

## **JUST SPACE / JUST SPACE ECONOMY AND PLANNING GROUP**

### **A response to the Mayor's document A City for All Londoners**

**11 December 2016**

#### **Introduction**

We welcome the Mayor's ambition for a City for All Londoners. It comes at a critical time, when the impact of London's recent development can be assessed and new courses set.

It is clear that if all Londoners are to benefit from development across the city then change needs to be driven by a fresh understanding of the impacts of London's current growth on ordinary Londoners. We feel that the Mayor should be bold at this stage, by ensuring that the GLA is the focus for a full range of views and sometimes radical ideas about how to prevent the emergence of a "Zone One city".

To this end, Just Space has been producing its own draft Community-Led Plan, whose policies have formed through the long-term experience and knowledge of community groups and other relevant organisations, as well as through our participation in very many planning consultations, EIP's and evidence sessions.

A key starting-point of our Plan is that the Mayor puts in place a process that establishes real engagement with those who have not had the open door to City Hall afforded to some other stakeholders. Inevitably there are conflicting views about the strategic directions that should be taken, but it is vital to argue these out with full participation and on an equal footing. The workshops revealed a surprising amount of agreement between very different participants and a common desire to solve the problems.

However, we are concerned that parts of City Hall still foster a 'business as usual' attitude. Planning decisions continue to ratify and encourage developments that significantly contravene the London Plan and fundamentally ignore the principles of A City for all Londoners; growth and the economy are still seen from very narrow viewpoints; the financial concerns of the biggest developers are prioritised.

The responses gathered here are from a large number of people and organisations in our network, many of whom have also taken part in the November workshops. We are impressed by how much better this initial engagement has been than under previous Mayors, but it needs now to be followed by sustained and genuine

engagement as you draft the London Plan and your various Strategies in 2017.

This response should be read alongside our [Community-Led Plan for London](#) in which many of the proposals we mention in this response are elaborated more fully.

### **Part 1. Accommodating Growth**

In a sense, the concept of Good Growth is the same as the principle on which Just Space was founded: seeking ways to ensure that development is just and socially beneficial. However, it is not clear in the document what Good Growth means exactly and there is a lack of acknowledgment of the rising inequality that has accompanied economic growth in London so far. The list of components that make up 'good growth' makes little reference to the economy/jobs (its nature/distribution) beyond saying that there should be 'access to good homes and jobs'. Implicit in the idea of 'good growth' is surely that the economy should serve to promote human well-being. If the London Plan could place well-being and thus the physical and mental health of Londoners at the heart of its purpose, this would provide a useful framing for the whole of the document.

We wish to emphasise that the use of TfL and other public land provides a crucial opportunity to deliver socially beneficial development but that this can only be successful using existing land values, not selling the land to developers for profit.

For Just Space this chapter particularly highlights the need for new mechanisms to deliver the ambitions of the Mayor successfully. For example:

- New indicators for measuring the success of the city, such as the % of the labour force that has a secure job that pays at least the London Living Wage, and measuring life satisfaction using wellbeing surveys.
- Require Social Impact Assessments to be undertaken, to measure what is there and calculate the impact of development proposals on existing residents and businesses in a neighbourhood, including in Opportunity and Regeneration Areas.

- To ensure good design and place making, the Mayor's Design for London team must be given real powers to assess applications within the Planning Decisions unit.

In particular, Just Space does not support Opportunity Areas as the mechanism to deliver high density development. While high density development is not a bad thing in itself, the designation and rolling-out of OA's has led to ubiquitous large-scale luxury flat developments, with high levels of displacement of residents and loss of small businesses inside and outside the red line, accompanied by the GLA's lack of responsibility for ensuring any meaningful prior engagement on the ground. Just Space is calling for a review and moratorium on Opportunity Areas in order to gauge the social and local economic benefits of what has been delivered to date. If Opportunity Areas are to remain the main route to accommodating growth, we think a much more democratic and participatory model should be employed to prevent the scale of mass displacement, together with a prioritisation of social infrastructure to ensure a decent quality of life in these areas.

We expand on this in the last chapter of ***Towards a Community-Led Plan*** 'How the Plan is to be delivered' page 59

The Mayor talks about protecting employment land in central London and resisting conversion of offices to housing there, but the problem extends to areas and boroughs outside central London, across the whole city. In the section on Employment land across the city, the Mayor states that he will make provision for industrial and retail activity and promote viable strategic locations for office space, including in Outer London. However, there is no acknowledgement of the challenges the Mayor may face in doing so. For example, there is no reference to the rapid loss of industrial land and accommodation or AECOM's 2015 Industrial land supply and economy study, which is a key part of the Evidence Base.

