

Planning and Regeneration Committee

This document contains the written evidence received by the Committee in response to its Call for Evidence, which formed part of its investigation into social value and informed the report *Social value in planning and regeneration: Knowing the price of everything and the value of nothing*. It also contains a briefing provided by the GLA on social value in planning and regeneration [see Appendix 2].

Calls for Evidence are open to anyone to respond to and in October 2024 the Committee published a number of questions it was particularly interested in responses to as part of its work, which can be found on page 2. The Call for Evidence was open from 8 October to Friday 8 November 2024.

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Questions asked by the Committee

The Committee recognises that ‘social value’ has different meanings to different people, so please feel free to use the interpretation that makes the most sense to you. Broadly, the Committee uses the term ‘social value’ to refer to the benefits derived from the places Londoners live and work, which may include social, environment and economic benefits.

1. What does ‘social value’ mean to you?
2. How should ‘social value’ be measured, particularly in relation to market traders and arch-based businesses?
3. What specific challenges do market traders and arch-based businesses face in London today? How does this impact the ability of traders and arch-based businesses to deliver ‘social value’ to local communities?
4. What role should the Mayor and/or Places for London have in supporting market traders and arch-based businesses to deliver ‘social value’, and is there further action either should take?
5. To what extent do the planning and regeneration policies of local authorities support market traders and arch-based businesses?
6. How could the London Plan better support council-run markets and arch-based businesses that deliver high social value?

Academics

Dr Myfanwy Taylor and Professor Sara Gonzalez / Ref No. SVP001

[Dr Myfanwy Taylor](#) (University College London) and [Professor Sara González](#) (University of Leeds). See Appendix below for the background to the research this submission is based on.

1. What does ‘social value’ mean to you?

The term, ‘social value’, is useful in drawing attention to the existence of value and values beyond market value. We know that market value often does not capture the more-than-economic value of what is transacted in market exchange; this is particularly so for the small firms and traders that we have focused on in our research. Research has evidenced the more-than-economic functions and values delivered by, for example, pubs; bowling alleys; local shops; and markets (e.g. Bua et al, 2018; Jackson, 2019). This evidence – and the term, ‘social value’ – speaks to wider debates and concerns about the meaning of growth and development, and the inadequacy of narrowly-economic metrics such as GDP for measuring progress.

While the term, ‘social value’, is helpful in many ways, our own view is that it can obscure the key issue of who generates social value and who benefits from it. If reduced to a quantitative metric, social value risks losing its connection with a more relational view of value as socially produced which emphasises the importance of the communities producing it and the communities benefitting from it.

In our *Markets4People* research, we have therefore used the term ‘community value’ rather than ‘social value’ to capture the holistic economic, cultural and social value that market traders and the market space itself generates. Through our rigorous methodology we established markets’ community value to be:

- Serving low-income and other marginalised, vulnerable or discriminated-against groups, for example older people, migrants and Black and Minoritised communities;
- Providing affordable and quality produce, including fresh and healthy food;
- Supporting social and cultural interaction, reducing loneliness and isolation by providing inclusive and generally accessible places;
- Providing low-cost and accessible trading spaces, sustaining employment and livelihoods for traders; and
- Generating economic value through customers’ purchases, rental income for market operators and increased footfall in high streets and town centres.

For further detail and evidence of this ‘community value’ in three traditional markets across England (one in London) you can consult this work:

- González, S., M. Taylor *et al.* (2021). *Grainger Market: a community asset at the heart of Newcastle upon Tyne*. University of Leeds.
<https://eprints.whiterose.ac.uk/174814/6/210602-M4P-Grainger-FINAL.pdf>
- Newing *et al* (2023) *The Importance of Newcastle’s Grainger Market as an Affordable Source of Food*. Markets4People, University of Leeds.
<https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2022/10/221027-GraingerMarketBriefingNote.pdf>
- Taylor, M. *et al.* (2021). *Queen’s Market: a successful and specialised market serving diverse communities in Newham and beyond*. University of Leeds.
<https://eprints.whiterose.ac.uk/174813/1/210531%20M4P%20Queens%20FINAL.pdf>
- Waley, P., M. Taylor *et al.* (2021). *Bury Market: shopping destination and community hub*. University of Leeds.
<https://eprints.whiterose.ac.uk/174812/1/210531%20M4P%20Bury%20FINAL.pdf>

Since the publication of this research, we have expanded our understanding of the social/community value of markets to include:

- Supporting and improving public health through the provisioning of healthy, affordable, fresh food and culturally appropriate food.
- Contributing to a just transition to sustainable food systems through their provisioning of fresh and seasonal food, reduction of waste and reach to vulnerable and minoritised groups.

For details of this work see:

- Gonzalez, S. and Bridge, G. (2024) Traditional public markets: Inclusive hubs for a just food system. In: AESOP Sustainable Food Planning Conference 2024, 19-22 Jun 2024, Brussels and Ghent, Belgium. AESOP Sustainable Food Planning.
<https://eprints.whiterose.ac.uk/218107/1/GONZALEZ%20and%20BRIDGE%20AESOP%20conference.pdf>
- Gonzalez, S. (2024) The right to food: how traditional markets support local food systems. Medium blog: <https://medium.com/policy-leeds/the-right-to-food-how-traditional-markets-support-local-food-systems-900980825273>

2. How should 'social value' be measured, particularly in relation to market traders and arch-based businesses?

Our *Market4People* research reviewed existing tools to measure the “social value” of markets which was published in a report:

- Bua, A., Taylor, M and Gonzalez, S. (2018) Measuring the value of traditional markets: Towards a holistic approach. New Economics Foundation, London.
<https://neweconomics.org/uploads/files/retail-markets.pdf>

We found that most attempts to measure the social value of markets have been based on *economic* measures such as: financial performance of markets, turnover, footfall, number of jobs or the positive ‘effect’ of markets in the wider local economy by attracting visitors. An influential report by the New Economics Foundation (Rubin et al, 2006) on Queens Market (Newham) expanded these measurements to include measurements on social inclusion, job opportunities and provision of affordable specialist food for low-income and migrant and diverse ethnic communities. Overall, the ‘more than economic’ value of markets has gone under the radar and often assumed or taken for granted by market operators without any evidence to support investment or strategic decision making.

To cover this gap, our *Markets4People* project focused on the social and cultural value of markets. They key recommendations based on our experience is:

- Social or community value should be measured from both trader and customer perspectives.
- The measuring needs to capture both quantitative and qualitative data through interviews and surveys specifically designed identify and evidence the holistic value of markets (see earlier section).
- Interviews and surveys need to capture the sociodemographic make-up of the trader and customer base, to understand who is producing and benefiting from social or community value and to be able to monitor any changes in the future.

Our markets' customer survey template is available here and can be re-used and adapted freely: <https://trmcommunityvalue.leeds.ac.uk/surveytemplate/>

In order to capture the holistic value of markets the survey collected data on:

- **Socio-demographic profile** of customers including: age, postcode, gender/sex, ethnic group, length of residence in the UK, employment status, occupation, household type, access to car
- **Details of their visit** to the market: how longer they have been coming, travel patterns, duration and frequency of state,
- **Details of shopping**: What products and services are bought, expenditure and rating of the quality and affordability of products in particular regarding the provisioning aspect of markets for essential goods.
- **Feelings and attitudes** in respect to loneliness, sense of belonging when they visit the market, interaction with other customers and traders and in particular with those of different backgrounds and the role of the market as a local amenity.

This evidence was quantified in clear and concise statistics and graphs and resulted in key findings such as:

Demographic characteristics of market users • 50% over 60 and 69% female • 33.4% non-white • 33.3% not born in UK • 76% not in paid full time work • 61.2% in the C2, D, E social grades • 25.6% living on own and • 22.1% living with children • 49.2% no access to a car • 61.6% live in the 20-30% most deprived neighbourhoods in the country.

Over 90% agree that they feel safe, welcome and their market is a community hub providing them a sense of belonging • 74.1% feel less lonely when they visit • Over 50% agree that they receive help or assistance from traders and other customers • 61.8% share news or information with traders • 73.9% bump into people they know and 68% talk to people they don't know • 53.4% arrange to meet people they know and 43% visit with family and 29% with friends.

We also held focus groups with particular groups of customers to gather rich qualitative data on:

- What specifically they buy at the market
- Why they visit and shop there.
- Socialising and interacting at the market.
- Importance of the market to the local community

Dr Taylor's research on Seven Sisters Indoor Market and Wards Corner did not involve a large-scale survey but rather through 13 longer interviews with traders, business owners and community leaders. Through the integration of these perspectives, Dr Taylor's research demonstrates the close entanglement of community and commerce at the Market and Wards Corner, and its importance and potential as a site of holistic social and economic development and flourishing (Taylor, 2019).

The particular importance of Seven Sisters Indoor Market to Latin Americans in London in relation to the human right to culture has since been recognised by the United Nations (United Nations Human Rights Office of the High Commissioner, 2019). The links between commerce and culture have also been drawn out by Dr Patria Roman-Velazquez through her research and activism with Latin American traders and communities in Elephant and Castle (Patria Roman-Velazquez, 2018; King et al, 2018).

3. What specific challenges do market traders and arch-based businesses face in London today? How does this impact the ability of traders and arch-based businesses to deliver 'social value' to local communities?

Market traders, arch-based businesses and other small businesses occupying 'low-value' land and premises in London face growing and intensifying pressures of commercial displacement and gentrification, evidenced both through extensive research and concerned efforts of traders and communities to bring these issues to the attention of the GLA and the Mayor of London.

These challenges pose a major risk to traders and firms' ability to continue to deliver social and community value – their relationships with other firms and communities are deeply rooted in place and highly vulnerable to displacement. The displacement of socially-valuable firms and traders in London severs their roots to the communities they serve with major consequences for identity, belonging and inclusion in London's communities.

Market traders in London operate from a variety of locations, including street markets operated by local authorities under street trading legislation and markets operated by private operators on a commercial basis. Here, we are particularly concerned with those publicly- and privately-operated markets in London that are serving as important community assets, providing access to quality everyday foundational and provisioning food, goods and other services at an affordable price to low-income communities, examples of which include Queen's Market

(operated by Newham Council) Ridley Road Market (operated by Hackney Council); Walthamstow Market (operated by LB Waltham Forest); Seven Sisters Indoor Market (privately operated; located in Haringey); Shepherd's Bush Market (privately operated, located in Hammersmith and Fulham). These markets typically face a range of challenges, including:

- They have been disinvested in over decades, resulting in poor basic infrastructure and services.
- They occupy large sites in strategic locations close to transport connections, making them vulnerable to redevelopment.
- They are not well integrated into wider relevant council policy agendas, for example inclusive economy; community wealth building; food poverty; public health; carbon reduction.
- Their importance and specialist functions is not well understood by the market operator – whether private or public.
- They are vulnerable to ambitious private and/or public-led redevelopment schemes seeking to transform them into very different markets serving a higher-income customer base.
- Traders and customers face structural barriers to having their voices, interests and concerns heard in policy debates and development projects, being disproportionately low-income, racially-minoritised, migrant and vulnerable communities, as well as (in the case of traders) working very long hours with minimal spare income or time which restricts their ability to participate in consultation events and to represent their interests via collective organisation.

For more details on the challenges and the role of community campaigns see our work here:

- González, S., & Dawson, G. (2015). Traditional Markets under threat: why it's happening and what traders and customers can do. <https://eprints.whiterose.ac.uk/102291/>
- Gonzalez, S and Dawson, G (2017) *Resisting gentrification in traditional public markets: Lessons from London*. In: Gonzalez, S, (ed.) *Contested Markets, Contested Cities: Gentrification and Urban Justice in Retail Spaces*. Routledge Studies in Urbanism and the City . Routledge , London, UK , pp. 54-71. <http://contested-cities.net/wp-content/uploads/2018/08/Chapter-4.pdf>

The case of Seven Sisters Indoor Market / Wards Corner provides an extreme example of the problem. The Market is located on the ground floor of the locally-listed historic Wards building, owned by Places for London (formerly Transport for London) owing to its location immediately above Seven Sisters tube station in Haringey. The Market was run by private operators between the 1980s and 2020, when it closed shortly before the Covid pandemic due to serious risks associated with the Market and the building's long term neglect by both market

operators and Places for London. In the 2000s, Haringey Council advanced plans to demolish the Market, Wards building and entire Wards Corner city block – including many local businesses serving low income and racially minoritised local communities, terraced housing and another locally-listed building – and entered into a development agreement with developer, Grainger to build private housing and retail space in its place.

This proposal triggered one of the most wide-ranging, long-running and now famous urban struggles against displacement and gentrification, involving market traders, local businesses and local residents (see, for example, Burgos et al, 2021). Part of the problem was the total neglect and lack of understanding of the social and community value of the Market and the other local businesses due to be demolished. Finally, after almost 20 years of campaigning with untold costs for key traders, businesses and residents involved, the developer withdrew in 2021, Haringey Council gave its support to the community plan to restore the building, and the Mayor of London committed to a process for groups linked to traders to bid for a long-lease of the building. That process finally began in 2024, and Places for London, Haringey Council and Wards Corner Community Benefit Society are now in discussions regarding the long-lease and the community plan. Meanwhile, the Market remains shut, the temporary market is delayed by at least three years and traders and the wider community continue to suffer the loss of this vital economic, social and cultural hub. Despite recent achievements, the advancement of the community plan's proposal to retain and enhance existing economic, social and cultural functions and values remains an uphill struggle.

Communities and traders have been raising concerns about these challenges for over 20 years, for example via community and trader groups linked to Queen's Market (in Newham), Ridley Road Market (in Hackney), Seven Sisters Indoor Market (Haringey), Brixton markets (Lambeth) and Shepherd's Bush market (Hammersmith and Fulham). The existence of so many market campaign groups is unique within the UK and – to the best of our knowledge – internationally, pointing to the seriousness of the situation and the need for renewed policy attention. Individual market campaign groups and other concerned groups have been raising concerns about the strategic London-wide threat to markets to the GLA and the Mayor of London through the London-wide Just Space network, including via the London Plan participatory process and successive community-led plans. In the 'Local Economy and Industry' section of Just Space's latest manifesto (Just Space, 2024: p6), for example, the network calls for the protection of existing street markets and their expansion across London's town centres.

Turning to the issue of industrial land, rates of industrial land loss have exceeded the targets set by each successive version of the London Plan. London's housing crisis, aided by relaxations of permitted development rights and changes made to the London Plan to facilitate the conversion of well-located industrial and other commercial workspace to housing, have dramatically increased the pressure and opportunity to convert commercial space to housing (Taylor, 2020). More recently, however, the pressures on industrial workspace have increased so much that industrial displacement is being driven more by industrial gentrification than the conversion of industrial land and premises to housing (Ferm, 2023).

Firms operating from industrial land and workspace face additional challenges linked to perceptions of industry as ‘dirty’, ‘backward’ and incompatible with housing and more ‘modern’ economic functions. Their economic importance and success – including their linkages to other firms and sectors; their potential contribution to repair and circular economies; their importance for innovation – is often overlooked due to these ideas and narratives. Likewise, their importance as sources of accessible, decent and local employment for local people is often missed. Furthermore, firms operating from industrial workspaces and land also deliver more-than-economic value, most famously perhaps is the case of Len Mahoney, a car mechanic operating from a Places for London-owned railway arch, who has a strong and long track-record of providing work experience, apprenticeships and entry level positions to local young people (in particular Black men) at risk of exclusion. Len’s services are also highly valued by the customers he serves, as evidenced via the East End Trades Guild of which he is a member.

As in the case of markets, firms operating from well-located industrial premises including railway arches are at particular risk of rising rents and ultimately displacement. The social or community value they provide is not currently part of the consideration of public or private landowners when reviewing rents or pursuing redevelopment projects. Like market traders and small businesses more generally, industrial firms face structural barriers in representing their interests in planning and policy debates and schemes.

4. What role should the Mayor and/or Places for London have in supporting market traders and arch-based businesses to deliver 'social value', and is there further action either should take?

The Mayor, the GLA and Places for London have an important role to play in ensuring existing social value is understood, protected and enhanced through redevelopment and regeneration processes. The Mayor, GLA and Places for London have various routes for doing this, as set out below.

The London Plan

The Mayor and the GLA should listen to the wide-ranging and serious concerns and proposals made by traders and communities regarding markets, industry and local economies via the Just Space network in successive community-led plans (for example, most recently, Just Space, 2024). Proposals to retain and enhance their social value should be incorporated into the London Plan.

These proposals are consistent with the findings and recommendations from the Markets4People research project regarding the importance of introducing stronger recognition, protection and enhancement of markets’ vital role as a source of affordable food and other foundational goods and services for low-income, racially minoritised and vulnerable communities in London. The Mayor of London should include a new “class” under **Class E – Commercial, Business and Service - which specifically relates to businesses that provide affordable goods and services and cover essential needs (drawing on the definition of essential goods and services used during Covid)**. The London Plan should also increase requirements placed on local authorities in relation to existing markets, and

require local authorities to develop plans to set up new markets. This should include supporting the development of trader- and community-led markets, which can be well-suited to running markets meeting particular needs and communities, as detailed in our report,

- Taylor, M et al (2023) *Trader and community-run markets: A practical guide to setting up, running your market and accessing support*, University of Leeds.
https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2023/01/230126_TandC_run_Markets_FINAL-1.pdf

The London Plan could also offer additional specific guidance to local authorities on existing and new markets, including for example recommending a minimum of 50% of stalls to be selling affordable, foundational and provisioning goods (e.g. fresh food; household products); affirming a vision of markets as frontline services delivering social value in particular to low-income, marginalised and minoritized communities; and introducing stronger requirements for market redevelopment and regeneration schemes to meet the principles of inclusivity developed and defined through our *Markets4People* research. These principles are set out in detail in our report,

- Taylor et al, 2021 *Developing markets as community hubs for inclusive economies: a best practice handbook for market operators*. University of Leeds.
https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2022/04/220408-HB1-final-version_RW_ONLINE.pdf.

In summary, the principles of inclusive market redevelopment are to:

1. Secure long-term community benefits from redevelopment, rather than a short-term financial return
2. Pursue a programme of regular incremental improvement that enhances community value
3. Ensure all traders have the opportunity and support to take up a place in the new market
4. Minimise disruption during the redevelopment process
5. Ensure trader mix policies for redeveloped markets reflect community value
6. Work in collaboration with market trader, user and local groups
7. Monitor the inclusivity of redevelopment schemes

The findings from Dr Taylor's doctoral research on commercial displacement similarly support the case made for Just Space for further protections on existing and expansion of new low-cost industrial land and workspace, including railway arches (Just Space, 2024). A parallel set of principles of inclusive redevelopment for industrial workspace could be developed, and those principles adopted into the London Plan. Most importantly, the London Plan should require

local authorities to include all existing industrial firms delivering social value in any redevelopment or regeneration schemes, with long-term affordable rents, secure leases and suitable units, so that they can continue to deliver social value to London's communities and to benefit from redevelopment. The London Plan could also require local authorities to do more to recognise and respond to the role and contribution of existing economic activities, for example, by requiring a local business audit as part of local planning frameworks and new development proposals.

Regeneration funding (via the Good Growth fund)

Via the *Markets4People* project, we have become aware of various concerns regarding the use of Good Growth funds in markets in London, for example at Queen's Market and Queen's Crescent, and recommend the Committee seeks the views of trader- and community-groups directly on these issues.

While the GLA has been innovative in establishing metrics for the social value of markets, these are strongly focused on additional value delivered through regeneration projects rather on existing social value. There is considerable scope to develop these metrics to place stronger emphasis on existing social/community value and the perspectives of current traders and customers.

We strongly recommend the Mayor and the GLA focus any further regeneration funding for markets on addressing basic infrastructure and environmental needs, to address decades of disinvestment, before funding any other projects or considering the need for more major redevelopment. In our surveys, when asked what they wanted to see change, the vast majority of customers surveyed stated basic improvements such as cleaning, lighting, toilets and security.

We also propose the Mayor adopts the *Markets4People* principles of inclusive market redevelopment (see above) into any future use of the Good Growth fund in relation to markets. We additionally recommend the Mayor requires local authorities to monitor the inclusivity of any schemes funded via the Good Growth, using indicators such as those listed in Table 3 of our report, copied below for ease of reference.

Table 3: Core elements and indicators of inclusive market redevelopment

Elements	Indicators
1. Secure long-term community benefits from redevelopment, rather than a short-term financial return	Surplus (if there is one) retained (%) External funding secured (£) Annual maintenance budget (£) Average rents per sqm (£) Plus community value measures (see Section 2)
2. Pursue a programme of regular incremental improvement that enhances community value	Traders satisfied or very satisfied with the market environment (%). Users satisfied or very satisfied with the market environment (%). Plus community value measures (see Section 2)
3. Ensure all traders have the opportunity and support to take up a place in the new market	Traders from the old market trading in the new market (%) Traders receiving training/support as part of application process (%) Traders from the old market who consider the new market a significant improvement (%)
4. Minimise disruption during the redevelopment process	Traders moved during redevelopment (%) Duration of temporary market (if there is one) (months). Traders receiving financial support (%) Traders receiving other forms of support (%).
5. Ensure trader mix policies for redeveloped markets reflect community value	Traders with an affordable offering in the new market (%). Users on low incomes that consider the new market affordable (%).
6. Work in collaboration with market trader, user and local groups	Meetings with traders, users and other groups (#) Representation of traders, users and other groups on market fora (%) Collaborative projects initiated (#) Funding awarded to trader, user and other groups (£)

London Markets Board

We recommend that the Mayor's London Markets Board should be expanded to include market customers who rely on markets' foundational and provisioning roles and functions. Market customers are currently not represented on the Board which is a major omission. Additionally, the London Markets Board should include the concerns of Londoners regarding gentrification and redevelopment of markets which have thus far not featured on the Board's programme of work to our knowledge.

Places for London

Places for London have recently taken some steps forward towards recognising the unique social value of Seven Sisters Indoor Market and working with traders and local residents on the future of the Market and the Wards building, as documented above. Dr Taylor, through her voluntary role on the Board of the Wards Corner Community Benefit Society (2022-24) and West Green Road/Seven Sisters Development Trust (2021-ongoing), would like to offer some personal reflections on how this recent progress should be further built upon in order to successfully bring back the social value of the Market, and help to ensure such issues do not arise again:

- Places for London should develop a social value policy, and a dedicated social value team with the skills, experience, capability and agility to work with traders, tenants and communities as partners to progress social value projects and plans. This policy and team

should learn from the experiences of traders and community members through the Seven Sisters Indoor Market/Wards building case.

- Places for London's procurement and sub-contracting process has introduced extensive delays and a lack of control over plans for a temporary market which have significantly extended and increased the harm done to traders' livelihoods and to the community. These processes need reviewing and reworking if Places for London is to develop a social value programme.
- There is a need for a culture change within Places for London if markets and industry operating from their premises are to continue to deliver social value for London's communities. Traders and commercial tenants find it incredibly difficult to communicate with and work with Places for London. These difficulties compromise Places for London's ability to progress social value objectives – and indeed to follow-through on Mayoral commitments in the case of Seven Sisters Market and Wards Corner – and need addressing if this is to change.
- Where traders and tenants are clearly delivering social value – or where proposed trader and community-led plans would deliver significant new social value – this should be taken into account when setting rent levels. Places for London should not aim to extract a profit from property or plans delivering social value.

To reiterate, however, we advise the Committee to seek the input of the Seven Sisters Market Traders Association and the Wards Corner Community Benefit Society directly to their enquiry.

5. To what extent do the planning and regeneration policies of local authorities support market traders and arch-based businesses?

We considered this issue in detail through our *Markets4People* research on Queen's Market, Bury Market and Grainger Market. Focusing on Queen's Market as a London-based example, we found that:

- The unique community value of the Market remained relatively poorly understood or valued by the local authority, despite some recent improvements in this area.
- The market environment had suffered long-term disinvestment, generating a need for basic improvements to, for example, lighting, flooring, cleaning, security and toilets.
- We identified that part of the problem was fragmented governance, resulting in 100% of income received from commercial units within the market being extracted from the market with no reinvestment within the market environment.
- Newham Council's recent efforts to regenerate Queen's Market – including via the Mayor's Good Growth fund – included some small measures to address these issues (e.g. toilets) but also incorporated measures which reactivated trader and community concerns about

displacement and gentrification (e.g. art projects; cultural space; affordable workspace; loss of parking).

- Distrust between the local authority and market traders and customers significantly increased when Newham Council began exploring again options for major longer-term redevelopment, including at first the option of total demolition, without making sufficient commitments of inclusion to existing market traders and other businesses integral to the market ecosystem operating from local authority commercial within the market. From our research, we found no case for major redevelopment given the market's unique success and contribution.
- The market operates a strategic development site within the Council's local plan, which is generating significant pressure to densify and intensify uses on the site which could compromise the market's foundational and provisioning roles for local communities and beyond as evidenced in our research.
- We made a series of recommendations addressed to Newham Council (pages 28-30 of the report), including trailblazing a new community wealth building approach to markets and putting the market at the centre of Covid-recovery plans.

Further detail on our findings and recommendations can be found within the report,

- Taylor, M. et al. (2021). *Queen's Market: a successful and specialised market serving diverse communities in Newham and beyond*. University of Leeds.
<https://eprints.whiterose.ac.uk/174813/1/210531%20M4P%20Queens%20FINAL.pdf>

6. How could the London Plan better support council-run markets and arch-based businesses that deliver high social value?

See 'London Plan' under response to question 4.

Appendix – Background to the research that this submission is based on

- **The ESRC-funded *Markets4People* research project** which aimed to understand and enhance the community value of traditional retail markets in the UK (2018-21); PI: Prof González; Senior Research Fellow: Dr Taylor; Co-Is New Economics Foundation and National Market Traders Federation as well as academics Dr Paul Waley, Dr Andy Newing, Dr Graham Clarke, Dr Lisa Buckner (all University of Leeds) and Professor Sophie Watson (Open University). The research included a large-scale, representative survey of 1,500 customers of three exemplary UK traditional retail markets (Queen's Market, Newham; Bury Market, Greater Manchester; Grainger Market, Newcastle Upon Tyne), supplemented with six customer focus groups and around 50 interviews with key actors locally and nationally. Findings are published in three case study reports and two best practice handbooks (available online [here](#)) and several academic articles and book chapters so far (e.g. Newing et al, 2023; Taylor and González, 2023).

