Transport Strategy needs to ensure that bus and rail services are closely integrated and linked and connect with transport for the wider South East region.

Transport Policy B1. Promote Active, Affordable, Integrated and Accessible Travel

Support and improve throughout London opportunities and facilities for walking, cycling, public transport, including their affordability, integration and accessibility. Implement road space reallocation including reducing or eliminating car travel lanes in specific areas to create additional space for walking, cycling and the public realm. Mini-Hollands to be brought in for all 32 Boroughs, the City and Mayoral Development Corporations.

Transport Policy B2. Outer London

Greater emphasis on maintaining, enhancing and extending Outer London's public transport services, particularly bus services and Orbital Rail, and on integrating with transport for the wider South East region.

Case Studies: Walking & Cycling

— *Walking makes up 30% of journeys and is increasing with the shift to public transport. Whilst the aim is to achieve walkable attractive routes, places and spaces for all parts of London, town centres, iconic streets and places need to put walking first. Two current projects in Peckham and Tooting will see up to £5 million invested in each one with a focus on pedestrian safety.*

Current proposals, such as the cycle super highways, quiet ways and Mini-Hollands (cycle friendly low traffic areas) have yet to demonstrate critical mass take off. Cycling network should be comprehensive (fine grained) and segregated covering all cycling needs and potentials, and not only super cycle highways, which are very high level. The ambition should be to achieve a take-off in everyday 'civilised continental style' cycling. Therefore, the objective, policy and implementation should be to 'normalise' or 'mainstream' cycling as the mode of choice, avoiding numerical targets, but requiring a transformational implementation strategy that progressively builds up modal share for cycling.

Note that, presently, there are only 3 Mini-Hollands proposals which are to be located in Outer London (e.g. www.enjoywalthamforest.co.uk/about-mini-holland/). They have 20% of trips as their target.



Transport Objective C

Improve environment and infrastructure: strong road traffic reduction targets, fewer vehicles and cleaner vehicles; implementing London wide road user charging, strengthening Low Emission requirements to include cars and avoiding traffic generating transport schemes.

An important driver of transport strategy should be to meet air quality targets. This requires a greater regulation and restriction of vehicular traffic in Central London and elsewhere with the phasing out and ultimate banning of all diesel (including buses and water transport) and a London-wide Ultra Low Emission Zone (ULEZ). But climate change remains an issue even if the air quality crisis was solved. An implementation strategy setting out the measures that are eventually determined to be necessary to fulfil the objective and policy is essential.

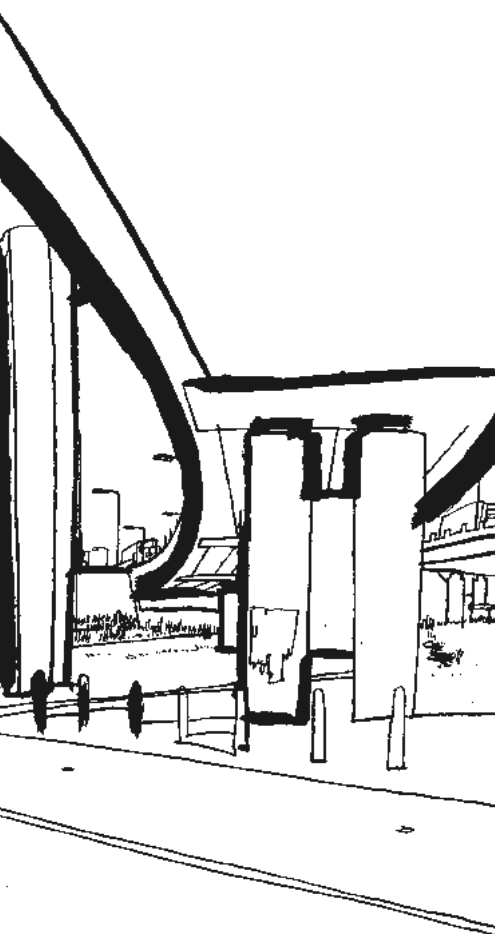
Road Traffic Reduction Target Setting would guide policy and proposals by providing benchmarks to measure progress, determine the need to strengthen or further resource implementation and require other agencies and authorities to fulfil their responsibilities in delivering an integrated transport strategy. Road user charging, London wide, would change travel behaviour and tackle congestion and pollution. (It is still in the current London Plan 2015—para 6.39A). It would need to be applied in a fair and proportionate way and could operate in a variety of ways, such as higher charges during peak periods or for certain vehicle types etc.

