

**M11. Is the strategic approach to accommodating development needs within London justified and consistent with national policy? In particular:**

**a) Is the focus on the Central Activities Zone, Town Centres, Opportunity Areas and through the intensification of existing built-up areas in inner and outer London whilst protecting the Green Belt and Metropolitan Open Land justified and would it be effective in meeting identified needs and achieving sustainable development?**

**b) Alternatively, should some of London's development needs be met through reviewing Green Belt and Metropolitan Open Land in London?**

(a) We suggest that the alternative proposed here (a vs b) is not exhaustive of alternative spatial strategies for London. In addition, the question suggests that the projected amounts of growth simply **MUST** be accommodated. Just Space and its member groups have steadfastly refused to accept this coercive framing of London's situation. London may be paying too high a price for hosting such a disproportionate share of the nation's growth.

Our view and evidence is that the existing spatial policies are not sustainable. They have an unequal and disproportionate impact on London's poorest communities. They produce poor outcomes as a result of their lack of an effective financial plan and dependence on planning gain. They are developed in a haphazard and fragmentary way.

A review of these policies would be welcome, alongside a moratorium on their implementation (see our comments on M13), but we strongly oppose any diminution in protections for Metropolitan Open Land as they constitute a crucial element in London's sustainability and residents' well-being.

In relation to the range of spatial strategies (CAZ, Town Centres, OAs and intensification – policy H1 (2)) we note the dependence of each of the designated spaces on strong transport accessibility and their subsequent concentration in inner London and densely developed areas. The overlap with regeneration areas is acknowledged (Opportunity Areas: Text 2.1.2; Town Centres: Figure A 1.5). We have noted the lack of adequate processes of consultation and due planning process in relation to these elements of spatial development, exacerbating poor outcomes for those affected (p. 30). Given the social geography of London, this means that mostly poor people living in the poorest boroughs and in the strategic regeneration areas, the 20% most deprived areas in England (Figure 2.19).

This selectivity, and the impacts of these developments which we have documented at length (displacement of poor and vulnerable residents, loss of community assets, loss of economic activities, loss of local list heritage assets, loss of social rented housing, pressures on social infrastructure) mean that these spatial policies are unsound and ineffective. They are unsound as there has been no evidence base assembled to justify their continuation based on past performance; they are

ineffective as there is no financial plan to support their implementation. The only financial plan is to use planning gain to fund development, which inevitably results in displacing residents, destroying social housing, blighting nearby neighbourhoods, and producing new neighbourhoods which do not meet the Mayor's own expectations of good growth.

We suggest that these policies may also be illegal. These spatial policies add up to a significant intensification of deprivation amongst a certain group of Londoners, compromising health, well-being, education. As not causing harm to Londoners is the basic legislative requirement of the Mayor in the GLA Act, this assault on the well-being, accommodation and livelihoods of London's poorest residents is unacceptable.

The further growth of the CAZ, for example, threatens residential communities in and adjoining the Zone with displacement by direct change of use as well as by the widening of the immense gap between social and market rents in these areas. Central London could become a place where only very high income people can afford to live, others being pushed out, especially families with children. The Mayor should do more through housing policy to increase the resilience of CAZ residential communities. We vehemently oppose the extension of CAZ functions at the expense of existing residential neighbourhoods, especially where this entails valuable social housing being lost, as in Elephant and Castle. The proper opportunity costs of losing existing housing provision in well-located and central parts of the city need to be assessed. We have called for stronger protections for existing businesses and residents in CAZ areas. (Our submission, p. 21).

In relation to Town Centres (SD 6-9), we have noted in our submission (pgs 22-30) that plans to prioritise housing and intensify town centres threatens valued social and community infrastructure and assets, jobs and especially local and ethnic businesses, existing affordable housing and a valuable social and public space for vulnerable Londoners. We note that "it is unsound that there are concerns raised by the IIA about the safeguarding of key social and community infrastructure in town centres, that no provision is made in relation to this in the relevant policies, and that the impacts of this policy on the foundations of vital and lifetime neighbourhoods in London, especially for poorer communities, are declared to be unknown. It is our view these highly valued and socially important functions of town centres and high streets will be seriously affected by this policy as low value uses are displaced for high value uses, economic and cultural activities for unaffordable housing." (p. 24-5). We cite and have submitted for your consideration, valuable research (sponsored by the Mayor) on "High Streets for All" which we feel should inform this policy. It is not at all clear how amended policy 2.6.1B ("The character and function of high streets within town centres should be promoted and enhanced") can be implemented within the framework outlined in the rest of the policy – it is a meaningless statement.