- **Prof Gonzalez’s further research on the role of traditional markets on public health and sustainable urban food systems** developed in the context of two research projects: a Healthy and Sustainable Market Charter for Bradford’s new Darley Street Market, commissioned by Public Health, (Bradford District Metropolitan Council in 2022 and Measuring the Carbon Footprint of traditional retail markets, funded by Research England in 2023).
- **Dr Taylor’s doctoral research on commercial displacement in London**, focusing in particular on markets, industrial firms and other small businesses (2012-17). The research included three collaborative action research projects with community and small business groups challenging and developing alternatives to commercial displacement, including the London-wide Just Space community planning network, the Wards Corner Community Coalition (in Haringey) and the Carpenters Community Plan group (in Newham). Findings are published in a handbook for community and small business groups (available online [here](#); in collaboration with Just Space), and in several academic articles so far (Taylor, 2020; 2021; 2023; Taylor and Edwards, 2016; Edwards and Taylor, 2017).
- **Dr Taylor’s involvement (in a voluntary and personal capacity)** on the Board of the Wards Corner Community Benefit Society (2022-24) and the West Green Road/Seven Sisters Development Trust (2020-ongoing). Her role has included project development to advance the Community Plan for Seven Sisters Indoor Market (the Latin Village) and Wards Corner; organisational development of the Community Benefit Society to deliver it; and stakeholder liaison and partnership development including with Haringey Council and building owner, Transport for London. Further information about the Community Plan and Community Benefit Society are available [here](#). Dr Taylor’s comments in relation to these roles are made in a personal capacity; the Committee is recommended to contact the Wards Corner CBS and the Seven Sisters Market Traders Association for an official response on behalf of those organisations.

References

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Community groups

East End Trade Guilds/ Ref No. SVP002

1. What does 'social value' mean to you?

EETG Guild members providing social value are often those simply representing marginalised communities. Being visible at the street level as working class, global majority, LGBTQI+ and female-led businesses and traders is essential to a sense of belonging, inclusion and safety in London for groups most at risk from oppression and violence. Simultaneously to being most at threat from displacement, these groups are most responsible for increasing the property and rental value of areas by the cultural impact they have through hospitality and the arts.

My experience of state and public sector-led initiatives and policy around social value is that within the hierarchy the focus is too often placed on the type of legal form of an organisation e.g. whether something is a charity, a social enterprise or a for-profit company. For example, Business Rates relief is given to charities and the landlords of charities but the concept of charity is Victorian. Rather than distribute economic power that generates community wealth to increase equality, charity keeps people in their place by taking money from big business and the state perpetuating inequality in a system that prioritises GDP growth before the well-being of people and planet.

Many small and micro businesses registered as profit-making have smaller profit margins than charities run as businesses with trading as well as grant income that is won based on the charity's ability to meet the criteria of the grantmaker rather than serve the broader interests of the community. Small businesses with narrow profit margins that cannot keep pace with increasing market rents are often stigmatised by the state without looking at their broader socio-economic impact and context.

There is now improved language within the local economic lexicon that allows space for increased nuance when it comes to social value for example – Socially Trading Organisations as described by Kindred in Liverpool: *“Socially-trading organisations (STOs) are businesses that deliver social benefits AND trade commercially. STOs are businesses with a social mission, who collaborate and increase their impact by working together to make a positive difference in their local communities. Socially-trading organisations are not limited to any particular legal form. They may include community businesses, community land trusts, community interest companies, social enterprises, cooperatives and some mission-driven companies, family businesses and local ventures who demonstrate social purpose through their actions and behaviour.”*

In addition, the function of Foundational Businesses in the everyday economy is also a vital part of social value; *“The services and products within the foundational economy provide those basic goods and services on which every citizen relies and which keep us safe, sound and civilized. Care and health services, food, housing, energy, construction, tourism and retailers on the high street are all examples of the foundational economy. The industries and firms that are there because people are there”* Business Wales.

2. How should social value be measured, particularly in relation to market traders and arch-based businesses?

Triangulation of methods is important for research and measurement. To gain a rich understanding qualitative observations rather than measurements such as case studies and video capture are as important as quantitative statistics that can be used to offset rent paid against social value creation.

The occupants of these spaces from the less privileged minority must have a voice in determining what is important to measure and observe to capture vital nuance. Customers of these businesses must also have a say in what they feel the social value is and how these types of businesses are providing it to include the voice of the broader community of local residents.

Regular consistent dialogue and engagement are needed to make sure policy is relevant and fit for purpose and adapting to the changing economy. When making these investigations with marginalised communities it is important to recognise them publicly and with funding for their time. For example, the East End Trades Guild is a female, neurodivergent queer-led not-for-profit. My time as Director in writing this is valuable but it will not be compensated for by the GLA. In terms of intersectionality, there will be other less privileged voices than mine that will not be included at all in this call for evidence due to increased inaccessibility including language barriers.

With large-scale landlords such as the Transport for London and Arch Co industry standard tools such as Toms can be helpful. We have outlined this in our [Manifesto for the New Economy](#) and Islington Council is a strong, successful example of this approach: <https://www.socialvalueportal.com/sector-real-estate#Success-Stories>

3. What specific challenges do market trader and arch-based businesses face in London today? How does this impact the ability of traders and arch-based businesses to deliver to local communities?

"The yearly rent increases are far outpacing the spending ability of the community. In simple terms, rent continues to go up, while our clients find themselves with less disposable income. Despite these financial pressures, we've remained steadfast in our mission to bring health and well-being practices to everyone, especially the low-waged and the elderly. But this has come with significant sacrifices. To bridge the ever-widening gap between what it costs to keep our doors open and what our community can afford, we've had to take on additional jobs, work exhausting hours, and offer services at little or no cost. These efforts have enabled us to continue supporting the community, but they have come at a personal cost that is not sustainable" Giuliana Majo, Tripspace Director and Physiotherapist and TfL arch tenant.

"With the continued increase in cost of living and the high rents charged to independent businesses in Hackney, the number and quality of community lead music events is drastically reduced as we struggle to make ends meet and cannot offer the same level as other large and privately or publicly funded community and event spaces" Joe Mercer, Signature Brew E8 TfL arch tenant.

"I find myself and workers, apprentices and work experience students and my loyal local customers in a most desperate situation due to the heavy-handed actions of my landlord TfL. A business that has been located in the hackney community for forty years, a business that is clearly needed by family's, the disabled customers and local schools who also believe in the need to employ and encourage the young into work. It has been a monumental uphill struggle to push and educate TfL, a public body that you would think should be supportive. The heavy strain and effort that we carry are not needed to do such important work. I have witnessed such small businesses who have been wiped out over the years, especially by TfL a government body, to me this is simply not the direction they should take, it is as if there is no empathy, just a blatant chase for money, we are important especially business that benefit locals it is a must for all of us to work together to create change" Len Maloney JC Motors, recently evicted Pfl arch tenant.

"Typically small indie venues like Signature Brew E8 are the ones that allow performances and amazing nights to happen. Without them being a thing, some local talent that has gone on to do big things may have never been found. High rents force these places to close down which in turn prevents a lot of future opportunities for upcoming talent" Nicki Nightz, Rapper and local artist from Hackney.

"There's a correlation between unaffordable rent and the quality of life for people. There's so much crime and mental health issues that stem from greed. People need to have roots in a community to feel stable, culturally people need to feel like they belong somewhere. There must be affordable spaces where people can go and enjoy life. It's also so important that money stays in the community, we have to support small businesses. People need to have these places to go to and at the same time to support the country" Lilith Ai, musician and artist from Hackney.

Market rents are stifling growth, particularly the ability to create and maintain essential social value.

4. What role should the Mayor and/or Places for London have in supporting market traders and arch-based businesses to deliver social value and is there further action either should take?

They need to take on board a broader range of specialisms that relate to local economies. The property sector has a very old and deeply established culture that is about wealth extraction. By their admission, Places for London has been set up as a subsidy to maximise profit. They have a huge blindspot due to this. Our experience with them so far has been that vast amounts of legwork and effort in chasing for meetings, creating agendas and presentations have only been forthcoming from our side. They do not seem used to or prepared for collaboration. The whole Pfl approach feels siloed and unyielding to differing perspectives and without the collaborative skills to make progress on solutions. My feeling is that they should pay the EETG as consultants to facilitate the next steps for implementing social value on their estate using mixed methods including TOMS. Help from the Mayor as promised in 2021 in identifying a site for the London Trades Guild Community Land would facilitate permanently affordable rent for local communities. Not only this but the legal structure of this Community Benefit Society enables and prioritizes democratic engagement with its members ensuring that the occupants of the arch/premises are needed and wanted by constituents.

5. To what extent do the planning and regeneration policies of local authorities support market traders and arch-based businesses?

Islington's approach is the best we have seen so far: <https://www.islington.media/news/islingtons-pioneering-affordable-workspace-programme-creates-gbp-1-24million-in-social-value-boosting-economy-and-helping-budding-entrepreneurs-from-often-excluded-communities>

More here on the use of TOMS in lease agreements: <https://www.socialvalueportal.com/success-stories/islington-borough-council-and-the-affordable-workspace-programme>

6. How could the London Plan better support council-run markets and arch-based businesses that deliver high social value?

Whereas Islington uses planning policy to secure office space the London Plan should support the protection of affordable industrial space such as arches. Industrial space is fast disappearing. *"Between 2000/01 and 2020/21 industrial floorspace in London fell by 24% through conversion to other land uses. In Inner London, the loss was over 40% and in Hackney, where JC Motors is based, the loss was 62%. This has combined with growing demand to drive up rents. By 2021, rents for industrial land in London were 36% higher than their average level over the previous decade."* Emmet Kiberd, Economist, NEF.

A test-and-learn approach for the Trades Guild Community Land Trust on TfL / Pfl industrial land to take on three businesses generating social value as proposed in our manifesto with funding for a viability study would be a good starting point. Long-term affordability via CLTs

for socially trading organizations and the foundational economy is key for economic stability that is seen and felt.

For a consultant fee I would be happy to work with you on how this translates into planning policy and convene others from the community and from NEF to support.

Friends of Queen's Market/ Ref No. SVP003

1. To what extent do local authorities use 'social value' in planning and regeneration, and how do they define and measure the concept?

REGENERATION IGNORES SOCIAL VALUE

Since the word 'regeneration' became a common term in planning more than two decades ago, its feel-good, positive slant ('revive' 'give new life to' 'restore') has created problems. Used by councils and developers to suggest beneficial improvement, it became clear that 'regeneration' obscures the downsides and losses brought about by the development process.

It is a model with a very narrow frame of reference. A project may raise a developer's economic worth, which on paper counts as a benefit, yet a local community may lose out. A cleared site may be more beneficial to a developer but entails many losses on the ground when people and businesses are forced out. Developments might be immediately sold, which again may add to a company's paper value and counted by the Exchequer, but the development might have been tailored to that sell-off rather than having long-term benefits for a neighbourhood. That sell-off produces no economic gain for a local authority.

Currently, the public benefits offered by a new development can be a small number of local jobs gained during the construction process, which do not last beyond the building stage. Other benefits might include new public space or public facilities. These often minimal gains might be claimed to offset the loss of, for example, a historic building or community space - but the loss of something with a perceived amount of social value is rarely, if ever, considered in full. (A building might be nominated as an Asset of Community Value but this does not guarantee its protection.)

To introduce social value into planning it is necessary to change the way the benefits of a proposed development are measured and to include the evaluation of existing frameworks. This would mean finding out how a facility that is under threat is used, by how many people, what are the benefits of this use, which may include the health of users, numbers employed, numbers involved in voluntary work, and so on. It would also mean calculating the unique and tangible benefits of any counter-proposal, for example, whether its offer might be found elsewhere.

2. How is 'social value' defined by retail market traders in London?

The intrinsic social value of street markets is well understood and documented. They are places in which people share the use of public land, where traders and customers get together. A market is open to people who don't even need to buy anything but they can still go there for social engagement, which does not take place in a supermarket. As well as providing secure

incomes, markets are good at providing affordable start-up opportunities, testing business ideas and allowing apprentice labour and the learning of skills.

Queen's Market in Green Street, Newham, plays a vital role in Newham because it provides cheap, healthy, fresh food to thousands of people who need it every week. It consists of an indoor stall market with small shops and kiosks.

We are fortunate that Leeds University's Markets4People study examined in detail the social value of Queen's Market in 2021. The research involved a survey of 500 market users (capturing a representative sample in terms of age, gender and ethnicity), two focus groups with selected user groups and around 10 interviews with key local actors, to contextualise the findings.

<https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2021/06/210531-M4P-Queens-FINAL.pdf>

From the summary: Queen's Market is a social, welcoming and supportive community asset. Ninety-two percent of market users strongly agree or agree that it is a community hub. Queen's Market is more important to market users than other community facilities (e.g. libraries, parks) and other retail and food outlets.

Queen's Market is also notable for its social cohesion: people of many different faiths and backgrounds trade and shop together at the Market. The importance of this should not be underestimated.

3. What do Londoners perceive to be threats to the 'social value' of markets?

The threat to the social value of street markets can come when the market is forcibly changed from the top down without asking traders, such as by altering licenses, raising rents, changing the layout and makeup of a market, developing streets that surround it, or redeveloping it entirely. When numbers of well-known, long-established traders are forced out, a market is changed. Morale is an important and rarely-considered factor: when the majority of traders are being treated badly this affects the whole market and translates to its customers, due to a market's permeability.

This threat can be partially avoided by management and council officers showing traders respect and gaining their democratically-agreed co-operation and consent for any changes: the traders know the market best and have its interests and smooth operation at heart.

At Queen's Market, affordable prices are enabled by the low rents for stalls and shops. The threat lies in the temptation to cash in on its land value by building homes on it.

With a replaced market in this scenario, a private developer would fail to provide the same low stall rents, its affordability would disappear and, for those people with no choice, their access to affordable food would be taken away.

4. How could the threats be mitigated?

Currently, policy provides little help. Any development plans for markets, or around markets, should require further, detailed, locally-focussed examination of the social benefits brought by the market, including physical and mental health benefits, together with the impact of their loss to the local population. An evaluation of any development should take these into account.

The London Plan should include a separate section on street markets which sets out strict controls on their redevelopment.

In summary, Social Value should not simply apply to “the benefits that an organisation can deliver to society through its activities and supply chain, and is defined within the Public Services (Social Value) Act 2012”, as the legislation states. Existing social value should be measured and prioritised, otherwise the development of London will continue to erase the beneficial places that people enjoy and which have every right to remain.

On Saturdays approx. **8900**
people visit the market
On Thursdays approx. **7500**

65% of customers are South Asian British
Urdu, Hindi, Punjabi, Gujarati, Bengali
*Newham wide ~36%
*Market Traders ~65%

25% of customers have African or
Caribbean heritage
*Newham wide ~17%
*Market Traders ~10%

The majority customers are **Women**
60-70%
Weekends Weekdays

1/3 of people come in a group
of two or more
– it is an important social space

There are **50** major supermarkets
as competition in Newham

Nearly **40%** of traders interviewed
believe expensive parking impacts their
business, with some traders estimating loss
of business revenue up to **1/3**
since £2/hr fee increase

Traders are concerned about:
•Cleaning •Run down feel
•More advertising

Average longevity of trading **17.5 yrs**
longest continuous trading period **45 years**

Meg Bartholomew | MsC Cities | LSE | 2018 *54 Traders interviewed over 3 months in May-July 2018

QUEEN'S MARKET

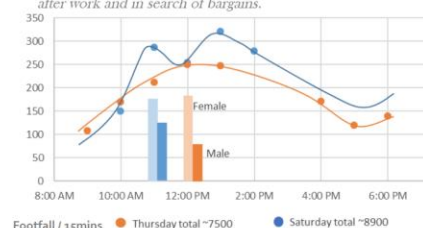
Queen's Market has been trading since the late 1800s, and in its current location since 1904. The current shops and roof were built in the late 1970s. In 2015, Queen's Market was registered as an Asset of Community Value.

The market is ethnically super diverse; most traders believe that they could ask almost any other trader for a favour & traders regularly interact with other traders regardless of background or faith. This makes Queen's Market a unique site for social cohesion in London. This is vital, as lack of integration costs the UK economy **£6 billion** each year.



Diagram showing spatial distribution of traders selling different products; distribution is even with minor clusters. There are also significant holes driven by empty pitches. These gaps affect consumer behaviour and reduce proximity benefit, however they do provide respite locations for sociality within the market.

Peak customer visitation times are between 11 and 1pm. There is a slight increase around closing time with customers coming after work and in search of bargains.



Friends of Shepherd's Bush Market/ Ref No. SVP004

Friends of Shepherd's Bush Market (FoSBM) is a group formally established on April 29th 2024. We are a democratic member-led group representing market traders, local residents, and community members. We are the leading collective representative group of tenants at

Shepherd's Bush Market. We came together as a result of the fact that the London Borough of Hammersmith & Fulham refused to acknowledge any voices of concern relating to development proposals made by Yoo Capital on the Shepherd's Bush Market and adjacent sites. Our constitution is attached to this submission.

'Social value' is a somewhat intangible and contested term. In relation to Shepherd's Bush Market we take it to mean a collection of qualities including affordability, diversity, community, character and accessibility. It has been cultivated and grown through generations of culture and experiences. 'Social value' is a core feature of people's attachment and sense of belonging to the place. Having less income should not infringe your citizenship, your basic human dignity and your right to have a say in the future of your area. 'Social value' is not something that can be added or imposed from above or outside. It is embedded and integral to certain places and communities. Once it is lost or destroyed it cannot just be "put back in". 'Social value' should be seen in terms of how the site benefits existing communities, not as what it might offer to imagined people who may be attracted to the area. The planning system both in local and regional government should be a way to protect places like Shepherd's Bush Market, that are at the heart of our communities.

In order for the Borough, GLA and Mayor to meaningfully support and protect 'social value' in Shepherd's Bush Market, there needs to be assessment and acknowledgement of existing 'social value', prior to giving consent. In terms of the London and Borough Plans this must be stated as an explicit "material consideration". At the moment nothing regarding 'social value' is enforceable or "challengeable" legally.

To protect the diverse & affordable character of markets & less gentrified retail, independent traders need to have the security of protected leases with all the stipulations of the 1954 act. Traders in Shepherd's Bush Market operate on tight margins and are only able to continue their business because of the safeguards and security of the TfL leases. Shepherd's Bush Market primarily serves low-income Black, Asian, and minority ethnic ('BAME') communities, with many traders hailing from these backgrounds themselves. This has led to the market being recognised as a stronghold for independent BAME business, both to historic traders and to those within the community looking to establish new businesses. Traders have established long-term generational relationships with customers and have even become an important safeguard for locals living in poverty; it is widely known that traders often extend informal credit to customers experiencing economic hardships, allowing them to take goods and pay at a later time. There is a local grocery which participates in a council token scheme offering impoverished families access to fruit and vegetables, as well as a foundation and charity shop for single parent families on the edge of the market. The market is a lifeline as at its heart it offers good value groceries and goods to marginalised communities.

The market offers a variety of traditional foods and spices used in African, Caribbean, Asian, and other minority ethnic dishes, which are not easily found elsewhere. Additionally, affordable goods, including haberdashery and clothing like hijabs, are available. This market acts as a central hub fostering solidarity among diverse ethnic communities, who gather to socialise and shop, attracting users from across West London. The traditional market's existence has made it

a historic community focal point, where people with protected characteristics have formed connections across generations. As the Planning Inspector noted in 2014, “the market is part of the social fabric of the area” and “the loss of even one of these family-run shops would be a blow to the community and the families themselves – the loss of all of them is devastating.”

There is a sense of pride within traders and the wider community of belonging to the market. It has historically been a place where those migrating to the UK have been able to establish themselves and for community to form. This continues with future generations starting up in the market. For the Friends of Shepherd’s Bush Market it is a place that provides dignity, self-confidence and citizenship.

The redevelopment site including Shepherd’s Bush Market is predominately made up of the Old Laundry Yard and the former St Mungo’s treatment and hostel building. It is important to understand the details of the ownership of the various parts of the site. The railway arches continue to be held in the freehold of TfL, as they are part of current transport infrastructure, with the Hammersmith & City line running overhead. The current landlords of the site are 25% U+I group and 75% Yoo Capital. The Old Laundry Yard is owned by the London Borough of Hammersmith & Fulham and was given to the developers in a land swap deal, as agreed at a Cabinet meeting in May 2024. The exchange was based on the promise of 40 units of “affordable” housing to be built by the developer. The former St Mungo’s hostel with 30 units of accommodation is currently being used by Kindred Studios – a creative home for artists and makers. This building was opened in 2002 and won a Housing Design Award, being praised as “a building which rebuilt human dignity through the excellence of its design”. The speculative development proposed for the site would evict the artists and demolish this building in order to construct a massive 9 storey commercial building. Friends of Shepherd’s Bush Market is deeply concerned about the environmental impacts of this proposal in the midst of the climate emergency, which both LBHF and GLA have recognised. Why is permission being granted for a scheme that falls well below the carbon emission reduction targets of the borough and GLA? Why is permission granted for a huge amount of office space in a borough which has alarmingly high levels of unoccupied office space (recently informed about 20%)? LBHF and the people of Shepherd’s Bush are getting a very bad deal.

It is our experience that there is negligible alignment between the interests of the developer and those of the independent traders, local residents and communities around Shepherd’s Bush Market. Despite owning the site for a number of years the developer has been undertaking an aggressive managed decline which has pushed out traders rather than investing for the benefit of the market. Currently ‘social value’ is being used by developers in a horse trade with cash-strapped Councils in order to push through inappropriate speculative development. Across London communities are being fobbed off with un“affordable housing” & empty “community spaces” with no long-term funding & no autonomous control, while losing places & spaces that are a treasured part of their community & culture.

The initial evidence gathering session that the GLA Planning & Regeneration Committee undertook on 9th October was an interesting afternoon. There were many positive points made and issues raised but it was notable how reluctant some were to acknowledge that there is a

huge difference between the interests of the developers and those of the people who live in London. Surely planning and government is about representing and defending the interests of the people. Councils are under resourced and chase short term income streams. In the process they are fobbed off by (well resourced) developers who do the bare minimum and have appropriated a version of 'social value' to get their schemes granted permission. Officers, Councillors and Members need to have training to get a better understanding of their civic responsibility regarding representing & defending the interests of low income, marginalised & racialised communities in London.

The Chair's final question was important – "what should have been in the London Plan that would have allowed the Mayor to call in the Shepherd's Bush Market planning application?". One thing that could have been done was to go through the current stage 2 referral process properly. We have submitted a complaint regarding the way in which the process was bypassed. This experience has exposed that this planning decision had already been made behind closed doors and without proper scrutiny or democratic accountability. Sadly, no officers from LBHF or GLA have seen fit to listen to any of the many concerns of traders, local residents and community. We have been consistently ignored & dismissed throughout the process. There has been a familiar pattern whereby unrepresentative voices who support the development have been cherry picked and amplified in order to tick the box of "community engagement". So, further to amending the London Plan to support traditional retail markets and arch based businesses that deliver high 'social value', there needs to be a re-establishing of democracy and accountability in the planning system. A major theme in the recently published Grenfell Tower Inquiry phase 2 report was the way in which community voices were dismissed as a nuisance. This seems to be the case in planning and regeneration. It is not good enough. It needs to change. We can do better.

As part of this submission we include some of the testimonies, about Shepherd's Bush Market, that were given to the Public Interest Law Centre this summer. We hope that they give some insight into the 'social value' of our beloved market.

[redacted information]

Latin Elephant/ Ref No. SVP 005

INTRODUCTION

Latin Elephant is a registered charity based in Elephant and Castle. For the past 10 years, we have worked intimately with local independent traders — nearly all of whom are from racialised and migrant backgrounds, and who have been disproportionately and negatively impacted by development in the area — to fight the regeneration-led retail gentrification that is impacting our community. As a direct result of this state-led regeneration, which forced the expulsion of more than 3,000 of social housing tenants and leaseholders (traders' customers and extended community) from the Heygate Estate and in the closure of the Elephant and Castle Shopping Centre, the area has been over time stripped of much of its social value. Local migrant and racialised traders have been displaced, the local economy decimated and key social spaces erased.

In working collectively to combat this, Latin Elephant has built strong, trust-based relationships with the traders in the community. These important connections have allowed us to gain an intimate understanding of how our community has experienced development and ‘regeneration’. Our submission is informed by this experience and knowledge.

Our submission is also supported by the extensive research we have conducted with the traders and others in the community, including [Southwark Law Centre](#) and [35% Campaign](#). The trust alluded to above is central to this research; without it, and without the active participation of traders in our work through knowledge sharing exercises, we would not have been able to produce the findings we have nor to engage as substantively with policy and practice over the last decade. Relevant examples of this research are addressed in greater detail below, and attached as an appendix to this submission.

Over the last year and a half, building on our long-standing recognition that our local experiences are part of more expansive, systemic challenges, we have concertedly integrated a cross-London perspective into our daily work. We currently facilitate a coalition of nine community campaigns and organisations from across London. Each of these campaigns — Catford Against Social Cleansing, Fight the Tower (Brixton), Friends of Queen’s Market, Friends of Shepherd’s Bush Market, Plush SE16/No Price on Culture, Save Ridley Road, Save Brick Lane, Ward’s Corner Community Benefit Society/Save Latin Village — is also fighting local retail gentrification and the loss of important local, independent commercial spaces including railway arches and markets. These campaigns also recognise that each of these spaces serve more than just economic purposes: they are important sites of social connection, of cultural expression and celebration of solidarity and care. Relevant experiences and lived knowledge contributed by our coalition partners is also shared herein.

Our colleague, Sarah Goldzweig, spoke on 9 October 2024 at the London Assembly’s Planning and Regeneration Committee meeting, and shared aspects of our organisational perspective, as well as thoughts from our coalition partners. We see this submission as a follow up to some of the discussion points raised during that meeting. We note that we’ve also spoken in front of the Planning and Regeneration Committee meeting about related issues in the past as well.

This submission includes our responses to the questions posed in the Call for Evidence guidance, as well as some additional thoughts and concerns which we think are important to consider in future discussion of social value, both of markets and arches as well as other spaces.

CALL FOR EVIDENCE QUESTIONS

1. What does ‘social value’ mean to you?

Southwark Planning Network (SPN), in a follow-up to the Southwark Land Commission Report, have offered ‘[Proposals for Social Purpose of Land Framework](#)’,¹ in which they share a clear and expansive definition of ‘social value’, which highlights some of the limitations of existing

¹ In particular, see sections 1.2-1.5.

definitions. We have shared excerpts from this document below, but encourage more substantial engagement with the ideas therein.

SPN asserts (and we agree) that:

[1.2] Often, notions of “social value” (or similar terms) have failed to step outside of the prevailing market-oriented approach to land and the planning decision-making process’. For example, developers often demonstrate social value, measured in monetary terms, using the so-called “QALY” approach (quality-adjusted life year). This is a metric used in health economics / public health decision-making that tries to capture the benefit of an action in terms of quality and length of life. While this might be appropriate in a health context (including assessing health impacts of a development), it is clearly an inappropriate metric when considering the social purpose of a development as a whole... this approach fails to grasp notions of community cohesion and gentrification. It also fails to fully meet the public sector equality duty and the need to have due regard to the impacts on those with protected characteristics (which in Southwark must include socioeconomic status). Thirdly, to quantify social value in monetary terms and to talk about the “price” of something is already to use a transactional, market-oriented approach that unduly restricts the scope of what can be considered. Accordingly, it is clear that an alternative approach is required.

