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Mayor Khan
City Hall
c/o yourviews@london.gov.uk

Dear Mayor Khan,

Response to 'A City for all Londoners'

What is Sustainable Hackney?

Sustainable Hackney is a network of organisations and people based in or near Hackney that works for a far more urgent shift to sustainable living and working and for a community-led, not corporate, approach to reorganising our neighbourhoods and city so that our resources are distributed equitably and we stay within environmental limits. We were formed through a merger of three umbrella organisations, one virtual, the oldest of which worked on environmental issues since 1989. Almost 900 organisations and people are signed up to our website. You can read more about us here: <http://sustainablehackney.org.uk/> . You can read about the policies and work that has resulted from our discussions since the merger in 2011 in our Greenprint here: <http://sustainablehackney.org.uk/greenprint> .

We held a meeting to discuss your proposals. The following summarises our views on 'A City for all Londoners' based on existing policy and the outcome of our discussions.

Summary of our view on 'A City for All Londoners' and next steps

'A City for all Londoners' (ACfAL) requires a deep strategic rethink if you are to deliver the changes needed in London and the promises in your manifesto. **You promised:** to tackle the fact that Londoners are being priced out of our city, deepening inequality and poverty, to deliver homes that Londoners can afford, to be London's greenest Mayor yet and to be the most pro-business Mayor yet.

The vision, on the whole, sounds very nice but it is predicated on questionable assumptions and concepts and vague on implementation. We appreciate that detailed strategies will be produced in the Spring but it is already clear that, rather than working to deliver for Londoners, the driving force of this document is "accommodating growth". Purportedly this is for future Londoners, those expected but not yet here. In reality, ACfAL is a 'Business As Usual' offer providing continuing opportunities for profit-driven partnerships between corporations and government delivering the type of growth that will continue to drive up house prices, drive out workspace and the working class and put profit and the interests of corporations before those of Londoners and the local businesses that deliver the majority of jobs in the capital.

We also question the concept of “good growth”, which we understand to have been developed by [PWC](#). This assumes that growth is indeed good.

We are also very concerned at the ongoing ‘World City’ perspective for London. This concept is part of the out-dated globalisation and neoliberal economics approach which has failed spectacularly, leaving the richest 1% of the world’s population as wealthy as all the other 99%, while the rest of us and the nation are saddled with extraordinary and growing debt, diminished democracies, public services struggling under the yoke of privatisation and government cuts and attacks on our pay and conditions at work and benefits if we are sick or unemployed. The document sees London as an island looking out only internationally. London is the capital of the UK and we want to see greater emphasis lie on developing the relationship with the regions, supporting the development of the regional economies, rebalancing of the UK economy and self-reliance at the same time as creating fair and equitable, not exploitative, trading relationships with other countries. London must play a significant role in rebalancing our imbalanced import-export payments.

Instead of ‘accommodating growth’, ‘good growth’ and ‘world city’, we urge you to proceed on the basis of the eco-city model, which has been under development for 30 years and put into operation in a number of places, along with work such as Tim Jackson’s *‘Prosperity without Growth’*, that by the New Economics Foundation and Just Space’s [*‘Towards a Community-Led Plan for London: policy directions and proposals’*](#).

This should be underpinned by extensive, meaningful and ongoing participation of Londoners facilitated and supported by City Hall to engage us in debate on the *reorganisation for sustainability* of our City.

Accommodating Growth

We reject the assumption that growth should be accommodated. While at present population is growing, the current [London Plan](#) (Spatial Development Strategy Consolidated March 2016 para 0.16G) expresses uncertainty as to whether this is structural or cyclical and this may or may not continue. Brexit adds an additional layer of uncertainty. In any case we would like to see efforts to manage demand rather than automatically meet it. Also according to the current London Plan, net domestic migration has fallen from ~100k pa to less than 50k pa. In our view this is because of the failure of regional economic and industrial policy and the corresponding lack of jobs. We want to see London vigorously supporting economic and industrial development and trade with the regions in order raise domestic net migration and reduce the pressure on London. Such an increase in self-reliance dovetails with the sustainability agenda and reduces energy requirements and pollution arising from transportation of goods.

