

Chapter 1 Planning London's Future (Good Growth Policies)

Chapter 1 provides an essential opportunity to set out an integrated approach to meeting London's current and future needs in a way that reduces socio-economic inequalities, ensures economic fairness, increases health and wellbeing, all within environmental limits.

The Just Space *Towards a Community-Led Plan for London*¹ puts forward a vision for London's future and specific policy proposals to support these objectives and achieve sustainable development. Through the Integrated Impact Assessment process, Just Space has also produced alternative options for the Good Growth policies and spatial development vision². The comments below summarise key principles and suggestions in these documents, highlighting important aspects that are missing from the Good Growth policies.

The introductory paragraphs to the Good Growth chapter present a range of assumptions which need to be carefully unpacked and debated.

Definition of "All Londoners"

The first assumption refers to who the London Plan is for, who is part of London's future. The term 'Londoner' is used throughout the Plan with no definition or explanation of who it includes. The term could be defined simply by 'people living or working in London', however a more complex understanding is necessary to give recognition to the whole range of women's and men's lived experiences, their contributions to shaping the city over the course of history, their multiple and intersecting social identities, diverse needs and aspirations, social, cultural and community networks.

Across many of its chapters the London Plan hints at an emerging Londoner profile which is perhaps that of a young professional commuting into the Central Activities Zone, with sufficient income to afford the London Living Rent or shared ownership, make healthy food choices, enjoy cultural events, and also have the time and resources to participate in civic life.

Many of London's communities would not feel reflected by this identity. For example those who have never been considered part of the global city economy (e.g. the working class, those in low income and precarious work, those involved in the everyday, foundational and informal economy etc); those who are time-poor due to having multiple jobs, caring responsibilities, long commutes; those who have been isolated from their family, social and community networks or displaced outside of London due to the housing crisis and increasing living costs; those whose values and cultural norms are not

¹ <https://justspacelondon.files.wordpress.com/2013/09/just-space-a4-community-led-london-plan.pdf>

² <https://justspace.org.uk/next-london-plan/community-alternative/>

usually represented in public life and institutions; those who are restricted from accessing basic facilities like healthcare through identity checks and upfront charging, for example migrants and refugees who may also face cultural barriers.

It is essential to make explicit that the term Londoner includes migrants, and given the impacts of Brexit we look to the Mayor to be a champion for all Londoners and to elevate groups who are being excluded from what London has to offer. “All Londoners” must be explicitly defined in the London Plan and every one of the Mayor’s Strategies to include Londoners without documented legal status and must take full account of where multiple identities cause an omission of a duty of care to those who are most vulnerable in society. We would welcome the opportunity for an open and inclusive discussion on this topic.

Low-income households

A second related point refers to the assumption that the proposed development model can ‘work for everyone’ and reduce inequalities. However an important issue such as rising poverty gets very limited mentions in the London Plan, despite being highlighted as a concern in the Mayor’s vision document ‘A city for all Londoners’. We would like to see the concerns and interests of low income households put at the forefront of the London Plan as a key priority and we make a number of suggestions drawing from the work of the [New Policy Institute](#) and [Taxpayers Against Poverty](#).

If the London Plan is explicitly designed to address the needs of low income households, it will be more likely to be successful in meeting the Mayor’s commitments to fairness, more likely to ‘work for everyone’ and deliver sustainable development across its social, economic and environmental dimensions. Low income, and especially working households are not only short of money but also pressed for time, due to caring responsibilities and part-time jobs. As a result, they: are cost sensitive; have higher dependence on and more interaction with local public services; have more local, varied and unpredictable travel patterns; have a larger stake in the local area³. To address this we suggest further changes to Policy GG1 Building strong and inclusive communities, and to other policies throughout the Plan.

Community Participation in Planning

Finally, we are concerned by the assumptions in the introductory paragraphs that only planners, planning applicants and decision makers are involved in shaping London’s growth and development. There is a significant omission in not recognising and supporting the role of London’s diverse communities in planning – for example in ensuring evidence and impact assessments are robust and reflect the whole range of experiences and needs on the ground, in developing visions for the future of their area and the whole city which are

³ As highlighted by the New Policy Institute in their work on the [London Poverty Profile](#)

based on these needs, in influencing policy formulation, in the implementation of policies and decisions and their monitoring. This also needs to take into account the full extent of what makes up local communities – not just residents, but also businesses, enterprises, organisations and service providers with a stake in the local area. To address this shortcoming we make a number of proposed changes to Policy GG1 Building strong and inclusive communities. In addition, the first sentence of each of the Good Growth policies should be amended to:

.... those involved in planning and development, which should incorporate inclusive local community participation...