Transport Policy C1. Improve the Environment

Strengthened Low Emission requirements, strong road traffic reduction targets and avoiding traffic generating transport schemes.

Transport Policy C2. Tackle Congestion and Pollution

Road Traffic Reduction Target Setting and Road User Charging (that is equitable and proportionate) for all of London to tackle congestion and pollution and create a fairer share of space for cyclists and buses, with revenue used to support sufficient, reliable, safe, affordable and accessible public transport.



58 **Transport Objective D**

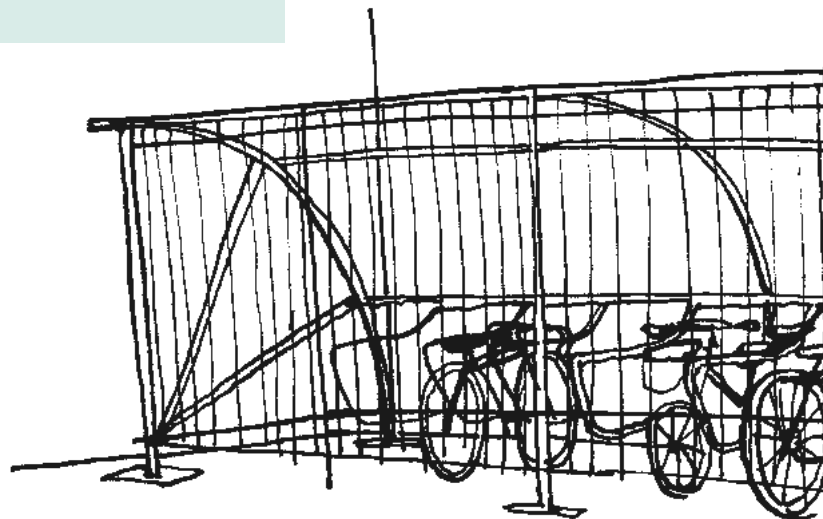
Promote an Integrated Approach to Freight: With a network of consolidation hubs and managed distribution for the final leg of delivery. Shift road freight to rivers and canals by implementing the Blue Ribbon Network.

Wide area wide restrictions on goods vehicles (other than permit holders) would direct freight into consolidation freight hubs which would manage and rationalize distribution. Operational facilities for water transport are to a degree have policy protection through the existing London Plan 2015 (see policies 6.2 & 7.26), but satisfactory adherence to these is contested.

On the waterways there should be a multi-stop, fast ferry service, with TfL providing more resources for water transport (existing fare structure and waiting times are a barrier). Crossing the Thames by ferries has more merit than building more bridges, even if they are walking and cycling bridges.

Transport Policy D1. Promote an Integrated Approach to Freight

Promote an integrated approach to freight with a network of consolidation hubs and managed distribution for the final leg of delivery. Shift road freight to rivers and canals by implementing the Blue Ribbon Network. Protect and enhance water transport opportunities, facilities and services.



