

GLA - PLANNING FOR LONDON: Components of a Spatial Strategy

JUST SPACE RESPONSE 31/12/23

Just Space is a Londonwide network of community groups focused on planning issues. The response below is drawn from a variety of comments made, and is not exhaustive or definitive. A more comprehensive set of proposals is set out in our [Community-Led Plan](#) and [Recovery Plan](#)

- **How effectively are we using spatial policy tools like OAs, CAZ, Areas of Regeneration, Town Centres, Strategic Infrastructure, Green Belt, heritage/conservation areas (NB these are not strategic policies), MOL, SIL/LSIS, and suburbs in managing and directing growth?**
- **What has happened in the last 5 years that should inform a new spatial strategy for London?**
- **Which future trends should be considered and acknowledged in a future London Plan spatial strategy?**
- **What role should connectivity play in shaping a future London Plan spatial strategy?**
- **Could the London Plan spatial strategy be presented in a different way? Would some policies with a spatial aspect benefit from being connected, inter-related, or overlaid? Are there any emerging issues or trends that would benefit from a new spatial policy?**
- **What sort of places should we be steering growth towards?**

The growth challenges facing London require a new geography and a fresh imagination, underpinned by inclusive growth, fairness and diversity of people, businesses and places, therefore avoiding over-reliance on the Central Activities Zone/Isle of Dogs, high-order Town Centres and on a small number of economic sectors.

This new geography for London will be a network of Lifetime Neighbourhoods and Lifetime Suburbs, providing many key amenities and job opportunities locally, thus reducing the need for costly and polluting travel into the Central Activities Zone. Outer London in particular needs lifetime suburbs and a real mixed development strategy. Through a new approach to public and community-owned assets driven by social sustainability objectives, social infrastructure and community spaces in all parts of London will be protected, avoiding the previous decimation of community assets in working class and multi-cultural geographic areas. It will be a Blue Green City, placing value on the connection and interaction between London's blue and green assets.

The South East region and the other regions of the UK are a spatial context which has to be considered in thinking about the spatial future of London. Inclusive growth, that puts economic fairness, health and well-being and environmental sustainability at the heart of development would require a re-balancing with the rest of the UK economy and involve the Mayor in partnerships and collaborations with other cities and regions. Such negotiations

could lead to welcome reductions in London's need to find space for additional homes or jobs.

It seeks growth by fostering higher pay, investment and productivity in the 50% of London jobs where real wages have been static or falling. It avoids the extinction of viable enterprises in industrial zones, in high streets and local centres and supports the provision of new workspace suitable for diverse activities and sectors, particularly in the foundational economy. This approach offsets the historic sectoral bias in favour of financial and business services in the centre.

To achieve a balanced polycentric development the public transport priorities will be orbital movement plus walking and cycling, with investment directed towards smaller scale infrastructure rather than commuter routes such as Crossrail 2. This connects well with the aim of protecting more workplaces outside the centre and with the Lifetime Neighbourhood and Lifetime Suburbs objectives, increasing accessibility and connectivity locally.

All parts of London (central, inner and outer London and the more affluent geographic areas within Boroughs) will contribute in an equitable way to meeting London's housing needs. There will be a high percentage of not-for-profit rented homes everywhere, the cessation of estate renewal on current terms (which entails demolition/eviction and big net losses of existing social rented housing in geographical areas where there is a high concentration of working class and minority ethnic communities) and direct development by GLA and Councils of not-for-profit rented housing on public land as a matter of urgency.

A continuous process of engagement will give voice and agency to all Londoners with a geographically dispersed model of hubs instead of all connections and resources being targeted at a central hub. Targeting areas of need will close deprivation gaps by measures that raise the Quality of Life of existing communities rather than through their dispersal/displacement. Programmes will be provided so that areas with a high concentration of working class and minority ethnic communities can access the participation tools that are available, such as community rights under the Localism Act.

Opportunity Areas and Strategic Areas of Regeneration

We are critical of some of the key spatial policy tools, in particular OAs. The process of fantasizing an area of wilderness and helicoptering in development has been disastrous for the communities which thrive in these places, invisible to such strategic planning. The input of existing communities who understand their area has been essential for making Opportunity Areas work for all of the community and bring genuine community benefits: for example, contrast the relative success of Waterloo OA (with an active community and Neighbourhood Forum) with the tumbleweed of the VNEB OA (how many people other than students really live there? Only 31 out of 1200 voters bothered to vote in that polling district in a recent by-election), or the eradication of 2,000 of the poorest households and 300 SMEs from the Elephant & Castle, scattered to the winds, for a project far from finished after 23 years and with an inexcusably huge carbon footprint.

We need a proper review of a spatial strategy which has always been essentially rooted in the GLDP Alterations nearly 50 years ago, which wasn't itself rooted in the newer challenges of sustainable development, good growth and the carbon catastrophe we face. The GLDP alterations were influenced by the need to hang on to industrial land in the hope that traditional manufacturing might return, and LPAC and then the iterations of the Mayor's spatial strategy haven't broken away from this (which is not to say that we don't desperately

need our depleted industrial land for a different future, including, for example, logistics, data centres, affordable workspace etc. Industrial land should continue to be protected, and probably protected better within inner and central London).

We need to go back to first principles for the geographical structure of the new Plan rather than more incremental change. All versions of the London Plan since 2004 have been obsessed with growth for its own sake, and maximizing land values in order to generate funding for the necessary social infrastructure resulting from this growth. And this has been done on the basis of London within rigid borders, despite the fact that millions of people commute from outside London to work or otherwise use London, and that the housing market also stretches way beyond London's boundaries, with the poorest increasingly exported (or self-exporting) outside its boundaries.

We need to think about the objectives which will drive the structure not the other way round. One starting point has to be a more realistic contribution from the ROSE towards meeting London's housing needs. The Mayor needs to lobby central govt to amend the GLA Act to create a requirement to co-operate by and with the shires and their local plans.

When 'regeneration' is all too readily used as a cover for the eradication of communities and the use of the land to produce assets (in particular tall buildings) simply to reap the purported benefits of increased land values, the identification of a neighbourhood as a Strategic Areas for Regeneration on the basis that it falls within the 20% most deprived areas is an outrage. Essentially this approach means the most deprived are additionally deprived of their homes, their communities, and any control over their future.

The hierarchy of town centres is working better than the OAs and SARs, but there is still too much emphasis on their relation and access to the centre of London. In order to gently increase densities in suburban outer London, there must be greater focus on the lateral transport connections, as well as a recognition that open space and the sense of openness is a critical piece of social infrastructure - outer London cannot not be seen as an opportunity to sprawl a higher density inner London outwards.

In recognition of this we need a return of the density matrix, and density monitoring in the Annual Monitoring Reports. This report also need to track the geographical element of the prospective whole lifecycle carbon emissions.

Clearly, if the circular economy is to be taken seriously, and all development is to consider alternatives to demolition - and schemes should be refused on the basis of alternatives available with lesser carbon impacts - then the entire logic of OAs and SARs has be reconsidered. Instead of focusing development at key points, ways need to be found to intervene less intensively but in a more widespread way across London to gently increase densities, in particular retrofitting and extending a whole range of buildings including the older stock of terraced and semi-detached housing (which makes up over half of the housing stock) which heretofore has avoided development pressures.

We need a London land commission to consider issues of land value, taxation and financing.

We also need the GLA to commission research on a range of issues such as impact of Mayoral policies on nature of development and operation of financial viability assessment processes.