Towards a Community-Led Plan for London
Ideas for discussion and debate
JUST SPACE is a community-led network of voluntary and action groups influencing plan making and planning policy to ensure public debate on crucial issues of social justice and economic and environmental sustainability.

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

To us, the planning system pays only lip service to the commitment to community participation: the gap between policy and practice is immense where democratic engagement is concerned.
In May 2016, Londoners will be electing a new Mayor and a new Assembly. One of the first tasks of the Mayor will be to develop a new London Plan, setting a vision and planning policies for the next 20 years. Just Space is stating loud and clear that Londoners and their community organisations are ready to play a central role in shaping the future of our great city.

For the past fifteen years, community groups have been given the opportunity to comment on London Plans drafted by the Mayor. In the process, we have developed a rich and diverse pool of knowledge and evidence. But this has not been enough!

London and its planning and development has changed significantly in recent years. Developers now have overwhelming influence on how the plans for London emerge. Financial viability has become the major criteria, boosting developer profits at the expense of social and environmental benefits. Meanwhile, national government has weakened the controls over change of use making it harder to protect our workspaces and our community facilities. Development has become geared towards speculative housing, housing which fewer and fewer Londoners can afford.
And yet, in theory—and in law—planning in London should be guided by the key principles of **sustainable development** and **participation**. The Localism Act of 2011, for instance, offers to re-empower citizens in the making of their neighbourhoods.

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

We want the new Mayor to agree a programme of effective and continuous engagement. We are calling this a **Social Compact with Londoners**. This will involve community organisations in the early formative stages of the preparation of the new London Plan, working with officers and decision makers in a spirit of co-production. We want, furthermore, the implementation and delivery of
policy to be at the heart of the new London Plan. Policies of most interest to communities, like Lifetime Neighbourhoods, are all too often overridden or ignored.

Just Space groups have already started applying these principles to enable a Community-led Plan for London to emerge. In July 2015, we organised five days of workshops, walkabouts and conference to kick-start the process. Since then, six working groups have been developing ideas that cut across all the Mayor’s responsibilities—housing, air quality, health, economy, climate change, transport—and have implications beyond planning. Our aim is to submit a draft plan to the new Mayor during his or her first days in office.

This publication reflects only some of the very rich work that has been developed collectively over the last few months. We also have ideas on many fundamental long-term issues, such as land taxation, community ownership, and finance mechanisms for infrastructure. Many subjects will be debated at our 4th February 2016 Community Conference at City Hall. And there will be lots more work to do after that. Come and join us!
Community participation in planning is an essential strategic issue for the Mayor and the London Assembly. It is a London-wide issue not just about process, but is an issue on which the legitimacy of plans and decisions depends. Appropriate learning and information, technical support and resources should be provided to enable the effective participation of community groups.

The Mayor must enter into a social compact with Londoners by developing a Mayor's Statement of Community Involvement, which will provide a framework and resources for participation. The recognition of diversity should be at the heart of this approach, to ensure minority or excluded groups are properly included.
Government planning policy must integrate and deliver on environmental, social and economic goals in line with the principle of sustainable development. This internationally agreed principle stresses that we “achieve our goals of living within environmental limits and a just society, and we will do it by means of a sustainable economy, good governance, and sound science”.
“Much of London’s economic life takes place along and behind high streets throughout Greater London”

**PROBLEMS:** London Plans and the strategy documents emerging from the London Enterprise Panel (LEP) and the business lobby group London First have hitherto focused on fostering growth of high profile globally-oriented sectors of the economy and growth of property-related interests. This approach has given London an economy with growing in-work poverty (after covering housing costs), poor prospects for businesses and workers in low-wage, small-firm and BME sectors, lengthening work trips for many people and thus increasing hardship.

The tendency of current practice to expel production, maintenance and logistics activity towards (and beyond) the edge of Greater London sacrifices important jobs and increases the mileage of (mostly diesel) vehicles delivering goods between firms and to households. This is a cost to the economy and a serious threat to the health of Londoners which needs to be fully reflected in policy and the evidence on which it is based.

Much of London’s economic life takes place along and behind high streets throughout Greater London. The affordability of these premises is already a severe problem and enterprises are further threatened by proposals to densify housing in these locations without due attention to the life of this diverse, sometimes unseen, economy.

The success of London’s economy is at present threatened by the progressive weakening of controls over change of use through ill-considered government relaxations of the General Development Order and Use Classes Order. These changes have been particularly damaging to the economy of London.
Economy
Key Issues

● QUESTION GROWTH AT ANY PRICE
Expand the material welfare and wellbeing of all who live or work in the city as part of a balanced development of the UK as a whole.

