

Good Growth

M9. (a) Are Good Growth policies GG1 to GG6 consistent with national policy and/or justified, and would they help ensure that the Plan provides an effective strategic framework to achieve sustainable development? (b) Are the policies in chapters 2 to 12 of the Plan appropriately informed by and consistent with Good Growth policies GG1 to GG6?

We support the definition of sustainable development in the existing London Plan, which enshrines within the London Plan the UK Government's Sustainable Development Strategy and was consistent with NPPF. This has now been deleted from the new London Plan through a minor change.

We also seek reference to, and an embracing of, the UN Sustainable Development Goals in particular 1-3, 10 and 11 of the goals which are all applicable to the Good Growth and refer to the need for an integrated functioning of cities and their inhabitants with policies which promote and foster health and well being, social and economic integration and healthy living environments.

For Good Growth, there needs to be a clearer definition, and we suggest this addresses social justice, economic exclusion and poverty. Since a minor change says good growth is inclusive growth there is merit in studying and making use of the explanations and recommendations of the RSA Inclusive Growth Commission. For example, this recommends integration of economic and social policy, inclusive industrial strategies and building social infrastructure at the same scale as physical infrastructure.

In considering the Good Growth Principles as a foundation for the London Plan an overtly integrated policy-level approach is needed. However, we find that the Good Growth policies in themselves are not integrated and have significant gaps (we offer the lens of food as an example).

GG2 Making the best use of land addresses physical and environmental infrastructure but leaves out the vital social component of sustainable development.

The key ambition of making London a zero carbon city is described in GG6, but should also be in GG4, for example to reduce embodied carbon emissions through major retrofitting programme and GG5 economy but this is deficient since it has no environmental dimension. Furthermore, there is no reflection on the Mayor's commitment to economic fairness through the Good Work Standard. Bullet point should be added to address these.

creates a major gap in strategic thinking and planning for inclusive, integrated, healthy and sustainable communities.

Policies in the Plan are not informed by the Good Growth policies. Specific changes are proposed in our submission (March 2018) and we will bring these forward in our written statements for the policy chapters. Here we provide a few examples, but this is by no means an exhaustive list.

GG1 Building Strong and Inclusive Communities includes many principles we would support. However, it is disappointing that a participatory approach is relegated to the text and we note that the minor change FA leaves out race and ethnicity from a long list of protected groups.

GGI is not followed through, however.

In Policy S1 Social Infrastructure, the community scale is secondary or non-existent. The policy should explicitly provide amenities and community spaces that strengthen communities, and take advantage of the knowledge and experience of local people. There needs to be a mechanism to apply this and we suggest the Social Impact Assessment tool.

In Policy S4 Play and informal recreation there should be consultation with children and young people in the design of play provision to understand their needs.

Policy HC1 does not factor in the heritage and culture of diverse populations who have made parts of London their own and conferred unique cultures of music, arts, food and trade. The policies in the Heritage chapter should reflect London's shared heritage. The Social Impact Assessment would also provide a framework for auditing cultural assets at a local, neighbourhood level.

GG3 Creating a healthy city says planning and development must address the wider determinants of health in an integrated and coordinated way, improving mental and physical health and reducing health inequalities but social determinants of health have not been integrated in. There is no sense that a Healthy City is an overarching theme for the London Plan. In Policy H10 health and well being indicators should be incorporated into decision making around regeneration schemes. Policy S2 should address the differentiated needs of diverse groups, encouraging the full range of specific needs in the Joint Strategic Needs Assessment.

In the Good Growth policies there is no explicit mention of food policies and the absence of a clear and integrated statement on how the city will feed itself. This is despite section 8 of NPPF Promoting healthy and safe communities (page 91).

Furthermore, the Milan Urban Food Policy Pact of 2015, to which the UK is a signatory, requires due attention to be paid towards including how cities have, ‘a strategic role to play in developing sustainable food systems and promoting healthy diets.’ The critical acknowledgement of the MUFPP is that since food policies are closely related to many other urban challenges and policies, it is essential to adopt an approach that is comprehensive, interdisciplinary and inter-institutional.

We propose a Good Growth principle that supports an integrated Food for London approach. What needs to be taken into consideration is:-

- the level of dependence London has on food supplied from outside of the city,
- its intention to dedicate some of its green infrastructure to an inclusive uptake of local food growing – which has a range of health benefits attached to it
- an intention to plan an integrated network of food hubs, which encourage local food processing and distribution,
- integration of the growing ‘take out/eat out economy into London’s diverse restaurant/café and night time economy and diverse market network in a way which encourages healthy eating practice for all communities

Such a Good Growth principle would promote social integration and inclusion and at the same time combat the growing food poverty and food waste profile of the city.

The KPI’s in chapter 12 must include fairness and diversity indicators. If Good Growth is providing a strategic framework for the whole Plan then it has to be measured. The RSA Commission recommends establishing inclusive growth as a regular official statistic.

We suggest including health and employment indicators for specific equality groups and indicators for civil society measuring its development across a range of issues and levels of participation.