Highlighting the strength of the existing definition of “social value” in the [GLA Characterisation and Growth Strategy LPG](#), which attempts to incorporate “the tangible and less tangible cultural and social characteristics and landscape that contribute to a sense of place”. Likewise, we feel like this is a great place to start. We are especially supportive of the inclusion of the following components (listed within the LPG, and in section 1.3 of [linked document](#)):

- *Intangible assets – presence of positive intangible characteristics that make a place unique or distinctive, and that foster a sense of belonging and identity.*
- *Cultural assets – presence and significance of attributes, spaces and activities that celebrate a place’s artistic, historic, cultural and creative character.*
- *Community assets – presence and significance of highly valued community uses, spaces, services or infrastructure that meet the needs of the local community (such as pubs, community centres and public spaces).*
- *Need and deficiency – a place with a wide range of economic opportunities, where the benefits of economic success are shared equitably.*
- *Town centres and high streets – presence of a vibrant town centre or high street that provides varied economic, civic and cultural offers throughout the day and night.*

With that being said, we argue that any definition **must** also include intentional reference to spaces which serve racialised and migrant communities and diverse working class communities,

in particular. Any definition of social value which does not seek to ameliorate the disproportionately negative impact of regeneration and development on such communities and the spaces they feel are important is inadequate.

We propose this in addition to concerns highlighted by Southwark Planning Network in its Proposals (copied below for ease; see also, section 1.4 in [linked document](#)):

- *Places that foster a sense of pride or strong emotional response from the community.*
- *Organisations and businesses that demonstrate a commitment and dedication to the local community.*
- *Places run by people with an organic rapport with the community – they may themselves be part of the community outside of their business.*
- *Places that the community will journey too, even from far away or if there are similar services closer by.*
- *Places that offer services and benefits beyond traditional market transactions – places offering something “extra”, often at no additional cost. For example, people may be able to experience or benefit from the place without having to spend money; a place where people can come to simply be there.*

We also want to highlight contributions from this [Proposal](#) which address not only establishing what social value exists in a given place, but also what the impact of losing such social value might be (see section 1.5). Any suitable definition or policy must consider:

...how a proposed development might have negative aspects from a social purpose perspective. This flipside of considering social purpose/value has traditionally been overlooked, but is essential to fully considering social purpose. This must include weighing up the loss of social purpose that will (or might) result from a development.

This section speaks to a topic which has been raised, repeatedly, by coalition members: that social value, once lost, cannot be recovered. This characteristic is at risk of being hidden by definitions which solely assign quantitative value to ‘social value’, and which provide opportunities for ‘net’ calculations. Spaces with social value have such value because they provide something to the existing community, which is built up over years through lasting and meaningful interpersonal relationships and opportunities for organic cultural expression. This is not just facilitated by the existence of a specific ‘space’, but by the activities and histories which are able to play out within that given space.

Furthermore, we argue that the following conditions must be met in any definition of ‘social value’:

1. Social value must be contextually-specific and locally-defined and grounded. By this, we mean that communities are, themselves, able to define what is important to them. Social value must be bottom-up and informed by the grassroots. It cannot be determined by developers and those with vested financial interests and profit motives, resting on specific definitions of the social value of/within a given space. Notably, this cannot be done through existing tick-box forms of consultation. Hyper-local contextualisation is necessary for avoiding further marginalisation of already-impacted communities, increased inequality and failure to protect local economies.
2. As a member in our coalition has emphasised, there is an important aspect of social value which is intangible. This organic and underrecognised component is absent from existing calculations and definitions and, thus, often excluded from consideration. Yet, communities have been adamant about its existence. Some of this intangibility speaks to **'belonging'** as an important aspect of social value, and one which is challenging to quantify, but which can still be understood. In fact, we want to highlight 'belonging' as a key component of 'social value' which must be included in any attempt at defining it. We feel that the documentaries *Élefan* (2022) and *The Palace* (2021) – both linked in the Appendix section of this submission — highlight this aspect brilliantly. Respectively, they demonstrate the importance of Latin American businesses and the former Palace Bingo Hall to the diverse working class Elephant and Castle community, and the devastation that their loss or the threat of their loss has had. We propose that these documentaries be considered as part of this evidence gathering process.

2. How should 'social value' be measured, particularly in relation to market traders and arch-based businesses?

Importantly, however it is determined, value should be measured in a culturally sensitive, holistic and contextually-aware way. This is especially important in London, where ['46.2%'](#) of residents identify as Asian, black, mixed or "other" ethnic groups, and a further 17.0% with white ethnic minorities' and where [over 300](#) languages are spoken.

Which communities are served by these businesses, not just in terms of the products and services they are providing but in their provision of spaces for people to come together around their shared cultures and experiences, in which emerge sites of informal but life-saving community networks? What needs do these communities have which are met by the infrastructure of these 'commercial' spaces, and which are not being met elsewhere?

Businesses and traders are often part of communities for years, and create and sustain trust with the members of these communities. This is reflected in deeper connections of care between community members, and even in close friendships, ultimately supporting wider networks of support which are often strengthened by shared lived experiences. This is especially important in migrant and racialised communities, where members have faced similar challenges. Ultimately, markets and small businesses contribute to an ecosystem that sustains community wellbeing. This is all in addition to the services and goods they provide, which meet the needs

of diverse working class communities; other retail spaces do not meet the needs of working class Londoners in these ways.

We'd like to call attention here to some of our findings in King et al. (2017). One (now former) Shopping Centre trader shared that, *'There is a retired builder that passes here every day. The other day he didn't and I phoned him. We went to his house, and he needed help. He spent one week in intensive care.'*

Another trader explained about their restaurant: *'We are not just a food place. We are an information point. People come here and ask for a doctor or a bank. Some people even ask about other restaurants! It is kind of sad because if we moved to other places people may see it more difficult to come in.'*

What both these traders identify is that the role of their business within the larger community ecosystem is far more significant than just their profitability and economic turnover. Rather, these businesses provide necessary and even life-saving support to the wider community. This is *in addition* to their contributions to the local economy. Small businesses are widely recognised as keeping money and investment local, supporting circular economies and employing local people. Small and medium enterprises (SMEs) contribute on a national scale as well: in 2015, it was found that the 300,000 BAME-led SMEs in the UK were estimated to contribute a GVA of £30 billion (figure from Department for Business, Innovation and Skills, 2015).

We propose that the loss of these spaces has rebound effects that impact health (mental, physical, community), housing and employment outcomes, to name a few. This is significantly representative of their social value.

Furthermore, the loss of these spaces need to be measured not in terms of quantifiable indicators, but those affective ways in which such spaces contribute to community wellbeing. We argue that, when measuring social value, what is there and what will be lost is equally important.

With this in mind, we want to raise concerns about who is determining what is 'valuable': Is it the businesses and communities, collectively and individually, themselves? Or, is this being determined by outsiders (e.g., developers) who are unaware of the inner workings of these spaces and the unique needs of individual communities, and/or who are financially-incentivised to ignore them?

Quantification of value runs the risk of leaving out unanticipated or unfamiliar aspects of a given space. It also runs the risk of co-optation, in that it opens up the possibility of framing 'social value' contribution as a net equation, which can be manipulated as long as developers claim to be contributing more than they are demolishing and 'replacing'. But this does not address issues of who is served by the spaces that contribute social value, or which of their needs are being met. Developers, proposing that they are contributing a total 'greater' amount of social value than existed prior, can justify the erasure of existing social value. Quantification in this way can obfuscate what is lost in favour of what is allegedly being added. This is

particularly concerning in the context of markets and arches and other retail spaces which provide significant 'hidden' value, but which may not fulfil common perceptions of 'social value'.

3. What specific challenges do market traders and arch-based businesses face in London today? How does this impact the ability of traders and arch-based businesses to deliver 'social value' to local communities?

1. **Lack of affordable retail space:** Across London, there is a dearth of affordable retail space. This is particularly true in those parts of London which are designated as Opportunity Areas or which are undergoing state-led/sanctioned regeneration. There was so little affordable retail space in Elephant and Castle, for example, that Southwark Council had to convert (arguably, unsuccessfully) a residential garage into retail space for displaced shopping centre traders in order to accommodate need. Despite doing so, and despite leasing land to Delancey/Get Living/Elephant and Castle Co. Ltd. to create a temporary retail area (Castle Square), around half of the shopping centre traders 'eligible' for relocation [remain un-relocated](#).²

We see the lack of affordable workspace as part of a much larger phenomenon: In a 2017 [report](#), we recognise that, 'the loss of affordable and independent retail space is situated in the wider national context of a significant shift in the growth of small-scale self-employment over the period from 2001 to 2017, in which independent retail is key'. These businesses are also at the centre of developing an understanding of social value for a number of reasons. As evidenced in the report, 'the disappearance of affordable workspace jeopardises the productive fabric of central London and precludes possibilities of a wider range of innovation and job creation'. These spaces are 'crucial economic and social anchor[s] for comparatively low-entry retail and service activities' and, in particular, meet the needs of racialised communities. All traders interviewed for this report also revealed that each consistently 'went beyond their 'formal' role by offering various forms of support and care to local residents.'

2. **Relatedly, rent increases under 'market value':**

More and more, Planning applications by developers, Council Officers' reports and considerations, and Mayor of London recommendations on local planning applications include the 'market value' reference to determine how much each square foot is worth in a specific 'opportunity area'. We have witnessed at Elephant and Castle's plans for redevelopment that these figures under 'market value' can be overestimated by as much as 40% the real area's value (per square footage)³.

The term was designed in such a vague way leaving developers in a strong position to determine how much monetary value an area has, with no room for SMEs nor local

² See also this [map](#) by Latin Elephant.

³ See Southwark Planning Sub-Committee B on 'Castle Square' Application, December 2018 https://www.youtube.com/watch?app=desktop&v=YiRsaPRmKHI&ab_channel=LondonSE1

authorities or the GLA to contribute to a fairer definition, or establish new definitions for a quantifiable unit which can include or exclude certain SMEs simply by overestimating the area's value.

3. **Lack of lease protections:** Lack of lease protections (including lack of protected leases) has emerged as a pressing issue in Elephant and Castle, and has also been raised by our coalition members. As one of our coalition partners from Shepherd's Bush has pointed out, protected leases with all the stipulations of the 1954 act are necessary for protecting the diverse and affordable character of markets and less gentrified retail. In addition, businesses in Elephant and Castle that were relocated as part of development and regeneration receive leases that are highly anti-tenant, and which severely restrict their rights and access to recourse. This puts them at a distinct disadvantage, and has made their collective efforts at securing improved treatment much more difficult.

As a result of vague leases that put landlords in advantage, we've witnessed an increased need for commercial property advice for small businesses to help them navigate complicated language, and a lack of specificity in contracts where usually traders are given very little to no option on how to hold landlords accountable. Consequently, when seeking this advice we have also seen a lack of commercial legal resources available to traders. Our experiences over the last decade have revealed a lack of *affordable* or *pro bono* commercial lease support. Traders are rarely made aware of their rights; in the instances that they are, there is little effort to ensure comprehension. This is particularly an issue given language barriers and, we argue, is thus also representative of a larger equalities issue. This argument was strong enough that in a recent CPO process in Elephant and Castle, Southwark Council and Elephant and Castle Co. Ltd (developer) acquiesced to Latin Elephant and traders' demands that arch traders impacted by the CPO be provided information about the CPO in Spanish, and that traders be provided a Spanish translator/interpreter to help them navigate the CPO process.

The lack of legal support has also become apparent as traders are attempting to negotiate heads of terms for new leases following their relocation. We have seen ongoing challenges — including uneven power dynamics — impacting traders working out of different London markets and arch sites, including in Elephant and Castle, Shepherd's Bush and Ridley Road.

4. **Racialised vulnerability to regeneration schemes:** As Latin Elephant has repeatedly addressed, Opportunity Area designations (and the consequences of resulting development) disproportionately negatively impact racialised communities, migrant communities and other diverse working class communities. As we recognise in a report by Román-Velázquez and Hill ([2016, p. 6](#)), 'regeneration schemes in London are taking place in deprived boroughs where there is a high proportion of diverse ethnic populations, thus minority groups and MEB's are disproportionately affected by these

schemes’. Retail gentrification, which is consistently connected to such Opportunity Area intensive development, thus impacts communities with similar prejudice.

Elephant and Castle is known for its unique utilisation of arch space, in which traders self-divide up the space and cluster multiple businesses. This was recognised by Theatrum Mundi as a key characteristic of cultural infrastructure in the area, and what they termed an urban backstage, or ‘the hidden spaces where cultural production, experimentation and rehearsals take place and the underlying conditions that underpin these activities’. [Karimnia et al.](#) (2020) write:

While local authorities have determined the arches suitable for commerce and retail, the fact remains that they are culturally idiomatic forms derived from the home countries of the migrants, and require more attention in classification. Activities such as food, arts and crafts are, as local activist and scholar Patricia Román-Velázquez describe: ‘extremely important and defining elements of any culture, which bring communities together and attract others to join in and understand more’.

The authors also acknowledge that the arches — including those along Maldonado Walk — have been directly impacted by the demolition of the Heygate Estate. One can only assume that the subsequent demolition of the shopping centre compounded these consequences. They recognise that this demolition, and the displacement that was central to its implementation, fragmented ‘hard-won social and economic relationships’ thus impacting the stability and success of not only the businesses in the arches, but the communities that have emerged through and around them.

Such creative uses of space are not unique to Elephant and Castle. Across the city, there are culturally-mediated forms of business organisation taking place, which should be protected because they support local economic activity and local cultural needs. Importantly, some of these uses of space may not be strictly in compliance with certain regulations or ‘expected’; yet, the importance these spaces serve for communities should, arguably, outweigh strict limitations on use.

5. **Developer-Landlord intimidation and conflicting interests:** The imbalances in access to expertise and resources described above become especially apparent in the situations where developers become landlords. This has been an acute issue in Elephant and Castle where traders are afraid to make complaints in case doing so will impact their future relocation. A conflict of interest in this developer/landlord overlap has emerged in the Elephant and Castle context: the developer is obliged by S106 terms to give priority to displaced traders applying for affordable retail units in the new development (a measure designed to mitigate the disproportionately negative impact of the scheme on long-term MEBs). However, the S106 also contains clauses that give the developer discretion to design the eligibility criteria for this application process. As a result, the developer serves to benefit from creating conditions as a landlord at temporary retail sites that weaken the financial and reputational position of businesses they lease to. A business with rent arrears and low turnover is likely to be excluded from accessing an

affordable retail unit in the new development on these grounds (regardless of the conditions that created or exacerbated this financial precarity). There is a strong risk that the developer will use this reasoning to discharge their responsibility to provide affordable retail to displaced MEBs, and charge at market rent to new bigger businesses.

6. **De-Clustering of businesses during relocation processes:**

The relocation plans should consider the value of how businesses and services work as clusters not simply as single entities. Clusters of specialist activities have been credited by The Mayor in the New London Plan (2017) however areas such as Elephant and Castle were not included, disregarding the importance of these spaces while also falling short in capturing the impact of de-clustering and how the latter has a direct effect on the loss of social value.

4. What role should the Mayor and/or Places for London have in supporting market traders and arch-based businesses to deliver 'social value', and is there further action either should take?

The Mayor and/or Places for London *should* play a greater role in supporting market traders and arch-based businesses to deliver 'social value'. In fact, we'd argue that through the existing call-in process, the Mayor has shirked this responsibility, instead opting to facilitate speculative development that will have devastating impacts on local traders' ability to meet their communities needs. We highlight both the demolition of the Shopping Centre in Elephant and Castle *and* the recent approval of the Yoo Capital proposal for Shepherd's Bush Market as clear examples.

We understand that local authorities are cash-strapped, and are struggling to meet housing and other benchmarks. Experience has shown, however, that councils will repeatedly sacrifice the social value produced by businesses to meet these expectations. The Mayor and GLA, with their London-wide perspective, their provision of planning guidance via the London Plan and other SPDs and the call-in process, can intervene. There needs to be a disruption of the policy narrative which devalues these spaces in relation to housing that is, fundamentally, not affordable to local communities and which does not actually address housing needs. And in those instances where social housing is being built, the social spaces that communities value and need cannot be seen as unrelated or treated as collateral in attempts to meet arbitrary targets set without true community input and guidance. The social value provided by market traders and by arch businesses — and broadly by local, everyday economies — is central to neighbourhood identity and community cohesion, and is *not* seen as a 'perk' or 'extra'. Ultimately, London needs regional policies which value local and everyday economies not only for their important economic contributions but also for their clear provision of social value, and for their cultural and social importance.

Where local authorities have failed to do so, the Mayor can attribute cultural heritage designations to retail areas (e.g., establishing Elephant and Castle as a Latin Quarter, as proposed by Latin Elephant in [2016](#)).

There are creative policy solutions which the Mayor and GLA might want to consider. We'd like to point to the [Small Business Anti-Displacement Network](#) out of University of Maryland, and their [toolkit](#), which proposes several policy solutions and other [strategies and tools](#) which local/municipal/regional governments can implement to maintain the businesses that help form the backbone of communities.

5. To what extent do the planning and regeneration policies of local authorities support market traders and arch-based businesses?

Planning and Regeneration policies at the local authority level do **not** support market traders and arch-based businesses. In fact, we argue that the existence of so many community campaigns, from multiple boroughs across London, each of which is fighting against retail gentrification and displacement, is evidence of this. This is especially true in boroughs where there are significant Opportunity Areas, and where speculative development and property investment remains a strong motivator for local authority decision-making processes.

Additionally, there is plenty of evidence of Cabinet members, local councillors and other planning officers who [leave their positions at local Councils \(e.g., Southwark Council\) to work for developers](#), taking with them their inside, privileged knowledge which they then use to advise developers on future planning applications. Knowing that these jobs await them, there is little incentive for local authorities to demand the most from developers, and to hold them to their promises. We see this in vague, ineffective and weak enforcement of supposed scrutiny and accountability mechanisms including section 106 agreements. This is a clear conflict of interest which remains unresolved within planning and regeneration policies.

6. How could the London Plan better support council-run markets and arch-based businesses that deliver high social value?

The London Plan could better support council-run markets and arch-based businesses—and other important parts of local economies—by:

1. Improving the way consultations are done, so that they are truly inclusive and not tick-box exercises that compound existing distrust of government. Businesses and communities should both have a say in how development is actually carried out, but this should come with clear explanations of rights and possible outcomes and challenges. Successful consultation requires community engagement at *all* points of the planning process: from inception to implementation and management of spaces. This might be done via consistent forums. Additionally, greater power should be attributed to neighbourhood plans and people's plans.
2. Consultations should be made accessible to full-time workers, carers and others who might otherwise find it difficult to attend consultations (e.g., through provision of childcare, scheduling for after-work hours, hybrid meetings). Consultations should take place in community languages, and all materials should be translated. Partnering with community members on surveys of existing social value, which are carried out over long periods of time to ensure inclusion, accuracy, and mass

participation. Also, there should be consideration on compensating constituents' for their time, so that there's a more active consultation during the planning process.

3. Addressing language justice issues, for example by translating all planning documents into community languages, holding consultations in community languages and always having a translator present for any engagement with community members.
4. Replacing unaffordable 80% market rental units with the London Living Rent.
5. Adhering more strongly to existing policy, strengthening of existing protective frameworks and scrutiny over application (e.g. EIAs, s106 agreements).
6. Legislating the burdens of proof should *always* fall on the developer and not on the community. If a developer wants to do something, they must evidence their argument, and provide clear plans for how they will remain accountable to communities even after planning permission has been granted. Community opposition should not have to fight an uphill battle against developers whose profit-seeking consistently leads to local displacement. Developers should be responsible for losses, including those which are unanticipated and experienced after planning permission is granted.
7. Ensuring that 'social value' is not being used to justify development and appease local authorities while it is still impacting communities. This is the inevitable consequence of co-option of 'social value' by developers, and means that using 'social value' in policy will still result in considerable harm. 'Social value' cannot be turned into a tick-box.
8. Building stronger scrutiny mechanisms into the planning system, to ensure that communities can continue to advocate for themselves and experience leverage even after the approval of any planning applications. This will also ensure that there are avenues for recourse for unanticipated losses and challenges.

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PlushSE16 / Ref No. SVP006

SOCIAL VALUE + COMMUNITY VOICES

As PLUSHSE16, a displaced community with direct, lived experience of the impact that current development policies have on real people, we want to let our community know publicly that we work daily adding our voices and perspectives to the conversation on 'social value.'

Our journey has been one of resilience, struggle, and relentless advocacy to protect what we know is irreplaceable: our community, our culture, and the authentic social connections that we've cultivated over decades. When policies do not protect communities like ours from the whims of developers like Regent Land and Developments who see only profit, the very essence

of our neighbourhoods gets eroded, and the people who bring life and vibrancy to these places are forced out but the cultural diversity marketed to the prospective new idea of local.

What Social Value Means to Us: Social value, to us, is not just a buzzword or something that can be quantified in reports or assessed on a spreadsheet. It's a living, breathing concept. It's the barbers who know every family by name, the food traders who offer a taste of home to immigrants and locals alike, and the countless interactions, stories, and memories shared within the walls and railings of our space. Social value is the culture we bring, the safety net we create, and the sense of belonging we foster. It's the glue that binds us together and reminds us who we are, even in the face of hardship.

The [#NoPriceOnCulture](#) movement emerged from our fight against displacement. It's our reminder—to developers, to policymakers, to everyone—that you cannot put a price on the spirit of community, nor should anyone be able to uproot it so easily. **We believe that social value must be defined by what local people value, what they fight to protect, and what they would grieve to lose.** When policy prioritises the interests of developers over people, it fails to recognise the importance of these spaces in fostering identity, safety, and connection.

The Disconnect in Policy: Our displacement happened because policies meant to safeguard community interest are often toothless in the face of well-funded developers. These developers come in with promises of "regeneration" and "revitalisation"—yet what they leave behind are voids, gaps in the social fabric, and a profound loss felt by the people who gave these spaces life. We are often told that *progress requires sacrifices*, but why is it always our communities being asked to sacrifice?

Policies like the [London Plan 2021](#) need to be rooted in the lived realities of people, not just the projections of market analysts.

There must be protection for businesses and spaces that provide genuine social value—determined by communities themselves, not imposed by outsiders.

It's time to bring the people who are most impacted into the room when these decisions are made, so that our voices are not just heard, but respected and acted upon.

Our Hope Moving Forward: While we are raw from our experiences, we are also hopeful. Hopeful that this conversation on social value becomes more than just a theoretical exercise. Hopeful that future policies will not only recognise but actively *protect the communities and cultures* that define this city. Hopeful that **PLUSHSE16 and others like us will be seen for what we truly are: invaluable, irreplaceable pillars of social fabric.**

We're grateful for allies and advocates pushing for change, and we urge decision-makers to listen closely to the people who live, breathe, and build this city every day. We're committed to continuing this fight, not just for ourselves but for every community facing displacement.

Thank you to our friends in this fight, so much coming by way of building on our lived experiences through this journey in our collective efforts to amplify community voices, and giving a platform to community to share their local stories ahead of The next London Plan.

London Assembly Recommendations

As a 22 year boot on the ground organisation here are our public recommendations to The Mayor of London Assembly on aspects around Planning and Space need change:

1. Inclusion, more needs to be done to **welcome people across communities into these spaces where policy is being adopted or changed**, for far too long communities are impacted by decisions made without their true engagement, we call for more outreach on finding out whats wrong with London directly from people. Policy officers need to sit amidst small business and local communities regularly.
2. The Mayor and Places for London should **actively champion policies that protect and preserve all small business owners**, recognising all as crucial contributors to London's social and cultural landscape. When we think about Southwark and our 22 year contribution to our society our community now more than ever have so many community groups that need access to more lower rental rates because affordable is not affordable, access to funding and training to help local businesses thrive not just merely survive.
3. A city-wide led commitment to **safeguarding spaces from rapid redevelopment or displacement** would show a tangible investment into the social value that community groups like PLUSH bring, this is the role the Mayor and Places for London can play in supporting our communities.
4. Current planning and regeneration policies as we have seen first hand often prioritise large-scale development over preserving existing local businesses, resulting in insufficient support for local economic trade. **While some policies claim to protect these spaces, in practice, they lack the enforcement and resources** needed to provide real, on-the-ground support. Strengthening these policies to include specific protections against displacement and prioritising long-term sustainability small and medium sized businesses is essential.
5. The London Plan could **explicitly mandate protections for small businesses by embedding “social value” as a key criterion in development decisions**. Creating dedicated real rent reflective zones of local trade along with, implementing rent caps, and incentivising developers to preserve existing businesses would help maintain the unique character of these spaces. Additionally, **establishing clear social value benchmarks but working with locals to achieve this** and offering financial assistance programs would further empower business owners to thrive and continue serving their communities.

6. **Developers must be held accountable even after a project is completed**, especially for any direct impact on communities following local authority sign-off. Too often, developers disappear when design decisions negatively affect the surrounding area. We believe there should be a mandatory accountability period — perhaps 5 years — during which developers remain responsible for any consequences arising from their work or ideas. This would encourage them to consider the lasting impact of their developments more thoughtfully and thoroughly especially when thinking about groups failed by Equality Impact Assess

So, What does Social Value mean to you?

Ahead of this large piece of policy change, we are asking on a local level across our community to feed into this long winded but necessary work through our project **Displaced Society, which is a series of talks, events** and local engagements.

We have put together a Poll below that you can feed into which we will factor into using to shape our community with real voices echoing amidst our fight.

Select the one that you connect with, when you are asked **What does Social Value mean to you?** What do you think about?

Whether you are a member of our community or not, we would like you to contribute if you need to talk to someone, we are all still available. Although we have lost our physical space, our commitment to relocation remains. While the PLUSH site may be derelict whilst we are displaced, the bond within our community is now more robust than ever. We are here for everyone and invested in this work of community, harnessing unity and belonging along the way.