Policies needed to foster cooperation with government and other countries and regions to secure this balance.

Debate: How much growth should London be welcoming? Is it at the expense of other regions? Growth of what?

● AN ECONOMY FOR FAIRNESS
Contribute to the fairer distribution of the benefits of economic activity among Londoners.

Policies needed to support the growth of productivity and earnings of those in low-pay occupations.

Debate: How can those excluded from economic activity or not earning enough to survive be supported in getting a better deal?

● DIVERSE ECONOMY
Resist the excessive dependence on financial and business services and on real estate and support the diversification of the London economy encouraging the success of manufacturing and recognising all the service sectors which meet the needs of citizens and other sectors across the city—ranging from the repair and maintenance of equipment and buildings to the care of elderly and vulnerable groups.

Policies are needed that acknowledge all workspaces are strategic for London, not just the big industrial estates; GLA, Boroughs and LEP between them must get to understand how the economy works at all scales, especially where big changes are proposed and ensure there is space for all enterprise.

Debate: What research is needed? Who should be doing it?

● GREEN ECONOMY
Taking advantage of the need to de-carbonise and ‘green’ the whole economy by pioneering and innovating in repair, maintenance and re-use of buildings and equipment, retro-fitting the building and vehicle stock for better environmental performance and fostering the labour force developments this will entail.

Policies needed for Mayor and boroughs to collaborate on greening strategies; Impact studies before major and smaller developments approved.

● MULTIPLE & ETHNIC ECONOMIES, BUILDING ON WHAT WE HAVE
Building upon the ethnic and cultural diversity of economic activity in London, re-directing urban regeneration to build upon the economies we have, rather than erasing and displacing them in each new regeneration scheme.

Policies needed for outreach, resources and capacity building to enable SMEs and especially those in ethnic economies to play a more active role in policy-making.

● JOBS NEARER HOMES
Foster a more polycentric distribution of job opportunities in London to reduce the need for travel, especially the need to travel by private cars, and the need for deliveries, making more efficient use of infrastructure and reducing the need for costly new infrastructure.

Policies needed to link economic development with ‘lifetime neighbourhoods’; ensure that suburban employment and services better defended against centralisation of London economy; orbital and local transport investment.

Debate and Research: Need for creative work on design and management of schemes which combine denser housing with affordable and functional work-space for a diverse economy.
PROBLEMS: As most of the current London Plan’s ‘affordable housing’ is not affordable to the majority of households in London, the term ‘Affordable Housing’ should be removed from any Mayoral or borough planning documents. The greatest levels of unmet housing need in London are for not-for-profit rented homes.

Evidence shows that increasingly low income households are being forced out of London, or to live in poor quality or overcrowded homes with detrimental consequences to their health and well-being. Delivery failures of social-rented homes are exacerbated by unnecessary demolition of council estates.

It is essential to maintain, retrofit and refurbish existing homes, for social, economic and environmental reasons and benefit. The seriousness of the housing crisis requires each new home to be an additional rather than a replacement home.

For many years, the private rented sector (PRS) has been seen as the poor relation of housing and at best has been viewed as a temporary stop-off on ‘the journey to home ownership’.

However, buying a home is not a realistic option for the vast majority of renters and policymakers now need to come to terms with the private rented sector as a permanent home for a significant and growing proportion of the capital’s residents, and make sure that it becomes ‘fit for purpose’ now and in the future.
JUST SPACE
HOUSING POLICY

To meet existing need and to address London’s backlog of need over a five year period a target of 30,000 not-for-profit rented homes per annum would need to be set.

Social, health and wellbeing indicators of existing residents should be incorporated into decision-making around regeneration schemes.

Any replacement of not-for-profit rented homes should be carried out on the basis of like for like in terms of tenure, rental cost and size.

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

Proposed regeneration of council or housing association estates should require comprehensive, independent analysis of social, environmental (including embodied carbon) and economic benefits of all proposed options and a ballot of tenants and leaseholders. Options should always include refurbishment.

Key Issues

- To meet London’s housing need, a majority of all homes built should be not-for-profit rented dwellings
- Not-for-profit rented homes should be defined as where the rent is made up of the cost of management, maintenance and repairs of homes

Housing That is Genuinely Affordable

“Public land should be held for not-for-profit rented homes”

Community-led Housing

“Alternative forms of housing help build strong and sustainable communities”
Private Renters

Debate

- The Mayor to set up a London wide landlord licensing scheme OR support, encourage and facilitate more of the boroughs to set up their own local schemes AND to do the same to help the creation and enlargement of local authority run social letting agencies, as a means of intervening in the local lettings market and raising standards.
- These could require landlords to offer 5 year Assured tenancies to their tenants in homes that are both energy efficient and have decent property and management standards.
- Are Assured Shorthold Tenancies (ASTs) still fit for purpose in a private rented sector that is now becoming a permanent home for many people living in London, especially families who need accommodation that is affordable, secure and stable?
- Issues related to the calculation and implementation of the London Living Rent.