GG1 Building strong and inclusive communities

The key theme that is missing from this policy is that of ensuring the inclusive participation of diverse communities in planning and development. This is mentioned in the supporting text (1.1.5) but should be made an explicit requirement.

Interaction and participation will play an important role in building a city where all play an active part in the decisions that affect them. They will give voice to the diverse needs across London's communities, particularly the needs of those under-represented or completely excluded, and make a significant contribution to the reduction of social and economic inequality.

Neighbourhoods that are healthy and inclusive will have facilities, amenities and community spaces that are accessible and affordable to everyone, now and for future generations. These spaces are highly valued for the opportunities they provide for social interaction, community networking and empowerment and in every neighbourhood they will be audited.

Engagement with communities will be a meaningful and continuous process, with real opportunities for co-production.

The definition of inclusive communities should come from the bottom up, from the lived experiences of people and groups. This should include not only residential communities and groups protected under the Equalities Act, but also local businesses, social enterprises and other organisations which are part of London's neighbourhoods.

The GLA should facilitate more ways and resources for groups and networks to meet, around particular issues and cross-cutting issues. The GLA should support communities to map out their assets, networks and relationships as well as good practices and good work that's being done on the ground by community groups and organisations.

It is essential to make plan-making and planning decisions more accountable and everyone should be involved in these processes, in line with the

proposals in the Just Space 'Towards a Community-Led Plan for London' chapter on Public Participation and Community Involvement in Planning.

Case study: Haringey

Haringey has a 65% non-White-British population, 70% of young people from minority communities, is the 5th most deprived borough in London and the 30th most deprived in the country, has 100 languages being spoken. There is the Haringey Development Vehicle and the United Nations taking up the case of the Latin American community, the Pueblito Paisa café in Seven Sisters and Wards Corner, a campaign which has been going on for 10 years. The Tottenham Community Centers Network is trying to ensure that local centers have affordable rent that can actually serve the needs of communities in Tottenham. There is also the Our Tottenham Group which is a coalition of over 60 groups coming together.

This is just an example of what is happening across London. There are organisations, coalitions and groups campaigning around the access to community space, whether it's shops or parks or community centers and for us it is crucial that this is reflected in the London Plan and that we continue to work together for communities in terms of inclusiveness. Building stronger, inclusive communities in Haringey and the whole of London is imperative but from what we've seen so far local authorities might not be able to do that. The new London Plan must provide sufficient guidance and advice as to what it really means in practice. Evidence should be collected on the impacts of what has been happening so far, the loss of community spaces and local facilities, but also in terms of the good work that is being done by community groups, in order to develop good practice guidance for those involved in development and planning.

Changes to the policy:

Introduce new points:

- ensure full public participation and scrutiny of planning decisions, Local Plans, Opportunity Area Planning Frameworks, the London Plan etc, from the early stages through to implementation and monitoring. This should be done in line with the policy proposals made in the Towards a Community-Led Plan for London (p.14): a Social Compact with Londoners, producing a Mayor's Statement of Community Involvement, resourcing by the Mayor to facilitate the informed involvement of communities and user groups, deep changes in governance in relation to London planning and decision making
- identify resources and support to enable a wide range of interests to participate, taking into account the particular needs of different groups

Point A –ensure that London’s economic and other opportunities are taken up and reflected in equal outcomes first of all for low income households and those who face socio-economic disadvantage or exclusion ...

Point D – Promote the crucial role of town centres, high streets and neighbourhoods..

GG2 Making the Best Use of Land

The key theme that is missing from this policy relates to sustainable development, across its social, economic and environmental dimensions. We challenge the assumption at the heart of this policy regarding how the ‘best use’ of land is defined. In the community-led alternative option put forward as part of the Integrated Impact Assessment process⁴ we have argued that **Lifetime Neighbourhoods and Lifetime Suburbs** should be central to achieving sustainable development. We consider the principles underlying Lifetime Neighbourhoods to be the adequate criteria for defining and measuring ‘best use’ of land.