Peace, Love, Unity, Strength, Harmony

The PLUSHSE16 Team

[#JusticeForPlush](#) [#NoPriceOnCulture](#)

Queens Market Traders Union/ Ref No. SVP007

The Greater London Assembly Planning and Regeneration Committee has asked traders in Council-run markets to talk about the social value of their markets and whether this is under threat right now. They have put a few questions. What follows is a reply from the Queens Market Traders Union about Queens Market ,London E13 9BA

1. What does 'social value' mean to you?

We think that we give social value because we sell quality goods -food, clothing and other items - at rock bottom prices to the whole community. This is really important because so many people are struggling to manage on their money. We also think we give social value because we treat our shoppers with respect and as individuals which you don't get in cut-price stores where

people just have to queue for long times and shop assistants are too run off their feet to interact with customers. We give our low income people the same respect and personalised service that wealthy people get in high-end department stores: we give advice about purchases and answer questions like when the haberdashery stall was asked how many metres of ribbon would be needed to decorate a wedding car.

We offer social value by providing culturally specific products for communities often neglected in high street stores: things like prayer mats, bitter melon, banku mix. We would like the Committee to note that much of our demographic is not very computer literate (coping with daily working and living does not leave time for on-line courses) so if we do not sell what they need they will not get it online.

2. How should 'social value' be measured, particularly in relation to market traders and arch-based businesses?

We think that all you planners and policy-makers should simply come to the market and see for yourselves how much social value we provide.

3. What specific challenges do market traders face today?

We are happy to report that one challenge seems to be on the way to being sorted: this is the lighting issue. We were promised brighter lighting to be paid for by a **GLA Good Growth** grant to Newham Council, our landlord. The lighting, delivered in June this year, left the market darker than it was before! **It has taken us five months of complaining and campaigning but at last Newham Council said last week that they will be trialling extra lighting to see if it works for us.**

However there are still problems with the toilets provided by Good Growth money.

There are no bins for hygiene product waste, no signs telling shoppers the location of the toilets. All these things have been requested from the Council without any positive response. Again we have asked unsuccessfully for the toilets be opened from 8am to 6.30pm. Traders and shoppers are active right until market closing time at 6pm so closing toilets at 6pm leaves no time to use them. **We ask, how can the Council enhance the community and social value of the market when they will not listen to community requests?**

We remain concerned about the use of Good Growth money in providing 'canopies' for the market.

To explain: the market roof does not extend to the front of the market so stalls there have had their own built-in covering or 'canopies'. The promise was that Good Growth money would provide more attractive covering for the stalls plus signage for the market.

The problem is that the front of the market has been boarded up since August and all the canopy traders relocated far from their usual positions since. Because the Council has been pushing the idea of building luxury flats on the site (the 'two options' see below) many customers have looked at the market front hoarding and concluded that demolition is already

going on in the market. The Council seems to be dragging the job out with no proper oversight of the contractors : they have failed to give us a proper schedule of works; the construction workers work only a few hours on the site then disappear, presumably relocated to other jobs. We have been told that the job *might* be finished by February 2025 : that will be six months of serious inconvenience to shoppers and traders. **The way the Council is handling the Good Growth grant for canopies looks as if Newham Council simply does not care about us much less the social value which we provide so this is a real challenge for us.**

Many of the **environmental challenges** we face relate to market maintenance.

Drains are full and smelling, need regular maintenance including unblocking sewer pipes.

The market needs repainting.

There used to be a monthly deep clean of the floor using specialised equipment: this appears to happen less frequently and traders are never advised when or whether it will occur.

Good Growth money promised for a new market floor appears not to be forthcoming (where did the money go?). as a result we face the problem of many holes that need filling, they are unsightly, a trip hazard and trap waste and water. Newham Council's Highways Department refuse to fill the holes as they are not legally hazardous, however this is a market not a road and should be viewed as such, retail spaces have flat attractive floors.

Maintenance of the compound is also a challenge: The compound is a large service area used for parking and storage of goods. To date Newham Council has taken no responsibility for cleaning it, blaming the traders for any rubbish left there. The state of it is pretty disgusting at the moment and it is attracting vermin.

All we are asking for is the Council to apply same twin-tracking policy applied on Newham's streets and in other properties i.e people who litter or fail to clear up waste to be identified (easily done these days of CCTV) and fined but then the premises to be properly cleaned with any rubbish removed. The Council also blames rough sleepers who break into the compound: we have said that they should secure the compound against unauthorised users. We have said this repeatedly but Newham council is not listening

If the Council appreciated the social value of the market they would address all these challenges instead of offering excuses why nothing can be done

And one last challenge we face which is to get management to listen to is also a challenge our representations over the Tannoy system. It will be absurd if the Planning department erect welcoming frontage to the market while Tannoy system continues to currently only issues warning about pickpocketing and theft! What about a good morning traders and shoppers or regular 'welcome to Queens Market', enjoy your shopping experience, announcements that we now have public toilets and where they are located.

But as with everything else, the challenge is to get the Council to listen to us about this.

The second part of your question 3 was how does this (ie. the challenges we face) impact the ability of traders to deliver 'social value' to local communities?

All these challenges make it a hard struggle to continue to deliver social value to our communities and customers: we are trying to keep them happy when all these challenges are making our jobs harder, but we do our best.

Your question 4 was What role should the Mayor have in supporting market traders?

We reply: we would like him to help any way he can to get the challenges listed above resolved.

5. To what extent do the planning and regeneration policies of local authorities support market traders and arch-based businesses?

We do not regard planning and regeneration 'two options' produced by the Queen's Market & Hamara Ghar Investment Strategy Study as supporting us traders in any way. Both options mean demolishing social housing in Tolpuddle Avenue at the back of the market and then building flats on the site: either 254 or 306. Across London only 6% of new development homes are for social rent: developers always have the last word and consistently break their promises to Councils about how many they'll build so these plans will not do anything for those of us and our communities who are on the housing list: most or all of the properties built will be luxury flats.

So these Council options do not support us: they cause great anxiety. We fear that the Council may use steep increases in pitch fees and shop rents not just to raise money but also to try to drive us out of the market then they can claim that it is failing and luxury flats would be better.

We cannot think of any place where a street market has continued to offer social value after luxury flats were built on it. We look at Rathbone Market in Canning Town: once a thriving Council-owned market it is now surrounded by luxury flats and down to 6 stalls max, with no fruit and veg.

So we ask Newham's planning and regeneration departments not to build luxury flats on our market site: those of us with good local knowledge could find them alternative sites if they asked.

6. How could the London Plan better support council-run markets and arch-based businesses that deliver high social value?

We would like it to include policies that protect street markets that deliver high social value from luxury flat developments.

Imran, Chair of Queens Market Traders Union

Individuals

Amaya Lopez / Ref No. SVP008

1. What does 'social value' mean to you?

In my opinion, 'social value' can have several meaningful interpretations. It's a value placed on something that enriches and helps communities and society in general – a value that is very difficult to measure as its range is far reaching.

It's also a value that cannot be easily monetarised and so is ignored by governments, local authorities and developers. It is a value that is often used to justify actions whose long-term consequences will erode existing 'social value'. It is not necessarily tangible, but it has often been established over a long period of time and, once it disappears, is very difficult to claw back.

'Social value' for me means community, diversity, character and accessibility – something we should treasure and preserve as it cultivates a sense of belonging and personal investment in an area. It also makes our society a better place.

2. How should 'social value' be measured, particularly in relation to market traders and arch-based businesses?

In relation to market traders and arch-based businesses, we can look at the 'social value' they provide and the impact 'social value' has on themselves. In the case of Shepherd's Bush Market specifically, which is a market close to where I was born and grew up, and even closer to where I now live, there is a historic 'social value' – many families of immigrants came to the area and established small businesses in the market (which is now 110 years old), which have been passed down the generations.

When I was a child, the market was a thriving, bustling shopping centre and now sadly has been managed into decline due to a lack of investment from consecutive developers and, I would argue, a failure to recognise its 'social value'. It still, however, offers items including an eclectic selection of food and clothing for shoppers, particularly those on a low income and from ethnic minorities. Many items sold are not easy to buy in ordinary supermarkets or shopping centres – and so the arch-based shops and stalls offer a unique service. When I visit the market, I am saddened by the way it has been ignored since 2011 and the welfare of the many traders dismissed – arguably to make way for bigger businesses once the development is complete. I have seen businesses, such as the excellent and beautiful children's bookshop owned by an inspirational Ethiopian refugee, forced out by the developer because the trader would not sign the developer's punitive lease. This trader demonstrated her 'social value' by offering children in our local community free books when she detected that their parents could not afford to buy them as well as help with homework and free art classes.

In short, 'social value' should be assessed at the beginning of a planning process specifically considering how, in the case of Shepherd's Bush Market, residents and traders would be affected if any or all of the market's social value were to disappear. Other questions to be raised should include: what 'social value' will the development add? How will a nine-storey office block, almost 15 metres taller than the nearby Dorsett Hotel, add 'social value' to the area and the lives of residents and market traders? A market with businesses catering to the needs of office workers, such as a myriad of coffee shops and lunch places, what 'social value' will that bring to the area, if these businesses are likely to be chains due to the increase in rents and changes to existing traders' leases. What 'social value' does a tower block add to residents losing their light? What 'social value' do these buildings contribute to when they are ignoring both H&F and GLA environmental targets by a country mile?

4. What role should the Mayor and/or Places for London have in supporting market traders and arch-based businesses to deliver 'social value', and is there further action either should take?

The Mayor and/or Places for London should firstly measure and assess 'social value' and do this at the beginning of the planning process and not after the local authority has granted planning permission and is just waiting for the Mayor to give the final go-ahead. In that way, the Mayor and/or Places for London would be able to effectively support the traders to continue to deliver social value and build on this.

There should also be greater transparency in the whole planning process – many traders and residents were turned away from Planning Committee meetings and told it was due to 'fire regulations', despite the fact that I was sitting next to empty seats. Any opposition was ignored and considered a nuisance. The Stage 2 referral process should have been properly implemented.

5. To what extent do the planning and regeneration policies of local authorities support market traders and arch-based businesses?

In my opinion, the planning and regeneration policies of local authorities seem to ride roughshod over market traders and arch-based businesses, whilst assuring them that they are supporting them and doing everything they can. Local authorities' actions in these areas are often shortsighted with no long-term vision, as can be seen by the decline in markets not only in London but nationally. It is important for local authorities to properly consult people with 'skin in the game' – traders and local residents – 'social value' is most relevant to them, not to developers who have their eye on profits and usually no link to the area they are developing.

With specific reference to Shepherd's Bush Market, engagement and proper consultation with market traders and residents was a key factor that failed to be implemented. I attended all the consultations and not once did I see a local authority representative. I contacted my local ward councillors, along with other residents, to express our concerns about the development (losing the market's unique spirit, having a giant tower block looming from the market that would house an unnecessary amount of offices as well as demolishing the former, award-winning St Mungo's building, having moved out the hostel residents and placed them in a nearby

residential street) and they pleaded ignorance about a development happening in their ward. The ‘social value’ of the market and the fact that it is part of our community was brushed to one side. The developer would fix things. But we all know that developers aren’t interested in social value as it can’t be monetarised. They are interested only in profit. They pretend they care in order to achieve their aims.

Hammersmith and Fulham’s Council ‘social value’ values were signed off by the cabinet in May 2020 and the local authority prides itself on being the first council to take ‘social value’ seriously. This has not been evident to market traders and residents.

To quote from their manifesto on ‘social value’:

H&F’s wider objectives focus on six core values: building shared prosperity; creating a compassionate and inclusive council; doing things with residents, not to them; taking pride in H&F; being ruthlessly financially efficient; rising to the challenge of the climate and ecological emergency.

As a resident of Shepherds Bush, I feel that the Council is very much ‘doing things to residents (and traders) and not with them’. I feel strongly that the ‘social value’ of this area will be significantly eroded if the development goes ahead. The whole area will be ruined.

6. How could the London Plan better support council-run markets and arch-based businesses that deliver high ‘social value’?

The London Plan should include policies that really scrutinise the plans proposed for markets and arch-based businesses, especially those that come under the title of regeneration. This should involve looking at the viability of these businesses continuing when proposals include introducing new leases or extensive building work. The London Plan should make local authorities accountable for their actions and insist that they seek a good deal for the traders, the community and the environment when developers are involved and not just kow-tow to their proposals, accept their money while disregarding their own ecological stated goals, and act to stifle valid concerns and opposition from people most affected – traders and residents.

James J Horada / Ref No. SVP009

Dear Sir/Madame,

This letter presents the argument that there has been severe injustice to the businesses of Shepherd’s Bush Market and that the proposals of the redeveloper company, formally known as ‘Orion Shepherd’s Bush Market Ltd.’ (later amended to the name of ‘YC Shepherd’s Bush Market Ltd’), are deeply alarming.

A Conflict of Interest

For over two decades, the businesses of Shepherd’s Bush Market have recognised that betterment of the infrastructure of the Shepherd’s Bush Market land (aka ‘Railway Approach’

W12) could, inter alia, improve the working lives of the Shepherd's Bush Market traders and empower the Shepherd's Bush Market businesses.

Regrettably, the core of the redeveloper's character is deemed to be driven by greed. It is understood that the redeveloper seeks profit, yet their ambitions may lead to Shepherd's Bush Market's character and offer being destroyed. The redeveloper's insistence on gaining complete control over the entire site and beyond, exerting their will over all who may reside or frequent the area, repeatedly proves that there is a clear and direct conflict of interest. The redeveloper's actions and proposal ultimately attempt to obliterate and deny the long-term prospects of the market businesses gaining empowerment.

The Shepherd's Bush Market businesses and residents who were asked to welcome the arrival of the redeveloper in February 2014, by the Hammersmith & Fulham Council, have been sorely deceived and have suffered beyond what should have been allowed.

Shepherd's Bush Market's Character

Shepherd's Bush Market was established in 1914 for ex-servicemen. The Shepherd's Bush Market land has served as an arena to assist independent family businesses to maintain a living whilst offering exceptionally good value for money to the London communities, including low-income families.

Shepherd's Bush Market's land has accommodated a famed array of ethnically diverse and multicultural businesses and as such has developed a 'hub' and an offering that has appealed to many cultures and communities for decades.

Shepherd's Bush Market has also proved to be a unique destination for several reasons including (i) its operating times, and (ii) its permanent solid retail structures.

Shepherd's Bush Market is a six-day-a-week market, operating from Monday to Saturday. The redeveloper's past attempts to meddle with the established opening times have been vehemently opposed by the market businesses. The redeveloper's proposals for the market traders to work on Sundays have alarmed the market traders as these family businesses have wished to retain their balance of family life, family commitments, and religious practices.

Yet, this has been an indicator of the redeveloper's behaviour, ambitions, and disregard for the long-established market businesses.

The redeveloper's greed has deeply troubled many. The concern is that the redeveloper appears to want to '*muscle in*' (i) on the daily operational choices of each independent market business. (ii) to gain a percentage of the income of some of these traders' livelihoods, and (iii) to exert a level of control, to the extent that these independent businesses may no longer be independent but servants of the redeveloper.

For several decades the retail units in Shepherd's Bush Market have been solid permanent structures and fall into three categories. (i) 'Arches' (on the west side of 'Railway Approach') (ii)

‘Stalls’ (on the centreline of ‘Railway Approach’), and (iii) ‘Shops’ (on the east side of ‘Railway Approach’).

Because of these permanent structures, the former landlord - *London Underground Ltd./Transport for London* (LUL/TfL) was able to issue leases to the market businesses that held the appeal of certainty, affordability, and functionality.

Under the care of Transport for London, with a tenancy of 145 leases in 2009, Shepherd’s Bush Market may have been one of the largest permanent markets in the whole of the United Kingdom.

LUL/TfL’s implementation of leases with the full inclusion of the Landlord & Tenant 1954 Act, brought stability, certainty, and permanence to the Shepherd’s Bush Market businesses. Due to LUL/TfL’s approach, each of the independent market businesses enjoyed a life spanning several decades whereby family businesses were passed from one generation to the next.

The redeveloper’s actions have shown a clear determination: (i) to remove the full inclusion of the Landlord & Tenant 1954 Act from lease proposals (ii) to place market businesses on licences when possible instead of leases, (iii) to steer away from renewing TfL leases (iv) if renewing leases to ensure terms and conditions that are less favourable for the tenant than the previous terms and conditions present in the TfL leases, (v) to decrease the liabilities of the landlord whilst increasing the liabilities of the tenants, (vi) to reduce the liberties of the market tenants, (vii) to reduce the tenancies within the market and (viii) to ‘cut off’ areas of Shepherd Bush Market land for the sole purpose of benefiting or increasing the value of neighbouring land areas such as the Old Laundry Site Area and ‘Market Yard’ otherwise known as ‘the Hawks Nest’.

Of the few businesses that the redeveloper has managed to coax into Shepherd’s Bush Market, few of these new traders have been able to retain a livelihood and remain in the market, simply because the redeveloper’s tenancy arrangements have been viewed as biased and unworkable thus strangling the prospect of traders lasting any longer than perhaps a few months.

With the uncertainty and argument for suitable and equivalent lease terms & conditions, retail premises, and future affordability, all those tenants who wish to remain in the market for the long-term future are extremely concerned.

A Virtuoso of Shepherd’s Bush Market

My family established their drapery/textile business in Shepherd’s Bush Market in 1919 and was titled ‘Dave Horatha & Co’. With the assistance of three generations, our family textile business served our patrons in Shepherd’s Bush Market from 1919 to March 2021. This term equates to a significant 102 years in Shepherd’s Bush Market. I was introduced to Shepherd’s Bush Market life as a child. I often frequented the market to help and learn the family retail business. I later worked full-time in the textile business for over 30 years.

Already equipped with insight into the history and workings of Shepherd's Bush Market, I became the Chairman of the Shepherd's Bush Market Tenants' Association (SBMTA) in 2006. The SBMTA was established in the 1950s. The importance of the SBMTA's constitution is discussed in the latter half of this letter. I retired from the role of Chairman of the SBMTA on 30th March 2022 and thus held the position for the term of 16 years.

To quote MP Andy Slaughter on 31st March 2022, in the House of Commons⁴ *"For more than 100 years, Shepherd's Bush Market has served the people of west London and beyond. For most of the time, the Horada family have been one of its leading traders. Yesterday, James Horada stepped down as chair of the Shepherd's Bush Market Tenants' Association, after 16 years in which he faced down repeated attempts by developers to destroy the market, winning a public inquiry and finally persuading the Lord Chief Justice and the Court of Appeal to save this unique institution"*.

The scope of my knowledge regarding Shepherd's Bush Market is extensive and the documentation that I own spans several decades. I may be considered, to date, to be one of the most well-versed experts on the affairs of Shepherd's Bush Market.

The Landlord - Transport for London

Under the stewardship of Transport for London, Shepherd's Bush Market consistently held over 138+ tenancies from one decade to the next. Its tenancy and footfall numbers within the market were consistently dependable. Yet, Transport for London had been diverting the Shepherd's Bush Market rental profits so to fund the London Underground rail network. Consequently, years of financial neglect led to Shepherd's Bush Market's infrastructure growing tired and underfunded.

What had been requested by the market community via the SBMTA was for Transport for London to revise its approach and improve the overall condition of Shepherd's Bush Market by retaining Shepherd's Bush Market rental profits and ploughing these funds back into the market's infrastructure for a period of 7 to 10 years. At the time, TfL's profits from Shepherd's Bush Market were approximately one million pounds plus per annum.

No longer could Transport for London treat the market merely as a 'cash cow'. There was a logical argument to reinvest Shepherd's Bush Market's profits back into Shepherd's Bush Market.

There has never been a call for Shepherd's Bush Market to acquire any extra land by the market community. The Shepherds Bush Market site was pleasingly self-contained. Its ability to seal

⁴ View the Hansard contribution by Andy Slaughter (Hammersmith) (Lab) on Thursday 31 March 2022
<https://hansard.parliament.uk/Commons/2022-03-31/debates/BB200139-5E12-431B-BAA0-796251B6E089/BusinessOfTheHouse?highlight=horada#contribution-F19EF7FF-CD00-42FE-8C20-EE4E16997931>

and govern its boundaries from neighbouring land areas was ideal. This simplicity avoided many complications relating to security or multiple service charge regime complications.

As Transport for London is a public company, the Shepherd's Bush Market businesses confidently knew that its landlord had to show a level of accountability. Regrettably, it is this accountability that was sorely missed when the market's stewardship was passed onto the private redeveloper company.

From the years of 2010 to 2013 there was a notable and positive shift in Transport for London's acknowledgement of the weary condition of the market's infrastructure. Consequently, TfL began to direct greater funds for capital expenditure and make improvements on the market. It is my belief that if TfL had maintained its momentum without the interruption of the Hammersmith & Fulham Council's eagerness to introduce Orion Shepherd's Bush Market Ltd. then Shepherd's Bush Market would be in a far more favourable situation under the care of Transport for London. The businesses would have avoided much hardship and uncertainty. Footfall would have remained strong. And there would be better prospects for the market community with the promise of an affordable future.

The Hammersmith & Fulham Council and the Alignment of Power

The scenario of Transport for London selling Shepherd's Bush Market to another party, especially to a private redeveloper, would have been thought to be most unlikely, however from 2010 and onwards, there was an alignment of a Conservative constituency within Hammersmith & Fulham Council, a Conservative Mayor of London, and a Conservative Government. It is believed that this alignment of power had led to the Hammersmith & Fulham Council exerting influence on Transport for London to consider the handover of the market's stewardship.

The alignment of a single political party holding power over several key political positions perhaps can achieve far more than that which a party may wish to admit. Currently, the Hammersmith & Fulham Council, the Mayor of London, and the Government are all now under the Labour Party's control.

The Labour Hammersmith & Fulham Council is considered to have claimed too readily and too often, that it holds little leverage over the redeveloper Orion Shepherd's Bush Market Ltd. / YC Shepherd's Bush Market Ltd. and yet, the Labour Party may have the influence to buy back control of Shepherd's Bush Market and place the market's future under the care of the public and accountable company - Transport for London.

The Real Reason - The Old Laundry Site Area

The Shepherd's Bush Market businesses had no wish for a private redeveloper, who knew little of managing the market, to be in the position of influence over the traders' livelihoods.

The redeveloper's actions soon clarified the fact that this whole deal was not about empowering the market businesses, but about the Hammersmith & Fulham Council increasing the worth of their ownership of their land known as the Old Laundry Site Area.

The Old Laundry Site Area is literally landlocked between four surrounding land areas. (i) Shepherd's Bush Market to the West, (ii) the Bush Theatre to the North (iii) the Pennard Road residents to the East, and (iv) the Saint Mungo's Drug & Rehabilitation Broadway Centre to the South.

The Shepherd's Bush Market Tenants' Association (SBMTA) for over a decade has repeatedly written to the Hammersmith & Fulham Council explaining that Shepherd's Bush Market does not require additional land, nor does it wish for the market's boundaries to be compromised or encroached on by neighbouring land areas such as the Old Laundry Site Area. Nonetheless, the Hammersmith & Fulham Council and the redeveloper have always understood that gaining control and exploiting Shepherd's Bush Market's land, could result in increasing access from the awkward Old Laundry Site Area and finally increase the Old Laundry Site Area's use and value.

It appears that much harm has been caused to many healthy and popular market businesses simply because the Hammersmith & Fulham Council has sought to increase its value on the Old Laundry Site Area land. The Hammersmith & Fulham Council has failed to adequately protect the market businesses, and their motivations are viewed to have now enabled the redeveloper to sever many long-established market businesses.

Two Undisclosed Agreements Between the Redeveloper and the Hammersmith & Fulham Council Years Before the Sale of Shepherd's Bush Market.

As relayed to the Mayor of London in the letter⁵ dated 8th December 2023, two undisclosed agreements had been signed by the redeveloper - Orion Shepherd's Bush Market Ltd., and The Mayor and Burgesses of the London Borough of Hammersmith and Fulham and had been kept a secret until 2016. These agreements were titled the **Options Agreement - 22nd December 2010** and the **February 2013 CPO Indemnity Agreement**.

The first undisclosed agreement was the **Options Agreement - 22nd December 2010**⁶ which is believed to have allowed the redeveloper - Orion Shepherd's Bush Market to acquire rights regarding the Old Laundry Site Area, defined as the "Property" and the second undisclosed

⁵ Letter dated 8th December 2023 – Titled "*Objection to Planning Application – Reference 2023/01093/FUL Relating to Shepherd's Bush Market – A Gradual Eradication of the Shepherd's Bush Market Businesses*" may be viewed via the Dropbox link:

<https://www.dropbox.com/scl/fi/x4zvolw2exeng2uswd0ev/8th-December-2023-Letter-to-The-Mayor-of-London-Objection-to-Planning-Application-Reference-2023-01093-FUL-A-Gradual-Eradication-of-the-Shepherd-s-Bush-Market-Businesses.pdf?rlkey=5fi09qfh06ng677dh64o8nvpq&dl=0>

⁶ The Options Agreement - 22nd December 2010 may be viewed via the Dropbox link:

<https://www.dropbox.com/s/51pbq89a4kbb7jk/Options%20Agreement%20-%2022nd%20December%202010.pdf?dl=0>

agreement is the **February 2013 CPO Indemnity Agreement**⁷. These two undisclosed agreements were not made available until 2016, and as the first agreement was established in 2010 it subsequently hid the redeveloper's true motivations and gave the redeveloper time to gain a footing within Shepherd's Bush Market.

What must be asked is whether the London Assembly and the Greater London Authority are aware of all the agreements that have been established between YC Shepherd's Bush Market Ltd. and the Hammersmith & Fulham Council relating to the general Shepherd's Bush Market London W12 area.

Service Charge Account Disputes

Upon the redeveloper acquiring the stewardship of Shepherd's Bush Market in February 2014, concerns were raised by the market community regarding the redeveloper's failure to abide by the service charge account lease stipulations and additional agreements (TfL 28th March 2003 Service Charge Agreement).

Several disputes relating to the redeveloper's conduct of the service charge Accounts from 2014 and onwards were formally raised. These matters, along with additional further disputes, when not resolved, were escalated to the SBMTA's solicitors.

Still to this day, market businesses have disputes regarding the redeveloper's conduct of the Service Charge Accounts. YC Shepherd's Bush Market Ltd. has refused to provide the relevant account information regarding manifestation error concerns relating to the full-time market superintendent position and the part-time deputy superintendent position for the financial service charge years of 2016 and onwards. Additionally, there are concerns regarding YC Shepherd's Bush Market Ltd.'s failure to correctly present the service charge accounts, to every tenant, for each service charge account year, from April 2017 and onwards. The fact that YC Shepherd's Bush Market Ltd. has failed to present seven years of service charge accounts to the tenants, as required, may be viewed as alarming and suspicious, especially as it is considered that there is due reimbursement owing to the tenants for several of these service charge years.

The aversion from the redeveloper to do what is correct and proper is a concern. The Hammersmith & Fulham Council's disregard of these concerns and transgressions by the redeveloper raises the question as to whether the Hammersmith & Fulham Council is afraid of helping the market community and standing up to the redeveloper.