The next section on Housing and mixed-use land talks about the potential to use 'surplus' industrial land in London for housing, without acknowledging that the pressure to release industrial land for housing is what has caused the loss of industrial land over and above the Mayor's targets for the last 15 years. Careful thought will need to be given in the London Plan to local transport links, particularly lateral and orbital links, if outer London employment is to be promoted.

Much work is now taking place on how to co-locate industrial areas and residential areas, including development projects such as the SEGRO and Barratt scheme at the former Nestlé Factory in Hayes. This work must become part of the GLA's thinking so that housing and industry cease to be in a state of constant competition and more creative solutions are brought into play.

## **Part 2: Housing**

Two key observations from the Just Space network deliberations over the last year to produce ***Towards a Community-Led Plan for London*** that are missing from ***A city for all Londoners*** are as follows:

The Mayor should now develop a London Housing Bill to give the Mayor devolved powers to bring about housing reform in London, including through city wide rent control and improved security for private renters, regulation of landlords through mandatory landlord licensing across London and meeting the challenge of providing not-for-profit, social rented housing.

The Mayor should care for existing homes, neighbourhoods and communities and respond to high levels of fuel poverty by scaling up refurbishment and retrofit programmes and protecting existing council and housing association estates and street properties as part of stemming the hemorrhage of desperately needed social housing stocks.

In addition, Just Space feels strongly, as do many people, that the term “affordable housing” should henceforth be removed from any documents produced by the Mayor as its meaning is the subject of endless interpretation that obscures the reality of the lack of genuinely affordable housing.

### **More detailed points:**

We are glad that the Mayor appreciates the severity of the London housing crisis and of its effects in preventing a majority of Londoners from being decently and healthily housed without being reduced to penury or over-reliance on housing benefit and other forms of social security.

In many respects the Mayor is constrained, in the short term, in what he can do by limited legal powers, tiny fiscal resources and many government policies which make

matters worse. We agree with the Mayor that solving the London housing crisis will be a long haul but we do not consider that the proposals go nearly far enough. New powers can be sought, fiscal devolution is on the government agenda and governments themselves change so we had hoped to see a more ambitious long-term approach. Even under existing powers, strong policies need to be embedded now in the London Plan to have substantial legal force:

The missing element in the Mayor's analysis is an explicit awareness that inflated **land prices** are a major inhibition to solving housing problems (as well as a big contributor to growing inequality). The Mayor could and should move towards very precise, not 'flexible', policies, especially on density and minimum social housing percentages to provide certainty to all concerned and reduce land prices.

We note that the new "**London Living Rent**" concept is spelled out in more detail in the draft revisions to the SPG, out last week, and shall be commenting carefully. Our first reaction is that the pegging of maximum rent to local incomes is valuable but that it should be in terms of median to lower quartile local incomes, not "average" as sometimes stated. The distinction will be crucial in most of London. London Living Rent appears to be roughly the same as Mayor Johnson's recommended level of "affordable" rent in London - around 65-69 per cent of market rent. And London Living Rent is supposed to be aimed at those saving to buy a house! The people who are not being served are the millions of Londoners who will NEVER have enough money to buy a house and who used to be able to access council housing. Social rent is the only form which really meets the urgent needs of Londoners in the lower half of the income distribution.

The purpose of linking this London Living Rent level to a 10-year deferred right-to-buy escapes us at the moment.

The Mayor's ambition to attract investors into offering Build-to-let homes alarms us for two reasons: more new investment can do harm by driving up prices for land and, without firm regulation from the outset, the homes built may end up in the hands of predatory / vulture investors simply squeezing maximum rent out of their tenants as has been seen around the world. Careful specification of conditions would be needed to prevent this.

Finally we must stress our disappointment at the omission of the potentialities of co-op, co-housing and community land trust formats which have proven over decades to

diversify the tenure forms of European cities, ensure that initial affordability is not dissipated over time and mobilise citizen skill and energies. In the same spirit we are alarmed to see the disappearance of the only good policy introduced by the previous Mayor: **Lifetime Neighbourhoods**. They are places that meet the needs of a local community at all stages in its life, recognising health and well-being, social networks, a thriving local economy and a sustainable environment.

