Protect Our Places Draft London Plan - email submission
15th October 2026

All survey responses (for online surveys and emailed)

The Protect Our Places Coalition (POP), was convened in 2023 by Latin Elephant (registered charity no. 1158554) and includes market traders and small and medium sized businesses from Black, migrant and minoritised backgrounds. POP works to protect and retain markets and retail in the face of development, alongside working for racial equity in London's planning system. We have 11 member groups from nine local boroughs, including Latin Elephant (POP convenor), Catford Against Social Cleansing, PlushSE16, Friends of Shepherd's Bush Market, Save Brick Lane, Friends of Queen's Market, Save Nour Save Brixton/Fight the Tower, Save Ridley Road, emerging grassroots group at Tooting Market, Save Deptford High Street and Wards Corner Community Benefit Society. POP supports the individual submissions of these groups and of Just Space. For more information see https://latinelephant.org/protect-our-places/

We wish to be invited to the Examination in Public to have the opportunity to explain the changes we are seeking and provide up-to-date evidence gained from the lived experience of Black, migrant and minoritised community members especially market traders and small independent businesses.

Summary of comments:

1. Reinstate Good Growth 1: Building Strong and Inclusive Communities as an overarching objective, with enforceable requirements for meaningful and ongoing community participation and accountability.

2. Make prosperity and health for all the purpose of growth, including mental health, and require development to prevent displacement of

existing residents, businesses and social and cultural infrastructure. Protect everyday markets and migrant and minorities economies, and deliver lasting benefits and greater equality for Londoners.

3. Strengthen equality and socioeconomic impact assessment. The Integrated Impact Assessment should include a robust Equality Impact Assessment under the Public Sector Equality Duty, explicitly assess socioeconomic disadvantage and inequality, and be revised before the Examination in Public.

4. Address the Plan's soundness and legal compliance. The GLA must address concerns about consultation, demonstrate that it has properly considered reasonable alternatives, and ensure the Plan is positively prepared, justified, effective and consistent with national policy.

Chapter 1 Good Growth

The first policy in the current London Plan is **Good Growth 1: Building Strong and Inclusive Communities**. It establishes the Plan's overarching purpose as "to build on the city's tradition of openness, diversity and equality, to help deliver strong and inclusive communities."

However, this objective has been removed from the Good Growth policies in the draft Plan. There is no clear commitment to strengthening accountability for equality or ensuring that communities can meaningfully shape development. Where community involvement is mentioned, it is neither sufficiently specific nor enforceable. References to "consultation" predominantly concern dialogue between City Hall, TfL and local authorities, rather than setting out concrete ways for communities to influence the future of their neighbourhoods.

We ask that **Building Strong and Inclusive Communities** be reinstated as an objective, with **sub-objectives to prevent the displacement of existing residents, businesses and social infrastructure; protect everyday markets and migrant and ethnic economies; and promote prosperity and health for all, including mental health.**

The GLA's Consultation report records that respondents "supported the Good Growth objectives in principle". It also acknowledges that where development leads to poor outcomes "(such as loss of green space, displacement, pressure on services, or declining wellbeing) it cannot credibly be described as 'Good Growth'" (paras 3.20–3.21). To reflect the spirit of these objectives, we ask that the Plan's overarching ambition be expressed as **"prosperity and health for all, including mental health"** and that this ambition be supported by clear policy requirements.

The Plan should also include a social value policy, in line with recommendation 1 of the London Assembly's April 2025 report, which drew on POP evidence and recommended that "the next London Plan should include a social value policy".

The Integrated Impact Assessment (IIA) should include a robust Equality Impact Assessment in accordance with the Public Sector Equality Duty under section 149 of the Equality Act 2010. The current IIA relies on a more limited "equality appraisal". The Plan should also explicitly assess socioeconomic disadvantage and inequality. Although socioeconomic status is not a protected characteristic under the Equality Act 2010, the GLA recognises the importance of socioeconomic disadvantage; its impacts should therefore be explicitly considered in assessments and policy.

Legal compliance. We have concerns about the consultation (in particular the second, third and fourth Gunning principles), about whether the Integrated Impact Assessment shows due regard under the Public Sector Equality Duty (section 149, Equality Act 2010), and about the failure to test reasonable alternatives, especially those that would strengthen protection for markets and small businesses. These points apply across the Plan.

We consider the Draft Plan unsound against each test of soundness, and we raise three legal compliance concerns: the consultation, the Public Sector Equality Duty, and the assessment of reasonable alternatives.

The NPPF (December 2024, para 36) states that "local plans and spatial development strategies" are sound if they are positively prepared, justified, effective and consistent with national policy. The draft Plan says it has taken into account the draft NPPF of December 2025 **(para 1.1)**, whose draft policy PM14(2) sets equivalent tests for spatial development

strategies: positive, appropriate, effective, and consistent with national policy.

Despite the socio-economic duty in section 1 of the Equality Act 2010 not being in force in England, we ask the Mayor to assess and monitor effects on socio-economic disadvantage as if it were a protected characteristic. We ask for a revised Equality Impact Assessment and IIA addendum, published before the Examination in Public.

POP member Catford Against Social Cleansing states:

The London Plan should make clear that housing delivery, regeneration and economic growth must improve the position of existing Londoners, particularly low-income households, social tenants, private renters, disabled people, young people and historically disadvantaged communities.

The draft Plan states that it aims “to balance growth with quality of life” and “tries to make growth fairer by setting out requirements for affordable housing and better access to jobs and services for all Londoners”. However, it does not provide the concrete protections needed to deliver these ambitions. Without stronger safeguards, development risks accelerating the displacement of Black, migrant and racialised communities, alongside the markets and retailers on which people rely and which are central to local life.

As POP member Friends of Queens Market states:

“Our concern about the draft London Plan is that, again, it does not protect or properly acknowledge markets of this kind in London, and that the Plan instead encourages uncontrolled development, to the detriment of communities, their valued spaces, and the environment, and without sufficient public benefits.”

Chapter 2 Making best use of land (MBUL)

MBUL1 Spatial strategy

MBUL1 is not positively prepared for these reasons: Development Management and Plan-Making A(2), aims to “achieve intensification of land use across London in a way that contributes to meeting London’s

different needs," as well as ensuring "infrastructure sufficiency in respect of growth and wider good growth needs." However the needs referred to above are also not sufficiently defined or properly assessed, and the underlying approach expressly moves further away from the need for affordable homes - a known need.

To be effective MBUL1 and MBUL2 must explicitly require development to demonstrate that optimisation of land use will benefit the existing community and not create even greater social inequality. Development must be required to measure and to make public the means by which it:

- Maximises genuinely affordable housing
- Protects existing community facilities
- Includes adequate health, education, youth, cultural and recreational infrastructure including affordable and healthy food
- Protects green and public space
- Prevents displacement
- Improves local quality of life; and
- Responds to the concrete needs of existing communities.

The policy should make clear that site capacity calculations must take account of the infrastructure and community impacts generated by additional population and a stronger "infrastructure before or alongside occupation" principle must be introduced with measurable infrastructure delivery milestones included in planning approvals.

MBUL1 is not positively prepared, as it ignores a known need. Without the provision of and access to affordable and healthy food, the policy cannot effectively meet the city's needs. Food must be given the status of necessary infrastructure, as part of the spatial strategy and referenced not only in **chapter 2 (MBUL), but also in chapter 3 (HN), chapter 4 (GLE) and chapter 5 (GHR)**.

Provision must be made for food security, affordability and culturally specific food access, rather than limited to aspects of hospitality and retail offers as is the case in this Plan.

Although **B(5)** refers to appropriate infrastructure, including locally assessed social infrastructure, its detailed strategic list does not explicitly

include markets, affordable food access, youth facilities or community and cultural spaces. Nor does it require local people to be involved in this assessment.

Markets are an essential part of our infrastructure yet are only mentioned once in this Plan. Access to affordable, culturally specific food supports the economic, cultural and social lives of Londoners of diverse heritage and backgrounds, as well as being fundamental to physical and mental wellbeing.

Everyday markets are both climate and health infrastructure. Markets sell fresh, affordable food within walking distance, use little packaging and support repair and second-hand trades. If they close, people travel further for food and lose access to affordable, culturally appropriate diets. We ask that everyday markets are treated as part of a healthy, low-carbon food system, and that the loss of a market is treated as a health and environmental impact through compulsory assessments.

MBUL1 is not justified as it does not consider Just Space Network's "Alternative London Plan for a Caring City" which states that we must: "expand the definition of infrastructure to include food, to recognise that healthy and affordable food is an essential system needed for communities to function. This would result in creating or ensuring equal and fair access to land for food growing, community kitchens, food hubs, wholesale markets, traditional street markets and affordable retail. (https://justspace.org.uk/wp-content/uploads/Justspace_Alt_Plan-2026.pdf 2026 - Policy 41)

MBUL1, Part A(4) is not effective. The stated aim to "prioritise affordable housing provision and public transport improvements in developer contributions", is not clearly defined and this lack of clarity will allow developers too much room for interpretation, and undermine contributions.

Nor is **MBUL1 A(5)** effective as it risks weakening the priorities established in **A(4)** by allowing exceptions where these are considered beneficial to overall delivery. The policy must define the circumstances in which exceptions may be justified, require transparent evidence and demonstrate their consequences for affordable housing and

infrastructure delivery. Any departure from these priorities should be justified against the needs of existing and future communities, with clear requirements for delivery and public accountability. Viability and speed of build should not be treated as sufficient justification in themselves for reducing essential public benefits.

Centre for London recorded the view of LPAs and community groups including POP coalition member Latin Elephant, that “a lack of defined responsibilities for developers in planning agreements may lead to the failure of measures intended to govern how developers contribute to the city.” (https://centreforlondon.org/wp-content/uploads/2026/09/Making-Regeneration-Work-for-Londons-Communities.pdf)

MBUL1 should explicitly require the spatial strategy to identify, assess and protect in explicit ways the existing economic, social and cultural assets that support local communities, including traditional markets, independent businesses, affordable commercial premises and community organisations, with the input of these same communities.

Intensification should demonstrate how these assets and the social and economic relationships they sustain will be retained and strengthened, rather than assuming that their replacement or relocation constitutes an equivalent benefit. This should include the cumulative impacts of development on local businesses and the ability of existing traders and communities to remain in place and benefit from regeneration. The reprovision of space must be delivered in a way that sustains businesses over the long term as detailed in our submission on chapter PV.

