

JUST SPACE COMMENTS ON DRAFT NEW LONDON PLAN

2nd March 2018

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

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

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

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

In 2015 Just Space and its member-groups began to prepare contributions for a completely new London Plan which was going to be needed and commissioned by the new Mayor. A series of Conferences and working groups brought together contributions from 85 community organisations. This led in August 2016 to the publication of [Towards a Community-Led Plan for London: Policy directions and proposals](#), which has been discussed at a number of roundtable meetings with the GLA.

In 2017 Just Space, supported by staff and students at UCL, prepared 4 new policy documents which were launched for public discussion at City Hall on 20th January 2018. [Land Reform](#), [Health Policy](#), [Industrial Strategy](#) and [Social Impact Assessments](#) have informed our deliberations on the draft new London Plan. However, this submission is informed most of all by the involvement of very many community organisations at 3 conferences on the London Plan co-ordinated by Just Space with the support of others: London Plan Community Event 20 January 2018 at City Hall, London Plan Equalities Event 5 February 2018 at City Hall, Working Conference on London Plan 24 February 2018 at UCL.

Chapter 0 introducing the Plan

Local Circumstances:

National Planning Policy Framework para 10 says that plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. The current London Plan (para 0.14 2016 as edited 2017) recognises 'local circumstances' as..."Given this consistency, he [the Mayor] considers that the London Plan can be seen as the expression of national policy for London, tailored to meet local circumstances and to respond to the opportunities to achieve sustainable development here. These views informed the early alterations referred to in paragraph 0.16B, and they were upheld."

However, the proposed Plan relegates the application of 'local circumstance' to the adjusting of policy by boroughs to suit localities. The Mayor has surrendered the ability for London, through the new London Plan, to exercise a greater degree of self-determination in plan-making to achieve London-wide policies that are more closely aligned with the needs, aspirations and conditions appertaining to London and Londoners. This is a missed opportunity of importance. For example in the adjudicated plan-led system of the UK, 'local circumstances' and policy, if well evidenced, is recognised by Government, the Appeal Court and PINS and can secure, say, "affordable housing" from small sites (10 homes or less) notwithstanding a Written Ministerial Statement to the contrary. Therefore, 'local circumstances' is a potentially important opportunity that the Mayor is not availing us of: a retrogressive step.

Little Recognition of Neighbourhood Planning

The Plan gives virtually no recognition to neighbourhood planning. It is now an active and popular level of planning that is part of the Development Plan. National Planning Policy Framework para 184 explains that neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. And the current London Plan does recognise that communities, local business organisations etc. have particular contributions to make to planning decisions, plans and strategies to shape neighbourhoods and the Mayor will support their involvement (para 8.4). The Mayor is again not availing us of an opportunity to progress planning in London that meets the needs, aspirations and conditions of Londoners.

Planning for people

Para 1.1.1 states that "planning for good growth means planning for these communities – both existing and new – helping them to flourish and making new connections between them". This is unfortunate as it can be read that planning is a top-down exercise done for people and not a collaborative venture with and by people. This in-exactitude does not make an appropriate start for the Plan and the intent that lies behind it.

Integrated Impact Assessment

Having regard to the Just Space analysis of the Integrated Impact Assessment (IIA) for the London Plan that appears elsewhere, Just Space considers that the IIA is not fit for purpose and that substantial further work should be undertaken on it before the Examination in Public. Otherwise, plan-making is put at risk.

We have the following grounds for viewing the IIA as unfit for purpose:

1. Non-availability of accessible formats
2. It fails adequately to evaluate the key alternatives available to London and the London Plan Process.
3. The timing of the IIA prevented it from genuinely informing the gradual evolution of the Plan
4. The handling of the analysis is deficient in crucial respects