#### **Next Steps:**

There is much to be done between now and the production of the Mayor's Housing Strategy and London Plan next year. In our ***Towards a Community-Led Plan for London*** (p.34-35) we argue carefully for the need for the Mayor to set up a Housing Forum representative of all tenure groups and of communities with distinctive needs, including older Londoners, refugees, gypsies and travellers, to refine and develop these proposals. We are ready and willing to help and have strong contacts with relevant representative organisations.

### **Part 3: Economy**

#### **Global city**

London's role as a Global City needs to be balanced more carefully with its role in providing an economy that works for all Londoners; an economy with well-being at its heart. As we say in our ***Community-Led Plan for London*** (p.19):

The London Plan needs to support an economy that delivers human wellbeing and tackles growing inequalities, all within environmental limits. To do this it is necessary to question the way London's economy has been framed so far, what and who it is for, its role in the UK and beyond.

By framing the document around London's global city functions (the sectors in which it is highly specialised and has competitive advantage), the document misses an opportunity to acknowledge that London's economic diversity has equally been a driver of urban growth. It also underplays the impacts that supporting agglomeration in the CAZ and financial and business sectors have on the rest of the city's economy. Although increasing specialisation in certain sectors has been a feature of its growth in more recent years, this specialisation co-exists alongside diverse economic sectors. The loss of diversity in London's economy could be a real threat in itself.

Much of the discussion about 'sectors' is anyhow imprecise, the inherited distinctions between industries (in SIC categories, for example) is often nowadays rather irrelevant. In general, space, subsidy and accommodation for "cultural" activities appear to be privileged across the board in policy. The culture of London extends to all parts of the economy. Privileging certain sectors (e.g. Art, theatre) is a biased approach undervaluing the creativeness of all sectors of London's economy.

In the context of the EU referendum there is a strong need to look at London's relationship with other UK regions and cities, not just with the rest of the world. This is mentioned very superficially (just in terms of the South East) and there is a danger that the message is to reinforce divisions rather than foster positive relationships.

### **Opportunity and economic fairness**

We welcome the Mayor's commitment to increasing opportunity for all Londoners and promoting economic fairness. However, the document underplays the tensions inherent in achieving these aims. As we say in our ***Community-Led Plan*** under the heading 'A fair city' (p.22):

Research shows that London fares badly on most socio-economic indicators. For example, despite increases in prosperity over the last decade, in-work poverty has increased by 70% and, after allowing for housing costs, Londoners' incomes have had the slowest recovery from the 2008 crisis of any UK region. Low pay disproportionately affects women, young people, people with disabilities, black and minority ethnic groups, households in rented accommodation and those working in the hospitality, food and retail sectors. Of special concern is the future of paid and unpaid caring activities, which predominantly employ women; these need to be transformed from a patchwork of low-pay insecure jobs to a more highly skilled, respected and non- exploitative sector.

The Equality Framework, Economic Development Strategy and Economic Fairness Team are mentioned here as driving forward initiatives to address inequality. It is imperative that the two documents are produced in an open and collaborative way with the involvement of a wide range of voices across civil society, enterprise etc to consider a diversity of topics including (1) understanding local economies through local evidence gathering and face to face visits to businesses, (2) relationship between London and the rest of the UK, (3) low pay and unpaid work, (4) Ethnic as well as gender pay gap.

The Economic Fairness Team should have diverse representation and draw expertise from a wide range of civil society, community, enterprise etc. A crucial question is how this will relate to the LEP and Business Advisory Group.

### **Spreading economic benefits**

We also welcome the Mayor's aspiration to allow all Londoner's to participate in London's global success and the acknowledgement of the large number of jobs across the city, outside the CAZ and Isle of Dogs. However, this section demonstrates little understanding of the spatiality and diversity of London's economy. We are concerned that the current focus on certain sectors/types of businesses is limited and fails to acknowledge the interdependency of sectors, the benefits of a localised and diverse economy and the challenges facing London.

There is an overemphasis on tourism, the night-time economy and creative businesses. Artists and creative workers are not the only sectors facing accommodation shortages and challenges. There is no mention here of the destruction of existing industrial land and low-cost workspace accommodation (including railway arches and markets) and the implications for the wide range of productive and service businesses that occupy space in such premises and are an important part of London's economy, providing a range of jobs for Londoners. There is no mention of Ethnic and Migrant business clusters that play a vital role in giving communities and new arrivals a local identity, as well as fostering a spirit of entrepreneurship and being significant local employers.