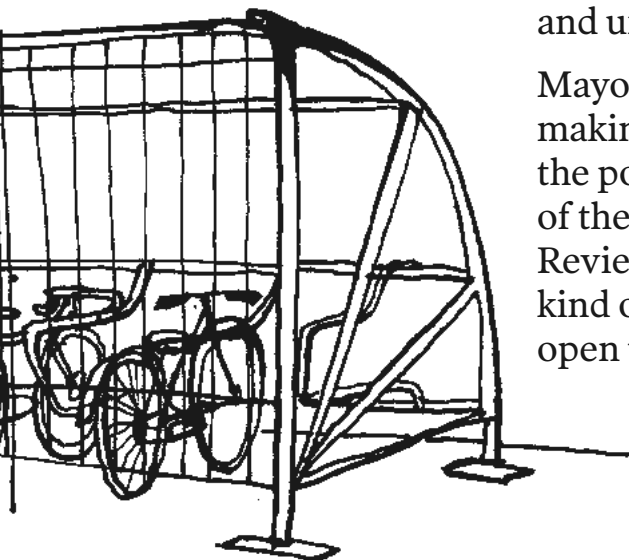
How the Plan is to be Delivered

The implementation of the London Plan's vision and objectives requires new models and mechanisms to deliver sustainable development, providing benefits for established populations while preventing a pattern of continuing displacement and gentrification.

The current delivery models are Mayoral Development Corporations, Opportunity Areas, Intensification Areas and Housing Zones. It has become clear that the kind of development being delivered within these large areas is having a disproportionately negative impact on poorer and inner city communities. The planning model needs to be reviewed because development is happening unevenly across London and contributing to increased commuting distances together with an unsustainable urban form.

In order to achieve the primary objective of strong and sustainable communities, the social dimension must be added to the economic dimension that dominates planning policy. There need to be precise mechanisms that address issues of inclusion and fairness — the new tool of Social Impact Assessments alongside a central role for Lifetime Neighbourhoods, greater weight attached to the protection of existing community assets and unlocking the potential of the Localism Act 2011.

Mayoral technical support, advice giving and decision making on London planning must be consistent with the policy direction outlined here, requiring a review of the Mayors Decisions Unit and the GLA Design Review team. These can play a significant role in the kind of developments that go forward and must be open to a wider scrutiny.



Implementation Objectives

- A comprehensive review of the existing delivery models of Mayoral Development Corporations, **Opportunity Areas**, Intensification Areas and Housing Zones.
- Promotion of **lifetime neighbourhoods** which build on, rather than eradicate, the existing qualities and diversity of London's neighbourhoods.
- Recognition of the importance of **Community Assets / Spaces** for the well-being of Londoners and for achieving lifetime neighbourhoods.
- Tools that are open and transparent such as the **Social Impact Assessment**, that assess existing uses in an area, allow the consideration of alternative proposals and give a high value to social sustainability.
- Comprehensive and inclusive **monitoring indicators** (Key Performance Indicators or KPIs) to provide a robust evaluation of the strategic aims of the GLA Act and the London Plan. For example, a KPI to monitor effective community participation in the preparation and implementation of the London Plan.
- Governance arrangements at the GLA that provide for the representation and participation of all Londoners, **such as through a Mayoral Social Compact with Londoners**, detailed in chapter 2.

Opportunity Areas

Opportunity Areas (OAs) are not creating the kind of housing and neighbourhoods that London needs. The pressure to develop at scale, the inflated land prices in OAs and expectations over the financial contribution required for infrastructure investment means that large scale, dense and high rise developments with a predominance of expensive market housing are the result within the Opportunity Areas. Funding for social needs and public, green and open space are often seen as residual to their development.

There are currently 38 OAs along with 10 'Intensification Areas', In the context of the existing London Plan they are expected to play a large role in the delivery of housing targets (more than 300,000 houses) But, based on our evidence, their impact on communities across London has





been negative — there has been a significant loss of social housing and valued residential neighbourhoods, while the normal planning processes for their delivery are outside the conventions of public participation and review.

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The declaration of Opportunity Areas incites increased land values, and speculation places intense pressure on existing uses. Pressures are then placed on authorities to act with speed, which leads to poor consultation process and low levels of public information, with consequently poor outcomes. Opportunity Areas are defined as taking place on “brownfield land” and we strongly oppose the fact that “brownfield” can include land occupied by communities and vital industrial activity.

Opportunity Areas require significant expensive infrastructural investment, meaning that they seldom deliver sufficient quantities of social housing. The sustainability of mega transport investment to produce dense high rise housing around major transport nodes (generating significant additional travel requirements) is questioned. The key policy proposals are as follows:

Policy Proposals

- A.** There must be a full review, documentation and assessment of Opportunity Areas to date.
- B.** Until this takes place, there must be a moratorium on the declaration of any further Opportunity Areas and no more approvals of Opportunity Area Planning Frameworks.
- C.** Already designated Opportunity Areas must function more democratically and adhere to strict public participation principles.