We support reorganisation of the city on the principles of the eco-city model. The eco-city model involves the wise use of space in order to achieve ecologically sound urban management and this model has and is being applied in various cities around the world. Amongst other aspects, this would require a balance between population and job density and true mixed use of space that reduces the need to travel between localities. Yet, as we found in working on Hackney’s transport strategy, growth in population is to be unevenly distributed across London, anticipated employment growth is inadequate for the population growth and in different locations *‘resulting in a 25% increase in trips’* in Hackney. Hackney’s transport strategy is a good document but it has no answer for this deteriorating situation. Neither, it seems, does A City for all Londoners’.

We are deeply concerned about Deputy Mayor Pipe's proposal that industrial land be "exported" and have reservations about the ACfaL's concept of 'mixed-use development'. The former is working entirely in the wrong direction and that latter, as interpreted in reality, has and is likely to continue to diminish availability of affordable industrial and other workspace as it removes affordable and replaces it with less but more expensive workspace. Both are working against your stated commitment in ACfaL to protect existing and identify new workspace, including in new housing developments. The myriad of workspaces behind our high streets, in back streets and on industrial estates are essential to reducing London's environmental footprint. Also, these are better shabby than unaffordable.

We want an end to the disparagement of our housing estates and workspaces in the London narrative that acts as an imperative to demolish good and serviceable buildings and destroy our communities.

The sale of public land and other assets must cease forthwith in order to maintain the assets for future generations and to facilitate the development of council housing and employment space.

Housing

As the document recognises the housing situation is totally unsustainable. Rising numbers now live in the private rented sector but rents have risen 20% in last 5 years, while average incomes have risen only 2%. 23% of London's children live in overcrowded conditions. First-time buyers in London have a median average income of over £55,000 pa and put down a median average deposit of £70,000 – meaning many who can afford to buy are relying on parental support or inheritance and entrenching inequality – on houses with an average price of over half a million pounds. But the [average annual salary in London is £37,408](#) and according to the [Social Mobility Commission](#) (p30) four in 10 Londoners have less than £100 in savings and more than one in ten take home less than two-thirds of average hourly pay. After housing costs, London has the highest levels of poverty in the country.

There is no evidence that increasing the availability of private housing will reduce the price of houses for purchase or make them any more affordable to Londoners.

Yes, more homes are needed in London but these must be council homes. This is the only way in which homes within reach of the budgets of Londoners can be provided. The designation of council estates as 'brownfield' must be withdrawn. Development of some of these sites should be on the basis of renovation of existing buildings and infill, along the lines of work by such companies as [Architects for Social Housing](#) and, on a smaller scale [Anne Thorne Architects](#). This allows the provision of additional housing without traumatic upheaval for existing Londoners and the savage breakup of our communities. Stop demolishing perfectly good homes – it is totally unsustainable and Londoners are entirely aware that the purpose of the schemes is to create new sources of profit for developers and contractors.

Assuming there are an additional 2 million people to be accommodated in London by 2041, what type of homes do they require to meet their needs? What type of jobs are needed to meet their needs and provide them with gainful employment? We need this information before decisions can be made.

We note that developers' bids are to be submitted to you by April 2017. We request that this process is reviewed. We do not require any more luxury housing in London [and the](#)

[corruption it supports must be tackled](#). We reject the current ways of working with developers, whereby they are accessing public land and subsidies from the taxpayers, disrupting existing communities, denying that higher levels of affordable housing are financially viable while making [extraordinary profits](#). Where developers must be involved, financial viability statements should be released to the public without redactions. The lack of transparency of agreements with developers is viewed with deep suspicion by many Londoners and is corrosive of our democracy. We would like to see direct development by local authorities and the GLA so that value is retained in the public sector.