The Mayor's initiatives to set up a Workspace Providers Board and fund for new workspaces in redevelopment will not help the vast majority of businesses who face acute accommodation challenges. As we say in the ***Community-Led Plan*** (p.23):

Small and Medium Sized enterprises — the engines of entrepreneurialism and innovation — are dispersed across the city in industrial estates, high streets and residential areas in workshops, light industrial units, wharves, warehouses, studios and sheds

If demand for this varied accommodation does not decline – current indications suggest it will actually increase – then very shortly we will face a critical situation of undersupply, leading to both a housing and workspace (particularly industrial accommodation) crisis. The retention, intensification and delivery of workspace



needs to be an integrated matter, not considered in terms of separate categories of strategic industrial land, office space, workspace for creatives and artists etc. Many of the land use categories overlap, with creative industries and 'makers' occupying both office (B1a) and light industrial (B1c) space, local authorities currently lack detailed knowledge of the nuances. The impact that the pressure for residential redevelopment has had on the broader economy, particularly businesses on short leases occupying this wide range of low-cost accommodation, is underplayed. There is an opportunity here for the Mayor to explore alternative community-led (or business-led) development and ownership models.

#### **Part 4: Environment, Transport and Public Spaces**

The **preamble** and the **approach** to this part raises hopes for a truly joined up consideration of environmental factors, previously independently addressed, by a comprehensive London Environmental Strategy that addresses the interdependencies of these factors. However, the principles underpinning environmental interventions that are said to be set out in *A City For All Londoners* are inadequately articulated given their importance. Presently they read as accommodations of 'givens' arising elsewhere in the document. For example, there is the assumption that the case has been made why London needs development and growth. Legislation, planning policy and the proper stewardship of the city require the delivery of all dimensions of sustainable development jointly and simultaneously. As *Towards a Community-Led Plan for London* (p.41) observes this internationally agreed principle stresses that we achieve our goals of living within environmental limits and a just society through the means of a sustainable economy, good governance and sound science. Such considerations should pervade all of the Mayor's strategies to determine the ambitions for the city - the scale, nature (composition) and distribution of development - and to inform the policies and programmes. Clearer recognition and adoption of these considerations are needed.

**A Healthy, Resilient, Fair And Green City – Air Quality:** the air quality issues of London are now well rehearsed, but efforts at resolution are tardy. The Supreme Court has ruled that all possible measures must now be taken to meet the legal limits of air pollution in the shortest possible time. The Mayor has set out a package of proposals, but given that human health continues to be at risk, more should be done. See the policy proposals set out in *Towards a Community-Led Plan for London* (p.43). Reducing motor vehicle dependency, the need to travel and traffic levels have to be expressly specified. Road Traffic Reduction Target Setting and road user charging would change travel behaviour, tackle congestion and pollution (p.57).

**A Resource Efficient City – Zero Carbon By 2050:** this ambition is welcomed, but the promised detailed roadmap is key to realisation. The present London Plan has carbon reduction targets but the measures necessary to achieve these are unspecified towards the end of the plan time-line. For proper plan making and the addressing of the drivers set out in *A City For All Londoners* – climate change, air quality, waste management, fuel poverty etc. – together with national law and international agreements, as well as for reasons of social and environmental justice, the measures and means need to definitively set out.

**Healthy Streets:** as part of the way to make London a healthier, fairer and greener city is very much welcomed. But this approach should be broader in scope, for example, by being rolled out to the other building blocks of the city – the open spaces, the neighbourhoods. Iconic projects in Oxford Street, bridging the Thames or mega transport schemes should not inhibit the necessary widespread implementation of Healthy Streets. And improving health and well-being as a primary purpose should be embedded throughout all the Mayor's plans and actions in order to tackle the entrenched, persistent and inequitable differences in health and determinants across London.

**Cycling And Walking:** active travel, including public transport, is to be encouraged and supported throughout London. Clarity on how the Mayor will tackle motor vehicle dependency and a return to increasing total vehicle mileage driven, particularly in outer London is necessary. Whilst the greater resourcing of cycling and walking is welcomed, the strategy should no longer be one of incremental expansion of an existing repertoire of programmes if transformational change is to be achieved. Within the time-line of a new London Plan, autonomous vehicles are predicted to dominate, yet scant reference is made to this.