Hammersmith & Fulham Council's Partnership with Yoo Capital

⁷ The second undisclosed agreement is the February 2013 CPO Indemnity Agreement may be viewed via the Dropbox link:

<https://www.dropbox.com/s/7o78vaibjoj2ndz/February%202013%20CPO%20Indemnity%20Agreement%20.pdf?dl=0>

There is the understanding that the Hammersmith & Fulham Council may have a partnership with Yoo Capital via the Olympia development (Yoo Capital is the associated company to YC Shepherd's Bush Market Ltd.). There are supposed reports that Yoo Capital may have allegedly breached planning agreements regarding the Olympia site, and yet the Hammersmith & Fulham Council may be failing to hold Yoo Capital accountable. These rumours have consequently raised worry as to whether the Hammersmith & Fulham Council has the inclination and courage to challenge the redeveloper when wrongdoings occur.

The Hammersmith & Fulham Council has supported the planning application reference 2023/01093/FUL relating to Shepherd's Bush Market, despite the likelihood that the plan may eradicate the current market businesses' long-term future.

The Hammersmith & Fulham Council has failed to implement the required safeguards that is expected from a regeneration scheme of Shepherd's Bush Market. First and foremost, one would expect a scheme to empower the current market businesses. A scheme should also bring about certainty, affordability, and a future for the market businesses. Regrettably, it does not.

At a recent meeting regarding YC Shepherd's Bush Market Ltd.'s planning application reference 2023/01093/FUL, MP Andy Slaughter kindly attended and commented that he felt the scheme was very risky. It is my belief that the livelihoods of so many business owners, their staff, and their families should never have been put at risk for a planning application that offers no benefit other than to a private redeveloper.

Hammersmith & Fulham Council's Disregard to the SBMTA's Voice from 2014 to March 2022

As the former Chairman of the Shepherd's Bush Market Tenants' Association (SBMTA) from 2006 to 30th March 2022, I am fully aware that the Hammersmith & Fulham Council had received thousands of pages of written correspondence from the SBMTA during the redeveloper's stewardship of Shepherd's Bush Market from 2014 to March 2022. These correspondences remain valid and accessible, still to this day.

Hammersmith & Fulham Council's Disregard to the Government Inspector's CPO Report

A Government inspector's report⁸ by Ava Wood Dip Arch MRTPI dated 10th February 2014 is a poignant and important document that takes an impartial and meticulous look at the concerns and challenges of Shepherd's Bush Market.

⁸ The CPO Report to the Secretary of State for Communities and Local Government by the Government Inspector - Ava Wood Dip Arch MRTPI may be viewed via the link:

http://data.parliament.uk/DepositedPapers/Files/DEP2015-0230/223452-223453_Slaughter_-_Shepherds_Bush_Inspector_Report.pdf

To paraphrase the Government Inspector - Ms Ava Wood Dip Arch MRTPI - *“the Shepherd’s Bush Market businesses provide a unique and valuable offer, not found elsewhere in the West London area”*.

It was the Government Inspector’s judgement that the redeveloper’s planning application reference 2011/02930/OUT was prejudicial to the Shepherd’s Bush Market businesses. It is important to note that the redeveloper’s planning application reference 2011/02930/OUT is remarkably similar to that of their latest planning application reference 2023/01093/FUL.

The latter planning application may very well be considered even more prejudicial to the Shepherd’s Bush Market businesses than the previous.

It may be considered shocking how the Hammersmith & Fulham Council appears to have overlooked the wisdom that the Government Inspector - Ms Ava Wood Dip Arch MRTPI offers in her CPO Report to the Secretary of State for Communities and Local Government.

The 2023 planning application reference 2023/01093/FUL slightly differs from the 2011 planning application reference 2011/02930/OUT whereby the proposal of building the continuation of the development on the Northeast side of Shepherd’s Bush Market that borders with the Bush Theatre land, appears to have been shelved for the time being, yet it would not surprise the community if the redeveloper now started to delay and amend its approved application plans in order to boast their potential of further profit despite the further damage that it may cause to the local communities.

Hammersmith & Fulham Council’s Disregard to the judgement relating to ‘Horada & Ors v Secretary of State for Communities and Local Government & Ors’ [2016] EWCA Civ 169

In 2016 the Shepherd’s Bush Market community defended themselves against the redeveloper’s assault and took the Secretary of State for Communities and Local Government to the Court of Appeal in order to stop the redeveloper’s planning application. Due to the wisdom of the Lord Chief Justice of England and Wales, Lord Justice Longmore, and Lord Justice Lewison, the Shepherd’s Bush Market businesses were successful in the Court of Appeal and won.

The Court of Appeal case ‘Horada & Ors v Secretary of State for Communities and Local Government & Ors’⁹ [2016] EWCA Civ 169, is considered not only to have brought justice, but also set further guidance and precedence as to the importance of caring for the Shepherd’s Bush Market businesses.

The Court of Appeal case highlighted several points, three of which are, but not limited to:-

⁹ The judgement relating to ‘Horada & Ors v Secretary of State for Communities and Local Government & Ors’ [2016] EWCA Civ 169 may be viewed via the link:
<https://www.bailii.org/ew/cases/EWCA/Civ/2016/169.html>

- (i) Shepherd's Bush Market serves many and has a strong and significant social value to West London.
- (ii) All the Shepherd's Bush Market businesses require and deserve safeguards that deliver long-term certainty and affordability.
- (iii) The multicultural and ethnic diversity of the Shepherd's Bush Market businesses should be protected, and mechanisms should be fixed in place to shield and promote the entire community.

The Court of Appeal case demonstrated that it is essential for the market tenants to retain their ability to legally defend themselves against the redeveloper. It also highlighted the concern that the Hammersmith & Fulham Council had inflated the redeveloper's interest in the Shepherd's Bush Market land area by flaunting the potential of the Old Laundry Site Area.

If the Council had exercised greater foresight and regard, it might have removed the offer of the Old Laundry Site Area from the grasp of the redeveloper and subsequently removed the threat of the eradication of the market businesses. The fact that the Hammersmith & Fulham Council has allowed the same mistake twice in one decade, despite the suffering and harm that has been caused, suggests that the Hammersmith & Fulham Council's beliefs and values may be considered unsound.

It does appear that the Hammersmith & Fulham Council have shown disregard for the judgement of The Court of Appeal case 'Horada & Ors v Secretary of State for Communities and Local Government & Ors' ¹⁰[2016] EWCA Civ 169.

Post The Court of Appeal case 'Horada & Ors v Secretary of State for Communities and Local Government & Ors' ¹¹[2016] EWCA Civ 169

After the Shepherd's Bush Market community's Court of Appeal win, the redevelopers took a sour approach to the SBMTA members.

Disputes regarding the landlord's behaviour remained unresolved and therefore were escalated. There were concerns regarding the redeveloper's disregard of lease terms and conditions, which

¹⁰ The judgement relating to 'Horada & Ors v Secretary of State for Communities and Local Government & Ors' [2016] EWCA Civ 169 may be viewed via the link:
<https://www.bailii.org/ew/cases/EWCA/Civ/2016/169.html>

¹¹ The judgement relating to 'Horada & Ors v Secretary of State for Communities and Local Government & Ors' [2016] EWCA Civ 169 may be viewed via the link:
<https://www.bailii.org/ew/cases/EWCA/Civ/2016/169.html>

included, but not limited to, the ‘28th March 2003 TfL Service Charge Agreement’¹² and service charge account disputes relating to (i) manifestation errors, (ii) failure from the landlord to reimburse the tenants, and (iii) failures from the landlord to present several years of service charge accounts to the tenants in the correct manner that the leases intend¹³.

Landlord’s Building Insurance relating to the Shepherd’s Bush Market Arches

Disputes were raised due to the redeveloper’s failure to address their obligation as the landlord to comprehensively insure the structure of the Arches. The current Transport for London leases, relating to the arches, indicate that the landlord’s insurance must cover/insure the structure of the arches including the brickwork. There were, and continue to be, ongoing concerns that the redeveloper may not be honouring these lease ‘buildings insurance’ stipulations and its obligations as the landlord to the tenants.

Further detail regarding the building insurance concerns/disputes for the Arches may be viewed in the letter addressed to the Hammersmith & Fulham Council dated 29th September 2023¹⁴, and is accompanied by the SBMTA’s solicitor letters (Owen White & Catlin LLP) that address

¹² The ‘28th March 2003 Agreement’ is an agreement between the landlord and the SBMTA, relating to the Service Charge Accounts, and is referenced within every Transport for London lease. The ‘28th March 2003 Agreement’ may be viewed via the Dropbox link:

<https://www.dropbox.com/s/1bgtdcrupbbp0yu/TfL%3ALUL%2028th%20March%202003%20Agreement.pdf?dl=0>

¹³ Issues and matters referred to within the letter to the Hammersmith & Fulham Council on 29th September 2023 <https://www.dropbox.com/scl/fi/1mg02h58m7xnapzvbne05/29th-September-2023-Concerns-Regarding-Planning-Application-202301093FUL-and-YC-SBM-Ltd.-s-Lease-Proposals.pdf?rlkey=wgssupyyjfnw27losigb9dle9&dl=0>

¹⁴ letter addressed to the Hammersmith & Fulham Council dated 29th September 2023

<https://www.dropbox.com/scl/fi/1mg02h58m7xnapzvbne05/29th-September-2023-Concerns-Regarding-Planning-Application-202301093FUL-and-YC-SBM-Ltd.-s-Lease-Proposals.pdf?rlkey=wgssupyyjfnw27losigb9dle9&dl=0>

the building insurance concern – **PDF Attachment B**¹⁵, **PDF Attachment C**¹⁶, **PDF Attachment D**¹⁷, and **PDF Attachment E**¹⁸.

Loss of Tenancies and Footfall in the Market Under the Redeveloper's Stewardship

Under the stewardship of TfL, the tenancies numbers in 2013/14 within Shepherd's Bush Market were 138+ leases. Keeping the number of tenancies in the market high, in turn, kept the market popular and vibrant. Subsequently, prior to 2014, the market's footfall was good.

Upon the redeveloper taking over the stewardship of the market, it appeared that they were making a concerted effort to remove tenants when they could and refuse prospective traders the ability to acquire leases with fair terms and conditions.

The outcome was that some prospective traders would accept short-term licenses yet found the redeveloper's new terms and conditions too oppressive to remain in the market for any notable period of time.

The loss of tenancies in Shepherds Bush Market under the redeveloper's stewardship has become increasingly more significant and this caused the tragic loss of footfall, reduced sales, and less income for some of the market businesses.

It was considered that the redeveloper's strategy was to remove as many tenants as possible from the market and gain control over those who managed to stay, so there would be less resistance to stand up to the redeveloper's proposals and ambitions.

Compared to the tenancy number of 138+ Leases in 2013/14 that had remain consistence for decades, the redeveloper has forced a tenancy number approximately below 50%, in the region of only 64 leaseholders.

¹⁵ **Attachment B** – Owen White & Catlin LLP – 8th August 2017

<https://www.dropbox.com/scl/fi/2jwnfx4jr4c8q14g15y3c/Attachment-B-08.08.17.pdf?rlkey=pudrdsgbnph6gbqznwlnvve9&dl=0>

¹⁶ **Attachment C** – Owen White & Catlin LLP – 18th June 2018

<https://www.dropbox.com/scl/fi/h4yogp0pl67osf1xh37sq/Attachment-C-18.06.18-Richard-Upton.pdf?rlkey=wofuxpnwjd0csn9s3ch10z57k&dl=0>

¹⁷ **Attachment D** – Owen White & Catlin LLP – 20th November 2018

<https://www.dropbox.com/scl/fi/yuke24u9bmqim0uj2bvp1/Attachment-D-20.11.18.pdf?rlkey=8sm1pwjv15q0v32gdp56zv4w&dl=0>

¹⁸ **Attachment E** – Owen White & Catlin LLP – 25th February 2019

<https://www.dropbox.com/scl/fi/eq77x4yzlhmct0q7bxu/Attachment-E-25.02.19-Bernie-Spears-and-Richard-Upton.pdf?rlkey=rxtuskxft8xrdovjih843i91l&dl=0>

In 2017 the SBMTA and the redeveloper had a legal scuffle between solicitors. The SBMTA had raised the concern of a falling of the multicultural and ethnically diverse tenancies within the market, under the stewardship of the redeveloper.

The redeveloper held the view that the SBMTA should retract the concern and instead state publicly that the redeveloper was increasing the diversity within the market.

It is viewed that this was neither the first nor last time that the redeveloper would attempt to bully the SBMTA. As the redeveloper refused to implement legal guarantees, pledging to the SBMTA that the diversity of the tenancy within the market would be increased, the concern of the future tenancy numbers in Shepherd's Bush Market remained a worry.

Letters between the redeveloper's solicitor – Gowlings WLG¹⁹ on 20th December 2017 and the SBMTA's solicitor – Bindmans LLP²⁰ on 16th January 2018 may be viewed.

It was observed by the market community that the redeveloper had extended its ambitions to the neighbouring land areas. It was considered that the redeveloper might attempt to suggest that the Old Laundry Site Area and the St Mungo Drug & Rehabilitation Broadway Centre were both underutilised as to create an argument to support their ambitions that all the neighbouring lands should be amalgamated together and developed. It appears that the redevelopers have done exactly this, over time.

Previously, the Hammersmith and Fulham Council gave the redeveloper control over the stewardship of the Old Laundry site Area. The redeveloper's management of the Old Laundry Site Area was problematic. Not only was the footfall of the Old Laundry Site Area considered appalling low and abysmal, but the site also caused impairment to the neighbouring Shepherd's Bush Market businesses.

The St Mungo Drug & Rehabilitation Broadway Centre had been in operation, providing a social and worthy service to the area and its community, however, it was viewed that the redeveloper immobilised and stopped the good work of this St Mungo Drug & Rehabilitation Broadway Centre.

The later argument that the redeveloper's planning application should be approved and supported as all these land areas are underutilised may be viewed as a dark twisted joke.

The Voice of the Community

¹⁹ Redeveloper's solicitor – Gowlings WLG letter dated 20th December 2017

<https://www.dropbox.com/scl/fi/s1vd4i27vo8j9q7cf742s/Letter-from-Gowling-WLG20-Dec-17.pdf?rlkey=gz5z8dufibcf1ikf2u0e2h867&dl=0>

²⁰ SBMTA's solicitor – Bindmans LLP letter dated 16th January 2018

https://www.dropbox.com/scl/fi/k9kh6uxqxfvezfo91twuj/Letter-from-Bindmans-to-Gowling-16-Jan-18_848898_1.pdf?rlkey=5oemm39hyvivupqyzlsucg0dl&dl=0

Since the redeveloper's presence within Shepherd's Bush Market, there has been concern that the redeveloper has wished to gag those who might defy or oppose its wishes.

This was immediately apparent when the redeveloper would conduct meetings on unfair footings. The redeveloper's attempt to manipulate the outcome of meetings, seeking control over the chairing of the meetings and the minutes was considered hostile, unfair, and prejudiced.

The market community often insisted on audio recordings being conducted at every meeting as this would prevent poor behaviour from the redeveloper.

Democracy and Liberties

Throughout the years it had been hoped that the redeveloper would amend its approach and act in a reasonable and unprejudicial manner towards the market community. Sadly, attempts to stifle the market businesses' liberties and freedom of speech continued. The democratic values and rights of our Country should be protected and upheld. The question is what can and will be done when an organisation threatens the rights of a community. The following are just some of the many accounts that have raised concerns regarding fairness and democracy.

Disregarding the Community's Vote

In May 2021, the market community was very disappointed with Yoo Capital's disregard for the market community's collective vote, whilst disrespecting the traditions and practices of Shepherd's Bush Market. The SBMTA's letter Reference – IL Ref 0530²¹ to the Mayor of London – Mr Sadiq Khan, on 25th May 2021, was one example whereby Yoo Capital showed disdain against the voice of the community.

Yoo Capital's Objectionable 'Heads of Terms'

In the autumn of 2021, Yoo Capital was considered to be acting suspiciously as it was deemed to be attempting to covertly approach unsuspecting businesses to sign a revised 'Head of Terms' lease document (HOTS).

Yoo Capital's behaviour was viewed as ungentlemanly and was frowned upon. The SBMTA raised its concerns to Yoo Capital and the Hammersmith & Fulham Council, in their letter dated 4th November 2021 – Reference IL Ref 0621²².

²¹ SBMTA's letter dated 25th May 2021 Reference IL Ref 0530 The Mayor of London Mr Sadiq Khan titled "Unfair & Undemocratic" may be viewed via the Dropbox Link:
<https://www.dropbox.com/sc/fi/7h565hmc2315dalgfmzep/25th-May-2021-Reference-IL-Ref-0530-The-Mayor-of-London-Mr-Sadiq-Khan-Unfair-Undemocratic.pdf?rlkey=exmhjz6xh6w2fjrikdyg3d24j&dl=0>

²² The SBMTA's letter to Yoo Capital & the H&F Council dated 4th November 2021 – Reference IL Ref 0621 may be viewed via the Dropbox Link:

Due to the lack of response from both Yoo Capital and the Hammersmith & Fulham Council, the SBMTA sent further correspondence dated 18th November 2021 – Reference - IL Ref 0631²³ to pursue the concerns associated with Yoo Capital's behaviour.

On 5th December 2021, Yoo Capital – (Mr Lloyd Lee) issued a limited written response²⁴ to some of the SBMTA's enquires regarding Yoo Capital's actions that were raised in the SBMTA's letters dated 4th and 18th November 2021. Some of Yoo Capital's answers appeared not to be credible. However, it is important to note that the SBMTA's letter dated 4th November 2021 asked the question to Yoo Capital: *"What the purpose and repercussions of the documents are?"*

In later pages the SBMTA asks: *"It has been reported that Yoo Capital is allegedly asking tenants to give their approval for the Yoo Capital planning application, is this true or false?"*

Yoo Capital's response in its email dated 5th December 2021 reads:-

"The documents do not refer to support for any future proposal and are not in any way linked to them. The signing of these documents is not a signature of support for any future proposal. It is landlord/tenant commercial letter giving market traders reassurance of their financial position as we proceed through the consultation process, which is what we originally pledged to provide at the beginning of this year".

Despite Yoo Capital's promises that these 'Heads of Terms' documents would have no role in accompanying or assisting their future planning application, Yoo Capital is viewed to have misled the market community and used these documents to appeal to the Planning Committee for approval of their planning application.

<https://www.dropbox.com/scl/fi/g1wrhaak9fi3r05t25sm1/4th-November-2021-Reference-IL-Ref-0621-Concerns-regarding-Yoo-Capital-seeking-signatures-from-the-Shepherd-s-Bush-Market-tenants-copy.pdf?rlkey=qzbw9ud26zplknwoc2g3sk7z3&dl=0>

²³ The SBMTA's letter to Yoo Capital & the H&F Council dated 18th November 2021 – Reference - IL Ref 0631 may be viewed via the Dropbox Link:

<https://www.dropbox.com/scl/fi/0t3x43o18tgp3hhoe3yff/18th-November-2021-Without-Prejudice-Reference-IL-Ref-0631-copy.pdf?rlkey=m1d8nl8tuu1w7jsjdvj1e0eib&dl=0>

²⁴ Yoo Capital's written response dated 5th December 2021 in response to the SBMTA's letter References - IL Ref 0621 and IL Ref 0631. This email may be viewed via the Dropbox Link:

<https://www.dropbox.com/scl/fi/whmhv9sg99sa34as24a74/5th-December-2021-Re-18th-November-2021-Reference-IL-Ref-0631-For-the-attention-of-Yoo-Capital-Mr-Lloyd-Lee-The-Hammersmith-Fulham-Council-Stephen-Cowan-The-Meaning-and-Significance-of-Yoo-Capitals-Alleged-Consultation-Documents.pdf?rlkey=5b8td9i3wobv3rkruq8rtwqgs&dl=0>

Yoo Capital's response in its email dated 5th December 2021 continues and reads:- *"We encourage all Market Traders to comment on proposals when we recommence consultation"*.

Yet, Yoo Capital appeared never to conduct a satisfactory consultation. When the SBMTA and many individuals, both businesses and residents, expressed their concerns, views, and queries to Yoo Capital about its planning application, the comments and enquires were ignored and given no regard nor reply.

As raised in the SBMTA's letter dated 4th November 2021 – Reference IL Ref 0621 and several more correspondences that followed, the Yoo Capital proposed Heads of Terms of not favourable and may deliver prejudicial outcomes for the long-term future of the existing market businesses.

Yoo Capital's Proposed Service Charge Dispute Settlement that Attempted to Restrict the Community's Freedom of Speech

Through the required use of solicitors, the SBMTA held legal disputes with Orion Shepherd's Bush Market Ltd./YC Shepherd's Bush Market Ltd. regarding the Shepherd's Bush Market Service Charges. Legal dispute notices had been served on the landlord by the market tenants via the SBMTA's solicitor and queries regarding manifestation errors regarding the service charge accounts including amounts paid for the role of the market superintendent and the part-time deputy market superintendent from 2016 and onwards, remained unanswered.

In way of avoidance of providing the requested information, YC Shepherd's Bush Market Ltd. proposed to enter into discussions with the SBMTA via the solicitors regarding 'a settlement' for the market community.

During 2020 and 2021 it became apparent that Yoo Capital wished to confuse the 'settlement' talks by introducing proposals for Shepherds Bush Market being managed through several future service charge regimes. This was viewed to be unorthodox and unacceptable.

Furthermore, Yoo Capital forced proposals of new lease terms and conditions that were detrimental to the future of the market businesses. These detrimental proposed lease terms were strongly opposed via the SBMTA's solicitor.

The legal discussions took an immediate halt when it was assessed that Yoo Capital was proposing unreasonable confidentiality clauses to be implemented within the settlement that could steal the future freedom of speech from the SBMTA and its members.

Yoo Capital's shocking proposals are stated within the 2021 Draft Amended And Restated Agreement²⁵ and the 2021 Draft Settlement And Supplemental Deed²⁶.

Yoo Capital's proposed settlement was deemed to be categorically unacceptable by the SBMTA and the SBMTA reiterated the original requirement for the manifestation error enquires to be answered.

The shocking written proposals from Yoo Capital to attempt to bind the voice of the market community was relied on to MP Andy Slaughter, and the Hammersmith & Fulham Council by the SBMTA on 24th May 2022 – the letter titled "Freedom of Speech"²⁷

As the former Chair of the SBMTA, I further raised the concern, via a letter²⁸ titled 'Freedom of Speech' to the Prime Minister – Mr Boris Johnson MP, on 1st July 2022, in faith of raising the Mayor of London's awareness of these matters so to encourage greater protection and aid for the Shepherd's Bush Market community.

The Shepherd's Bush Market Tenants Association (SBMTA)

The SBMTA is an Association originating back to the 1950s. The SBMTA has a constitution²⁹ that must be adhered to. The purpose of the SBMTA is to represent the interests of the members whenever necessary. I was voted Chairman of the SBMTA in 2006 and throughout my chairmanship until my retirement on 30th March 2022, I held a strong and supportive following. The SBMTA membership comprised of a supermajority of the tenants in Shepherd's Bush

²⁵ 2021 Draft Amended And Restated Agreement - please view the full document via the Dropbox link:

<https://www.dropbox.com/s/g2q767a73k7neoq/2021%20Draft%20Amended%20And%20Restated%20Agreement%20.pdf?dl=0>

²⁶ 2021 Draft Settlement And Supplemental Deed - please view the full document via the Dropbox link:

<https://www.dropbox.com/s/z6k1ztw4peb39qi/2021%20Draft%20Settlement%20And%20Supplemental%20Deed%20.pdf?dl=0>

²⁷ SBMTA's letter to MP Andy Slaughter dated 24th May 2022, titled "Freedom of Speech" - please view the letter via the Dropbox link:

<https://www.dropbox.com/sc/fi/8gwvqckp6xjao89fm1wof/24th-May-2022-MP-Andy-Slaughter-Yoo-Capital-settlement-Freedom-Of-Speech.pdf?rlkey=bc6k6736pbdxduoby5e2tahg&dl=0>

²⁸ 'Freedom of Speech' dated 1st July 2022 – Letter to Prime Minister Boris Johnson MP - please view the letter via the Dropbox link:

<https://www.dropbox.com/sc/fi/fwbko3sywk2jft5yds5t/1st-July-2022-The-Right-Honourable-Boris-Johnson.pdf?rlkey=7dc1en2pggqudd5njlfz1py4&dl=0>

²⁹ SBMTA's Constitution

<https://www.dropbox.com/sc/fi/7jegd3jyjk2mlhi77920/SBMTA-s-Constitution.pdf?rlkey=2glqzh1h4cjs7hauschavmc0&dl=0>

Market. Throughout each year of my 16 years as Chairman, the SBMTA membership numbers continued to sit at approximately 85% of the market tenants.

In 2022, before my retirement, the SBMTA held a committee of 9 individuals. However, upon my retirement, the eight remaining individuals of the SBMTA committee splintered on the reasoning of a lack of confidence in the replacement chairman – Mr Peter Wheeler. Only two committee members remained with Mr Wheeler (i) Mr Surjeet Duggal, and (ii) Mrs Laura Sakstein.

The other six SBMTA committee members resigned after my retirement and further to this, numerous tenants decided to withdraw their membership from the SBMTA.

It is my educated guess that the SBMTA, under new leadership, with its committee of three individuals, may have only held a maximum membership of 17% of the Shepherd's Bush Market tenants. However, due to the stipulations of the SBMTA's constitution, it may be viewed that the SBMTA held no members whatsoever. There are also concerns that the SBMTA constitution was breached. Further to this, there is unease that the three SBMTA committee members may have put themselves into a position that is a conflict of interest. There is concern that each of the three individuals may have established personal alleged agreements with YC Orion Shepherd's Bush Market Ltd. that were conditional on their support and approval of the redeveloper's planning application.

Because of the union like position of a SBMTA committee member, It may be viewed that failure from each of these three SBMTA committee members, to be transparent and forthcoming regarding the terms and provisos of any alleged agreement with the redeveloper could be considered as a failure to disclose their possible conflict of interest.

The SBMTA's constitution states: Contribution Fees: Fees shall be £40 per member per year. Non-payment of fees shall lead to exclusion from membership.

This matter of the SBMTA fees means that if a member of the SBMTA wishes to withdraw its membership it merely has to cease its membership contribution. Vice versa, a tenant who wishes to be a member of the SBMTA must make payment of the 'Contribution Fees' of £40 per year.

The SBMTA in the financial years from 1st April 2022/2023 and 1st April 2023/24 received no Contribution Fees, therefore it may be deduced that the SBMTA held no members.

The SBMTA's Constitution states: Meetings: There shall be at least one General Meeting held each membership year. The Steering Committee may call other meetings as required, provided members have at least one week's notice.