Key Issues

- Bring land forward for development at lowest possible cost
- Ensure most effective use of land and property in relation to public policy objectives
- Land and property value appreciation should be captured for public policy objectives

Land Value Capture

PROBLEMS: A systematic review of the relationship between planning, land ownership and development is critical to securing the housing supply and infrastructure that is needed. The profit requirement and the dependence on development finance need to be taken out of the equation.

Debate

Further research is needed on the policy options that include:

- Tax on land that has been consented for development but not started on site.
- Land value tax.
- Local Plans should be explicit as to the land use for any development site, including specification of density, tenure mix, affordability, bedroom size mix and built form.
- Consideration of which existing taxes should be superceded, including possible Council Tax, Business Rates, Stamp Duty, Capital Gains Tax, Inheritance Tax.

JUST SPACE
PRIVATE RENTERS POLICY

The Mayor to seek devolved powers to introduce city wide rent control, based on Living Rent formula.

The London Living Rent is currently being calculated by Matt Padley and other researchers at Loughborough University’s Centre for Research in Social Policy. Further research will be undertaken.

Generation Rent and the Highbury Group recommend that rents should be set at 30% of lower incomes.

JUST SPACE
COMMUNITY-LED HOUSING POLICY

The Mayor to provide a package of support for community led housing that includes exemption from CIL and s106, capacity building funding, a knowledge bank to develop both Borough understanding and retain the expertise of community led housing groups, and the promotion of community led building.

Alternative forms of housing are distinguished by a community led approach to housing production, ownership and/or management. They include housing co-operatives, community land trusts, community self build, co-housing, tenant management organisations and community housing associations (right to transfer). They help build strong and sustainable communities, provide mutual support, have the potential to limit property speculation and for all these reasons should be scaled up.
Transport
“Shift road freight to rivers and canals by implementing the Blue Ribbon Network”

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

The London Plan needs binding policies to bring essential changes in our transport habits.

**Transport Key Issues**

- Reduce the need for people to have to travel by providing key amenities and job opportunities locally and more balanced economic development between the Central Area and the rest of London.
- More investment throughout London in walking, cycling and accessible transport, and in Outer London in public transport services, particularly bus services and Orbital Rail.
- Strong road traffic reduction targets, implementing road user charging, strengthening Low Emission requirements and avoiding traffic generating transport schemes.
- Promote an integrated approach to freight with a network of consolidation hubs and managed distribution for the final leg of delivery. Shift road freight to rivers and canals by implementing the Blue Ribbon Network.

**Debate**

- Road user charging, particularly London wide, would change travel behaviour and tackle congestion and pollution, but could be a regressive tax favouring those who can pay, while penalising those whose lives cannot be lived without a car, those lacking good public transport and adding costs to commerce.
- Efforts to mainstream cycling as a mode of choice are unambitious, partial or unsuitable to many cyclists and potential cyclists. A game-changing implementation strategy is needed. But current proposals, such as the cycle super highways, quiet ways and Mini-Hollands (cycle friendly low traffic areas) have yet to demonstrate critical mass take off.

**JUST SPACE TRANSPORT POLICIES**

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

International examples such as Transit Oriented Developments (TODs) show how mixed multi-functional communities focused on public transport hubs can achieve sustainable development.

Support and improve throughout London walking, cycling, public transport facilities, including their affordability and accessibility. Road space reallocation including reducing or eliminating car travel lanes in specific areas to create additional space for walking, cycling and the public realm.

Creating safe, liveable and fully accessible routes, places and public transport for all also requires consideration of affordability as low paid workers are disproportionately affected by rising transport costs.
THE PROBLEM: For many Londoners, the day-to-day reality is one of feeling insecure about the future, feeling isolated, not feeling heard, having their needs overlooked and marginalised. Day-to-day experience of the London Plan is mostly about the break up of communities, despite the Plan’s official commitment to “ensuring equal life chances for all” and despite its official celebration of London’s diversity.

From our experience, there is a serious lack of commitment to this policy, coupled with a failure to implement. To decision makers, social inclusion, recognition and justice are vague concepts which are treated as a tick-box exercise. There is very little serious evidence being gathered about the circumstances of people from different communities, with their different needs and experiences. There is no adequate assessment of the impacts that the plan has had on London’s diverse communities.