We note, therefore, that in each of the identified spatial areas (CAZ, Town Centres, Opportunity Areas) the threat to social and community infrastructure is excessive and unsustainable. Our argument is that this threat is strongly intensified by the lack of a credible financial plan for the scale of development identified, and the fact that

each development must pay for its own infrastructure needs – a highly unsustainable policy.

The implication of inner London in the unsustainable, ineffective and unsound spatial development framework is clear. We note the intention to promote economic centres in outer London areas, and to intensify development there (for example in Wimbledon OA).

We have suggested in the Just Space “Towards a community-led plan for London” that transport improvements in Outer London will be important to spreading potential for provision for housing and jobs more widely, and deintensifying pressure on displacing poorer communities and social rented housing from more well-connected parts of inner London.

Just Space have proposed that the Mayor “Promote Active, Affordable, Integrated and Accessible Travel that is the alternative by choice to car dependency: more investment throughout London in walking, cycling and accessible transport, and in Outer London in public transport services, particularly bus services and Orbital Rail.” We propose commitment to “lifetime neighbourhoods in Outer London (p. 54-56) with stronger integration of work and home, less need for lengthy commutes – all of which will benefit from enhanced transport accessibility. Internationally, well managed and dedicated bus routes and not only hard track rail provision have been shown to be effective mass transit systems.”

The current spatial strategy is fragmentary and lacks a metropolitan wide view of the potential, spatial form and potential of London’s spaces. Bits and pieces of the city are opportunistically developed to an unacceptable level with very negative consequences for those displaced and those neighbouring areas affected. It represents extremely poor practice in terms of international norms of metropolitan scale spatial planning, with a distinct lack of integration across different parts of the metropolitan region (discussed in M12), and an absence of city-wide considerations in favour of a highly fragmented approach.

The current spatial framework for the London Plan, in the context of a lack of financial plan, is unsound, ineffective, and we suggest in fact illegal, (a) because it is causing harm to vulnerable residents, and (b) because the concerns of the IIA in regard to these impacts and loss of social infrastructure have not been attended to. The spatial framework has not been subject to a review to assess its impact on London’s population, so there is no evidence base for proceeding with this array of plans. Our evidence base from community groups across the city provides extensive insight into the impacts on residents, social infrastructure, businesses and jobs.

(b) Just Space strenuously opposes any construction on Metropolitan Open Land, and support Policy GG2 D in this regard.

Protect London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and

promote the creation of new green infrastructure and urban greening.

However, as we will bring forward in another matter, but relevant here, protections for Metropolitan Open Space are already potentially undermined by this Mayor in his change in wording from the FALP (Policy 7.17) to DNP (Policy G3A). Building on Metropolitan Open Land has a significant impact on environmental services functions (water run-off, air quality, micro-climates) and on the health and well-being of the population – which the Mayor is specifically tasked not to harm.

We feel that Policies G3 and G4 already offer too strong an opening for losing valued metropolitan and local green and open spaces. We do not see that there is any scope within a commitment to sustainable urban development to consider building on Metropolitan Open Land.

In our submission (p. 74) we noted that “the protective and enhancement policies, in the light of current and future development /growth pressures, including those promoted by this Plan, need to be strengthened by substituting ‘must’ for ‘should’. The quality and quantity of the many different kinds of green and open spaces, including blue features, should be accorded value in terms of recognition, protection and enhancement.

In our submission we have noted that the use of the Green Belt could be enhanced for Londoners who do not live nearby, and that food production should be encouraged (p. 48).

Thus, we do not see that the alternative to intensifying growth in selected areas of inner London is to necessarily build on the Green Belt – there are other uses for this area which also need to be considered in the context of sustainable development and equalities considerations. And we feel that to open up the possibility of building on Metropolitan (or Local) Open Land would be to definitively render the Mayor’s development policy in breach of every consideration of sustainability.