



**639 Enterprise Centre**

**639 High Road,**

**Tottenham**

**London N17 8AA**

**2<sup>nd</sup> March 2018**

**The Ubele Initiative response to the London Plan Policy Proposal GG1:  
Building Strong and Inclusive Communities**

**Introduction**

The Ubele Initiative is pleased to see that the opening policy statement of the London Plan which focuses on Good Growth, sets out the Mayor's strategy for **Building Strong and Inclusive Communities**. However, we feel that the strategy's ambition to create an inclusive London, appears to be oblique in several places.

To an organisation such as ours, which aims to help support the sustainability of BAME communities, it does not seem to pay sufficient attention to how London boroughs needs to plan to meet the needs of communities which continue to experience institutional discrimination and social exclusion. We are particularly keen to see London's Mayor make a clear commitment for **how** the London Plan should be delivered **to meet the needs of BAME communities and also young people (as well as young people from BAME groups)**.

We have not made specific policy change suggestions as we feel that policy makers should incorporate the key sentiments of our recommendations in a manner which is in-line with the overall ethos of the plan. However, we feel that there are key aspects of this policy proposal which needs considerable attention to reflect the realities for BAME communities living, working and building our future city– hence our submission.

## **Impact of previous London Plans on BAME communities**

As stated in this policy, London's BAME communities currently represent 40% of the city's population. The current plan appears to do little to acknowledge that several of London's previous plans and planning processes have created deep inequalities and social divides. Available evidence suggests that London's BAME communities have ended up experiencing a more unequal London than other groups. The result appears to be the unwitting creation of an 'Black and Brown underclass' in our city. The London Plan makes little reference to how and why systemic inequality, social exclusion and institutional discrimination persists in one of the richest cities in the world and how this might be addressed in the planning policy proposals in this section. This is extremely disappointing and hope that our submission will be considered in this context.

## **The need for impact evidence before another London Plan**

We believe that as a pre-requisite to the building of strong and inclusive communities in London, the **Mayor needs to commission the collection of robust regional evidence about the harmful impact of planning processes on the above groups thus far.** Challenging though this will be, it will set a very different tone and intention to that of previous plans.

Conversely, there is a dearth of evidence for example about **the successes which demonstrate how and where BAME communities have contributed** for example to the building of London's emerging social and community enterprise economy and/or cultural sector. There seems to be a plethora however, of evidence of BAME communities as 'beneficiaries' of London's programmes and initiatives. Surely the London Plan which sets out a 20-year vision can do better than this!

If this draft plan appears to simply paper over ever widening cracks within the current planning system, without seemingly seeking to address root causes, the GLA will miss a real and unique opportunity. It seems as though the Plan intends to offer more of the same (and in some cases even worse than before!). How can we ensure that the proposed London Plan does not see London experience another Grenfell type tragedy with the resultant scandal, and local primarily, BAME communities impacted, who will be left with no option but to seek legal, social and economic justice all over again.

The Ubele Initiative does not want to be viewed as doom mongers, but as has been well documented, early warnings were not heeded by the local authority about the impact of their development plans. However, having been drafted into the area in the aftermath of the fire to help assess the emotional health and well-being of children and young people, we (as Ubele) do not want to find ourselves in such a position again in any other community, BAME or otherwise, anywhere in the UK.

There is however still time **to undertake honest and open dialogue and a critical analysis of what is currently happening and what planning policies are required to meet the needs of excluded groups over the next 20 years.** This would help avoid knee jerk reactions and could send a strong message across London that the voice of some of the city's most dispossessed communities is really being taken seriously by London's policy makers and ultimately reflected within the Plan. This might delay the planned timetable slightly, but will be time well spent. Collaboration needs to be conducted with the likes of our organisation, Just Space and other groups which represent community based organisations especially those, in this case, from BAME groups.