MBUL1 is not effective without specific targets and measurements so that impact can be monitored. Monitoring should continue throughout implementation and after completion, so that the Plan can assess whether regeneration has delivered lasting benefits for existing communities.

LPAs and developers must be required to involve communities including businesses owned or run by Black, migrant or minoritised backgrounds in effectively shaping the decisions that affect them from the earliest

stages, and report on how they have carried this out, who has been involved and how views have been taken into account.

MBUL1 Implementation 2.15 refers to “the development of positive place-visions that factor in place assets. These include natural, cultural, historic, infrastructural, (..) and economic (..) assets.” The following text should be added: **"and social assets, including existing communities, their businesses and their social and cultural infrastructure, such as everyday markets, community spaces and clusters of migrant and ethnic businesses."**

MBUL1 Part A(4) Add**: "Prioritise affordable housing provision, public transport improvements and the re-provision of premises for small and independent businesses, everyday markets and social infrastructure displaced by development in developer contributions"**

MBUL1 Part A(5) and para 2.17 Add**: "This flexibility does not apply in Brownfield First Opportunity Areas or town centres where existing communities, businesses or social infrastructure are at risk of displacement."**

MBUL1, new implementation paragraph. "Viability assessments, section 106 agreements in full, and details of Community Infrastructure Levy receipts and spending for strategic schemes should be published in a timely manner, so that communities can see what has been secured and hold delivery to account."

MBUL2 Optimising the use of land and site capacity

MBUL2 is not positively prepared and not effective.

The London Context Map categorises each built-up area of London into locations with a predominantly similar character, which “provides a high-level description and understanding of London’s character.” But the approach to characterising areas risks reducing local character to only the built environment and fails to adequately recognise the specific

social, cultural and economic aspects that make each place distinctive. It is therefore not effective.

Optimisation should not destroy what is already there. Instead, **MBUL2 Part C(3)** gives failure to meet optimised densities "very significant weight" and says character studies "should not preclude change" **(Part A(2)).** These provide significant opt-out clauses.

Nothing in the policy asks what an intensified site already holds. An everyday market, a cluster of shops or a community space should be treated as a site-specific constraint and a public benefit to retain, not as under-used land. We ask for **MBUL2** to require LPAs and applicants to identify existing uses at risk of displacement from the earliest stages of planning, and to show how they will be retained.

Character must incorporate markets, local economies, cultural identity and demographics, rather than focusing primarily on architecture. This is particularly important in areas where traditional markets and independent businesses sustain culturally significant trading networks and serve communities at risk of being displaced and who must be protected. Standardised character studies and design codes could produce visually coherent schemes while overlooking the distinctive social and cultural character of individual neighbourhoods. For example, a market could be retained physically but lose its character if its independent traders are replaced by higher-rent businesses or a standardised food-hall.

POP works in many neighbourhoods where essential social and cultural aspects have been erased by development, including Surrey Keys, Elephant & Castle, Brixton Town Centre, Dalston, Brick Lane and many others. Without adequate recognition, essential aspects of our places and the livelihoods linked to them cannot be protected.

Character studies must be undertaken with meaningful involvement from traders, community organisations and local residents, and their findings should have a substantive influence on decisions about density, height, land use and redevelopment, from the earliest stages of development. Local stakeholders should identify not only the potential for

change but also the existing assets, relationships and livelihoods that development should retain and support.

The Optimisation Framework (OF) should not be used to predetermine development capacity without adequately assessing these specific local social and economic factors.

The OF is described as a “recommended density range” and “indicative height range”, but then policies relating to it use it as a minimum. It is more suitable to set maximum densities acting as envelope parameters. There is a risk that developers will use minimums to frame otherwise unacceptable development as acceptable.

In any event, the OF is based on an assumption in favour of densification without sufficient evidence base or analysis that this will help delivery or meet need. Therefore we refute the high-density conclusions of the OF.

The approach to optimising land and density does not adequately account for the social and economic value of what already exists in an area. There is a lack of assessment of how increased density increases strain on social infrastructure. The process initially acknowledges these sensitivities, then allows (and even encourages) them to be ignored by encouraging additional density. This is therefore not positively prepared.

Instead of assessing policies in isolation, the **Integrated Impact Assessment** should consider the combined effects existing communities and businesses of the different policies in this draft plan, alongside the **MBUL2**, including:

- **MBUL3**: tall-building locations identified in Table 2.2.
- **Opportunity Areas**: locations designated for significant growth.
- **PV3:** housing-led intensification and changes to town centres, including the potential loss of markets.

Based on the collective experience of POP coalition members, the combined effect of these policies if not changed in the ways we suggest will lead to the further displacement of traditional markets, independent businesses and the communities they serve.

MBUL2 Part C(1), implementation. Add**: "Site-specific constraints include existing everyday markets, community facilities and clusters of small, independent and migrant businesses that should be retained."**

MBUL3 Tall buildings

MBUL3 and Table 2.2 are not positively prepared as a known need is ignored. Such designations raise land values and rents in the streets around them: therefore tall building locations must require anti-displacement plans. We ask that every Table 2.2 location is accompanied by an anti-displacement plan detailing specific and enforceable measures, prepared with the community, covering existing residents, businesses and social infrastructure.

Anti-displacement measures must be monitored by community groups including trader panels and others. Monitoring must be supported by the LPA with information published in a timely way, over the whole period of development to ensure that measures are implemented.

MBUL3 and Table 2.2 Add: **"Plan-making authorities should prepare, with local communities, an anti-displacement plan for each location in Table 2.2, covering existing residents, businesses (including everyday market traders) and social infrastructure, before metropolitan-scale tall buildings are allocated."**

MBUL4 Optimising the use of land and site capacity

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

MBUL5 Sustainable Transport to enable London’s Growth

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

MBUL6 High quality design for a growing, changing city

MBUL6 is not positively prepared or justified and is not effective.

MBUL6 Part B(1) states the aim "to create mixed use liveable neighbourhoods" and that development proposals should, as part of the design of the development, create "buildings and spaces that positively respond to local distinctiveness, by identifying the special and valued features and characteristics of the locality and using these to inform the proposal," as well as that "its local context, including socio-demographic and heritage, should be at the heart of how the space is designed and managed."

For this to be effective, specific protections must be introduced so that design protects existing communities, businesses and cultural character, and produces the conditions for them to thrive, not simply produces well-designed new buildings.

POP demands protection for markets, long-term affordable rents and measures that prevent their displacement from the area (see also POP's comments on how markets and small businesses must be protected under **PV3 and GLE1**). Housing growth and markets or independent businesses should not be treated as competing uses where one must give way to the other.

MBUL6 should require design and site-allocation decisions to demonstrate how existing markets and businesses will be retained, remain affordable and continue trading, not only during redevelopment but into the future.

The Protect Our Places report *Protect Our Places: Coming together to demand more racially-just urban planning in London* argues that traditional markets and independent businesses are not simply

commercial uses that can be replaced by equivalent floorspace elsewhere: they provide affordable goods, sustain migrant and racialised communities' businesses and livelihoods, and contribute to the social and cultural identity of local places. (https://latinelephant.org/coming-together-pop-report-released/)

Further evidence of the importance of street and covered markets is found in the GLA's own publication *Tomorrow's Market Good Practice Guide* which recognises that: "Markets also play a key role in the wider success of London's high streets and town centres, offering routes into local employment, attracting footfall, distributing healthy and affordable produce and operating as community hubs that deliver significant social value." (https://www.london.gov.uk/sites/default/files/2025-09/Tomorrows_Market_Good_Practice_Guide.pdf)

MBUL6 Part A(3) asks boroughs to plan positively for contrasting uses to coexist and for mixed-use liveable neighbourhoods. This must be done in partnership with communities from the earliest stages and include market traders and businesses in effectively shaping the decisions that affect them from the earliest stages. LPAs and developers must report on how they have carried this out, who has been involved and how views have been taken into account, to avoid this becoming a tick-box exercise.

In order to facilitate this, councils must set up trader and community panels alongside Design Review panels. These must include Black, migrant and minority-owned businesses and provide genuine transparency and opportunities to influence plans. Design review must consider whether proposals sustain existing social and economic uses.

MBUL6 (and other policies in the draft Plan) should require community engagement before key development options are fixed, rather than after decisions have effectively been made, and engagement should be able to concretely shape decision-making.

For major schemes, developers should therefore publish:

- Who was engaged
- Who was not reached
- What communities asked for
- Which requests were accepted
- Which were rejected
- Why they were rejected; and
- What changes were made as a result.

This would turn consultation from a procedural requirement into genuine participation as defined by the government's Gunning Principles but is not now required by this draft Plan. (https://www.gov.uk/government/publications/consultation-principles-guidance/consultation-principles-2018)

For example, in Elephant and Castle the Latin American community and its retailers should inform what good design means there, rather than being treated as an existing feature to acknowledge while redevelopment changes the spaces around them. This should be the case in all of our neighbourhoods, whether in Southwark, Tower Hamlets, Newham, Lambeth, Lewisham or Hammersmith & Fulham.

MBUL6 para 2.89 The Plan's only reference to health impact assessment is in the context of design review **(para 2.89)**. Here the role of HIAs should be strengthened and extended to other chapters of the Plan.

Add: **"Health impact assessments for major regeneration schemes, including in Brownfield First Opportunity Areas, should assess the effects of displacing existing residents, businesses and social infrastructure, including the loss of social networks and effects on mental health, and their findings should inform whether and how schemes proceed."**

MBUL7 London's Heritage

MBUL7 will not protect heritage assets from the direct or indirect impacts of development. This draft policy is a significant watering down of heritage protection under the previous London Plan. It is therefore not justified or effective.

MBUL7 B states that local heritage strategies “should be informed by evidence and involve collaboration between Boroughs, stakeholders and communities” and that strategies should include “tangible actions and priorities” and “intangible heritage.”