Lifetime Neighbourhoods and Community Infrastructure

We welcomed the term Lifetime Neighbourhoods when it was introduced into the London Plan in 2011 but we feel that its principles need to be more central to the implementation of the London Plan. ‘Lifetime Neighbourhoods’ provide definition and detail for sustainable communities. They are places that meet the needs of a local community at all stages in its life, recognising health and well-being, social networks, a thriving local economy and a sustainable environment.





Community assets are essential to Lifetime Neighbourhoods, not only for accessing various services but also for fostering a sense of belonging, building networks of community organisations and enabling communities to thrive together. London planning has little focus on protecting existing community assets and does not offer guidelines to implement the Localism Act in ways that meet the needs of particular groups and create social inclusion and social capital.

An appendix to this chapter provides detailed case studies of social impact assessment and lifetime neighbourhoods

Case Study

— *The report A Place to Call Home by the Ubele Initiative shows that so far very few Black Asian and Minority Ethnic (BAME) communities have benefited from tools like the Community Right to Bid. Research also shows that applications for BAME assets to become Assets of Community Value have been ignored or refused. Community assets are being displaced without any re-provision and policy ignores the uniqueness of BAME-related assets. The asset disposal process is too often secretive and often unaccountable.*

Case studies such as the Africa Centre and Ward's Corner show how Equality Impact Assessments are either not carried out or 'bypassed' despite having demonstrated that specific local groups would experience significant losses. The London Plan needs to offer a practical tool to evaluate the social and economic impact of development on these sorts of assets.



Policy Proposals

Strategic

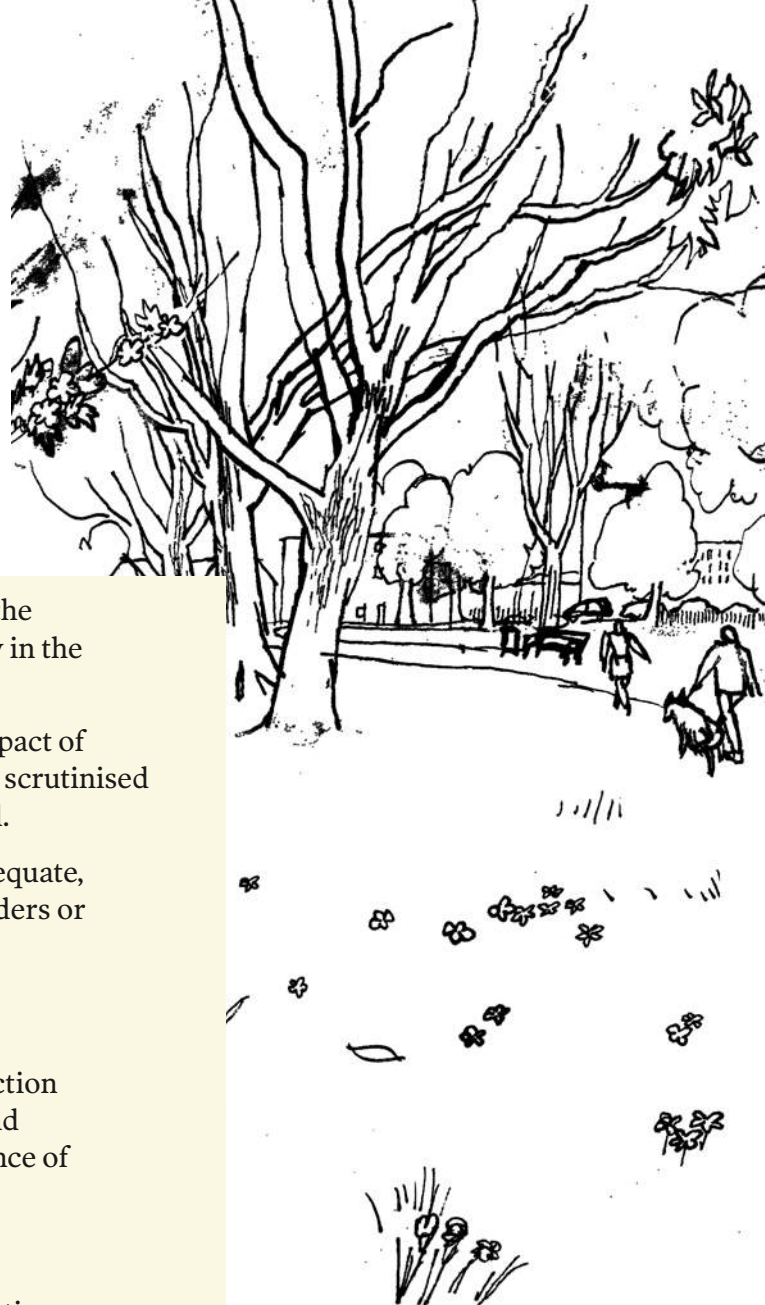
- A.** London will demonstrate its commitment to developing an inclusive and sustainable city through the achievement of lifetime neighbourhoods that support empowered communities in which local employment, social and community facilities, shops, streets, parks and open spaces, local services, decent homes and public transport bring people together and are affordable and accessible to everyone, now and for future generations.
- B.** In Outer London, lifetime neighbourhoods will be an important tool in achieving a more balanced economic development. ‘Lifetime Suburbs’ will provide a real mixed development strategy for Outer London, reducing the need to travel, travel times and the over-dependence on the centre of London.