The three SBMTA committee members failed to hold a General Meeting in the membership year of 2022 (1st April 2022 to 31st March 2023). This would constitute as a breach of the SBMTA's constitution; however, this may have occurred as there may have been no members within the SBMTA.

The Hammersmith & Fulham Council's Failure to Perform its Due Diligence Regarding the SBMTA's Membership.

There had been protests by the Shepherd's Bush Market community that the Hammersmith & Fulham Council appeared to be only consulting with the three SBMTA committee individuals who may have held no support whatsoever from the market community. Furthermore, these three individuals may have allegedly entered into personal agreements with the redeveloper/applicant.

It is unclear why the Hammersmith & Fulham Council had not conducted adequate due diligence on whether the SBMTA held any members after the change of the SBMTA's leadership, let alone whether the SBMTA held the majority voice of the market tenants.

Had these three individuals claimed to the Hammersmith & Fulham Council that they represented the majority of the market when they did not?

Had the Hammersmith & Fulham Council acted with adequate thoroughness to enquire and confirm who these individuals represented?

Why did the Hammersmith & Fulham Council decide not to consult with each market tenant?

When this question was previously raised to the Hammersmith & Fulham Council, they appeared to take the complacent and naïve view that the applicant of the planning application YC Shepherd's Bush Market Ltd. would be unprejudiced and sincere in collecting the views of the market tenants regarding the planning application. This was viewed as an unacceptable excuse.

A new group known as 'Friends of Shepherd's Bush Market' (FoSBM) is reported to be the leading voice of the market community.

It appears, that in haste, YC Shepherd's Bush Market Ltd. has attempted to create a contrived 'Steering Group' with the prejudicial intention of keeping control over the outcome of this Steering Group. It appears that YC Shepherd's Bush Market Ltd. is adopting several dubious practices, including but not limited to (i) excluding 'Friends of Shepherd's Bush Market' (ii) holding control of the chairmanship of the steering group and (iii) holding control over the minute taking of the steering group.

YC Shepherd's Bush Market Ltd.'s formulation of their steering group is viewed as a sham and an insult to democracy.

The Friends of Shepherd's Bush Market's letter³⁰ dated 10th May 2024 titled "Concerns from Friends of Shepherd's Bush Market Regarding YC Shepherd's Bush Market Ltd.'s Conduct and

³⁰ by Friends of Shepherd's Bush Market, dated 10th May 2024, please view the Dropbox link:

<https://www.dropbox.com/scl/fi/dkf2i7d79b688etgkivg8/10th-May-2024-Concerns-Regarding-Proposed-Steering-Group-FoSBM.pdf?rlkey=4hpdxi0nb4355tj8qi36s4ki&dl=0>

Steering Group Terms” sent to the Mayor of London and the Hammersmith & Fulham Council, discusses with evidence as to why democracy is not being exercised. To view the letter by Friends of Shepherd’s Bush Market, dated 10th May 2024, please view the Dropbox link:

<https://www.dropbox.com/scl/fi/dkf2i7d79b688etqkivg8/10th-May-2024-Concerns-Regarding-Proposed-Steering-Group-FoSBM.pdf?rlkey=4hpdxi0nb4355tj8qi36s4ki&dl=0>

Conclusion

Transport for London relinquishing the stewardship of Shepherd’s Bush Market gave the redeveloper the opportunity to sabotage the character of Shepherd’s Bush Market and harm a significant proportion of the market businesses. The Hammersmith & Fulham Council’s decision to allow the Old Laundry Site Area to incite and enable the redeveloper’s planning application to potentially eradicate the future of the current market businesses is viewed as horrendous. The uncertainty that the redeveloper’s ambition has placed on residents and businesses is viewed as unjust and deplorable. The Shepherd’s Bush Market’s multicultural and ethnically diverse businesses offer social richness and importance to the West London area, it is considered that failure to protect this community would be an unforgivable disgrace.

Yours sincerely

[redacted personal information]

Local authorities

London Borough of Hounslow EDI Team/ Ref No. SVP010

1.What does ‘social value’ mean to you?

LB Hounslow sees social value as a means to deliver real life improvements for those living in neighbourhoods with least assets and least opportunities to thrive and prosper.

We have analysed and achieved a deeper understanding of the structural inequalities and challenges faced by people where they live. We use ‘social value’ to negotiate ‘social value’ outcomes which directly responds to multiple indices of deprivation, our community needs index score, and households experiencing multiple deprivation characteristics,

The Council considers that ‘social value’ should be optimised to achieve a Transformative impact on tackling structural and systemic inequality for our residents by nurturing the conditions necessary to promote social mobility for all. We use social value to target interventions and redirect investment to ensure we deliver for the most unequal parts of the borough. ‘Social Value’ can be a means to achieve a common vision for the Borough with partners and developers and attain maximum impact for tackling geographic inequalities.

2. How should 'social value' be measured, particularly in relation to market traders and arch-based businesses?

Measuring social value in numerical terms tends to focus minds and activity on things that can be easily converted into figures. However, a more balanced approach should be employed when measuring and monitoring the delivery of social value. Measuring 'social value' should provide for flexibility and an opportunity to engage a variety of partners and residents to respond to their points of view.

'Social Value' should also be used to communicate and engage with residents on what their priorities are for an area. We have quantifiable social outcome measures but we also include measurable outcomes put forward by residents. The social value outcomes is co-designed by resident's feedback. We include targeted intervention measures in our procurement and contracts.

3. What specific challenges do market traders and arch-based businesses face in London today? How does this impact the ability of traders and arch-based businesses to deliver 'social value' to local communities?

4. What role should the Mayor and/or Places for London have in supporting market traders and arch-based businesses to deliver 'social value', and is there further action either should take?

5. To what extent do the planning and regeneration policies of local authorities support market traders and arch-based businesses?

6. How could the London Plan better support council-run markets and arch-based businesses that deliver high social value?

Our evidence demonstrates that many deprived areas lack access to availability of fresh and affordable food, opportunities for social interaction and participation in leisure activities to enhance physical and mental well-being, especially for communities who would not otherwise be reached. Public markets can revitalize communities, create economic opportunities for small entrepreneurs, increase access to healthy local foods, bridge urban and rural landscapes, and provide safe and sociable public gathering places. Market stalls offer a fertile ground for start-ups for those on lower incomes, supporting budding entrepreneurs from economically deprived areas by providing them with a low-barrier entry point to the marketplace.

Priority needs to be given to promote market stalls where residential zoning takes priority and scope for business zoning cannot be motivated. Markets facilitate trade and enable the distribution and allocation of resources and can help those who are inherently disadvantaged, such as the elderly and disabled people and people on low incomes. By encouraging small market traders in deprived areas, these marketplaces can help communities grow and survive. Additionally, by serving as hubs for community interaction, local street markets strengthen the bonds that bind communities together.

Hence, the London Plan, Regeneration and planning policies need to encourage market trading in geographical areas where there is no retail presence and where there are transport barriers to access fresh food or to access supermarkets.

London Borough of Tower Hamlets/ Ref No. SVP011

1. What does 'social value' mean to you?

Social value can be defined as the benefit to the economy, communities and the environment from commercial investment. Placing communities impacted

by change at the centre of social value creation and ground interventions in community need. Social value is about processes and not just outcomes, including enabling local knowledge to influence development decisions

2. How should 'social value' be measured, particularly in relation to market traders and arch-based businesses?

Local Employment: Track the number of local jobs created, fair wages, and support for disadvantaged groups.

Community Engagement: Measure how these businesses foster social cohesion through interactions, volunteerism, and use of public spaces.

Cultural Preservation: Evaluate contributions to local culture, diversity in products, and hosting of cultural events.

Access to Affordable Goods: Assess whether these businesses provide affordable, essential products, particularly in underserved areas.

Environmental Impact: Measure sustainability practices like waste reduction, local sourcing, and lowering carbon footprints.

Support for Socially Disadvantaged Groups: Track how many disadvantaged individuals they employ or support, and their involvement in social enterprises.

Economic Resilience: Analyse the survival rates of businesses and their impact on the local economy and supply chains.

Health and Well-being: Measure access to fresh food, health initiatives, and their contribution to walkable, active communities.

These metrics can help highlight how these businesses contribute to social, cultural, and economic well-being, making a case for stronger support in urban planning and regeneration efforts.

3. What specific challenges do market traders and arch-based businesses face in London today? How does this impact the ability of traders and arch-based businesses to deliver 'social value' to local communities?

Market traders and arch-based businesses in London face several key challenges, which directly impact their ability to deliver social value to local communities:

Rising Rents and Property Pressures

Increased rents, especially in arch spaces, put pressure on small businesses with limited financial margins. This makes it difficult for traders to keep goods affordable, and many face closures or displacement.

Impact on Social Value:

- Loss of affordable goods and services: Rising costs force traders to raise prices, reducing access to affordable products for low-income communities.
- Job loss and community disconnection: Business closures result in fewer local jobs and less community engagement, weakening local economic resilience and social cohesion.

Development Pressure

As redevelopment projects target prime market and arch locations, traders face displacement. These spaces, often key to local community identity, are replaced by large commercial or residential developments.

Impact on Social Value:

- Loss of social hubs: Markets and arches often serve as gathering places, fostering community interaction. Redevelopment removes these hubs, weakening the sense of community and reducing spaces for cultural exchange.
- Erosion of local culture: Displacement of independent traders diminishes cultural diversity, as larger, chain businesses replace them, eroding the unique local character.

Regulatory and Bureaucratic Barriers

The complex and costly regulatory landscape makes it difficult for small businesses to navigate licencing, health and safety standards, and other bureaucratic hurdles.

Impact on Social Value:

- Exclusion of vulnerable groups: These barriers limit opportunities for small, minority-owned, or start-up businesses, reducing diversity and economic inclusion in local markets.

- Limited business sustainability: With resources spent on compliance, traders have less capacity to invest in community projects, training, or expanding their services.

Competition from Large Retailers and Online Platforms

Market traders and arch businesses face competition from large retailers and online platforms, which offer lower prices and greater convenience.

Impact on Social Value:

- Reduced footfall: Fewer customers visiting physical markets means less opportunity for community-building activities and fewer local jobs, weakening the social fabric of the area.
- Cultural dilution: Local, diverse offerings are overshadowed by standardised products from large retailers, reducing the cultural uniqueness of the area.

Poor Infrastructure and Lack of Investment

Many markets and arch spaces suffer from inadequate infrastructure, with poor lighting, heating, and amenities, making them less appealing to customers.

Impact on Social Value:

- Lower customer engagement: Without modern infrastructure, footfall decreases, limiting traders' ability to sustain their businesses and contribute to community projects.
- Business growth constraints: Lack of investment prevents traders from expanding or improving their services, reducing their potential to create jobs or host community events.

Transport and Accessibility Issues

Many markets and arch-based businesses are located in areas with poor transport links and limited parking, making it difficult for customers to visit.

Impact on Social Value:

- Limited access for vulnerable groups: Poor accessibility particularly affects low-income individuals and the elderly, reducing their access to affordable goods and services.
- Decline in community interaction: Fewer visitors leads to reduced social engagement, undermining the role of these spaces as community hubs.

Post-COVID Economic Uncertainty

The COVID-19 pandemic has changed consumer habits, with more people shopping online and fewer visiting physical markets, leaving traders struggling to recover.

Impact on Social Value:

- Loss of business stability: Many traders are still struggling to regain footfall, reducing their ability to sustain employment and contribute to the local economy.
- Weakened community ties: As fewer people visit markets, the social connections and interactions that markets traditionally foster decline, weakening the sense of community.

Lack of Representation and Support

Small market traders and arch-based businesses often lack representation in local planning and policy decisions, leaving them without access to crucial resources or influence in development plans.

Impact on Social Value:

- Missed opportunities for community investment: Without support or involvement in decision-making, these businesses struggle to access grants, funding, or infrastructure improvements, limiting their capacity to contribute to local social projects or services.
- Reduced resilience: A lack of targeted support weakens their ability to withstand economic challenges and continue delivering local jobs, cultural diversity, and community spaces.

4. What role should the Mayor and/or Places for London have in supporting market traders and arch-based businesses to deliver 'social value', and is there further action either should take?

The Mayor of London and Places for London (PfL) can play a vital role in supporting market traders and arch-based businesses to deliver social value by addressing key challenges such as rising rents, displacement, and regulatory barriers, and by promoting policies that enable these businesses to thrive. Here's how they can help, along with further actions they could take:

Rent Control and Affordable Spaces

The Mayor and PfL should work to control escalating rents in market areas and arch-based spaces, ensuring that small businesses are not priced out. They can advocate for affordable commercial rents, particularly in spaces owned by public bodies like Network Rail.

Further Action:

- Implement rent caps or rent regulation mechanisms for market traders and arch-based businesses, particularly in areas undergoing regeneration.
- Provide financial relief such as rent subsidies, grants, or targeted funding for small, independent businesses to prevent displacement.

- Promote longer-term leases to offer more stability and security for traders and arch-based enterprises.

Protecting and Designating Market Spaces

The Mayor and Pfl should prioritise protecting markets and arch-based business areas from development pressures. This could include formally designating markets and arch-based spaces as critical community assets to ensure they are preserved for public use.

Further Action:

- Introduce planning protections that safeguard market spaces and arch-based businesses from redevelopment or gentrification by designating them as Local Cultural Hubs or Community Value Areas.
- Incentivise developers to incorporate markets or affordable commercial spaces for small businesses within new developments, ensuring continuity for these businesses in changing urban areas.

Support with Regulation and Bureaucracy

Navigating complex regulations is often a barrier for small traders. The Mayor and Pfl should streamline processes for licensing, permits, and regulatory compliance to reduce the burden on market traders and arch-based businesses.

Further Action:

Create a simplified, one-stop portal for market traders and arch-based businesses to access all necessary licences and permits, making the process quicker and more affordable.

Offer regulatory advice and support through dedicated business support units that assist with compliance issues, particularly for smaller, minority-owned, and start-up enterprises.

Business Support and Skills Development

The Mayor and Pfl can introduce targeted business support programmes that provide traders with skills training, financial literacy, and digital tools to help them grow, compete, and adapt to challenges such as online competition.

Further Action:

Develop training programmes that focus on areas like digital marketing, financial planning, and customer engagement, helping market traders and arch-based businesses modernise and expand.

Create mentorship or incubator programmes to support new entrepreneurs, particularly from disadvantaged communities, and ensure these businesses have the resources to succeed.

Promoting Social Value Contributions

The Mayor should formally recognise the social value that market traders and arch-based businesses provide, such as job creation, cultural diversity, and community cohesion. This recognition could be built into procurement, grants, and public sector partnerships.

Further Action:

Introduce a ‘Social Value Certification’ for businesses that demonstrate positive community impact, allowing these traders to access additional funding, tax relief, or promotional opportunities.

Encourage public sector contracts to prioritise businesses that deliver high social value, providing these enterprises with stable, long-term revenue streams.

Investment in Infrastructure and Public Realm

Market traders and arch-based businesses often suffer from outdated infrastructure. The Mayor and PfL should invest in upgrading markets and arch spaces to ensure they are modern, accessible, and attractive to both traders and customers.

Further Action:

Fund infrastructure improvements in market spaces and arches, such as better lighting, heating, sanitation, and security, to enhance customer experience and support business growth.

Expand public transport and accessibility options to ensure markets and arch spaces are easily reachable, particularly for underserved or low-income communities.

Promoting Local Markets and Cultural Diversity

The Mayor and PfL should actively promote London’s markets and arch-based businesses as essential to the city’s cultural and social fabric. Marketing campaigns and city-wide initiatives can raise awareness of their social value and attract both residents and tourists.

Further Action:

Launch city-wide campaigns that celebrate the cultural diversity and social impact of markets and arch businesses, highlighting their importance to London's identity.

Organise festivals, pop-up events, and seasonal markets that showcase the unique offerings of these businesses, driving footfall and strengthening their role as community hubs.

Sustainability Initiatives

The Mayor and PfL should encourage sustainability among market traders and arch businesses, helping them adopt eco-friendly practices while reducing operational costs.

Further Action:

Offer grants or incentives for green initiatives such as waste reduction, local sourcing, or energy-efficient upgrades, ensuring these businesses contribute positively to environmental goals.

Provide training on sustainability practices that could help traders minimise waste, reduce costs, and attract environmentally-conscious consumers.

Conclusion:

The Mayor of London and Places for London can play a transformative role in supporting market traders and arch-based businesses to deliver social value by addressing key challenges like rent pressures, development threats, and regulatory complexity. Further action should focus on safeguarding affordable spaces, simplifying regulations, offering business support, and promoting the social contributions these businesses make. Investing in infrastructure, promoting cultural diversity, and fostering sustainability will ensure these businesses continue to thrive and deliver benefits to their local communities.

5. To what extent do the planning and regeneration policies of local authorities support market traders and arch-based businesses?

Local authorities in the UK offer inconsistent support for market traders and arch-based businesses through their planning and regeneration policies. Key challenges include:

- **Lack of Protection:** Many regeneration projects prioritise large-scale developments, leading to higher rents and the displacement of small businesses.
- **Gentrification:** Urban renewal often results in gentrification, pushing out market traders and arch-based businesses in favour of wealthier enterprises.
- **Inconsistent Support:** Some markets, especially iconic ones like Borough Market, receive strong support, but smaller, community-based markets often lack sufficient backing in planning policies.
- **Rising Rents:** Regeneration increases property values, making it difficult for small businesses to afford rents, leading to closures or relocations.

Overall, while some local authorities recognise the social value of these businesses, planning policies often fail to fully protect or promote them in the face of redevelopment pressures.

6. How could the London Plan better support council-run markets and arch-based businesses that deliver high social value?

The London Plan could better support council-run markets and arch-based businesses that deliver high social value by embedding policies that protect these businesses within the planning and development framework. This could include implementing affordable rent controls

and safeguarding spaces for small traders in regeneration projects, ensuring they are not displaced by large developments. The Plan should also prioritise social value in development decisions, recognising the role of markets and arch businesses in providing local jobs, promoting cultural diversity, and fostering community cohesion. Additionally, streamlining regulations, offering grants, and investing in infrastructure would enhance their ability to continue delivering social value while adapting to urban growth.

Other

Social Value Portal/ Ref No. SVP012

1. What does 'social value' mean to you?

Social Value is the value an organisation and its supply chain contributes to society beyond a reported profit. While profit is measured in standard accounting terms with an outcome in currency, Social Value is measured by actions.

Within the Public Services (Social Value) Act 2012 it is described as the 'economic, social and environmental wellbeing' that is created by a service (or development) and is delivered as both direct and indirect outcomes or benefits arising from an intervention over a period of time.

In the Real Estate sector, there is ample opportunity to unlock Social Value which can be embedded at each of the RIBA stages to maximise community benefits across the development lifecycle.

In the context of the planning system, there is an argument to say that social value is covered already by the National Planning Policy Framework (NPPF), but in the broadest sense because it talks about sustainable development. It does not specifically mention social value, but it does speak towards the social, economic, and environmental impacts of sustainable development. When we talk about social value, it means a triple bottom line approach to understanding how the built environment impacts society/community, environment and also the economy.

2. How should 'social value' be measured, particularly in relation to market traders and arch-based businesses?

There are a number of ways of measuring Social Value, but the one most widely used across the public sector is the **TOM System**. Supported by LGA, used by many councils and businesses across the England and Wales including the GLA and TFL.

Within construction and development sectors, it has become the norm with Frameworks like Scape reporting for 2023 £1.08 bn in Social Value representing 24% of contract value.

Market traders and arch-based businesses have unique and specific opportunities to create Social Value. Where measurement of Social Value is required within these spaces as a result of a

policy change, it is important that the policy clearly defines what should be measured and how. This can be informed by local needs and priorities as well as an understanding of the baseline so that additionality is the focus.

Importantly, what measures are used should be based on community feedback and consultation. Guidance for policy makers and developers should promote flexibility in terms of what social value activities take place and therefore what measures are used to be as responsive to local need and priorities as much as possible.

In the context of procurement and the planning systems, when organisations are presenting the potential or delivered social value benefits of these spaces, quantitative scoring should be evaluated alongside qualitative method statements. Not only is it important that organisations are looking to measure and target the right things, but they should demonstrate how they plan to deliver social value through existing programmes, local partnerships and by demonstrating that they are focusing on the things that matter most to the community.

4. What role should the Mayor and/or Places for London have in supporting market traders and arch-based businesses to deliver 'social value', and is there further action either should take?

The Mayor and Places for London have a responsibility to set the vision for London, of which Social Value should be an integral objective to strengthen the social fabric of the city. Guidance for market traders and arch-based businesses detailing how they can unlock Social Value in support of the Mayor's vision for London would help to create alignment of activities. Supporting a network of local traders who are signed up to a collaborative Social Value charter could also help to streamline delivery and establish systems of peer accountability and standards of best practice.

Additionally, developers and borough councils that own spaces for market traders and arch-based businesses should be given clear guidance around the importance of prioritising existing and local businesses when it comes to social value delivery. A clear set of measures that define social value activities but also allow for flexibility depending on local need and organisational capabilities is vital. This will help these organisations to be the most successful when engaging with market traders and arch-based businesses. Guidance should push for consulting people at a hyper-local level and using the measures which matter most to them, highlighting the importance of this flexibility in reporting.

Follow-up unanswered question: The current London Plan is framed around 'good growth' – but many market traders say they are being let down by how London is changing economically. Do we need to rethink the overall approach of the Plan, and how can social value be part of this?

Standardised measurement is important in order to ensure that transparency and accountability are promoted through the implementation of policy at a local level. However, this has been most successful in uplifting local people when the following are in place:

- A clear list of measures that correspond to local challenges and priorities
- Sufficient guidance to promote flexibility and applicability in organisation's social value strategies, depending on local context and project details. For example, although guidance benchmarks can be useful rigid metrics that are found in many employment & skills plans can often direct resource away from interventions/programmes that more effectively address specific local needs
- Measurement corresponds with local engagement, consultation and partnership
- Mechanisms to contractualise and enforce reporting as well as sufficient evidence that what was promised to local communities was delivered

The Arch Company/ Ref No. SVP013

1. Introduction

- 1.1. We welcome this opportunity to respond to the London Assembly Planning and Regeneration Committee's Call for Evidence on 'social value' in planning and regeneration. We are one of the largest providers of space to small businesses in London with approximately 12m sq ft of lettable floorspace including 3,200 railway arches, former railway buildings and parcels of land that are home to 2,300 businesses. Our purpose is to make space for businesses to thrive.
- 1.2. We were created in 2019 following the sale of much of Network Rail's commercial estate. We are owned by Blackstone, the world's largest alternative asset manager, and TT Group, one of the UK's largest, privately owned property investment and development firms.

2. The socio-economic contribution of businesses in the railway arches

- 2.1. There are over one million SMEs in Greater London accounting for approximately three-fifths of employment. Small businesses are more likely to employ local people and use local suppliers. Policies that address the challenges faced by SMEs – including access to space – will support the GLA's aspiration to deliver an inclusive economy that raises living standards for low and middle-income Londoners. As one of the largest individual providers of space to SMEs in London, we believe we have an important role to play within this.
- 2.2. A 2024 socio-economic impact report into our estate, conducted by economic consultancy Volterra, found that businesses in railway arches, most of which are small businesses, contribute **£3.3bn** to the UK economy every year, supporting **43,100** jobs and generating up to **£790m** in additional tax revenues. Most of this value is generated within the Greater London area.
- 2.3. The report demonstrates the importance of small businesses as drivers for growth and the critical role arch spaces play in supporting local economies, fostering small business growth,

and contributing to economic activity. It is estimated that **32%** of people working in arch-based businesses live in the same local authority area where they work.

- 2.4. Arch-based businesses provide important employment opportunities for people on low and middle incomes. A higher proportion of occupations including skilled trades, sales and customer services, and machine operatives can be found in arch-based businesses compared to the rest of London. In the case of machine operatives, the proportion of those working in railway arches is double the London average.

3. Our approach to providing value for money spaces

- 3.1. Through the provision of fit for purpose and value for money spaces within the railway arches i.e. “affordable workspace” we help to create social value. Our spaces offer value for money for small businesses throughout London with an arch typically costing between **£15k-50k** a year. This is in a context where space for small businesses in urban areas is in very short supply with significant competition existing between businesses to secure suitable commercial premises.
- 3.2. Arches are at the more affordable end of the spectrum of commercial property, and they are a great option for small businesses looking to start-up or scale-up. Volterra’s research into our estate shows that space provided by us is more affordable than other comparable commercial space in local authority areas including Southwark, Lambeth, Tower Hamlets and Hackney.
- 3.3. Our cash collection rates are very healthy with **98%** of rent due to us being paid within an acceptable timeframe, usually three months from the invoice issue date. This is in line with the typical average in the property sector. This high cash collection rate does not suggest that typical arch-based customers have any issues affording rents.

4. Tackling covid related rent arrears

- 4.1. We recognise some of the affordability challenges our customers have faced over recent years and we have taken steps to address these. The pandemic and increases in energy and other costs put additional pressures on many small businesses. In response, we offered a **£12m Hardship Fund** that supported **1,550** of our customers with at least three months’ rent free. This, along with support from government, helped the most severely affected small businesses through the worst of the pandemic.
- 4.2. After the pandemic we worked with businesses who had covid-related rent arrears to agree payment plans along a mutually agreed timetable. Around **7%** of our customers are currently on some form of payment plan to address covid-related rental arrears. These plans can be up to four years in length, although most are between one to two years.
- 4.3. This means **93%** of our customers have no rental arrears and again demonstrates the affordability of our spaces. We always try to work with a customer in rental arrears to avoid a scenario where they may need to leave their space, which as an outcome we wish to avoid.

5. Our Tenants' Charter

- 5.1. A unique challenge to us is that rents in 2019 – when Network Rail sold much of their commercial property portfolio to us – were very often out of kilter with market rates at the time. Some of our customers had not had a rent review for up to **20 years** and were paying well below the open market rent.
- 5.2. In recognition of this challenge, we developed a Tenants' Charter, which included an affordability mechanism to give customers more time to adjust to changes in market rent, normally in the form of stepped rental agreements. We estimate we have contributed more than **£1.5m** in rent discounts to customers via these agreements. This is an almost unique approach in the commercial property sector by explicitly taking affordability into account when determining new rent levels.
- 5.3. Most rents are now broadly in line with open market values, with customers on legacy agreements having their rent reviewed on average once every three years. In addition, we have introduced a new customer-friendly lease agreement which means most of our new customers now have rent adjustments indexed to inflation rather than facing a periodic rent review. This gives businesses in our spaces greater certainty to plan for and anticipate future business costs. We are also investing in technology, improving our processes, and upskilling our people so that we become the obvious choice for small businesses looking for space in London.