The UK joined UNESCO's 2003 Convention for the Safeguarding of the Intangible Cultural Heritage in 2024. According to Historic England, Intangible heritage (often referred to as intangible cultural heritage) refers to “the living traditions, practices, expressions, knowledge, and skills that communities and groups recognize as part of their cultural identity.” (https://historicengland.org.uk/research/results/reports/8613/AdvisingonHistoricEnglandsFutureEngagementwithIntangibleCulturalHeritage)

Unfortunately "intangible heritage" appears only once in the whole draft Plan. In order to be effective and to be implemented, this must be strengthened and concrete measures introduced.

MBUL7 protects buildings, views and World Heritage Sites but it barely mentions the heritage that lives in people, trades and food cultures, through the markets and businesses that are part of POP, and many others across London. The character of a place is not just its buildings, it also comes from its markets and businesses, culture and communities (see also comments on **GLE5**).

2.98 is not effective. It states “local heritage strategies can be used..Topics they can address include..”

In the same way as design strategies, local heritage strategies **must** (not "can") cover intangible heritage and markets, and must be co-produced with communities in order to reflect their views and include the cultural and social aspects that define London’s neighbourhoods. This must be done from the earliest stages of planning. Heritage Impact Assessments for schemes affecting markets and retail centres must also assess intangible heritage, not only the built environment.

The Plan’s heritage approach must be strengthened substantially for it to protect London’s African, Caribbean and other minoritised communities (see also **MBUL8, GLE5, PV3**). For example, African and Caribbean

communities have made an enormous contribution to London's cultural, political, economic and social life. Yet without explicit equality-based protections, development can result in the loss of:

- Cultural organisations
- Community centres
- Independent businesses
- Markets
- Churches and faith spaces
  music and cultural venues
  Youth organisations.
- Sports organisations
- Black-led organisations; and
- Places of collective memory.

POP member Shepherd's Bush Market offers a variety of traditional foods and spices used in African, Caribbean, Asian, and other minority ethnic dishes, which are not easily found elsewhere. Additionally, affordable goods, including haberdashery and clothing like hijabs, are available. The market acts as a central hub fostering solidarity among diverse ethnic communities, who gather to socialise and shop, attracting users from across West London. The traditional market's existence has made it a historic community focal point, where people with protected characteristics have formed connections across generations.
The draft Plan (**GLE4, GLE**5) recognises the value of pubs and cultural venues through explicit retention and reprovision requirements, while the heritage value of everyday markets and their living cultural practices needs to be made explicit.

To be consistent with National Policy and in line with the UK's obligations under the 2003 UNESCO Convention, **MBUL7 Part B and 2.98 Part B** should state: **"Heritage impact assessments for development affecting everyday markets or established clusters of migrant and ethnic businesses should assess impacts on living heritage."**

LPAs must be supported to set up **"legacy business registers"** for long-standing independent businesses and traditional market traders.

Implementation: "The Mayor will support boroughs to establish legacy business registers for long-standing independent businesses and market traders."

MBUL8 Inclusive design

MBUL8 is not effective and must be strengthened substantially. Major regeneration schemes should assess potential impacts on community and cultural life and undertake a full Impact Assessment that considers Londoners with protected characteristics (see also **MBUL7, PV3**) and must include:

- Health inequalities
- Disability
- Deprivation
- Safety
- Access to green space
- Air quality
- Noise
- Transport
- Community cohesion; and displacement.

This assessment must include community engagement with communities with lived experience, and must concretely influence how and whether a development will proceed.

MBUL8 (design and access statements) should be amended to state that engagement should be reported with **"relevant end users, existing occupiers, including traders and their customers, and protected characteristic groups, using interpretation and translation where needed."**

MBUL9 Healthy Streets and public realm

MBUL9 is not effective. It states it aims to create welcoming, safe, greener public spaces designed around people's health and wellbeing, and to involve local communities in their design.

But **MBUL9** must include stronger specific commitments to long-term maintenance, enforcement and cumulative impact assessments, which

are not merely delegated to boroughs. As evidenced by the Centre for London in their report *Making Regeneration Work for London's Communities*, development schemes take place over many years and span several political administrations, council teams and development partners. Commitments made at the planning stage can be diluted or become undeliverable as market conditions, political leadership, developers and officers change. Long-term accountability that continues throughout construction, occupation and the later phases of development programmes must therefore be required through the London Plan.

MBUL9 Part D(4) should state **"involve local communities, including women and girls, existing traders and their customers, to inform the design of public spaces."**

For involvement to effectively inform design, LPAs and developers must be required to report on how they have carried this out, who has been involved and how views have been taken into account.

MBUL9 E Impacts to be assessed and mitigated "including during construction, and including impacts on the access, trading and footfall of existing businesses and markets". Add**: "Where everyday markets operate, public realm schemes should retain space for street trading, servicing and loading."**

MBUL10 Security and safety

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

Chapter 3 HN

HN1 Increasing London's Housing Stock

HN1 is not positively prepared or effective. The policy states “the Mayor remains committed to a strategic target for London of 50 per cent of homes to be genuinely affordable over the longer-term plan period.” However, this commitment is meaningless in practice, as there is no analysis of failure across the previous London Plan period, or suggestion of how to improve delivery. This is especially lacking in meaning when more specific policy targets are being reduced. The targets detailed by **HN1** are clearly unrealistic but even if met, it is recognised that will not meet the need.

HN1 sets no minimum standards or guidance on bedroom size mix. There must be a recognition of the shortage of larger family-sized affordable homes, and a commitment to build the homes that London’s families need.

Alongside an unchanged viability regime, **HN1** will result in empowering developers to justify planning harms and reductions in affordable homes, and other benefits, which support existing communities and small businesses, in the name of meeting targets.

Where viability is used to reduce re-provision of social homes and affordable homes, or affordable space for traders and retailers, the viability assessment should be published and developers must not be able to use claims about a scheme's financial viability to reduce commitments to existing businesses and communities without those claims being open to public scrutiny.

HN1 is not consistent with National Policy. The draft London Plan is in opposition to the government’s Planning Practice Guidance on viability, which says viability assessments should be open to scrutiny, with transparent assumptions and information that is publicly available.

Housing growth should strengthen existing neighbourhoods and their economies, not simply increase the number of homes via setting housing delivery targets as **HN1** does. Planning for growth must also consider protection of the existing markets, shops and services that are at the heart of the everyday lives of residents, especially those from Black, migrant and minoritised backgrounds.

Housing, markets and independent retail are interdependent parts of neighbourhood life (also see our response to **PV3**). New housing creates demand for affordable food, everyday services and social interaction, but if development displaces those businesses, new homes may be delivered at the expense of the existing community and local economy. Housing growth must sustain the markets and local economies that make neighbourhoods liveable, rather than erase them.

Delivering the homes London needs must go hand in hand with sustaining the existing social, cultural and economic infrastructure that enables neighbourhoods to thrive. Traditional markets and independent businesses provide affordable goods and services, support livelihoods, create opportunities for social interaction and contribute to the cultural identity of local communities (**MBUL**).

Housing-led growth should therefore be planned in conjunction with the protection and development of markets and independent businesses, rather than treating them as separate policy concerns or assuming that new housing will automatically generate inclusive, successful neighbourhoods. The Plan should recognise the contribution of existing markets and local businesses to neighbourhood liveability, require their needs and vulnerability to displacement to be assessed early in growth planning, and ensure that new development supports their continued presence and accessibility in the long term.

This is particularly important in areas experiencing major housing-led regeneration, where the delivery of new homes can place pressure on existing affordable commercial space and displace the businesses and communities that give a place its character. **HNE** should make clearer links to the draft Plan's policies on town centres, high streets and markets, ensuring that housing growth contributes to the long-term resilience of existing local economies and communities.

We ask for major schemes in town centres and OAs to assess the social value already there (including everyday markets, independent shops and community and cultural spaces) and to show how it will be acknowledged and protected.

Latin Elephant's warning was quoted by the London Assembly: "quantification of value runs the risk of leaving out unanticipated or unfamiliar aspects." This must be addressed by working alongside communities to define social value, not only involve them via tick-box consultations.

HN2 Protecting and reshaping housing

HN2 is not positively prepared or justified and is not effective.

HN2 A(2) proposes replacement of lost social rent floorspace, but will lead to net loss in units (as the supporting paragraphs acknowledge). There must be stronger protection insisting on the same number of units or at least habitable rooms.

3.27 is not effective without reference to specific guidance on how ballots are carried out.

HN2 refers to a right to return but it is not defined and is therefore not effective. The right to return within a limited timeframe needs to be strengthened and made explicit. **HN2** does not consider analysis of estate regeneration across the previous LP period, which shows displacement and delay and a failure to return in practice: there is no assessment or acknowledgement of this and no attempt to improve in practice.

Annex E describes Elephant Park as "setting a benchmark for mixed-use, high-density regeneration," but Elephant Park is widely considered as a failure in social homes provision. It replaced the Heygate Estate, where 1020 council homes were demolished and of approximately 3000 new homes, 100 are for social rent (8 of these are off-site). The estate's former community was displaced: tenants were promised a right to return that few could exercise, and many leaseholders left London altogether, which has been widely documented (35% Campaign). Presenting this as a benchmark is not justified. We ask that the description be removed and that HN2 prevent this from happening again.

There must also be measures to protect and support for non-social rent tenants displaced as a result of development. Moving costs and compensation must be provided.

HN2C seeks to regulate demolition and replacement of affordable housing, but needs to be stronger. It lacks detail to be meaningful and measurable in practice, including:

- what must be included in the **C(1) “robust assessment”**, including what “alternative options” must be included. This must include a detailed breakdown of refurbishment.
- what “social and environmental impacts” must be considered, and in what circumstances these impacts will outweigh benefits.
- the requirement to “maximise the provision of additional affordable housing” needs to be clarified and made more enforceable. Again, Section 106 agreements and viability assessments must be made transparent and open to democratic scrutiny.

This policy also fails to acknowledge the resulting shift from council housing to other forms of social rent housing, and the subsequent loss in secure long-term tenancies.

A development should not be considered successful simply because it produces a net increase in housing numbers. **HN2** should ensure that boroughs explicitly measure and continue to monitor over the period of the development whether existing residents remain and if they benefit from improvements in their housing, including rent levels, security, space, suitability of homes and location. This should take into consideration the cumulative impact of development in the same area.