We note significant under-occupation of many housing developments and request more information on this and on the powers you need in order to ensure existing properties are occupied, if necessary, compulsorily purchased. We also note the [London Assembly's request](#) that you investigate the impact of overseas investment in London's housing markets. We want the opportunity to consider the results of your research into these aspects of London's housing as part of the extensive engagement and debate we have proposed prior to any new developments or agreements with developers.

We want alternative mechanisms for the creation of housing under community ownership and control such as community land trusts. Developers should be forced to release this from their land banks.

We welcome your call for devolution of more powers to London. We will support devolution as part of more meaningful debate on the future development of London. Such powers must include tax-raising powers if it is to be meaningful and should include the power to set rent controls and to establish a private property register with information on empty properties.

Economy

We have already written of our concern about the assumptions of 'accommodating growth', 'World City' and 'good growth'. We want you to publish an impact assessment of the 'accommodating growth' and 'good growth' approaches as there is no evidence that it will deliver on the huge challenges that you set out at the start of the document.

We do need London to play a major role in rebalancing the UK economy and to follow the eco-city model of true mixed-use communities that integrate living and working and reducing the need to travel with community control and social justice.

We note from [Mark Brearley's excellent work](#) that 65%, 2.7 million, of London's jobs are outside the central activities zone. Many of these jobs are threatened by redevelopments, which are designed for profit, not for sustainable communities. We want to see space and support for the local small and medium enterprises that are essential to increasing job density across London and reducing our environmental footprint.

The Mayor should control the rents that TfL are charging to businesses. [We have evidence that the rent increases are inordinate](#), in this Hackney example from £22,000 a year to £72,000-£84,000 a year and are driving businesses out.

We are also concerned about the loss of infrastructure such as the Mare Street bus garage. Loss of bus garages over many years has increased significantly the empty mileage of London's buses. We need this infrastructure integrated into the fabric of London and/or the retention of this space as work space and it must be protected from sale for housing.

We welcome your support for the London living wage but clear support for trades unions is necessary to ensure this is NOT the maximum, that there are secure contracts and hours worked are reasonable.

Environment, Transport and Open Space

Environment

We welcome your commitment to protect and enhance the environment, to clean air, to the Green Belt and open spaces, to London being zero carbon by 2050 and to healthy streets and social integration. However, it is unlikely that the measures outlined are sufficient to address the “huge challenges” faced and we have not been convinced that continuing growth of London through to mid-century can deliver a city that meets the rigorous tests climate change and resource and energy efficiency required. We look forward to your comprehensive appraisal of London’s environment and to the detailed environmental strategy due to be published in 2017, when we hope the environmental agenda will become clearer. There should be pre-formal consultation discussions involving the many environmental groups in the capital.

Air pollution

We agree that tackling air pollution is urgent. There are clear and valid proposals but they demonstrate the limits of the Mayor’s powers – so you need to identify the powers needed to be able to implement the wide range of proposals. In addition, why not stop procuring diesel buses now, rather than phasing out? Also the Parliamentary Environment Audit Committee identified lack of public awareness and knowledge as a key factor. Link this to the proposed debate on reorganising for sustainability along with other changes in behaviour to reduce environmental footprint (e.g. reducing consumption and waste, increasing recycling). The infrastructure for zero emission vehicles need to be put in place. Tall buildings make air pollution worse by trapping it in the street canyons.

The Ultra Low Emission Zone is likely to raise objections and, as was the case with the Congestion Charge, is likely to be easier to implement *after* measures to further improve public transport have been implemented.

Energy

Again some good proposals and we agree that energy strategy needs a total rethink. The 40% of energy consumed in London that is wasted must be cut down drastically. We need funding for retrofit. The London heat map must be revisited and put into practice. Microgeneration and the use of London’s buildings to generate energy is essential, installed as buildings are built or redeveloped.

Sustainable Hackney put considerable resources into establishing [Hackney Energy](#) and the [Bannister House community solar project](#). We now have expertise but Government support has been cut. Without Government support we can not develop more community energy schemes, so it is vital that subsidies are reinstated.