Planning Decisions

- A.** To measure and evaluate the impact of development proposals on existing residents and businesses in a neighbourhood, Social Impact Assessments will be undertaken. This involves the Boroughs, supported by the GLA, carrying out detailed analysis of what an area already contains: its housing, jobs, community facilities, locally appreciated buildings, and so on. A report should be prepared for public consultation and made a part of evaluating the viability of any new plans.

B. Social Impact Assessments will:

- Be informed by impact assessment criteria that are prepared by the Boroughs together with the voluntary and community sector.
- Acknowledge the social and health costs (alongside the economic and environmental costs) of relocation or displacement
- Be recognised as an important tool in planning decisions, alongside the Equality Impact Assessments required by the Equality Act 2010.



— Be conducted and published independently of the developer to ensure impartiality and transparency in the decision making process.

— If mitigation strategies to offset the negative impact of development proposals are proposed, they will be scrutinised and the effectiveness of their delivery investigated.

— If the mitigation strategies are considered inadequate, the communities affected (whether residents, traders or community assets users) will be balloted.

Local Plans

The Mayor places a high importance on the protection of existing community infrastructure provision and will encourage initiatives that promote the resilience of community assets.

Boroughs should have policy requirements:

- A.** With the presumption to protect and enhance existing community assets that meet the needs of particular communities.
- B.** On the affordability of community floor space and security of tenure (lease agreements).
- C.** Valuing the ‘irreplaceability’ and uniqueness of some community assets. Planning applications that do not enhance this ‘uniqueness’ of place will not be supported.
- D.** Empowering local community networks, in alliance with research organisations, to evaluate the socio-economic value of community assets, gathering information from members and users.

Where re-provision of community infrastructure is required, this will include conditions enabling the existing users of the space to resume their use of the space on equivalent terms.



Neighbourhood Plans

Neighbourhood Plans are an important mechanism for the implementation of lifetime neighbourhoods. They are a platform for communication and participation, with the potential to engage all groups in the design and delivery of planning policy and implementation.

The Mayor will work with the Boroughs and Voluntary and Community Sector to:

- A.** Provide programmes of capacity building for public officers, including cultural awareness and community development.
- B.** Implement measures to support under-represented and excluded groups to take advantage of the Localism Act 2011 and especially the community right to bid and asset transfer schemes, community economic development, community right to build and community right to neighbourhood planning.
- C.** Publicise the Boroughs' corporate asset management strategy and lists of assets available for transfer to community groups.