Annex A, should include a new KPI **"Homes lost through redevelopment, by tenure; and outcomes for existing residents of estate regeneration (number remaining or returning, and on what tenure)", reported annually and cumulatively over the Plan period.**

HN3 Delivering affordable housing

Para 3.49 requires that annual housing costs (including mortgage, rent and service charge) are no greater than 40% of net household income, but how will this be enforceable in practice and monitored? Is there any analysis on costs under affordable homes delivered under the previous London Plan period?

HN3 is not positively prepared and is not effective. **HN3 A(1)** states a requirement for authorities to maximise the delivery of genuinely affordable housing to contribute to London's 50 per cent strategic affordable housing target. This target is unmeasurable and meaningless in practice, particularly given the more specific and lower targets elsewhere in policy.

The same criticism applies to **A(2), B(1) and B(2)**, which are not positively prepared as they ignore a known need. The reduction in targets is unacceptable and unjustified given the GLA's own evidence base, which identifies a growing proportionate need for affordable homes, and a finding that affordable homes costs are not the principal impact on viability. The GLA itself recognises that reducing affordable housing targets "has typically led to higher land values, rather than an increase in housing delivery."

HN3 is not effective. It states that affordable housing need could represent around 66% of overall supply at a delivery rate of approximately 56,000 homes per year. Yet the strategic target remains 50% genuinely affordable housing over the longer term. The Plan should explicitly recognise the gap between the 50% strategic target and the identified 66% level of affordable housing need and should therefore treat the 50% target as a minimum, not a ceiling.

Monitoring. Boroughs should be required by the Plan to publish annual figures showing:

- Total homes delivered
- Social rent homes
- Other low-cost-rent homes

- Intermediate homes
- Market homes; and
- Homes lost through redevelopment.

The policy is not effective as there is no acknowledgement that smaller amounts of affordable homes are less attractive to registered providers of social housing. Reducing the targets will lead to more situations where no one wants to take on the affordable homes, in most cases with a s106 provision allowing for eventual sale as market housing. The policy should seek to limit and more tightly regulate such s106 provisions.

HN3 must acknowledge that a low level / lack of affordable homes can be considered “too high a price to pay” and a ground for refusal, especially where there is a particularly high need identified locally. This is affirmed by the Schneck case of 2022.

HN3 does not acknowledge the GLA’s own evidence that larger developments with a particularly high proportion of private housing and a lack of affordable homes can actively result in negative socioeconomic impacts, particularly in lower-income areas and where development also delivers improvements in local amenities. GLA Housing Note 10, describes this as “gentrification pressures” and notes that concentrating new housing in lower-income areas such as Catford or Elephant & Castle can cause rent and price increases. POP has seen these increases lead to the displacement of Black and minoritised residents and of the small businesses that are an integral part of the community and neighbourhood.

Implementation 3.40 is not effective or positively prepared. The spatial aspect of the Plan is potentially disastrous for mixed and balanced communities. Lower affordable housing requirements in suburban areas, where there are already much lower proportions of affordable housing and land is cheaper, sit alongside an approach that directs high-density, high-value development towards central and inner London. This risks exacerbating well-known existing inequalities and creating an even more divided city. Taller buildings can also attract prohibitive service charges and rising ground rents, further affecting affordability (**MBUL**).

Viability varies greatly within boroughs and is based on site-specific constraints. Viability can also change over time. There is no assessment in **HN3** of the potential that we are at the bottom of a cycle and viability may improve; reduced targets would lead to significant under-capturing.

Reduced targets where development is “proposing significant transport infrastructure delivery” are not sufficiently defined, giving developers too much flexibility to seek reductions. A clearly defined and high threshold must be set.

Table 3.2, para 3.41. The reduction to a 40% baseline requirement for public land is unacceptable. The 50% target must be retained.

It should not be possible for the Mayor to agree a 25% threshold on public sector land via a Public Sector Land Portfolio Agreement. The sale of public land for such limited public benefit is not justified and in any case, not properly detailed.

Sub-policy I allows for development following the fast-track route to avoid submitting viability information where it meets the criteria under C and D. This incentivises existing schemes to submit s73 applications and reduce affordable homes in line with altered affordable homes requirements without scrutiny, even where such schemes are already deliverable. The Plan must also ensure that viability is not routinely used to justify reducing affordable housing commitments.

Sub-policy J: Allowing delivery off-site where it results in a higher level of affordable homes risks incentivising delivery on less desirable off-site locations where it results in the smallest increase in affordable homes (even one room). This also risks failing to assess and capture viability improvements from doing so. Assessment must factor in profit and not just cost.

Sub-policy N requirement to demonstrate that the scheme is providing the maximum possible level of affordable housing is not measurable or effective in practice.

Sub-policy O must go further and acknowledge that developers are often able to deliver higher levels of AH than accounted for under viability.

Sub-policy P must be more prescriptive in setting out what is meant by careful scrutiny and robust justification of proposals reducing levels of AH. The policy should also be extended to applications for new permissions where a similar scheme is already consented on the site.

Shared ownership has become increasingly problematic in light of stagnant property values and crisis in additional costs (mainly service charges). This form of AH should not be supported.

The requirement for an Early Stage viability review where substantial implementation has not taken place within two years is a positive change and should be retained. Where applicants seek to reduce affordable housing in an existing consent, the application should be reassessed afresh and scrutinised in public.

HN4 Gypsy and Traveller Accomodation

Policy HN4 is not positively prepared or effective. The move to more specific borough targets is very supported. However, there is no detail as to how these targets are expected to be achieved, and what the repercussions would be for any authority that fails to meet them in order to make this enforceable.

HN5 Managing specialist accomodation

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

HN6 Build to rent

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

HN7 Housing size mix

HN7 is not effective as it sets no minimum standards or guidance on bedroom size mix, and therefore doesn't address the need for affordable family housing. There must be a strengthening of requirements to deliver affordable family sized units, particularly in light of under-delivery under the previous London Plan.

While in some respects "London is a single housing market area" (as per **para 3.95**), different boroughs have different size mix needs. Contrary to the London-wide data, some boroughs need more family sized units (conventional in addition to affordable). This should be acknowledged and accounted for.

We refute the claims that 88% of private market need is for 1- and 2-bedroom homes. This has not been properly evidenced and contradicts LPA need figures. Therefore **HN7** is not positively prepared.

Furthermore, the concept of a single housing market ignores the fact that the location of housing massively affects its impact. As stated, GLA Housing Note 10 notes that concentrating new housing in lower-income areas such as Catford or Elephant & Castle can cause rent and price increases. The reference to single housing market areas needs to include this important qualification.

There must be a more detailed definition of what is meant by "mixed, inclusive neighbourhood." In practice, without a clear criteria, developers find ways to describe any scheme as contributing to a mixed and inclusive neighbourhood, rendering the phrase and policy meaningless.

HN8 Housing design

HN8 is not positively prepared. Much of HN8 has carried over from the current London Plan, but there is no application of a review of outcomes of housing design policies, and no fundamental changes to the approach. This is despite increasing evidence of the need for homes to cope with rapid climate change.

London's markets must be protected from the creation of housing close to their operations, to prevent them from pressure from new residents in homes that are not designed for the specific requirements of where they have been located.

The **"Agent of Change principle"** should also protect markets. Housing-led intensification will bring new homes next to markets that open early, are serviced by van and are noisy. The Plan applies the Agent of Change principle to night-time and cultural uses in **GLE4**. It should apply this equally to everyday markets, so that new residents cannot force a market to close or cut its hours.

HN8. Add **"Residential development near everyday markets should be designed to protect the market's operation, including early-morning trading, servicing and loading, noise and waste, applying the Agent of Change principle."**

HN9 Accessible housing

HN9 is not positively prepared or effective. It requires at least 10% of affordable homes to meet wheelchair-accessible standards, at least 10% of market homes to be wheelchair adaptable, with other homes meeting accessible and adaptable standards but there are not sufficient measures in place to monitor provision.

The Plan must require that boroughs monitor and demonstrate that accessible homes are:

- Allocated to households who need them;
- Distributed across different housing sizes and tenures;

- Located close to transport and services; and
- Retained as accessible homes in perpetuity.

Accessibility should not simply be a technical building standard. It should be directly connected to current and specific housing need.

HN10 Burial space

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

Chapter 4 GLE

GLE1 Sufficient and appropriate employment space

GLE1 is not positively prepared or justified and is not effective. Chapter 4 does not mention street or covered markets at all (they appear only in **PV3**). The principle behind **policy F**, which supports the re-provision of potentially displaced small and independent businesses, is supported. However, it is not effective as the current wording is unclear and therefore open to misinterpretation or evasion. The policy must ensure that existing businesses are protected, and not just the floorspace. Further detail is also required to set out what might constitute “feasible and appropriate.”

There should be an express requirement that the new costs to the businesses cannot be much higher than the existing costs, and must remain affordable, or viable to the specific businesses. There must also be early and widespread consultation to ensure new space meets businesses’ needs. There must also be a requirement for fit-out costs to be covered by the developer and this should be clearly laid out in planning agreements.

The example of Elephant & Castle illustrates what is needed. When the shopping centre closed in 2020 after 55 years, around 40 of its 97 independent traders still had nowhere to move to. Around 130 small and micro businesses, the vast majority run by migrants, were directly or indirectly affected. Only 36 relocation applications had then been approved, against around 80 units promised at planning committee, and relocated traders had to downsize: by Latin Elephant's estimate, a net loss of 4,000 square metres of trading space. The relocation fund (up to £634,000 from the developer and £200,000 from Southwark Council), a temporary market for traders at Castle Square, 10 per cent affordable retail with first refusal for existing traders, and a rent cap of 75 per cent of market rent for years 6 to 15, were won only after years of pressure from the community. Nothing in this chapter would require even that. This experience demonstrates why the Plan must establish enforceable requirements.

4.15 does not include the everyday economy of markets, independent shops and migrant and ethnic businesses, which provides jobs, routes into business and affordable food and goods for many Londoners. This is unacceptable. We ask that **GLE1** recognises everyday markets and migrant and minoritised economies as a fundamental part of London's economy. **Part A** must require local plans to provide low-cost premises for these businesses.

GLE1 Part F (and GLE5 paragraph 4.56) is not positively prepared and not effective.