Lifetime Neighbourhoods provide a framework for sustaining and developing sustainable communities and a place-based or spatial focus for mobilising resources to ensure inclusive community participation and community-led planning. They are places that meet the needs of the local community at all stages in their life. Their principles recognise and value health and well-being, social networks, thriving local economy and sustainable environment. These include, as defined by the London Tenants Federation: communal spaces, facilities, services and activities – well run, accessible, affordable and relevant to all; homes that meet our needs; good consultation, democratic accountability and empowerment of communities. A full description is provided in the Towards a Community-led Plan for London Implementation chapter⁵. We welcomed the introduction of the Lifetime Neighbourhoods policy in the 2011 London Plan and we strongly argue it is essential for this to be included in the new London Plan.

The London Plan is based on predictions of massive growth until 2041 which is a long time ahead, yet it hasn’t tested different scenarios or alternatives. It is based on this massive prediction of growth that we are being asked to accept densification and intensification, which may have serious effects on the way of life of the current population living and working in London. Already, a great deal of space in London has been taken up by developments that do not serve the needs of Londoners. In regard to Opportunity Areas, although Just Space has repeatedly asked for this, no analysis has been done of their effects on the homes and jobs of the current London population – especially

⁴ <https://justspace.org.uk/next-london-plan/community-alternative/>

⁵ <https://justspacelondon.files.wordpress.com/2013/09/just-space-a4-community-led-london-plan.pdf>

the fact that many have been forced out of the Opportunity Areas mainly through the development of expensive housing.

Organising development and shaping growth should be done in ways that meet the needs and aspirations of the people and communities of London in an inclusive, fair and sustainable way, coordinated with development beyond its boundary. New models of development and regeneration will prioritise social sustainability and social infrastructure; the protection of existing settled communities to support Londoners' attachment to place and sense of belonging; delivered to achieve the decent homes, densities, place-making and sustainable development needed by —and sensitive to— communities and localities.

A more sustainable pattern of development will be achieved through a greater recognition of a more polycentric geography for London; together with rebalancing employment and housing demands to protect and enhance diverse workspaces and the localised economy; lifetime neighbourhoods and, in outer London, lifetime suburbs, providing many key activities and facilities locally, reducing the need to travel; a crucial role for active travel and public transport, including orbital and smaller scale investments; and meeting challenging environmental limits, targets and opportunities. Implementation with clear impact evaluation and monitoring will optimise delivery.

Key land use policies (especially those governing densities and essential social & affordable housing provision) will be made firmer (less flexible, less negotiable) to give greater certainty in the land market: specifically aiming to ensure that developers don't pay more for sites than is consistent with meeting development plan requirements.

Changes to the policy:

The first sentence should be changed along the lines of:

To achieve sustainable development that meets the needs of communities now and for future generations...

Introduce new points at the forefront:

- best use of land will be measured in terms of socio-economic and environmental value, not just financial viability.
- plan for more dispersed patterns of development, in order to achieve inclusive and well connected Lifetime Neighbourhoods and Lifetime Suburbs
- prioritise the protection of existing uses that meet the needs of local communities

Point A – Delete the word ‘prioritise’. Development in Opportunity Areas etc must not displace existing resident and business communities, social infrastructure, networks and other assets that are valuable to people who live and work in these areas

Point C – this should include local economic audits and socio-economic impact assessments

Point D – add: and support the productive use of green spaces for food growing

GG3: Creating a Healthy City

The key theme that is missing from this policy relates to ensuring that plan making and planning decisions are based on detailed and inclusive evidence of multiple and intersecting health inequalities to support an integrated approach. We propose this is achieved through **Joint Strategic Needs Assessments**.

A healthy city is one where everyone enjoys a healthy urban environment to live, work, learn and play, regardless of their income, their background, or the part of London they live in.

The London Plan’s policies must act to bring air pollution down to safe levels, while encouraging active travel by making it safer and pleasanter to walk and cycle in the city. In practice, this includes:

There is strong evidence that people with better access to the natural environment are less prone to mental illness. Access to green space may also increase physical activity. The London Plan must mandate boroughs to ensure that everyone in London is no more than 5 minutes’ walk away from high-quality nature, and maintain the current policy of ensuring that no one is more than 10 minutes from a local park or open space.