Transport

We support the ‘Healthy Streets’ approach. However, reducing the need to travel simply does not have enough prominence. We would like you to work with London boroughs, neighbouring authorities and local businesses to address low jobs density in communities, implement stronger local labour policy, review skills shortages and increase and improve training provision. The breadth and depth of cultural facilities in London already contributes

to Londoners being able to enjoy themselves where they are and, of course, it should be supported.

We welcome reducing dependency on cars and the promotion of walking, cycling and use of public transport.

We oppose all and any expansion of airport/runway capacity. Alternatives to air travel are needed if climate and air pollution targets are to be met.

We oppose Crossrail 2, the Silvertown Tunnel and HS2. HS2 and Crossrail 2 are vastly expensive and massive projects that will disrupt the lives of Londoners for years. HS2 aims to serve a small number of elite travellers at the expense of the many both in terms of money and disruption. Crossrail 2 only serves the social cleansing of central London agenda. It will lead to increased land values and house prices in the vicinity. The arguments against the Silvertown Tunnel have already been made by neighbouring boroughs.

Instead we advocate investment in the overground lines for a frequent service and accessible stations, improvements in the speed and accessibility of as well as an urgent shift to zero emission buses and development of sustainable freight and delivery systems. Main line trains should stop at stations where they cross overground/underground lines.

Parks, open spaces and biodiversity

We agree that these spaces should not be encroached upon. Some have already become overcrowded in Hackney and the only green space in Dalston is at risk from development. But more than this we need an assessment of the form, content and management of our open spaces and streets in order to ascertain what is needed to provide the vital environmental services needed in our City: clean air, clean water, flood control, temperature mitigation and so on. Biodiversity has been neglected and “off-set”. The London Biodiversity Action Plan should be reviewed and resources provided to restore our ecosystems and biodiversity to ensure it can deliver a stable environment for us.

Control of our neighbourhoods

We agree with protecting and preserving the buildings and places that are important to us. This will only happen if we have democratic control over our neighbourhoods so we need devolution of powers to London and new democratic structures to create integrated communities with the power to defend our space. Otherwise politicians and planners and developers will continue to take up our time fighting their inhospitable schemes and destroy what we value regardless.

A City for all Londoners

Social integration

We are concerned that the title chapter on the conditions of everyday life for many Londoners, poverty, inequality, discrimination and disadvantage, precarious employment and the challenges faced by our health, social care and other public services in the face of privatisation and austerity appear at the end rather than the beginning of the document.

The need to address these should be driving force in the document. The role of strong communities is recognised but placed here at the end is divorced from the destruction of communities arising from “regeneration” and development schemes and the economic system that drives them in the pursuit of profit. We agree that democratic governance needs active citizens’ participation but to work this must be supported in an imaginative way on an ongoing basis. This means that consultation on the strategies and plans that will

govern our futures should be carried out in a way that facilitates meaningful participation – before they are written. We look forward to that in relation to the strategies to be published in 2017.

There should be support for our trades unions in order to organise for decent pay and conditions.

Crime

We all want to feel safe in our homes, when we walk down the street and use public transport. We want violence to be dealt with and work to be done to prevent it happening. However, the focus in this section is entirely on individuals.

[As we referred to above](#), we need a clear strategy to tackle the corporate crime, fraud and corruption associated with the vast wealth managed through and being brought in to London. We want tax avoidance dealt with and the tax havens in British Territories brought into a fair tax system. We need financial, employment, social and environmental violations to result in criminal charges and penalties and the agencies tasked with safeguarding us to be adequately resourced.

Conclusion

As you say, we face huge challenges and developing effective solutions takes time and effort. We have limited resources and there has been limited time to consider your proposals and our response. We have argued for meaningful engagement with participation supported by City Hall in order to for there to be real involvement in the democratic governance of our City.

We want to make it clear that we support the more detailed work that Just Space have produced in '[Towards a Community-Led Plan for London: policy directions and proposals](#)'.

We look forward to the opportunity to participate in the development of the draft strategies as well as commenting on them once they are drafted.

Yours sincerely,

Kathryn Johnson

Kathryn Johnson
Secretary
On behalf of Sustainable Hackney