6. Generating socio-economic and environmental value through the provision of more value for money spaces

- 6.1. We have invested considerable amounts into the estate to increase the availability of value for money commercial premises for small businesses, and all the socio-economic benefits which that entails. We have an ambition – called **Project 1000** – to invest **£200m** to bring 1,000 previously empty and derelict spaces into use by 2030. So far, we have undertaken or planned **350 projects**, investing **£47m** since 2019. These projects range from minor projects focused on the maintenance and upkeep of individual properties, to large-scale redevelopments aimed at improving or regenerating parts of the estate.
- 6.2. Our investment programme is very much aligned with the principles of 'Good Growth' as set out in the current London Plan with its emphasis on socio-economic inclusion and environmental sustainability. Project 1000 is creating even more space for small businesses with further opportunities for job creation and the provision of amenities to local communities.
- 6.3. Furthermore, we are retrofitting historic Victorian railway heritage assets which produces less than half the Embodied Carbon of an equivalent new build industrial unit. The Volterra research demonstrates that refurbished space delivered via our investment programme is estimated to save **60m kgCO2e** compared to comparable new developments. This is equivalent to **35,000** times the average yearly emissions per car in the UK, and so would be equivalent to eliminating the carbon footprint of **35,000 cars** on the road for a single year.

7. Challenges around protecting arches for certain uses within the planning system for reasons of social value

- 7.1. In our experience determining social value can very quickly become a political judgement around what and who is and isn't socially valuable. As one of the largest providers of value for money spaces in London, we believe the best way to deliver social value for our customers and for local communities is to be fair and consistent in our approach.
- 7.2. Our focus is on effective estate management, providing fit for purpose units and offering a good level of customer service. By focusing on these basics, we provide a blank canvas for businesses and organisations to do all sorts of extraordinary things. The diversity of activities that takes place within the arches reflects the vibrancy of London and the enormous social value that creates.
- 7.3. Blanket planning policies focused on protecting arches for certain uses can have an unintended impact of limiting other and unknown opportunities to create social value. For example, we sometimes find that councils wish to stick to a rigid classification of railway arches for industrial usage. This can happen despite the changes in demand from the local area for more retail and hospitality use. In some cases, this goes against placemaking efforts instigated by other parts of the council.

8. The use of affordable workspace clauses in the planning system

- 8.1. As with blanket policies that protect existing uses, we would also caution against blanket policies to promote affordable workspace. This can undermine the viability of some projects. For example, one local authority is proposing that developments of over 1,000 sqm of gross commercial floorspace should provide at least 15% at a peppercorn rent and in perpetuity. This would create serious issues for us.
- 8.2. Bringing empty and derelict Victorian railway arches into functional use, making them waterproof and connected to utilities, whilst not interfering with the operation of the railway above or the streetscape below can be operationally challenging and therefore expensive. An arch typically generates **£15k-50k** per annum in rental income, which means the investment case to bring empty and derelict arches into use can often be incredibly tight. Blanket policies aimed at creating more affordable workspace like the one above could therefore inadvertently choke off plans to create commercial space, which would have been at the affordable end of the market anyway.
- 8.3. One successful project to create even more social value from railway arches is The Arches – Worcester project, which has been funded by **£4.5 million** from the Government and Arts Council's Cultural Development Fund. The initiative has already seen five railway arches redeveloped to create new spaces for creative enterprises. They now sit alongside existing hospitality businesses to create a new city destination. The work is part of Worcester City Council's City Centre Master Plan, which sets out aspirations for the city centre for over the next 20 years and beyond. Similar approaches could work in London using public funding

and/or Section 106 contributions from residential developers operating on sites adjacent to railway arches.

9. The need for flexibility and pragmatism within the planning system

- 9.1. We can sometimes find the planning system to be slow and unresponsive to the needs of the local economy. For example, the wrong planning use class on a particular unit or row of arches can be a significant detriment if mismatched with local demand. It can also constrain wider placemaking efforts if regeneration priorities are not aligned with planning usage. Businesses in our spaces are sometimes performing multiple activities – e.g. food and drink production and a retail/hospitality operation – that don't fit neatly into the planning system framework.
- 9.2. Some councils take a very pragmatic approach and are willing to flex planning use categories to meet local demand, but our experience is varied. Anchored within the overall strategic goals within the London Plan and Local Plans to create more commercial space, we need that space to be flexible to accommodate to changes in demand.
- 9.3. We believe the GLA has an important leadership role in creating alignment across London's 32 boroughs. Within the London Plan, a more robust definition around social value – one that takes environmental benefits and investing in local economies and communities into account – could be helpful. London's planning system should ultimately be focused on creating more spaces for small businesses, and the subsequent positive socio-economic impact this would create.

10. Key contact

- 10.1. If you have any questions about this response then please get in touch with **[redacted personal information]**

Attached to this submission was the report in Appendix 1.

Tom Young Architects/ Ref No. SVP014

Please see attached document which explores issues relating to social value in the context of the GLA Good Growth funded work to Queen's Crescent NW5. The central problem is the failure to

1. quantify before and after - and refusal to keep to original metrics and commitments in a way to make the lives of bureaucrats easier
2. recognise the community concern with local economic life and economic thrust of "good growth"
3. address Queen's Crescent as the last remnant of a wider economic neighbourhood - ie understand long term decline and replacement of an inclusive local economy by an exclusive one driven by residential real-estate

4. explore wider research on these topic

Please explore this [webpage](#) & this [website](#) for more evidence and exposition

1. A VIBRANT LOCAL ECONOMY

1.1. In our July complaint we drew attention to the obvious fact that the Good Growth Fund is committed to neighbourhood economic development. The fund's relationship to the LEAP underlines economic improvement is central.

1.2. Queen's Crescent is the target of Good Growth funding because it's a key site of economic activity in a defined London neighbourhood.

1.3. This comment from the GLA Design Review Panel's report on Camden's QC proposals stresses "a vibrant local economy" is an objective "A street market project is often led by a strong business case whilst these proposals focus on physical interventions. Both are important to the success of the scheme and need to go hand in hand to ensure quality spaces that support and are supported by a vibrant local economy"

2. EVIDENCE

2.1. There is no doubt about the Fund's commitment to getting evidence: "We view the collection of evidence on project performance and impact as an integral part of the delivery process. This is why we require all projects funded by the Good Growth Fund to identify a set of indicators against which performance can be tracked"

2.2. In 2018, the GLA set out a programme of "milestones" linked to funding for QC public realm work. It required Camden to "Appoint independent evaluators to establish pre-project baseline and conduct post-project evaluation"

2.3. Camden's chief officer for "Inclusive Economy" wrote to us in September 2022 — four and half years after the Mayor's March 2018 announcement of the QC grant — no independent evaluator had been appointed

2.4. She stated at the same time: "We are currently working across Council services and with our partners at the GLA to agree practical, appropriate metrics and our shared approach to evaluation".

2.5. An evaluation framework should be decided before work begins, not after when there's an obvious risk it will be adapted to facts on the ground.

2.6. In relation to that risk, the Good Growth Fund: Evaluation And Impact Handbook states: "As a formal requirement of the funding, you will need to develop an Evaluation Strategy before Grant Agreements are signed, which sets out your baseline position and a clear approach to collecting evidence".

2.7. In May 2022, Camden wrote to us to confirm it had discarded economic improvement targets included in their 2018 Good Growth application e.g 20% increases in footfall, business turnover and market stalls. It did so without public discussion.

2.8. No replacement quantitative economic improvement KPIs or “indicators” or “outcomes” have been publicly announced

2.9. Officer Graham’s view is that metrics for assessing Camden’s Good Growth work are still in place without recognising the implications of history outlined here.

2.10. Without detailed baseline work on business turnover and activities before introducing the traffic restrictions and the GLA funded public realm “improvements” e.g parklets, street painting and planter boxes, it is now hard to reach evidence-based conclusions which relate the public realm “improvements” to the local economy.

2.11. The omission undermines the GLA’s commitment to evidence collection: “Collection of evidence will help you and your partners to better understand the difference your project has made in practice to the local economy, communities and beneficiary groups” 1

2.12. Worse, the Good Growth programme in general will be denied a properly evidenced case-study from what is a “major” Good Growth scheme. There won’t be “Evidence collected (that) will also provide valuable information for the GLA and the LEAP to understand the impact of our programme of investment across London as a whole, providing learning to help us shape and design future investment programmes 2 ”.

2.13. Camden has offered one bit of data about business turnover to the public so far. It appears in a so-called “factsheet” distributed by Camden officers on 2nd December 2021 at a street event and baldly states Mastercard transactions have quintupled since 2019 without acknowledging any of the obvious disambiguation issues such a de-contextualised datum raises

2.14. The datum was used unprofessionally (to say the least) in a publicity document designed to give the impression the Queen’s Crescent Safe & Healthy Streets Scheme has contributed to strengthening the local economy. It is crude misinformation betraying a key principle of evaluating Good Growth funded projects: “We expect that larger and more complex projects should devote more effort to understanding the attribution of impacts, demonstrating causality between impacts recorded and the activities of the project



3. GOOD GROWTH & SAFE TRAVEL

3.1. Public realm/Safe Travel interventions are fairly well-advanced: see 3.1.1. the installation of GLA funded parklets and tree-planter boxes 3.1.2. the decoration of the street surface and light projections 3.1.3. the child-centred street-painting events held in the Summer 3.1.4. the December 2021 “street activation” event 3.1.5. the 2019 co-design work led by The Decorators and East Architects 3.1.6. Camden MarketsTeam’s plan to initiate a 7-day a week street market using the pedestrianised section first announced in July last year 3.1.7. Pedestrianisation and road closures

3.2. Camden generally hides the fact that the QC interventions are meant to improve the local economy although its publicity carries LEAP branding. Publicly, it focuses heavily on the Safe Travel agenda.

3.3. On the web, Camden directs public attention to part of a web-page titled “Safe Travel Camden”. Phrases like “local economy”, “vibrant economy”, “business development” etc are missing from it. 3 ibid 2 ibid 1 GOOD GROWTH FUND: EVALUATION AND IMPACT HANDBOOK

3.4. Updates e.g the July 2022 “postcard” say nothing at all about Good Growth goals.

3.5. There’s a pattern of avoiding direct discussion of neighbourhood economic questions.

3.6. We noted before the importance to Camden of the Holmes Rd-QC “rat run” and the failure to recognise Holmes Rd is an economic frontage like QC to which it is functionally connected via Spring Place and Grafton Rd both of which also have important fragments of residual economic floorspace.

3.7. Claims around improvements achieved through road closures ignore the following 3.7.1. Despite the introduction of a partial road closure on Holmes Rd, traffic repeatedly clogs up on the Talacre Rd, Athlone St, Holmes Rd route 3.7.2. The semi-pedestrianisation of Queen’s Crescent means the following streets now get more traffic/more congestion not less 3.7.2.1. Bassett St 3.7.2.2. Allcroft Rd 3.7.2.3. Gilden Crescent 3.7.2.4. Rhyl St 3.7.2.5. Coity Rd 3.7.2.6. Athlone St 3.7.3. Stopping up the so-called “major rat-run” has had mixed effects 3.7.4.

3.8. Camden struggles to relate Safe Travel interventions to the complexity of local economies.



3.9. See their “Our work since the pandemic to bring you safe and healthy streets” flyer circulated in October 2022. It includes a local business headline all about streateries none of which have appeared in QC, Holmes Rd or anywhere else in our neighbourhood (as we have already explained to the GLA).

4. ECONOMIC DEVELOPMENT: WHATS ON OFFER, WHAT’S NEEDED



Danny Beales @DannyBeales · 8m

A big step forward for an important local neighbourhood centre in Camden. Working with @MayorofLondon, @CamdenCouncil is investing almost £2m in improving Queen’s Crescent market, to become more welcoming, green, have an extended market, outside seating & areas for culture/art!



4.1.

4.2. What’s offered is what the presiding authority wants to offer. In other words, the corporations involved — the GLA and Camden — have some products to sell. Whether or not they’re much use is less important than making claims about them

4.3. There are many aspects to the current GLA and Camden understanding of our neighbourhood and its functional area: 4.3.1. The area within a 15 minute walk of QC (and the

32,000 potential QC users who are supposed to live there) 4.3.2. Consultation catchments 4.3.3. The area inside the four surrounding main roads which Camden wants to protect from through traffic using the QC-Holmes Road rat-run 4.3.4. The Community Vision 4.3.5. The Kentish Town Framework area encompassing the Murphy's Yard and the Regis Rd business park

4.4. The Community Vision covers the part of the area inside the four main roads which is not dealt with by the Kentish Town Framework

4.5. Importantly, the economic floorspace development outlined in the framework is unlikely to be realised for a long time: at least 10 years and probably longer

4.6. Planning blight now affects the area as planned major investment at Murphy's and Regis Rd pends

5. YOUR RESPONSE SO FAR

5.1. Officers Graham and Jadav have ignored questions we have raised about neighbourhood economic development and the Queen's Crescent Good Growth Fund work

5.2. Jadav's response emphasises "robust grant management process" without demonstrating it. We asked for documentary evidence but nothing has been sent to us

5.3. You soft pedal the GLA's role: see these examples of your phrasing crafted to distance the GLA from responsibility 5.3.1. the GLA did not play any active role in Camden's decision to apply for Department for Transport funding 5.3.2. it is important to note that the London Review Panel's role was to act as critical friends to provide guidance and independent expert advice and its conclusions are entirely advisory in nature 5.3.3. the GLA has also not had any role in decisions on how the Department for Transport's funding has been spent 5.3.4. Our role has been limited to supporting LB Camden's efforts to integrate its traffic management scheme...with the wider public realm scheme

Unit 38/ Ref No. SVP015

Dear colleagues,

Thank you for the opportunity to share some reflections on Social Value—these insights are informed by our work with community groups across the country on projects centred on community and collective ownership of buildings and space.

1. What does 'social value' mean to you?

Social Value, to me, intuitively refers to the non-economic value derived from a project or space, which may be tangible or intangible. I have worked on several projects in London supporting racially minoritised communities and businesses where the 'social value' is

substantial—for example, a supermarket in a Latin American market in Tottenham serves not only as a place of business but also as a source of rights and advice, immigration and benefits support, a place to find work or housing, and a cultural hub for socializing and expressing identity. Yet, this value often goes unrecognized (formally or informally) by those in power or by policymakers. Consequently, these communities are frequently excluded from decision-making processes due to an inability to justify their 'value' in terms deemed palatable by power holders.

The burden of demonstrating or proving social value almost universally falls on the affected communities, often through rigid social metrics that fail to capture the breadth of services and programs (whether 'formal' or 'informal') delivered in a space. Additionally, there is seldom clear indication to the communities of how they will benefit from such a study. However, I believe there is a powerful opportunity if a social value exercise can lead to a transparent and concrete commitment to support community asset transfers, favourable leases, and funding access.

At the same time, while working within existing social value frameworks, we have found that demonstrating a project's social value can sometimes be strategically beneficial in supporting alternative proposals for community ownership—for instance, in persuading a landowner, local authority, or funder of the substantial benefit of supporting a project. This has helped us "get a foot in the door" but has also required spatial proposals and a robust business case to effectively make our argument. Using established models, such as the HACT 4.0 model, we have demonstrated that the projects we work on generate millions in social value, though the figures are calculated using housing association models that do not fully align with the community or business uses our projects prioritize.

While useful, particularly when combined with spatial and business case arguments, this work requires a degree of technical expertise that often exceeds the capacity of many groups we work with.

2. How should 'social value' be measured, particularly in relation to market traders and arch-based businesses?

There needs to be a clear understanding of the purpose behind calculating 'social value,' as the objectives will determine the criteria's rigor. Is it about program management or the operation of a space? Is it for accessing a lease, community asset transfer, technical support, or funding? If the goal is to support market traders and arch-based businesses, social value should reflect the range of benefits these businesses provide (building off of the HACT 4.0 model would be a good starting point). This data should then support initiatives that protect traders by offering secure, long leases, enabling the social value delivered to the neighbourhood to grow.

If the purpose is to appraise program management or the success of an initiative, a participatory process defining area- or neighbourhood-specific metrics would be essential. The prosperity index, which has been piloted in several London case studies, offers powerful metrics not conventionally considered (e.g., Power, Voice and Influence, Belonging, Identity, and Culture).

For the projects we work on, established and rigorous social value models like HACT 4.0 are valuable because they make the 'economic' case more evident in discussions that almost always frame arguments around economic benefits.

3. What specific challenges do market traders and arch-based businesses face in London today? How does this impact the ability of traders and arch-based businesses to deliver 'social value' to local communities?

To fully understand this, we need to engage directly with the affected traders and communities, as each neighbourhood faces unique pressures and priorities. From our work with other organizations, we have found that security of tenure is often a key issue. A recurring problem is that organizations require funding to refurbish or retrofit spaces that have experienced historic underinvestment and managed decline but are unable to access funding due to insecure or short leases. This issue requires urgent attention, especially with landlords now required to meet certain EPC ratings for their buildings.

Our experience working with traders at Seven Sisters Market on the Wards Corner Community Plan highlights this issue. Traders and businesses possess deep knowledge about managing their market, yet opportunities for self-management are almost non-existent. Often, economic priorities clash with the qualities that make these spaces and businesses valuable and successful.

4. What role should the Mayor and/or Places for London have in supporting market traders and arch-based businesses to deliver 'social value', and is there further action either should take?

Conducting a review of existing social value models (such as TOMS, HACT, etc.) and adapting more rigorous models to be varied and specific to community uses is crucial. This would support groups in calculating their existing 'social value.' A practical first step would be meeting with organizations, like ours, that use social value in their work to support community groups. These organizations can help map out where and how social value modelling can be most effectively applied and what policies it could directly inform (e.g., leases, community asset transfers, funding).

5. To what extent do the planning and regeneration policies of local authorities support market traders and arch-based businesses?

From our experience working with traders at Wards Corner, Elephant and Castle, Chapel Market, and Whitecross Market, planning and regeneration policies do not sufficiently protect the small/micro, independent businesses that typically occupy arches and markets. These policies often fail to recognize the significant benefit these spaces offer the neighbourhood.

6. How could the London Plan better support council-run markets and arch-based businesses that deliver high social value?

Policies should be in place to recognize the value of these businesses, protect them through long and secure leases, and proactively encourage investment and funding to help them grow and evolve, not merely survive. I strongly believe this can be achieved by promoting self-governance and community/collective ownership, trusting traders and their communities to

manage their spaces to reflect the neighbourhood's needs. These principles should apply more broadly, including to initiatives that aim to develop local economies and protect community centres and spaces, especially those owned by local authorities or public bodies.

Appendix

Appendix 1



The socio-economic impact of businesses in the railway arches

Final report

September 2024

volterra.co.uk

The Arch Company

The socio-economic impact of businesses in the railway
arches



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The socio-economic impact of businesses in the railway arches

Socio-economic impact in figures



Approx. 5,300

Properties in The Arch Company portfolio, making it the largest landlord to small businesses in the UK.



Over 1.3m m²

Of building floorspace – approximately as much commercial space as the entire city of Cambridge.



25,600

FTEs estimated to be supported by organisations in space managed by The Arch Company.



£2bn

Economic activity supported each year in space managed by The Arch Company, as measured in GVA terms.



£590m - £790m

Tax revenues generated by activity in space managed by The Arch Company each year.



17,500

Further FTEs supported by supply chains and working spending by organisations in The Arch Company spaces, increasing annual GVA from £2bn to £3.3bn.

Economic potential of the portfolio

The Arch Company has the potential to support even more economic activity than it does currently. At present, 70% of The Arch Company spaces are occupied, and so there is a significant opportunity to build on the current economic impact and increase the economic benefits the portfolio provides.

Project 1000 is one way in which The Arch Company is working to make this a reality, with the investment of £200 million into disused or derelict properties and the goal of bringing 1000 vacant properties into use by 2030.

Bringing the full portfolio into use would lead to an estimated additional:

- **8,200 FTEs**
- **£630m economic activity in GVA terms**
- **£190m - £250m tax revenues**

Case studies: The Arch Company impact within 6 local authority areas

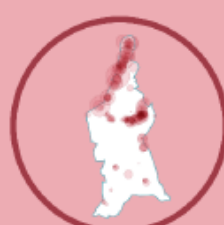
The unique business model and property portfolio of The Arch Company revitalises underutilised commercial spaces across the country and contributes to local economies by supporting small businesses.

This report highlights the economic impact of properties within The Arch Company portfolio, with a particular focus on the six local authority areas of: Southwark, Lambeth, Tower Hamlets, Wandsworth, Manchester and Hackney, where 43% of properties in the portfolio are based.



Southwark

Total space	220,000m ²
FTEs supported	4,900
Business rates	£7.8m
GVA supported	£360m



Lambeth

Total space	144,000m ²
FTEs supported	2,900
Business rates	£5.9m
GVA supported	£210m



Tower Hamlets

Total space	85,000m ²
FTEs supported	1,400
Business rates	£3.4m
GVA supported	£120m



Wandsworth

Total space	66,000m ²
FTEs supported	1,100
Business rates	£2.1m
GVA supported	£95m



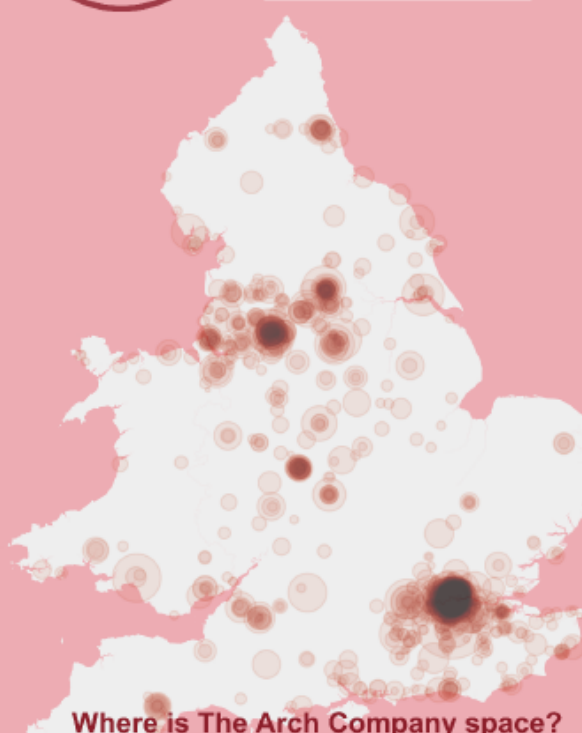
Manchester

Total space	56,000m ²
FTEs supported	600
Business rates	£0.6m
GVA supported	£47m



Hackney

Total space	28,000m ²
FTEs supported	500
Business rates	£1.4m
GVA supported	£39m



Where is The Arch Company space?



1. Executive Summary

- 1.1 This report highlights the significant socio-economic contribution made by businesses in the railway arches. The currently occupied spaces within The Arch Company portfolio are estimated to support 25,600 Full Time Equivalent jobs (FTEs). Organisations in The Arch Company spaces provide key supply chain links for local communities and urban economies, with this having a multiplier impact supporting further indirect jobs. Volterra estimates that this additional activity supports 16,100 FTEs as a result of indirect impacts and a further 1,400 FTEs as a result of induced impacts through worker expenditure. This results in a further 17,500 FTEs supported in addition to those directly based within the portfolio.
- 1.2 Employment by organisations within The Arch Company portfolio support a significant amount of economic activity. Measured in Gross Value Added (GVA) terms, this is estimated to total £2bn each year. When combined with the GVA indirectly supported and induced by these businesses, this figure rises to £3.3bn. If the commercial property occupied within The Arch Company portfolio were a local authority, and the indirect and induced impacts are taken into account, it would rank above 162 of the 375 local authorities in the UK in terms of its economic contribution. The cumulative economic output created by businesses within this large collection of smaller scale properties is a material contribution to the national economy.
- 1.3 The economic activity directly supported by these organisations feeds into tax revenues for Government, estimated to total £590m to £790m annually through income, business and property taxes. This excludes any indirect impacts supported by the supply chains of these organisations. Of this figure, commercial property maintained by The Arch Company is estimated to support £42m annually in business rates payments.
- 1.4 The Arch Company supports a number of impacts that go beyond the direct economic impacts associated with investing in and managing space. By prioritising the refurbishment of existing spaces, particularly underused spaces tailored to small and local businesses, the company not only contributes to the conservation of historical and urban landscapes but also promotes sustainable development and regeneration practices. The wider socio-economic and environmental impacts that benefit local communities include:
- **Supporting the foundational economy** – The foundational economy refers to the concept of the services and goods that are essential to everyday life, and is often linked to concepts such as 15 minute cities, which is the principle that basic amenities should be accessible within 15 minutes for each resident via sustainable transport modes. The Arch Company spaces, which are generally small in size and so disproportionately benefit small businesses, acts to support these concepts by creating spaces for businesses that serve their local communities.
 - **Providing sustainable spaces** – The most sustainable spaces are those that already exist. The retrofit of industrial space by The Arch Company has been estimated to reduce carbon generation by 50% compared to building new industrial space.¹ The refurbished space delivered under the company's ongoing regeneration programme alone would be estimated to save 60m kgCO₂e compared to comparable new developments. This is equivalent to 35,000 times the average yearly emissions per car in the UK, and so would be equivalent to eliminating the carbon footprint of 35,000 cars on the road for a single year.
 - **Providing local employment opportunities** – Skilled trades and machine operative roles provide valuable skills development opportunities. These roles are estimated to be more prevalent in The Arch Company properties than in the general workforce. Businesses in the railway arches also support local employment opportunities; 32% of workers in the portfolio are estimated to live in the same local authority as they work.

¹ Engineering Services Consulting Ltd., 2022. Embodied Carbon Assessment & Benchmarking: New Light Industrial Space.

The socio-economic impact of businesses in the railway arches



- 1.5 Whilst the portfolio's combined economic impact is already significant, it has not yet reached its full economic potential. If all of the portfolio was occupied, this could unlock new spaces that support a further estimated 8,200 direct FTEs, generate £630m of economic activity annually and bring in between £190m and £250m in additional tax revenues each year.
- 1.6 This forms a key expansion programme on the way to fulfilling the portfolio's maximum economic potential, that is estimated to be up to 33,800 FTEs and £2.6bn a year in GVA were all properties to become occupied.

The socio-economic impact of businesses in the railway arches



2. Introduction

2.1 As The Arch Company turns five years old in 2024, this report reflects on the scale of the impact delivered by the businesses in the railway arches. It also demonstrates the role that The Arch Company portfolio can play in delivering further socio-economic impact in the future. Key impacts for The Arch Company are presented for the overall portfolio and for six case study local authorities including Southwark, Lambeth, Tower Hamlets, Wandsworth, Manchester and Hackney.