Planning policies can have a significant impact on access to healthy and unhealthy food. Furthermore, the London Plan must require that all new developments improve local residents’ access to affordable fresh healthy food, or at least maintain it where this access is already good.

Changes to the policy:

Introduce new points:

- § Reduce the need to travel by continuing to encourage development which contributes to lifetime neighbourhoods

- § Not allow any new roads in the capital, and restrict any new river crossings to those reserved for public transport, walking and cycling.
- § Widespread pedestrianisation of central London and local town centres, and provision of safe walking and cycling infrastructure along roads
- § Ensure that new schools, care homes and hospitals are not built near main roads
- § support and resource a community development approach to addressing health inequalities
- § support social prescribing through protecting and enhancing existing community and social infrastructure

Point A – include a requirement for Boroughs to conduct inclusive Joint Strategic Needs Assessments to support their plans and strategies. One of these wider determinants is the issue of housing. There is currently a huge mismatch between the kinds of homes that London needs and the ones that are being built and as a result, commuting worsens and the city becomes more socially polarised. New homes must be built at a height and standard of design utilising stable building materials and techniques, energy and water conservation measures, and provisions for refuse recycling. These residential areas should also have access to green spaces given their role in promoting physical and mental wellbeing.

Point C – we suggest that this policy might be strengthened by addressing the balance of land given over to private vehicles (cars and lorries) versus other uses of land to make London streets greener and more pleasant.

Point D – this should include social, cultural and gendered aspects of health, across diverse groups. Also, with 10,000 premature deaths in London linked to air pollution, it is essential that these assessments consider air quality and the measures needed to improved this and secure good quality air for all. We don't feel that these policies go far enough and we feel that action needs to be taken quicker to address this urgent health crisis.

Point G - by supporting healthy and affordable food businesses on high streets, markets, town centres, as well as ensuring sufficient space for community-led food growing

GG4: Delivering the homes Londoners need

The key theme missing from this policy is that of prioritising meeting identified housing need for social rented homes and homes that meet the whole range of specialist needs. We make a number of proposals here and in more detail in the comments related to the Housing chapter.

The London Plan should prioritise the delivery of not-for-profit rented homes, including social rented and community-led housing, particularly on land owned

by the GLA Group, Local Authorities and other public bodies. The term “affordable” is still being used although both the London Tenants Federation and Just Space have repeatedly asked that it stopped being used because of its lack of genuine meaning. Homes aimed at households with a household income of £90,000 or £60,000 are not genuinely affordable to a London population where the mean household income is £39,000 and that of people already in social housing is £17,500. There appears to be a gross mismatch as the housing in these ‘affordable’ categories is not even affordable to those on middle incomes let alone those on lower incomes.

All new homes should be energy positive, built to lifetime home standards and provided at densities which are sensitive to the diverse needs of London’s communities and take into account social and green infrastructure, as well as affordable access to public transport, as part of Lifetime Neighbourhoods and Lifetime Suburbs. Caring for all existing homes and communities should be prioritised through investment in energy efficiency infrastructure and sustainable retrofitting and adaptations. Not-for-profit homes must be protected from loss through redevelopment.

The delivery of new homes and measures to protect and improve existing homes will apply across the whole range of housing types and sizes, with steps taken to increase provision where there is evidence of consistent shortage and poor living conditions. These processes will ensure the full involvement of all London’s communities in housing decisions, supporting capacity building for social tenants, private renters and groups with specialist needs.

Changes to the policy:

The first sentence should be changed along the lines of:

To ensure that everyone across all household sizes, income levels and specialist needs is able to live in all parts of London in secure, high quality homes they can afford...

New points should be added:

- prioritise the protection of existing not-for-profit homes and retrofitting and adaptations to ensure energy efficiency
- ensure the participation of London’s communities in housing decisions in line with the proposed changes to Policy GG1

Point A – should be changed to: Ensure new homes are delivered to meet the full extent of backlog, current and future housing needs, as identified in the SHMA and other evidence-base documents

Point B – should set a target for social rented instead, and refer to targets for family homes and specialist accommodation

Point C – Support diverse and inclusive communities

GG5 Growing a good economy

The key theme missing from this policy is the link to the Mayor’s economic fairness agenda, the vision set out in A City for All Londoners and the objectives to reduce inequalities (for example 1.0.7). We propose a different framing of how London’s economic success is defined and how it translates in planning and development and more detailed comments under the Economy chapter.