GLE1 Part F contains no equality test at all and fails the Mayor's Public Sector Equality Duty under section 149 of the Equality Act 2010. Displacement is never treated as an equalities issue, although it falls hardest on people with protected characteristics. Section 149 requires the Mayor, and every borough, to have *due regard* to the need to eliminate discrimination, advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. Advancing equality includes removing disadvantage, meeting different needs and encouraging participation in public life. The duty applies when policy is made, not after the harm is done.

POP member PLUSHSE16 states why this is important: "Race and age are protected characteristics. PLUSHSE16 was five Black-owned

businesses serving a largely Black and Caribbean-heritage community, and a youth music studio for 12 to 20 year olds. When a space like this is removed, the loss is not neutral. It falls on one community, in one place, again and again across London. The London Assembly found these consequences "all too often have a disproportionate impact on low-income, marginalised and minority communities". A Plan that does not look for that impact cannot claim to have had due regard to it." (https://www.plushse16.com/about)

The draft Plan must define "small business" and "independent business". There must also be an acknowledgement that these definitions can cover many different things across a broad socioeconomic spectrum. There should be an express preference for small, independent businesses that meet the specific needs of and are affordable to the local community (in particular in line with protected characteristics). Often developers will bring in unaffordable independent businesses that are targeted at affluent new residents and contribute to gentrification and the displacement and erasure of social and cultural aspects of the lives of residents, especially those of racialised backgrounds.

GLE1 must ensure that "sufficient and appropriate" employment space reflects the specific needs of existing businesses and local economies, not simply the overall quantity of commercial floorspace. This must include food-related businesses.

Replacement space may be inadequate if it is unaffordable to existing businesses, unsuitable in size or layout (especially for the provision of food), in the wrong location (with reduced footfall or too far from businesses serving related needs), or unable to serve the existing customer base. This is particularly important for everyday market traders, independent retailers and culturally specific businesses, whose viability depends on affordability, location and established community connections. The policy should require boroughs and developers to assess these factors when planning for employment space and when proposing to displace or re-provide existing businesses.

Plans for the reprovision of potentially displaced small and independent businesses must take into account the fact recognised by Centre for London that: "regeneration takes years, and often spans several political

administrations, council teams and development partners” as well as the need for long-term security for small business-owners. Rents must be affordable for extended periods, and leases must be secure.

Section 10 currently accepts "relocation assistance" and "phased relocation" as the fallback. This creates a loophole that must be closed: the Plan already lets developers offer relocation instead of space back on site. We suggest replacing the bullet list with:

“Where existing independent businesses, market traders or community enterprises are affected, schemes should re-provide space on site, of equivalent size and affordability, with a right of return. Relocation should be a last resort: agreed with the businesses, nearby, and fully funded including reasonable fit-out costs.”

GLE1 F is not effective as it leaves displacement to developer discretion. **Part F** says developments that would displace small and independent businesses "should either re-provide such space in the development where feasible and appropriate in terms of its type, size and cost, including affordable workspace where this exists on site, and/or work with the borough to ensure that appropriate relocation options are available".

This is not effective for these reasons:

(a) "where feasible and appropriate" is undefined, so re-provision becomes optional and viability-led;

(b) "and/or" lets a developer choose relocation instead of re-provision;

(c) "work with the borough" passes responsibility to boroughs, and relocation options being "available" is not the same as being suitable, affordable, agreed or taken up;

(d) "affordable workspace where this exists on site" does not clearly cover market traders, stall and kiosk holders, licensees and sub-tenants (the very businesses left out at Elephant & Castle);

(e) there is nothing on timing, continuity of trading, a right of return, rent levels, how long affordability lasts, or monitoring.

Proposed replacement text for GLE1 Part F:

“F. Development that would result in the displacement or potential displacement of existing small and independent businesses, including market traders, stall and kiosk holders, licensees, sub-tenants and businesses occupying temporary or meanwhile premises, must:

(1) identify all affected businesses, on the site and in its immediate vicinity, at the earliest stage of plan-making and pre-application engagement, and assess the impacts on them and on their customers, including through an equality impact assessment;

(2) re-provide space within the development that meets the needs of those businesses in terms of type, size, location, servicing and cost, at rents and service charges no higher in real terms than they paid before redevelopment, secured in perpetuity or for no less than 15 years;

(3) secure continuity of trading, through suitable temporary premises on or near the site before any business is required to leave, and a right of return to the re-provided space;

(4) only where on-site re-provision is shown not to be possible, secure relocation to suitable premises nearby, agreed with the businesses affected, with relocation, fit-out and any additional rent costs met by the developer; and

(5) set out these measures in a business re-provision and relocation strategy, prepared with the affected businesses and their representatives before the application is determined, secured by planning obligation, with outcomes monitored and published annually for at least five years after re-provision or relocation.”

Proposed implementation text:

“Viability should not be used to reduce the requirements of Part F. The count of affected businesses should include everyone trading on the site, whatever the form of their occupation, and should be checked with the businesses and local community organisations. Plan-making authorities should identify, in local plans and site allocations, clusters of small, independent, and migrant and ethnic businesses at risk of displacement, and set out how they will be retained.”

GLE1 A Add to the range of business space: **"including low-cost premises for micro-businesses, market traders and migrant and ethnic businesses"**

GLE1, para 4.15 Add: **"and the everyday economy of markets, independent shops and migrant and ethnic businesses, which provides jobs, routes into enterprise and affordable goods and services"**

GLE1, para 4.14 Add **"affordable retail, market space and units let to existing traders to the uses that conditions may safeguard."**

The Plan's own equality assessment section 15 asks for impact assessments on schemes. We challenge the GLA's assessment of the Plan itself, because it scores the town centre and small business policies as good for equality without looking at displacement. The Integrated Impact Assessment scores **PV3** as having a significant positive effect on equality, partly because it asks boroughs to designate markets **(IIA para 6.362) (see PV3)**. It scores **GLE1** as positive even though it cites evidence that development displaces businesses owned by Black, Asian and minority ethnic Londoners **(IIA para 6.160)**. The equality assessment of **PV3 (Appendix A, para A.99)** considers public realm, safety and noise, but not displacement caused by housing-led intensification of town centres (**see PV3**).

Suggested modification: a revised Equality Impact Assessment, published before the Examination in Public, that assesses displacement impacts on people with protected characteristics and on people facing socio-economic disadvantage.

GLE2 Supply of industrial land

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GLE3 Data centres

POP wishes to highlight Just Space's comments on **GLE3**. Data centres are an environmental, placemaking and social issue, not just an economic one. Boroughs should identify suitable locations in their Local Plan for data centres with availability of electricity and water, and opportunities for clustering. Proposals for data centres in such locations should be supported in principle; elsewhere they need to justify why the location is appropriate.

GLE3 is fundamentally not effective, except at planmaking stage, when LPAs can be challenged. It is not fit for purpose.

The Brick Lane data centre is located in a residential and commercial area because its serving high-frequency trading, needing proximity to the City and key internet infrastructure, which drives it into central London rather than peripheral locations. This leads to land-use conflict: data centres for trading are prioritized over housing needs and other social uses. Is the ability to make money a few milliseconds faster is a valid justification for using scarce city-centre land - even while acknowledging London's role as a financial centre.

POP wishes to challenge the reasoning for data centre provision in London. It is noted that Slough already has a high concentration of data centres.

The policy is not positively prepared. We know that data centres can require the equivalent of one or two dedicated power stations, with a very large carbon footprint, and the current policy wording does not seem to fully grapple with this scale of impact. The policy only asks for the "lowest emission engines and fuels available," which could still be highly polluting (e.g. using red diesel if cleaner options are unavailable) and contradicts **4.41** claim that London data centres will be "clean, green, efficient".

GLE3 should be changed to:

- Demand tighter standards on backup generators
- Challenge data centers that displace housing or key community uses
- Scrutinize "latency" and "financial edge" justifications

- Every data centre should be required to have a full Environmental Impact Assessment before planning approval.

GLE4 Night-time economy

GLE4 is not positively prepared. The policy explicitly supports London's night-time economy, including culture, nightlife, hospitality, events and the night-time workforce but does not recognise that London's night-time economy depends upon the people who work within it, and who also face pressures referred to in our response to chapters **MBUL, HN and PV** linked to transport, affordable homes and access to affordable and healthy food.

This includes:

- DJs
- Musicians
- Performers
- Security workers
- Hospitality workers
- Event workers
- Technicians; and independent promoters.

Regeneration should not undermine existing cultural and nightlife ecosystems through excessive rents, residential encroachment or loss of suitable venues. **GLE4** must be more clearly defined in order to be enforceable (see our response to **GLE5**).

Markets are not "retained" and protected by **GLE4 or GLE5**. **They must be added to KPI 11.**

As we have stated (**MBUL**), the value of everyday markets and their social and cultural contribution to the local community and economy needs to be made more explicit and protected and sustained in the long term.

As stated in **HN8, the “Agent of Change principle”** should also protect markets. Housing-led intensification will bring new homes next to markets that open early, are serviced by van and are noisy. The Plan applies the Agent of Change principle to night-time and cultural uses in **GLE4**. It should apply this equally to everyday markets, so that new residents cannot force a market to close or cut its hours.

GLE5 Culture and creative industries

GLE5 is not effective. It defines culture in a way that leaves many of our essential spaces out completely. The policy sees culture as galleries, venues and Creative Enterprise Zones but it does not value the culture that lives in London’s barbershops, hair studios, Caribbean kitchens and youth studios.

GLE 4.57 defines culture as "music and performance venues, visual arts, fashion, film, design, crafts and making, cinemas and museums.” This is not positively prepared. The definition leaves out the places where diverse working-class communities actually make and share culture.

Paragraph 6.27 does recognise that markets serve "London's diverse ethnic communities.” The same recognition is missing for the businesses that do this on the high street every day.

The testimony of POP member PLUSHSE16 must be taken into account: “The PLUSHSE16 barbershop was a place of public debate. The music studio gave young people affordable access to production. The takeaway kept Afro-Caribbean food culture on a street where it is often misrepresented. Under GLE5 as drafted, none of this counts as a "cultural facility". So none of it would be re-provided.”

Part D is not effective. It asks for re-provision of "existing cultural facilities" but **4.55** only "encourages" boroughs to "consider" continuity of use and a right of first refusal for the existing operator. This language must be stronger and enforceable.