Monitoring

Policy Proposals

New indicators for measuring London's economic success should include those developed by the New Economics Foundation.

- A.** Good jobs: % of the labour force that has a secure job that pays at least the living wage (using ONS Labour Force Survey Data).
- B.** Wellbeing: average life satisfaction on scale of 0–10 (using ONS Measuring National Wellbeing survey).
- C.** Environment: Carbon emissions in relation to the minimum limit set to avoid dangerous climate change (using DEFRA data); similarly for air quality.
- D.** Fairness: ratio between after-tax incomes of top 10% and bottom 10% of households (using ONS data on The Effects of

Taxes and Benefits on Household Income); this should be computed both before and after housing costs.

- E.** Health: % of deaths avoidable through good quality health care/public health interventions (using ONS Avoidable Mortality statistics).

Other additional indicators should cover:

- F.** Financial success of households, after meeting housing costs.
- G.** Diversity of business sectors (for example in terms of size, number of employees and required floorspace; social and cultural, number of ethnic and migrant businesses etc).
- H.** Strength of local supply chains (for example interlinkages between firms, delivery distance, time and cost etc).
- I.** Sustainability of resource use (for example capacity of renewable energy equipment installed; amount of waste generated that is not recycled).
- J.** Environmentally-damaging travel and transport generated by economic activity (for example number, distance and cost of work-trips, deliveries, air-travel).
- K.** Gender disparities in terms of wages and access to the labour market (for example a Gender-sensitive Regional Development Index).
- L.** How much of the profits generated by businesses based in London are:
 - Paid in tax (and of that, how much is returned through central allocation to the GLA and the boroughs).
 - Re-invested into business (as opposed to paid out as dividends and interest).
 - Spent on wages (and whether this is rising over time, as growth goes up, or not).
 - Distributed through dividends or profits to local community members who own or have invested in local businesses.
 - Distributed across socio-economic classes within the population.

Appendix

Social Impact Assessment Case Study — How could this be useful for London’s Gypsy and Traveller Communities?

67

— Gypsies, Travellers and Roma are still among the most disadvantaged groups in England and the inequalities they face in a wide range of areas remain largely ignored, either due to unsuitable policies, discrimination and stigma or a lack of evidence.

Over half of Gypsies and Travellers in London are economically inactive mainly because they are looking after home and family, suffer from long term illness or disability or are excluded from the labour market for various reasons. Children and young people fare worse in terms of education outcomes than those from other marginalised groups. Gypsies and Travellers face higher health inequalities than any other ethnic minority group, with higher incidences of maternal death, miscarriages, diabetes and chronic conditions particularly of the respiratory system, as well as mental health issues.

High pressures on the land market, political unwillingness and lack of strategic leadership from the Mayor have resulted in a severe shortage of culturally suitable accommodation and little hope for new sites to be identified in the future. The new planning definition of Travellers which excludes all those who have stopped travelling for work purposes, together with the Housing and Planning Act will have damaging impacts on future generations. Insecurity, lack of choice, isolation and discrimination are already taking a great toll on family life, health and well-being and opportunities for education and employment.

However at the moment there is no mechanism to assess these negative impacts. Local authorities have to give due regard to minimising inequalities facing the community, in line with the Public Sector Equality Duty, Equality and Human Rights legislation, but the evidence and assessments (such as Gypsy and Traveller Accommodation Needs Assessments, Joint Strategic Needs Assessments, Equality Impact Assessments) supporting local plans and strategies are usually superficial and don’t address these cross-cutting issues.

Social Impact Assessments undertaken at a London-wide and local level could provide a more comprehensive analysis of how health, education, employment and accommodation inequalities are related and what planning policy approaches are needed to address these concerns. This tool could be useful in emphasising the social value of Gypsy and Traveller sites (as culturally suitable accommodation, supporting family life, caring and other unpaid work, increasing health and well-being, providing safe play space) rather than development density or viability considerations.