The economy of London should be managed in ways which foster the reduction of inequality, especially of in-work poverty, sustaining London’s production of goods and services valued by its citizens, by the rest of the UK and for export. It will, in particular, foster and nurture the sectoral and ethnic diversity of economic activity in the interests both of robustness and fairness, paying attention to the social and environmental value of activity alongside private profitability. Growing activity is to be expected in greening the economy, in attending to the safety and environmental performance of the building and vehicle stocks and in moving towards a more circular economy.

Land use and transport powers should be used alongside powers to manage and influence education, training and skills through the LEAP and alongside the procurement and employment powers of the GLA Family. Aims there will be to reduce the discrimination against SMEs and ethnic and other minorities (including the disabled), extend the implementation of the London Living Wage and foster good jobs with security and progression prospects, halting the drift towards casual and insecure work which are the source of so much in-work poverty.

Land use planning will be grounded in a much closer understanding of the social, environmental and interlocking economic value of public and private enterprises across all sectors and localities. This is especially important in respect of Opportunity Areas, Housing Zones, land in and behind High Streets and other localities subject to planned development policy designations by the Mayor and Local Planning Authorities (and in major development applications). In these cases social impact appraisals will be made in advance of decisions, evaluation criteria including the effects of change on jobs being lost as well as gained, travel and emissions impacts and cultural effects. To

this end the Mayor will support and strengthen community and employer organisations in their contribution to understanding and policy-making.

Changes to the policy:

The first sentence should start with: 'To protect and support London's everyday economy/diverse local economies ...'

Introduce new points:

- ensure that the success of London's economy is measured in different terms: to deliver human wellbeing and address growing inequalities, all within environmental limits. These should be linked to Key Performance Indicators for the London Plan and the Economic Development Strategy.
- ensure that planning decisions and plan-making are based on evidence of the contribution of London's diverse local economies, the interconnectedness between activities and sectors and the particular needs of businesses
- support all London's diverse economic activities and sectors to become greener
- protect and enhance land uses and activities that play a significant role in the transition to a circular economy (e.g. recycling, repairs)

GG6: Increasing Efficiency and Resilience

The key theme missing from this policy is that of achieving socio-environmental justice, not just the transition to a zero carbon city. This means ensuring that low income households and those who are the most disadvantaged are prioritised in being involved in and benefitting from efficiency and resilience improvements, in recognising that they are under-resourced and therefore more likely to face higher risks.

Integrating and delivering on environmental, social and economic goals, to live within environmental limits and a just society that is more resilient to changing circumstances, including extreme weather events and climate change. Strengthening targets in the light of the Paris Agreement 2015, to move away from fossil fuels and fuel poverty by scaling up retrofitting, increasing energy efficiency and renewables, within systems that are democratically controlled locally.

It is essential to ensure stewardship of the environment in which biodiversity/nature and community food growing can thrive. Applying the principles of a circular and sharing economy where waste is purposefully used and reused as a resource to maximise the green economy and minimise adverse environmental impacts. Protecting and enhancing the Blue Ribbon Network not only for its amenity and natural qualities but also for its transport and economic abilities.

Changes to the policy:

Introduce new points:

- Make London a Blue Green City, as a cross-cutting approach to sustainable water supply and drainage, flood risk management and green infrastructure.
- Prioritise investment and interventions to benefit first of all low income households, those who are at greatest socio-economic disadvantage and face health inequalities

Point A: the target to become zero carbon should be more ambitious. The plan needs a stronger focus on renewable energy and would like to see included in the policy commitment to facilitate support and promote the uptake of solar energy in new and existing buildings. Globally, solar is the fastest growing form of renewable energy and there is potential for the plan to act as a catalyst for innovation with the ultimate goal of widespread adoption of solar energy, thereby achieving or even exceeding aspirations set out in the mayor's Solar Action Plan.

Point B - the list should also address fuel poverty, since this is essential to being more resilient. Homes and other properties built to the highest standards of sustainable design have minimal fuel requirements and there may be potential for some schemes to be generators of energy, thereby benefiting occupants, the community, and the wider environment.

Point D: include public and community ownership of renewable energy