It must be made clear that the specific existing cultural and or creative providers should be protected, and not just the use class or floorspace. This is particularly so where the existing providers respond to local culture and local need.

No cultural or community facility should be lost without genuine replacement of equivalent or better quality, affordability, accessibility and community function.

Part B(1): Development proposals should "protect existing cultural facilities and creative industries (consumption and production)".

Part D: Where existing cultural facilities are present, development should "provide/re-provide at least an equivalent amount of cultural space with similar affordability for end users".

In addition, markets must also be protected and must be added to KPI 11. Everyday markets must be named as cultural facilities under GLE5 and recorded on the Mayor's Cultural Infrastructure Map.

GLE5 must protect the cultural life of Londoners with protected characteristics (see also MBUL7, MBUL8, PV3).

GLE5 Parts A(1) and B(1), para 4.54 A wide range of cultural and community resources including everyday markets must be recognised as cultural facilities, and LPAs must be encouraged to consider them as candidates for listing as Assets of Community Value.

Annex A, KPI 11 and new KPIs. Rename KPI 11 "Cultural venues, pubs and markets". Add KPIs for: net change in market pitches and floorspace; businesses displaced and the share re-provided at equivalent affordability; the share of displaced businesses still trading two years later; affordable retail and market space secured. Report by owners' protected characteristics where data allows, annually and cumulatively.

GLE6 Visitor infrastructure

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GLE7 Affordable workspace

GLE7 is not positively prepared or justified and is not effective. **GLE7** lays out affordable workspace requirements for a wider range of commercial development than the previous Plan. However, the policy must clearly define “workspace” clearly to include the commercial, retail and community spaces, including shops and food businesses, that it states it is aimed at. Without this, the policy cannot be effective.

Affordable workspace should also include premises for local community organisations, social enterprises, voluntary organisations and other culturally significant organisations that are an essential part of London’s fabric. Any replacement space should be at least as affordable, accessible and suitable for the existing occupiers and their community function.

GLE7 Part B(4) and paragraph 4.67 The Plan is not positively prepared and not justified because it has no social value policy. The phrase "social value" appears only twice in the economy chapter: in **GLE7 Part B(4)** and **paragraph 4.67**, both referring to who may rent affordable workspace. However this is not defined and no way of measuring is put in place. Therefore it is not protected.

POP member PLUSHSE16 states that **GLE7** is:

- Not positively prepared. In April 2025 the London Assembly Planning and Regeneration Committee found that redevelopment is causing "irreversible damage to communities". It recommended that the next London Plan "include a social value policy" setting out how community voices are heard in planning decisions, and new policies to protect long-standing businesses that deliver high social value. The draft does neither. A known need has been left

out.

- Not justified. The GLA's own evidence was given to the Mayor and not acted on. No reasonable alternative, such as the Just Space Alternative Plan's Policy 20 *Audits of social value*, has been assessed.
- Not effective. Without a definition, social value becomes whatever a developer's consultant says it is. That is how a 12-storey tower with 27% affordable homes was presented as "housing for the community" while five Black-owned community businesses were removed (see https://www.plushse16.com/london-plan-response).

The term “affordable” must be clearly defined. Rents are only “affordable” when businesses are able to pay them without placing their sustainability at risk.

To be effective, the Plan must recognise that genuine affordability is also determined by service charges, fit-out costs, business rates, lease length, repairing obligations, deposits and management charges. For example, in Elephant & Castle, traders have faced prohibitive fit-out costs that put at risk their ability to relocate as part of redevelopment.

Affordable rents must be offered in the long term to avoid the practice of offering tapered discounts, after which traders face a “cliff edge” that threatens their survival, as experienced by traders in Elephant & Castle.

More detail must be provided on the practical delivery of affordable workspace, including a minimum percentage of floorspace, minimum pricing expectations, basic terms such as the developer covering fit-out costs and limits on additional charges, and an expectation that the space will be managed by an affordable workspace provider.

Where affordable workspace is provided over the longer term, the policy should make clear what happens when circumstances change, for example where further redevelopment is proposed or the premises become uninhabitable. The protection and re-provision obligations should continue to apply in these circumstances rather than simply disappear.

GLE7 should not allow affordable workspace to be provided off-site or through a financial contribution in lieu as a substitute for re-providing existing affordable commercial or market trading space lost through

development. These alternatives move the benefit away from the businesses and communities affected by development and may force businesses to relocate away from their established customer base and related businesses, putting livelihoods and local economic networks at risk. GLE7 should therefore require on-site re-provision of existing affordable or market space where it is lost through development.

The policy must define the circumstances in which affordable workspace would be considered “not practical or feasible to deliver on-site”, with clear criteria and evidence requirements, so that this exception cannot become a routine route around on-site provision.

The 2021 London Plan requirement under Policy E9 to “secure affordable commercial and shop units” should also be restored.

GLE7 A risks failing to reach those that need it most. Affordable workspace is triggered only by offices, research and development, light industrial, data centres and storage, but not by housing-led schemes in town centres, where markets and independent shops are often located. This is despite the fact that most community groups asked for all Class E uses to be covered (Consultation Report, paragraph 3.59). The policy ignores this.

GLE7 E should not exempt affordable workspace provided on a temporary or meanwhile basis pending the redevelopment of the site where its occupiers were displaced from the same or a nearby site. Otherwise, traders moved into temporary units during phased redevelopment lose all protection.

Proposed amendments:

GLE7 A and C(3): Trigger affordable workspace requirements in major mixed-use and residential development in town centres, with affordable retail and market space as eligible uses.

GLE7 D add: **“Off-site provision or payments in lieu should not be accepted where existing affordable workspace, affordable retail or market space is lost on the site.”**

GLE7 E: Replace “unless the existing affordable workspace has been provided on a temporary or meanwhile basis pending the redevelopment of the site” with **“including where it has been provided on a**

temporary or meanwhile basis to accommodate businesses displaced from the same or a nearby site."

GLE8 Access to employment and skills

GLE8 is not positively prepared. It acknowledges that London's economic success is not shared equally and specifically seeks to improve access to employment for people who are unemployed, under-employed and from under-represented groups. The Plan records an 11 percentage point employment gap between white Londoners and Black, Asian and minority ethnic Londoners.

However, its response is limited to jobs and training in construction and end uses but for many migrant Londoners, self-employment in markets and small shops is the route into work. **GLE8** must widen the approach taken to increase opportunities, by including support for local enterprise, business support in community languages, and local procurement from existing small businesses. This must also include support via affordable workspace, cultural provision, and prioritising small independent businesses in planning. Also see chapters **HN, MBU**L.

GLE8 requires major developments to support employment, apprenticeships, skills and training opportunities through planning obligations. However, for this to be effective, the policy must require major developments to publish measurable targets for:

- Local employment
- Apprenticeships
- Youth employment
- Employment of under-represented groups including women
- Construction jobs
- Skills training; and
- Long-term employment opportunities.

These commitments should be monitored after planning permission is granted until delivery, with measurable and enforceable targets that are made public in a timely way.

KPIs 9 to 12 Monitoring None of the current economic indicators measures small businesses, everyday markets or displacement. We ask for indicators on the net change in market pitches and floorspace, on businesses displaced and re-provided at equivalent affordability, and on the share of displaced businesses still trading two years later, reported by the protected characteristics of business owners where data allows.

GLE8, Part B(4) add: **"Support local enterprise and self-employment, including business support in community languages and local procurement from existing small businesses."**

GLE9 Aviation

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GLE10 Safeguarded wharves

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GLE11 Circular economy

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GLE12 Waste

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GLE13 Aggregates and mineral resources

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

Chapter 5 GHR energy, carbon, flooding, green space GHR8, parking

GHR1 Energy efficiency

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GHR2 Low cost, low carbon heat

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GHR3 Whole life-cycle carbon

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GHR4 Heat risk

GHR4 is not positively prepared or justified and is not effective. Heat risk must include outdoor trading and small premises. Everyday markets, kiosks and small shops are among the places most exposed to heat, and their occupiers can least afford cooling. **GHR4's** requirements for shade and green infrastructure in public and communal spaces should explicitly include market spaces.

GHR4, **heat risk in public and communal spaces**. After "providing shaded areas", add: **"including everyday market spaces."**

GHR5 Flood risk and drainage

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GHR6 Trees, biodiversity and geodiversity

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GHR7 Green infrastructure and Urban Greening Factor

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GHR8 Accessible green space

GHR8 is not positively prepared and is not effective. New parks and greening improve health, but they also raise land values and rents as the GLA has recognised.

Elephant Park's new park is part of the scheme the Plan calls a benchmark. However, it is well known that few former Heygate Estate residents are there to enjoy it. We ask that greening and new accessible green space in OAs be planned with existing communities and paired with anti-displacement measures, in order that the people who lived with poor air and little green space can benefit. Community food growing should be supported and food recognised as essential infrastructure..

GHR8 Implementation. Add: **"In OAs, new and improved green space should be planned with existing communities and accompanied by measures to prevent the displacement of existing residents and businesses (see MBUL1 and GLE1). Opportunities for community food growing should be supported."**

GHR9 Clean and healthy waterways

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

GHR10: Air quality

GHR10 is not positively prepared or justified and is not effective. **GHR10** rightly asks plan-makers to consider the "sensitivities of particular populations or communities including those with protected characteristics." The IIA notes that "poorer and Black, Asian and Minority Ethnic communities are more likely to live in areas with poorer air quality."

But **GHR10** does not include outdoor and street-level workers such as market traders. Construction management plans for major schemes must assess and mitigate the dust, noise and access impacts on neighbouring small businesses and traders. For example, at Elephant & Castle, market traders and street-level businesses work long hours beside some of the busiest junctions in south London, and have lived with years of demolition and construction, which contributes to poor air quality.

GHR10, construction (Part D and implementation) Add: **"Construction and demolition management plans for major schemes should assess and mitigate the impacts of dust, noise, access restrictions and loss of footfall on neighbouring small businesses and market traders, agreed with those businesses."**

GHR10, plan-making evidence on vulnerability and exposure. After "sensitivities of particular populations or communities including those with protected characteristics", add: **"and of people who work outdoors or at street level for long hours, such as market traders."**

GHR11 Cycle and car parking

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

Chapter 6 PV

PV1 Brownfield First Opportunity Areas (BFOAs)

Policy PV1 is not positively prepared or justified and is not effective.