**Public Space:** in all its varieties is vitally important for active social/community life and a more cohesive and better functioning city. But the trends for open space loss, privatised public space and commercial operations in parks, for example, need to be countered. Good access to public space is fundamental to successful neighbourhoods and the city. Positive measures to remedy the social environmental injustices from unfair access and distributions, quality and quantity, across London should be integral to planning of London.

**Good architecture and design:** together with the respecting of local distinctiveness and the well- worn phrase that higher density does not necessarily mean high density

seem to be an enduring promise of plan-making. Unfortunately the gulf between such good intention and actuality is plain for all to experience. Correction of this should start with greater public input into the debates and definitions of good design, development and successful place-making.

**London's heritage:** sense of place and affection for place are not only found in areas of historic environment and heritage assets. Attachment to place, whereby locals appreciate/value their homes, estates, neighbourhoods and town centres that are cared for, is prevalent throughout London. This should be encouraged, enhanced, and disruptive processes, such as Opportunity Area/estate/area regeneration, corrected to prioritise social sustainability and participation.

**Inclusive neighbourhoods:** are welcomed, but this should be part of the Lifetime Neighbourhoods approach which has other merits, particularly if further refined as in *Towards a Community-Led Plan for London* (p.68-69).

### **Integration**

The Mayor refers to the importance of 'integration' between different parts of the document and explicitly makes the link between transport and environment. However, no reference is made to the links between land use and the environment and the tensions inherent in (a) further concentration of high-value economic activity in the centre and the environmental impacts (commuting, business trips), and (b) pushing out lower-value businesses further from the city and the impact of this on the rise in business to business trips and the resultant environmental impact.

## **Part 5: A City for all Londoners**

We support fairness and social justice being central to the Mayor's vision for London.

A new equality framework is very much welcomed and it should be produced swiftly and collaboratively so that it can influence the preparation of the Mayor's Strategies. It is important for this framework to be outward looking, speaking to those experiencing disadvantage and exclusion and indeed to all Londoners and it must set the scene for the process of Integrated Impact Assessments (IIA's). These IIAs and the Strategies they inform should also be the product of collaboration between the Mayor and Londoners. The lack of any reference to equality, health, environmental

and other impact assessments and the key role they play in the preparation of the Mayor's Strategies is disappointing.

It would also be helpful if the Mayor were to give recognition and value to a wider range of groups. Part 5 makes no mention of Gypsies and Travellers, or of migrants and refugees, surely two of the most marginalised groups in London. The section on Health Inequalities could have mentioned these groups as case studies. An earlier section on the city's rough sleepers mentions changes in welfare as a cause; it would be very appropriate to also mention changes in immigration law and to recognise the growing number of migrants and refugees who find themselves as street homeless.

We are excited that the Mayor emphasises building strong communities and their active participation in the democratic governance of London. For these aspirations to be realised, policy levers need to be identified and drawn down such as Lifetime Neighbourhoods, Neighbourhood Planning and the Localism Act. Lifetime Neighbourhoods should be central to the implementation of the Mayor's vision as they provide the definition and detail for integrated, inclusive and empowered communities.

We too have identified the importance of governance (see the Community –Led Plan) and would relate this to the Mayor's call for a devolution of powers and resources to London. We would very much like to work with the Mayor to extend the ambition of the devolution agenda to seriously address social policy issues such as the housing crisis, and to give space to the layer of civil society, including in the partnerships that London forms with other cities in England.

We feel strongly that when the Mayor refers to the Health Board or the Homes for Londoners Board or the LEP there needs to be follow through for the participation of civil society either within these structures or through the creation of parallel and connecting structures where London's communities and citizens can have a real voice and agency in decision making. This requires a considerable amount of opening up, so that the community sector part of civil society, and its rich diversity of community groups, are welcomed.

We support the Mayor's attention to the social dimensions of transport and his commitment to step free access. We would suggest this could be reinforced by explicitly naming accessibility and integrated travel. For further details see the Transport chapter of the ***Community-Led Plan***.

The Mayor points out that the cultural breadth of London extends to the local and community level, but gives no details to fit alongside the paragraphs about London's iconic cultural institutions. We have written extensively about the pressure on grassroots music venues, community centres and community halls, street markets and many other community spaces which are the fabric of London's diversity and one of its building blocks. They not only provide access to much needed services, they foster a sense of belonging, building community networks and enabling communities to thrive together. Yet there is no part of current policy that meaningfully creates, or prevents the loss of, these spaces. We have made policy proposals in the ***Community-Led Plan*** (p.63-65) with which we would like the Mayor to engage.