“The spaces which are essential to London’s diverse groups should be protected”
Social Inclusion
Key Issues

- The London Plan to be based on evidence and impact assessments which take into full account the diversity of needs across London’s communities, particularly the needs of those usually marginalised and excluded. These include for instance young and older people, working class communities, disabled people, Black Asian and Minority Ethnic (BAME) communities, LGBT communities and Gypsies and Travellers.

- To recognise and protect the spaces in London which are essential to London’s diverse groups — whether these be community assets (e.g. BAME community assets), residential space (e.g. sites for gypsies and travellers) or business space (e.g. markets for ethnic and migrant traders). These spaces to be fully recognised as the cornerstone of an effective Localism Act.

JUST SPACE
SOCIAL INCLUSION
POLICIES

Introduce needs and impact assessments (such as social impact assessments) that are (a) based on communities own assessments, reflecting their own understanding of their social identities and (b) reflect the cross-cutting nature of problems faced by minority and/or excluded groups (for example, the link between lack of stable accommodation and education attainment for Gypsies and Travellers).

The Mayor, in collaboration with the Boroughs, to implement measures to support minority and excluded groups to take advantage of the Localism Act 2011 and especially the community right to bid and asset transfer schemes, community economic development plans, community right to challenge, community right to build and community right to neighbourhood planning.
PROBLEMS: We are not “living within environmental limits”. London is not on track to meet targets to control climate changing emissions and is blighted by illegal levels of air pollution.

Policies have not proved adequate to address the deficiency of green space, the erosion of habitat and the protection of existing green space from commercialisation and development. Green spaces from Green Belt and Metropolitan Open Land, to pocket parks are under threat. The Plan has not adequately addressed how the food we consume can be healthy, affordable and sustainable.

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

“New schools, hospitals or care homes should not be built in air pollution hotspots”
Key Issues

● Review key environmental targets such as on climate change, air pollution, protecting nature and sustainable use of resources to make sure they are up to date and based on the latest science and requirements. The policies and proposals of the Plan must together ensure that the environmental targets are actually met by the dates required.

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

● Ensure every community has access to healthy, affordable and sustainable food and opportunities for community food growing activity. New land for community food production should be identified in the London Plan and Local Plans.

● Counter any decline in species and habitat, with strengthened policies requiring the conservation and enhancement of biodiversity, including the making of improvements to designated habitat areas and appropriate adaptations to the built environment.

● Increase river and canal transport of passengers and freight, including waste and construction materials, and implement integrated water resource management for the Thames River Basin.

Debate

● The Mayor must revise the Climate Change targets after the Paris agreement December 2015 and the aspiration for 1.50 degree limit to the global average temperature rise.

● A shift is needed in London’s energy infrastructure, to meet carbon emission targets, move away from fossil fuels and address fuel poverty. One proposal is to create a not-for-profit publicly owned energy supply company owned by London public bodies that is dedicated to cheaper, cleaner and more democratic energy. Another is a major retrofitting programme for existing homes, including decentralised energy and renewable energy options.
“Integrate food growing space in all new housing developments”
**AIR QUALITY**

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

- New schools, hospitals or care homes should not be built in air pollution hotspots and schools near busy roads should be fitted with effective air filtration systems—as recommended by House of the Commons Environmental Audit Committee.

London must be made to meet EU legal limits by 2020 at the latest—this is the date the rest of the UK will have to comply by, and Londoners should not have to suffer dangerously filthy air for a further 5 years after the rest of the country.

London must set itself on a path to meet World Health Organisation recommended levels for air pollutants.

Reduce the need for people to have to travel and cut road traffic levels as set out in the transport section.

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**COMMUNITY FOOD GROWING & FOOD PRODUCTION**

Boroughs must identify and safeguard land for commercial food production and community gardening, including allotments, parks, and orchards. Boroughs to maintain a public list of available plots and to administer a land register of interested parties looking for land for production and marketing of food for London.

Career-long agricultural tenureships offered by boroughs and GLA for food production sites so that enough time is provided to develop financial viability, benefits of bio-diversity, soil replenishment and community development.

Integration of food growing space as a requirement in all new housing developments with utilisation of green roof methods and potential for trainings and enterprise opportunities.

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

Land for food will support community food growing and food production enterprises. Scaling up the use of land for food will meet the long term goal of achieving a resilient food system and feeding the city. Food growing and production are closely related to housing, health, the economy and the environment. It is essential to adopt an approach that is intersectional, participatory and inclusive of all stakeholders. Food production provides employment, training and contributes to sustainable economic development.
The following community and voluntary sector groups have participated in developing the ideas that form this publication.


More information is available on the Just Space website

JustSpace.org.uk

If you would like to get involved in the next stages of the Community-Led Plan for London or have any comments please contact Richard Lee, the coordinator of Just Space

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