Brownfield First Opportunity Areas (BFOAs) are identified as “locations with significant development capacity to accommodate new housing, commercial development and infrastructure (of all types).”

However, measures are not included in the plan to protect the existing Black and minoritised markets and businesses and the residents that use them, from displacement. There must be monitoring put in place in areas designated as BFOAs and the GLA and LPAs must ensure that growth builds on the existing local economy and cultural identity, rather than treating existing businesses and markets as obstacles to redevelopment.

The Draft London Plan identifies New Cross–Lewisham–Catford as a Brownfield First Opportunity Area. POP member Catford Against Social Cleansing calls for the London Plan to require the BFOA approach to demonstrate:

- Net increases in social rent housing and other genuinely affordable housing tenures
- Protection against displacement
- Adequate transport infrastructure
- Health and education capacity
- Youth and community facilities
- Protection for independent businesses
- Community wealth-building
- Protection of cultural identity; and
- Meaningful resident participation.

The regeneration in all the other areas designated must be in the interests of the existing community, not simply take place around it.

Many of the draft Plan’s policies intersect at Elephant & Castle, which is considered to be:

- a Brownfield First Opportunity Area, with 5,000 indicative homes and 13,900 jobs **(Annex E);**
- a location for buildings of 100 metres and over **(Table 2.2)**;
- a major town centre **(Annex B)**, on the edge of the Central Activities Zone;
- dependent on the Bakerloo Line Extension.

Elephant & Castle has already lived through the kind of regeneration the Plan promotes and is evidence of its failure to benefit residents, especially those of minority and / or migrant backgrounds and / or on lower incomes. The demolition of the Heygate Estate, with its devastating loss of social rent homes and the closure of the Elephant & Castle Shopping Centre in 2020, impacting around 130 small and micro businesses, the vast majority run by migrants (72 per cent of Latin American retailers in the area were of Colombian origin, and over 40 per cent of the businesses were women-owned (Latin Elephant, 2021)).

Displacement is a health issue. The Plan's own **IIA** acknowledges that "stark health and socioeconomic inequalities, including ethnic inequalities, remain" in London **(IIA Non-Technical Summary, paragraph 1.67)**. Losing a home, a business, or the everyday market where people meet and buy affordable food harms physical and mental health and personal economies, especially for older people, migrants with limited English, and people on low incomes. Nonetheless, the Plan's references to health impact assessment do not mention displacement.

We ask that health impact assessments for major regeneration schemes assess the effects of displacement and the loss of social networks, including on mental health, and that their findings shape whether and how schemes proceed.

Add: **"Health impact assessments for major regeneration schemes, including in Brownfield First Opportunity Areas, should assess the effects of displacing existing residents, businesses and social infrastructure, including the loss of social networks and effects on mental health, and their findings should inform whether and how schemes proceed."** The Plan's only reference to health impact assessment is in the context of design review (**para 2.89**).

These changes are needed for the Plan to be justified, effective in reducing health inequalities as its own objectives require, and legally compliant with the Public Sector Equality Duty.

The policy states that planning in these areas should now recognise “the role of heritage, culture and local identity in place-making” and that “the involvement of community voices, particularly those from underrepresented groups, should be sought.” But as stated by PLUSHSE16, seeking is not hearing, and hearing is not acting. Just Space notes that "consultation" appears only 13 times in the draft, mostly about the GLA talking to boroughs and TfL. The alternative, a Mayor's Statement of Community Involvement, has not been assessed.

We ask that communities, in particular migrant, Black and minoritised and working-class residents and traders, be involved from the earliest stages of OA frameworks and site allocations, with funding, interpretation and translation provided.

PV1 must define the strategies that will be used to recognise the culture and local identity of areas, so that “placemaking” protects their special character. The policy should provide specific detail about how this character will be protected from the impacts of development, and how this will be monitored over time and by whom.

To involve local voices, including importantly the Black and minoritised businesses that are at the heart of everyday markets and independent businesses, the Plan must set up stakeholder panels, where there is genuine scope for shaping local plans and transparency in decisionmaking. Planning documents including section 106 agreements and viability assessments, as noted in chapter **HN**, must be published to facilitate democratic scrutiny throughout the development period and beyond. It is well documented that commitments made at planning may be delivered many years after permission is granted, and are frequently renegotiated.

Part B(7) encourages meanwhile uses. As stated in **PV3**, the meanwhile use of spaces can bring value to the community and to a community or commercial activity. However, businesses and community groups need

secure and long term leases so that activity can be sustained without regular threats of displacement.

PV1 add new part **"Opportunity Area planning frameworks should include an anti-displacement plan, prepared with the community, covering existing residents, businesses and social infrastructure."**

Monitoring. The GLA has removed many of the Opportunity Area monitoring dashboards and replaced them with short “pen portraits”, not even produced by the LP team. There is no visible monitoring of tenure and mix of homes, of jobs, of impacts or of community benefits or promised infrastructure, let alone of the equalities impact. Stronger monitoring, cumulative impact assessment and enforcement mechanisms are required.

Annex E states regeneration should build on Elephant & Castle''s cultural and community assets, "recognising the significant Latin American community and the need for a diverse retail and community offer.” However, recognition is not protection. For Southall, the same annex says "it is essential to retain and preserve Southall's heritage and cultural assets as it develops,” and supports "community-led approaches to regeneration.” Elephant and Castle's Latin American community deserves the same.

Annex E - New Cross / Lewisham / Catford Opportunity Area. The vision names four Catford site allocations (Catford Shopping Centre, Catford Island, Laurence House/Civic Centre and Wickes/Halfords) and the longer-term re-alignment of the South Circular (A205). It says nothing about the residents, traders and community organisations already there. By contrast, the Southall vision states that "it is essential to retain and preserve Southall's heritage and cultural assets as it develops.” Suggested modification: **"It is essential to retain and support Catford's existing communities, independent businesses, market traders and community organisations as the town centre changes. Redevelopment of Catford Shopping Centre and the other allocated sites should secure continuity of trading, affordable replacement**

space on site, and a right of return for existing traders and organisations, shaped with them from the start."

Annex E says Southall's town centre "should be supported through enabling community-led approaches to regeneration". We ask for the same in every Opportunity Area and town centre, and for community-led options for managing markets (London Assembly recommendation 7).

<u>PV2 Central Activities Zone (CAZ)</u>

PV2 is not justified as it does not consider alternatives in face of the known impact of similar policies.

Plan-making and development management A aims to “realise the potential for new residential development to create areas that are more mixed commercial and residential in character, complemented by social infrastructure.” This policy does not provide the needed protection of the existing mix of businesses, but promotes the displacement and destruction of small independent retail.

Development can be successful in economic terms while an area's smaller, independent or culturally specific businesses are displaced. As stated by POP member Friends of Queens Market in their submission, the focus on high-end activities will prevent benefit to large sections of the population, an effect which does not adhere to the Good Growth objective to “grow the economy in a way that benefits all.”

PV2 2 The policy should be changed to: **“Support the maintenance and growth of a diverse and inclusive CAZ economic ecosystem based around the strategic functions, making available a range of business space (including secondary space and markets) and securing the delivery of (or contributions to) affordable workspace and community space.”**

POP argues that support for the experience economy should include explicit and measurable protections for existing independent traders, everyday markets, affordable premises and businesses that serve local communities, not just destinations that attract spending.

Class E flexibility may effectively increase pressure on existing commercial premises. Premises may be able to change between uses without a full change-of-use planning application. Permitted development rights can also allow some conversions to housing. Controls must be introduced to ensure that this flexibility does not undermine the diversity of high streets or reduce affordable commercial space.

The draft identifies Elephant & Castle as a Class E / Experience Economy Cluster, while also partly recognising it as a town centre. The area's existing Latin American businesses, markets and cultural identity are part of the economic and experiential value that planning should protect and sustain, not simply features to acknowledge while redevelopment proceeds. This is the case in other areas.

Centre For London states that "regeneration should start from the value already present in a place. Existing residents, traders, community organisations, cultural spaces, social rented homes, markets, high streets and informal networks all contribute to local wealth. Too often, regeneration captures this value without doing enough to protect the people, businesses and organisations that created it."

PV3 Town centres and high streets

PV3 is not positively prepared and not effective in several ways.

PV3 is not effective because it promotes "vibrant, resilient, accessible and inclusive" high streets and a "diverse mix" of uses but does nothing to stop high-street rents being set by national chains that local and working-class businesses cannot compete with.

In the experience of POP member PLUSHSE16, large chains such as

Tesco, Sainsbury's, Gail's and Pret A Manger are a catalyst for unaffordable high-street rents. They can pay rents and offer lease covenants that local independents cannot. Their lettings then become the comparable evidence that landlords and valuers use, which sets the benchmark for the whole street or parade. They effectively dictate and distort market values.

Once a street's rents re-base around national chains, affordable rents disappear from lower-income and working-class communities. Every "affordable" rent is then calculated from that distorted figure. Their arrival is often presented as a sign of successful regeneration but for the people already there, it is often the start of the end.

PV3 is not justified. The Plan offers no evidence on who is occupying London's high streets, at what rents, or what happens to independent businesses when national chains arrive. Just Space's Alternative Plan proposes audits of social value (Policy 20) and a restructuring of business rates (Policy 25). Neither of these alternatives has been assessed.

PV3 is also not justified as although it does allow the designation of everyday markets by LPAs, it does not provide for designation by communities or local panels, as recommended by the GLA's Planning and Regeneration Committee in their 2025 report *Social value in planning and regeneration: Knowing the price of everything and the value of nothing* where it's stated that "the next London Plan should include provisions to allow communities to designate markets which have a demonstrated contribution to social value in the community as a protected asset." (https://www.london.gov.uk/sites/default/files/2025-04/Social%20value%20in%20planning%20and%20regeneration%20report%20April%202025.pdf)

Designation should be wider. Wholesale markets as well as culturally-specific food shops must also be able to receive designation along with traditional everyday retail markets as strategic (and thus essential and protected) food infrastructures.

However designation alone is not enough and should bring defined protections and safeguards. These should include:

- an equality impact assessment for any proposal affecting a market
- a minimum level of affordable workspace
- options for community-led management of markets
- no net loss of market capacity due to development
- trading continues during redevelopment
- traders have a right to return at rents no higher than before.