## Strengthening generic policy statements to promote inclusion

Generic policy statements for example, about the need to '*...create places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish ...*' or *.....spaces are designed to reinforce or enhance the.....inclusivity of neighbourhoods...*', provide little acknowledgement of the complexity and challenges inherent in community life across London. **Most communities remain separated primarily on the basis of race and class and an intensification in the gentrification of London's neighbourhoods will only accelerate and widen this divide.**

An acknowledgment of this possibility needs to be included in the Plan. **Suggestions could be offered to local authorities about how this should be tackled. This section should also include cross references to other relevant Mayoral policies.**

### More specifically:

#### 1.1.2

The Ubele Initiative welcomes the recognition the London Plan gives to the diversity of communities found living in London with 40% of residents from BAME backgrounds. We are surprised that there is no clear statement in this important foundational policy which acknowledges the vital contribution that such communities make to the social, economic and political life of the city. This might have been stated in former plans but **we would like it seen included in the policy statement here.**

#### 1.1.3

This paragraph also usefully acknowledges economic inequality experienced by groups in London but appears to skirt over the stark reality of thousands of people from BAME communities who find themselves disproportionately unemployed, in low wage and insecure employment than members of White communities. This is still the case even when educational qualifications are taken into account (Human Rights Commission 2016). Evidence also suggesting that BME staff experience disproportionate levels of local authority redundancies (Lewisham Council, 2017)

Recognition of some of the challenges and barriers which come to participating fully in London's life due to aging is also welcome. However, there is little acknowledgement of how this might impact older people from BAME communities who might have originally had plans to 'return home' to 'New Commonwealth' countries and now find that London has over a period of several decades of residence become their home. Again, low level or insecure employment might not have resulted in large pension 'pots' leading to poverty which will impact further on their ability to participate more fully in London's life. **We would like the policy statement to be revised to take this point into consideration.**

#### 1.1.4

More acknowledgement of the current state of affairs needs to be evidenced in this section to support why this is needed. For example, delivering good quality, affordable homes means that the needs of BAME communities will need to be taken into account as rates of overcrowding are not only twice as high as the rest of London, but 13% of ethnic minority households are over-crowded compared to 5% of white households (Runnymede trust 2016) found that ethnic minorities experience employment and housing disadvantage in every London borough. **We would like to see**

**the policy statement acknowledge that there is this racial disparity and that for BAME groups good quality and affordable homes are even more urgent.**

Space does not only need to be welcoming, diverse and accessible, but there also need to be a real diversity of communities securing and managing London's newer spaces including workspaces. This should interrupt the system which has developed over the past few years which is of white privileged middle class younger and older men with social and economic connections coming to typify the management of new space across most boroughs in London.

***The Reclaim our Space*** Manifesto, 2016 was signed by over 40 community based organisation across London. It makes a series of important demands about the need for community spaces which is of relevance to **Policy Proposal GG1** but is also submitted by us for the purpose of this consultation exercise for consideration under **Policy S1: Developing London's Social Infrastructure**.

**#1** Help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

**#2** Recognising the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.

**#3** Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.

**#4** Community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.

**#5** Community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.

**#6** Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected and their use encouraged.

**We would like GG1 policy statement and the S1 to be revised to recognise the main sentiments include our manifesto.** We would also like to see mention of the **need for local authorities to undertake a Social Impact Assessment alongside other statutory assessment processes** and to collaborate with organisations such as Just Space and academic institutions such as UCL Bartlett School of Planning to conduct these important assessments.

### **1.1.5**

Again, this paragraph appears to skirt over the reality of the impact of local planning systems on BAME communities in London. An urgent London wide review should be conducted of BAME engagement in Neighbourhood Planning processes to see if there is anything like 40% membership in local groups. Such systems rarely actively engage with and/or keep young people engaged. Ubele has evidence to suggest that there is massive under –representation in this respect (due to the requests we receive from London groups about how best to create more inclusion of groups most likely to be impacted by local plans). **We would like the policy statement to recognise that the Neighbourhood Planning system has failed to engage diverse communities. The plan should suggest that resources, if required, need to be secured to ensure that previously under-represented groups are included in future planning processes.**

*Submitted by Yvonne Field, CEO/Founder*

*On behalf of the Ubele Initiative*