68 **Lifetime Neighbourhoods Case Study**
London Tenants Federation

— *Lifetime Neighbourhoods provide definition and detail for sustainable communities. They are places that meet the needs of the local community at all stages in their life. Their principles recognise and value health and well-being, social networks, thriving local economy and sustainable environment.*

The London Tenants Federation has developed a tenants' definition of Lifetime Neighbourhoods, using the three themes of housing, amenities and participation.

A 'lifetime neighbourhood' is one that has:

**Communal Spaces, Facilities, Services and Activities —
Well Run, Accessible, Affordable and Relevant to All**

— *Community centres and meeting places that are accessible to all within our communities.*

— *Amenities for young people and support for them to engage.*

— *A wide range of social amenities and facilities accessible, affordable and inclusive to all residents in an area. (The market determines that too much is inaccessible to those on low incomes or dependent on benefits).*

— *Neighbourhood-based public services and facilities which are needed; e.g. for the range of health, education, leisure and economic needs. Localisation, not centralisation.*

— *Well-designed and maintained, car-free play spaces for children.*

— *Well-equipped and well-managed public parks and green spaces.*

— *Safe, green and living streets and public realm (including building frontages and interfaces).*

— *Accessible, affordable and extensive public transport links.*

— *Respect for heritage and the conservation of the positive character of local neighbourhoods.*

— *Access to allotments, food growing and community gardens*

— *A vibrant and relevant local economy, especially small workplaces and sustainable good quality jobs.*

- *Local shopping parades and corner shops.*
- *Funding for community-led projects and initiatives.*
- *Nearby spaces and zones on the edges of communities for specific specialist needs, i.e. local town centres, major leisure facilities, green belt.*

Homes That Meet Our Needs

- *Well-designed estates with no nooks and crannies.*
- *Adaptable ‘lifetime homes’ that can change as peoples’ needs and family make-up changes, assessable to the elderly and disabled.*
- *A wide range of homes in each estate and neighbourhood, so for example, older persons can move from full independence to supported housing and to extra care housing without having to move.*
- *Good space standards; equivalent to or higher than Parker Morris.*
- *Allocations policies that recognise community needs and care for elderly.*
- *Housing supply to reflect need rather than the market.*
- *Affordability to be defined as a rent that all tenants can genuinely afford.*
- *High standards of management and maintenance of our homes.*
- *Positive investment in council homes.*

Good Consultation, Democratic Accountability and Empowerment of Communities

- *Democratic and accountable structures that genuinely involve tenants at all levels of decision-making about our homes and communities.*
- *Local authorities and housing associations that engage in proper consultation. That means genuine involvement and empowerment, not information-giving sessions after the decisions have already been made.*
- *Real involvement in decision making from initial ideas to final product (including planning, design and implementation), so that all residents have a sense of ownership.*
- *Support for and development of vibrant local self-organised grassroots networks of social co-operation, solidarity and mutual aid.*

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- *Government that engages in proper consultation.*
 - *Tenants and residents will remain apathetic until councils and governments start to deliver.*
 - *People who live in a community have full control over what they need.*
 - *All residents to have a sense of ownership of their communities, including the widest possible consultation and democratic accountability including young and old, disabled and BME residents.*
 - *Residents to be consulted, drive the agenda, own and run the process there after.*
 - *Funding to enable residents to represent themselves and govern their own communities.*
 - *Investment in communities to ensure that all can take part and community needs are addressed.*
 - *Recognise and support natural, organic communities and networks, rather than impose artificial boundaries.*
 - *Social and environmental sustainability of neighbourhoods.*
 - *Long-term, joined up thinking for community benefit.*

Summary

All Londoners should have the opportunity to enjoy a good quality environment in an active and supportive local community. Ensuring this means planning for lifetime neighbourhoods in which communities are empowered and in which local shops, social and community facilities, streets, parks and open spaces, local services, decent homes and public transport are affordable and accessible to everyone now and for future generations.

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The following community and voluntary sector groups have participated in developing the ideas that form this publication:

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Concrete Action,
Living Streets,
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Housing Justice,
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The May Project (community food growers),
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More information is available on the
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If you would like to get involved in the
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