The public ownership of markets should be retained and transparent governance and management ensured; low rents should be protected with secure leases to enable a market's affordable and social function and the provision of markets in further high streets and neighbourhood centres should be supported.

Markets should be added to **KPI 11** with a "no net loss" target, in the same way as Pubs (**GLE4**) and cultural venues (**GLE5**)

6.27 "Market" and "strategic" must be defined. The draft Plan never defines a market or what makes one "strategic". The only examples given of strategic markets are visitor destinations and have already been heavily gentrified. New definitions and criteria are needed in the Plan, so that everyday markets are valued and can be protected.

6.27 The current draft states that markets provide "choice and access to a range of food and goods for London's diverse ethnic communities," and strategic markets are "Portobello Road, Borough, Brick Lane, Columbia Road and Camden", which "offer significant attractions for Londoners and visitors." The 2021 list was the same, with the exception of Brick Lane. It is noticeable that none of the markets mentioned focus on the provision of affordable and diverse foods (rather than prepared or

It's telling that although Brick Lane would now be designated a "strategic" market, Save Brick Lane (a POP member) is still fighting to protect its community and established businesses. A tourism-focused strategic designation does not safeguard the people who give a market area its character.

Plan-making and development management A states that local plans and development proposals should address and positively contribute to

“promote and enhance town centres and high streets as vibrant, resilient, accessible and inclusive places.” However, the draft London Plan describes a developer-led strategy for densification. Without introducing clear and enforceable safeguards, this Plan will erode cultural specificity and diversity in retail, social and cultural spaces as has already happened in the past.

This dynamic was noted by the GLA itself in its April 2025 report *Social value in planning and regeneration: Knowing the price of everything and the value of nothing*: “In some cases, development leads to the disappearance of important community spaces, such as markets, arch-based businesses, community centres, libraries, and youth centres. The loss of these spaces has a significant and lasting impact on the community and can lead to negative attitudes toward development.”

(https://www.london.gov.uk/sites/default/files/2025-04/Social%20value%20in%20planning%20and%20regeneration%20report%20April%202025.pdf)

There is currently no published London-wide data on who trades and shops in London's markets, so the effects of this policy chapter on protected groups cannot be assessed or monitored. Protect our Places and Latin Elephant would welcome working with the GLA to pilot such data collection at Elephant and Castle.

PV3 A(3) promotes all town centres as locations suitable for mixed-use and housing-led intensification. Friends of Queens Market and other POP members strongly oppose this policy to promote housing in town centres, as it can directly threaten the economy of a town centre as follows:

- because high-end housing pushes up rents, forcing existing businesses out. This particularly applies to retail units provided on the ground floor of housing blocks: these blocks usually displace existing established businesses and then bring higher rents, or sometimes empty premises, which affects the town centre.

- because this policy puts housing in competition for space with businesses and community use, such as markets. The loss to the local economy of these is not remedied by their replacement with housing.

Residents also have demands which may be at odds with the efficient running of, for example, a market which starts work at early hours, and so on. There is no example of a market being paired with housing and remaining operational and Friends of Queens Market have witnessed this pressure in Newham.

PV3 is not justified because the policy does not sufficiently protect the affordability of markets and therefore does not adhere to the Good Growth objective to "grow the economy in a way that benefits all." The Plan is not positively prepared because it does not meet the objectively assessed need: that of Londoners with the lowest income being able to buy genuinely affordable food and goods.

PV3 discusses the meanwhile use of space and wants to support flexibility. As stated in **PV1**, the meanwhile use of spaces can bring value to the community and to a community or commercial activity, but secure leases are essential both for commercial and community spaces so that activity can be sustained over time, and make a more significant contribution to the local area without regular threats of displacement. The increasing use of legislation to obtain the protection of Asset of Community Value status reflects this need for long-term control.

As noted by Friends of Queens Market, "businesses cannot function or grow on a temporary basis and need certainty. The threat of property development and its vague or unknown timing is no help to the productivity of businesses, for example, where they need to make decisions on capital investment."

6.25 states that strategic and local partnership approaches should be supported and encouraged. Partnership approaches must include traders, community organisations and local residents, and their findings should have a substantive influence on decisions about density, height, land use and redevelopment, starting at the earliest stages of

development and continuing to scrutinise delivery. Local stakeholders should identify not only the potential for change but also the existing assets, relationships and livelihoods that development should retain and support, as well as how this is done.

The London Plan should require community engagement before key development options are fixed, rather than after decisions have effectively been made (as stated by Catford Against Social Cleansing and quoted in our response to **MBUL6**).

For major schemes, developers should publish details of community engagement and its impact on the plans to create genuine participation. Ongoing scrutiny is essential as "these commitments may be delivered many years after planning permission is granted, and can sometimes be renegotiated as schemes or viability conditions change." (https://centreforlondon.org/wp-content/uploads/2026/09/Making-Regeneration-Work-for-Londons-Communities.pdf) (Also see MBUL2 and PV1)

PV3 must be assessed via the **Integrated Impact Assessment,** together with MBUL2, the tall building locations in Table 2.2 and the Opportunity Areas. The cumulative impact of all these policies in the same areas must be assessed (see **MBUL2**).

Paragraph 6.24 should add affordability (rents and service charges per pitch or unit, secured over time) and the mix of goods sold to the measures of a market's capacity. A market can keep its stall count and still be priced out of existence.

We ask for glossary definitions of a market and an everyday market: one that mainly meets residents' everyday needs for affordable fresh food, goods, and services, often serving migrant, Black, minoritised, and working-class communities. Criteria for strategic importance should include serving diasporic communities across London, selling affordable and culturally specific food and goods, long-standing cultural value, and clusters of independent and migrant-run businesses, not just visitor appeal.

The Plan should include a dedicated social infrastructure policy. This would define social infrastructure to include markets, affordable retail, community facilities and cultural spaces. It should require needs

assessments to identify existing and future needs, and provide a clear policy basis for resisting the loss of these assets where a need has been identified.

PV3 A(4) and B(3)(iv), paragraph 6.25 Covered markets and shopping centres with everyday markets and independent traders inside, like the Elephant & Castle Shopping Centre, can be labelled "surplus commercial space." **A(4)** should exclude everyday markets and affordable retail space. Findings that frontages are "surplus to demand" **(B(3)(iv))** should assess social value and equality impacts, not only market demand. Town centre partnerships (**para 6.25**) should include trader associations and community groups as equal partners, and land assembly must not result in the loss of markets.

PV3 D(2) rightly asks boroughs to improve access to goods and services in areas that are poorly served. It should refer expressly to affordable fresh and culturally appropriate food, which everyday markets provide.

Proposed replacement for PV3 Part E

E. Plan-making authorities must identify, designate and safeguard all street and covered markets, including everyday markets, on their Policies Map, having regard to their functional and operational capacity, footprint and social value. Local plans and development proposals should:

(1) resist development that would result in the loss of a market, or a net reduction in its functional or operational capacity or its affordability, unless the market is re-provided on site or nearby with equal or better capacity, affordability and accessibility, agreed with existing traders;

(2) secure continuity of trading during redevelopment, and a right of return for existing traders at rents and service charges no higher in real terms than before, on secure leases (protected by the Landlord and Tenant Act 1954 wherever possible), in perpetuity or for no less than 15 years;

(3) require a market impact assessment and an equality impact assessment, prepared with traders and customers, for any proposal affecting a designated market;

(4) keep publicly owned markets in public ownership, with transparent governance that includes traders and the communities who use them;

(5) support new and expanded markets in town centres, high streets and neighbourhood centres, especially where people lack access to affordable fresh and culturally appropriate food; and

(6) apply the Agent of Change principle to protect the operation of markets from new noise-sensitive development.

New implementation text: "Local communities and trader associations may nominate markets for designation. Plan-making authorities should consider nominations and publish the reasons for their decisions".

B. Paragraph 6.24 (market capacity)

Add: "Functional capacity also includes the affordability of pitches and units (rents, licence fees and service charges) and the mix of goods and services sold, including affordable fresh food. Affordability should be maintained in perpetuity or for no less than 15 years, with increases for existing traders limited to inflation."

C. Paragraph 6.27 and the glossary

Replace paragraph 6.27 with:

Markets play a vital economic, social and cultural role. Everyday markets provide affordable fresh food, goods and services, low-cost routes into business, and places of connection, care and belonging, particularly for migrant, Black and minoritised, and working-class Londoners. They contribute to the vitality, character and heritage of town centres, high streets and the CAZ and are of strategic importance. These include everyday markets serving communities across London, as well as markets that are also visitor destinations, such as Portobello Road, Borough, Brick Lane, Columbia Road and Camden.

PV3 Part A(4) Add: **"excluding everyday markets and affordable retail space, which should be retained"**

PV3 Part B(3)(iv) Add: **"Findings that frontages are surplus should assess social value and equality impacts, and should not apply to designated markets."**

PV3 para 6.25 "Partnerships should include trader associations and community groups as equal partners. Land assembly must not result in the loss of markets."

PV3 Part D(2) Add **"including affordable fresh and culturally appropriate food" after "provide access to goods and services."**

The Plan's own equality assessment. Section 15 asks for impact assessments on schemes. We challenge the GLA's assessment of the Plan itself, because it scores the town centre and small business policies as good for equality without looking at displacement.

The Integrated Impact Assessment scores **PV3** as having a significant positive effect on equality, partly because it asks boroughs to designate markets **(IIA para 6.362)**. It scores **GLE1** as positive even though it cites evidence that development displaces businesses owned by Black, Asian and minority ethnic Londoners **(IIA para 6.160) (**see **GLE1**). The equality assessment of **PV3 (Appendix A, para A.99)** considers public realm, safety and noise, but not displacement caused by housing-led intensification of town centres.

Suggested modification:
A revised Equality Impact Assessment, published before the Examination in Public, that assesses displacement impacts on people with protected characteristics and on people facing socio-economic disadvantage.

PV4 Strategic economic clusters and corridors

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

PV5 Industrial land supporting housing growth

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

PV6 Metropolitan Open Land (MOL)

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy.

PV7 Sustainable development and enhancement of the green belt

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy

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PV8 Strategic and local views

Our organisation does not have a comment on this section. This should not be taken as indicating approval of the policy

End.