2.2 This report uses internal data provided by The Arch Company to estimate the socio-economic impact of businesses in the railway arches.² This data is composed of a snapshot of their internal portfolio data, as well as a variety of other internal data sources provided by The Arch Company. Volterra has built on this data to provide estimates of key metrics, such as the number and type of businesses, and the economic impacts of the portfolio. The methodology of estimation is based on a combination of existing research, expertise from Volterra, and the application of industry standards.

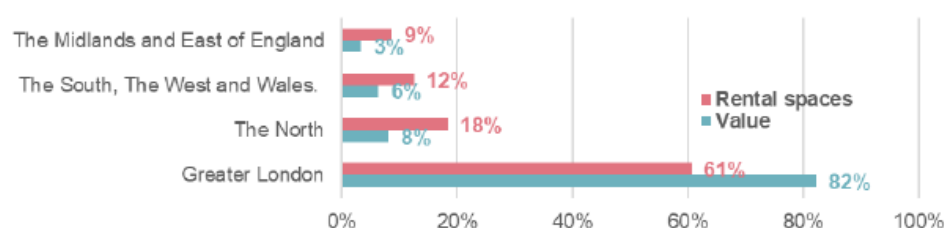
Overview of The Arch Company's portfolio

2.3 The Arch Company is the largest landlord to small businesses in the UK.³ Their 5,300 properties, acquired from Network Rail in 2019, consist of railway arches, and other properties deemed non-essential to the running of the railway system.⁴ Around 70% of these properties are railway arches with the remainder comprising a mixture of former railway buildings and parcels of land. The Arch Company manages these properties, maintaining and leasing them out to a range of customers, most of which are small businesses. Of the 5,300 properties in the portfolio, 3,600 are rented by approximately 3,200 individuals and organisations, with some customers renting multiple spaces.⁵

2.4 Figure 2.1 breaks down the geographical composition of the portfolio, showing the share of properties, referred to as 'Rental Spaces', and overall value in The Arch Company portfolio by region. As shown, 82% of the 'Estimated Rental Value' (ERV) of the portfolio is based in London.

Figure 2.1 – The majority of the portfolio is based in London

Share of portfolio properties and valuation by region.



Source: The Arch Company internal data, 2023

² This data is valid as of August 2023

³ National Audit Office, 2019. Network Rail's Sale of Railway Arches.

⁴ Since 2019, The Arch Company has split some rental spaces into multiple rental spaces to better reflect the nature of the space. For example, Network Rail may previously have had an intermediary landlord in place and therefore counted this as one single rental space. In practice, this may have comprised of multiple spaces with multiple subtenants. This is why the rental space figure has increased from 5,200 in 2019 to 5,300 today.

⁵ Note: The disparity between the number of properties and customers is due to the fact that some customers rent multiple properties.

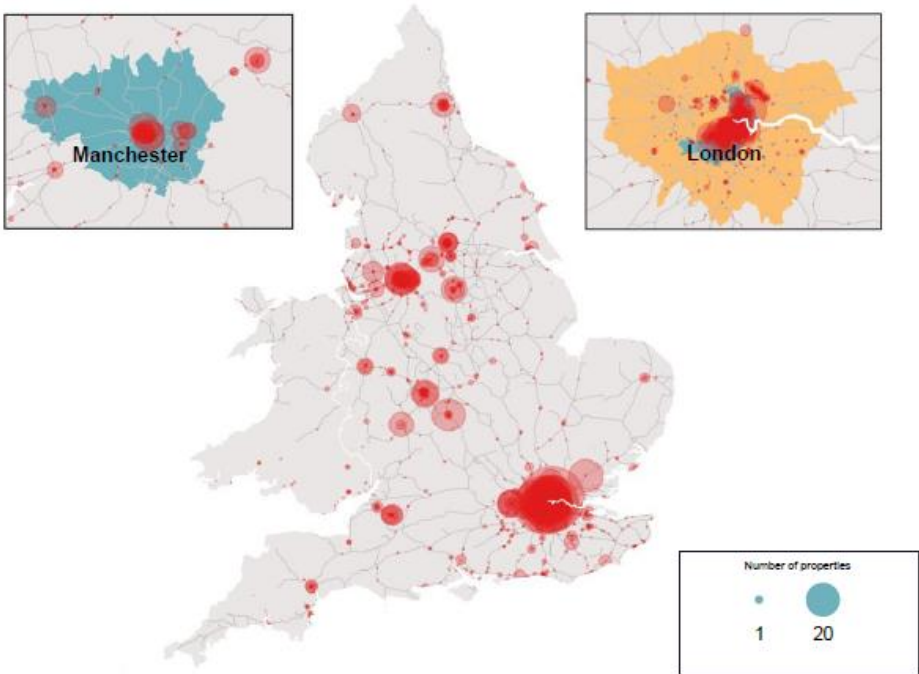
The socio-economic impact of businesses in the railway arches



2.5 Figure 2.2 displays the geographical composition of the portfolio in greater detail, mapping its properties across England and Wales. The composition of the portfolio can be seen to broadly reflect the composition of the railway network, with large clusters in London and the industrial cities of the North West, and more numerous but smaller clusters in the less industrialised South East.

Figure 2.2 – The composition of the portfolio reflects that of the railway network

Location of properties in portfolio. Bubble size represents the number of properties in a given postcode.



Source: The Arch Company internal data, 2023, MapTiler, 2024

2.6 In total, The Arch Company portfolio spans approximately 1.3m m² of gross lettable building space. It also includes more than 21.5m m² of total land, bringing the total space in the portfolio to 22.8 m². 1.3m m² of lettable space is approximately equivalent to the amount of commercial space located in the entire city of Cambridge, which gives an indication of the scale of the portfolio.⁶

2.7 The dominant type of spaces in The Arch Company portfolio are industrial spaces. Parts of the report use a comparison of Arch Company industrial space with general industrial space as the appropriate comparison example, rather than other use types. Throughout this report, industrial spaces are defined as including areas for light industry such as workshops, vehicle servicing and food manufacturing, as well as logistics and storage spaces such as 'final mile' distribution areas.

⁶ VOA, 2023. Non-domestic Rating: Business Floorspace, 2022.

The socio-economic impact of businesses in the railway arches



2.8

Table 2.1 shows the amount of floorspace in The Arch Company portfolio by use class and location.⁷ As previously highlighted, the majority of floorspace is concentrated in London, with industrial being the largest category, closely followed by retail and leisure.⁸

Table 2.1 – Use types include industrial, office, retail and leisure

Floor space by use type and location (gross internal area (GIA) m²)

Use type	London	Other UK	Total
Office space	27,600	15,900	43,500
Retail space	65,700	43,600	109,200
Industrial space	398,500	161,200	559,700
Leisure space	77,500	44,600	122,100
Other/unclassified space	44,200	112,000	156,200
Currently vacant space	193,500	123,400	316,900
Total commercial space	807,000	500,600	1,307,600

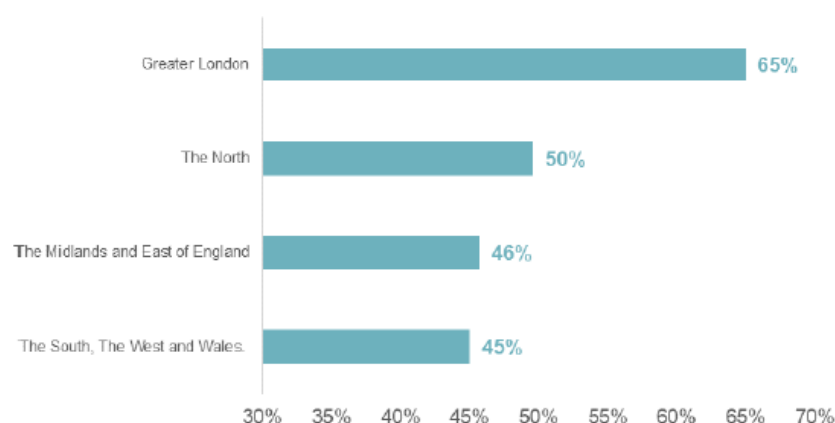
Source: The Arch Company portfolio data. NB: floorspace figures are rounded and do not sum.

2.9

As well as having the largest amount of total floorspace, London also contains the largest share of properties in industrial space, which represents 65% of all occupied units across the region. Figure 2.3 shows the proportion of The Arch Company properties that are used for industrial – including logistics – usage across different regions.

Figure 2.3 – London has the highest proportion of industrial use types

Percentage of rented spaces used for industrial uses by region (%)



Source: The Arch Company internal data, 2023.

⁷ Note: some use types are flexible and use types are not recorded for every rental space. These spaces are recorded as other/unclassified space in the table.

⁸ Note: Figures may not sum due to rounding.

The six case study areas used in this report

2.10 This report presents the key economic impacts of The Arch Company in six case study local authorities. These local authorities represent some of the local authorities with the highest amount of commercial floorspace operated by The Arch Company, together contributing 46% of the total commercial space within The Arch Company portfolio. In order of total rental value, these are Southwark, Lambeth, Tower Hamlets, Wandsworth, Manchester (City of) and Hackney.

2.11 These case study areas are as follows and are mapped in Figure 2.4:

- Southwark
- Lambeth
- Tower Hamlets
- Wandsworth
- Manchester (City of)
- Hackney

Figure 2.4 The six case study areas used in this report



3. Spaces for small businesses

- 3.1 One of the largest benefits of The Arch Company's operations is its contribution to meeting the need that small businesses have in finding suitable lettable space. By creating spaces for these small businesses, The Arch Company's operations play an important role within local and regional economies, as well as the national economy. This section explains how.

The importance of small businesses as a driver for growth

- 3.2 Small businesses are the backbone of the UK economy. Small and medium-sized enterprises (SMEs),⁹ constitute 99.9% of all UK businesses and are responsible for 60% of private sector employment. Small businesses form an important component of local economies. For every £1 spent with a small or medium-sized business (SME), 63p is re-spent in the local area compared to 40p in every £1 spent with a larger business.¹⁰
- 3.3 New and small businesses are vital for a growing economy. Small businesses account for a disproportionately large share of new jobs created in most major economies in the 21st century.¹¹ These firms are also disproportionately responsible for developing new services and products within markets and delivering innovation.¹²
- 3.4 Put simply, without the freedom for new and small businesses to grow, it would not be possible to deliver the jobs and economic opportunities needed for the growth of the UK's economy. This is acknowledged across UK Government in strategy.¹³ The Labour party's Plan for Small Business (2023) states that *"it is no exaggeration to say that without a diverse and thriving ecosystem of small businesses our country would not just be poorer, but the communities we live in would be as well"*.¹⁴
- 3.5 Beyond their role as key suppliers to the UK, small businesses are in part responsible for the future direction of its growth. One of the most significant trends affecting the UK economy is the 'productivity puzzle', which is the term used to describe the decline in the growth of output per worker, or productivity. Since 2010, the UK has seen marginal to no growth in the productivity of its workers. Had the productivity of UK workers followed the trend seen in the 00s, output per worker would now be 16% higher than it currently is.¹⁵ This trend is seen internationally but is particularly evident in the UK. Increasing output per worker to German levels would, for example, boost UK GDP by almost £200bn each year.¹⁶
- 3.6 One of the most popular current explanations of why the puzzle is so severe in the UK is referred to as the 'long-tail' of productivity for UK businesses. In the UK, the gap between the top performing and bottom performing businesses is significantly larger than that of other countries and is growing.¹⁷ Smaller spaces for start-ups and scale-ups are required to enable new business formation and survival, that can help to tackle the UK economy's productivity issues.

Space as a barrier to growth

- 3.7 New and small businesses need space and facilities to grow. The absence of viable and affordable commercial space is listed as one of the key barriers preventing growth by small businesses. The Small Business Survey (2022) shows 20% of UK small businesses report the availability and cost of finding

⁹ Less than 250 employees.

¹⁰ FSB and the Centre for Local Economic Strategies, 2013. *Local Procurement – making the most of small businesses one year on*

¹¹ OECD, 2015. *Young SMEs, Growth and Job Creation*

¹² Enterprise Research Centre, 2020. *The Role of Innovation in Small Business Performance: A Regional Perspective*

¹³ Department for Education, 2022. *Action Plan: Small and Medium Sized Enterprises*

¹⁴ UK Labour, 2023. *The Beating Heart of Our Economy: Plan for Small Business*

¹⁵ MakeUK, 2022. *The UK's Productivity Puzzle - what's the deal*

¹⁶ PwC, 2019. *The Productivity Puzzle Revisited*

¹⁷ A. Haldane, 2018. *The UK's Productivity Problem: Hub No Spokes*

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premises as a major obstacle to the success of their business.¹⁸ This has risen from 12% in 2020 and does not reflect the countless number of small businesses and organisations that cannot locate suitable workspaces.

3.8 High levels of demand acts to push up the rents for commercial properties, and so can act as a deterrent to start-ups who may not be able to compete financially with larger or older businesses.¹⁹ Such conditions can act as a deterrent against the formation of new businesses and undermine long-term economic growth.

3.9 This deterrence can be seen clearly in the five London-based case study areas, where the rate at which new businesses are created per 100,000 population of 834 was lower than the London-wide figure of 867. This figure falls to 657 further if Hackney, which performs well in terms of business starts, is excluded.²⁰ The importance of sufficient space to facilitate business start-ups and survival cannot be understated. This is particularly the case for industrial space in London, which is discussed in the next chapter.

Railway arches act as engines for growth

3.10 As the largest landlord to small businesses in the UK, The Arch Company's portfolio plays a vital role in ensuring that small businesses have access to the facilities they need to start-up and scale-up. The Arch Company portfolio provides a range of options for the types and characteristics of spaces required by businesses and organisations. These range from highly affordable spaces tailored towards storage and industrial businesses (such as the properties on Randolph Street in Camden, outside London's core), to relatively more high-end spaces that attract higher footfalls and cost relatively more (such as the Findlater's Corner property outside London Bridge station, which was unoccupied for several years prior to investment by The Arch Company through its capital regeneration programme).

3.11 A significant proportion of the portfolio is based in areas where start-ups may face barriers to the commercial property market. The portfolio's strengths of accessibility, price, and size acts to support start-ups in those areas. Due to its proximity to major transport hubs and high level of accessibility, a significant proportion of properties in The Arch Company portfolio are in areas that face high demand for commercial space. The five London-based case study areas, for example, contain 39.6% of all commercial space within the portfolio and all lie within Inner London, which faces high demand for such space.

3.12 The range of options within The Arch Company portfolio ensures that organisations can occupy space that is affordable for their given budget and provides value for money. When choosing a commercial property to rent, businesses must weigh up a number of different factors, such as affordability, size and location. This section provides benchmarks for how the range of properties within The Arch Company portfolio perform on these factors.

Affordability

3.13 Arch spaces provide value for money for small businesses and organisations that would otherwise be unable to access commercial spaces. Commercial space is affordable where it is cost effective considering its type and location. Retail space with relatively high footfalls is often more expensive than larger industrial space that does not have the same requirement for footfall. Comparing the affordability of property requires consideration of these factors to provide a like-for-like comparison.

3.14 Focusing on industrial property only (the dominant type of The Arch Company's space), Figure 3.1 compares the estimated average rental rate in spaces operated by The Arch Company to all industrial

¹⁸ Department for Business & Trade, 2023. *Longitudinal Small Business Survey 2022*.

¹⁹ Chamber of Business, 2023. *What is the Long-Term Impact of Rising Rent Costs for Business in the UK?*. Available at: <https://www.chamberofbusiness.co.uk/articles/what-is-the-long-term-impact-of-rising-rent-costs-for-business-in-the-uk/>

²⁰ ONS, 2022. *Business Demography*.

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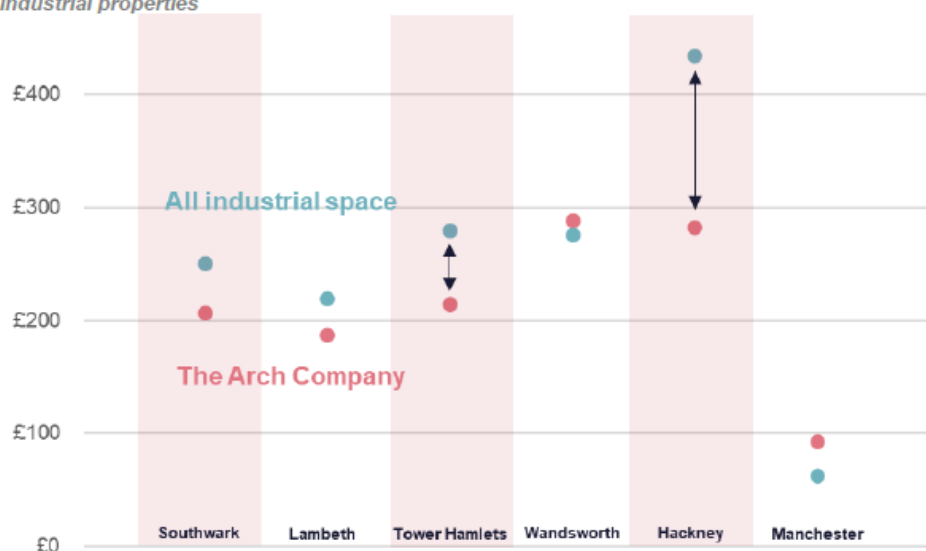


properties within each of the six case study local authorities (including The Arch Company space) referred to throughout this report. In four of these six local authorities, The Arch Company makes up more than one third of all industrial property listings in the area.

- 3.15 Affordability figures are estimated using data from the Valuation Office Agency (VOA). Where possible, properties from the portfolio are matched against the VOA's valuation list, and the portfolio estimated rental value (ERV) is compared against the VOA's rateable value estimate. The ratio between the two is then applied to the unmatched properties in the portfolio to estimate what their VOA rateable value would be, allowing comparisons between the two groups to be made.
- 3.16 The results of this exercise show that, even without considering further characteristics that often make The Arch Company space more attractive (such as smaller footprints and highly urban locations), The Arch Company's industrial space is often more affordable. In Southwark, Lambeth, and Tower Hamlets, the local authorities with the greatest number of The Arch Company properties, industrial properties in the portfolio have a lower median ERV per m² than their local counterparts. Likewise, properties in the portfolio perform similarly well against other properties in Hackney.
- 3.17 In Wandsworth and Manchester, industrial space in The Arch Company portfolio is marginally less affordable than average. In Wandsworth, this is largely because The Arch Company spaces are mainly clustered around Battersea, one of the most expensive areas for property in the borough and in one of the most central clusters of manufacturing, storage and distribution activity.

Figure 3.1- On average, The Arch Company industrial properties are more affordable in 4 of the 6 local authority case study areas

Median estimated rental value per m² of The Arch Company industrial properties and all local industrial properties



Volterra estimates using: VOA, 2023. Non-Domestic Floorspace: Stock of Properties Including Business Floorspace, and data provided by The Arch Company.

- 3.18 Demand for railway arch spaces has increased significantly over the last twenty years with a corresponding rise in market rents. The Arch Company is a commercial landlord that takes affordability into account when determining rents with established customers. At the point of contractual rent reviews or lease expiry,

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customers may have access to a stepped rent deal if they can demonstrate that they might otherwise struggle to adjust to changes in market rent.

3.19 These agreements help ensure that short-term shocks to an organisation's finances do not affect their ability to continue to lease the space and facilities they need by providing gradual 'steps' in rent over time to market rates. Over the past two financial years, The Arch Company estimates it has contributed more than £1.5m in rents to the businesses and organisations that need them most through these agreements.

3.20 The commitment to ensuring that businesses and organisations are less affected by financial shocks is reflected in The Arch Company's approach to the pandemic. Just over one year into the company's acquisition of properties from Network Rail, the pandemic caused significant financial issues for occupants of spaces. The Arch Company responded to these pressures by providing 1,550 customers with three months' rent free as part of an £12m Hardship Fund.

Size

3.21 The spaces maintained by The Arch Company are predominantly small units. More than 90% of spaces in the portfolio are less than 5,000ft²,²¹ the smallest amount of space needed under current guidance for a small company with 50 workers.²² These smaller spaces disproportionately cater for the needs of small businesses.

3.22 An industrial micro-business, for example, would typically employ 1 – 10 people, and so would require on average between 36m² and 360m² of floor space;²³ 77% of industrial properties in The Arch Company portfolio meet this criteria in Inner London, whilst just 46% of all industrial properties in the same geography do so.²⁴ Likewise, 88% of The Arch Company industrial properties in Outer London meet this criteria, compared to just 51% for all industrial properties in the area.

3.23 The average commercial space in The Arch Company portfolio is 247m², with the average industrial space being 244m². Under current standards for the average amount of space occupied per worker, an industrial space of 244m² would support approximately 7 workers onsite.²⁵ The figure below shows the distribution of the sizes of these properties.

²¹ This statistic uses GIA as the basis of analysis.

²² 100ft² per employee is generally considered the minimum within office workspaces. Other types of uses requiring machinery, retail space, storage, etc would require larger spaces. See Eptura, 2023. *How Much Space Do You Need per Employee?*

²³ Using the employment density for the B2 – General Industrial use class.

²⁴ VOA, 2023. *Summary valuations: non-domestic rating list entries 2023*

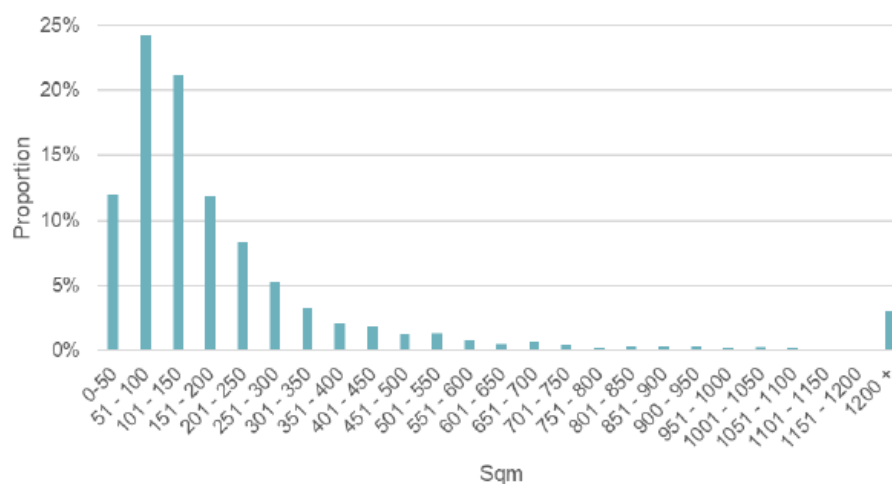
²⁵ Current national estimates from the HCA, 2015. *Employment Density Guide*, and London-based estimates from the CAG Consultants, 2021. *London Sites Database*, both put the average amount of occupied space per worker in B2 or light industrial space (not including warehousing, storage, etc) at 36m² per full-time worker. 244m² / 36m² per worker = 6.8 full-time workers.

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Figure 3.2 – The majority of The Arch Company properties have less than 200m² of total space

Number of rental units within size bands across the portfolio (% of units)



Source: The Arch Company portfolio data, 2023

3.24

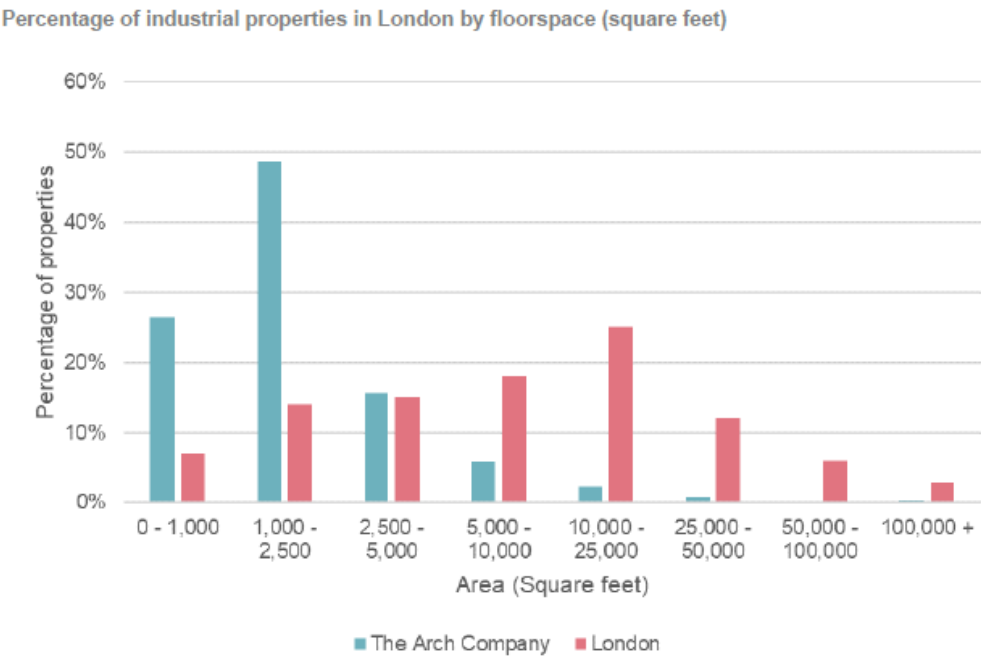
Figure 3.3 shows the proportion of industrial properties in each size range for the portfolio and London. London has a fairly uniform distribution of sizes, whilst properties in the wider portfolio are heavily weighted towards the smaller size categories. The differences in the larger categories are stark, 25% of London industrial properties are in the 10,000 to 25,000 square foot range (929m² to 2,322m²),²⁶ for example, compared to just 3% of industrial properties in The Arch Company portfolio. 75% of The Arch Company portfolio is in the smallest two size categories, compared to just 21% across London. This highlights how The Arch Company properties are likely better suited to smaller businesses.

²⁶ Equivalent to the 930 – 2300m² range

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Figure 3.3 -- The portfolio has a far greater proportion of small properties than London, using industrial properties in London as the use type to compare



Source: GLA, 2020. London Industrial Land Supply Study 2020. The Arch Company internal data, 2023.

Location

- 3.25

The historical context of the portfolio gives it a number of unique qualities that differentiate it from other commercial spaces. The Arch Company spaces are predominantly small archways running along railway lines into economic centres. The location of properties in the portfolio therefore aligns closely with major railway hubs, and so a significant portion of them are based in densely populated and highly developed areas that are also well connected to the road network.
- 3.26

Figure 3.4 quantifies this factor, measuring the accessibility of industrial properties in the portfolio against other industrial properties in their respective local areas. Each property is assigned to an 'Accessibility Decile' based on the quantity of employment accessible within a 60-minute commute from the property,²⁷ with a value of 10 indicating that the property is within the top 10% most accessible industrial properties in the area, and 1 indicating it is in the bottom 10%. The mean 'Accessibility Decile' is then calculated for properties in the portfolio and properties not in the portfolio. The Arch Company properties outperform other properties on this measure in four of the six case study areas.

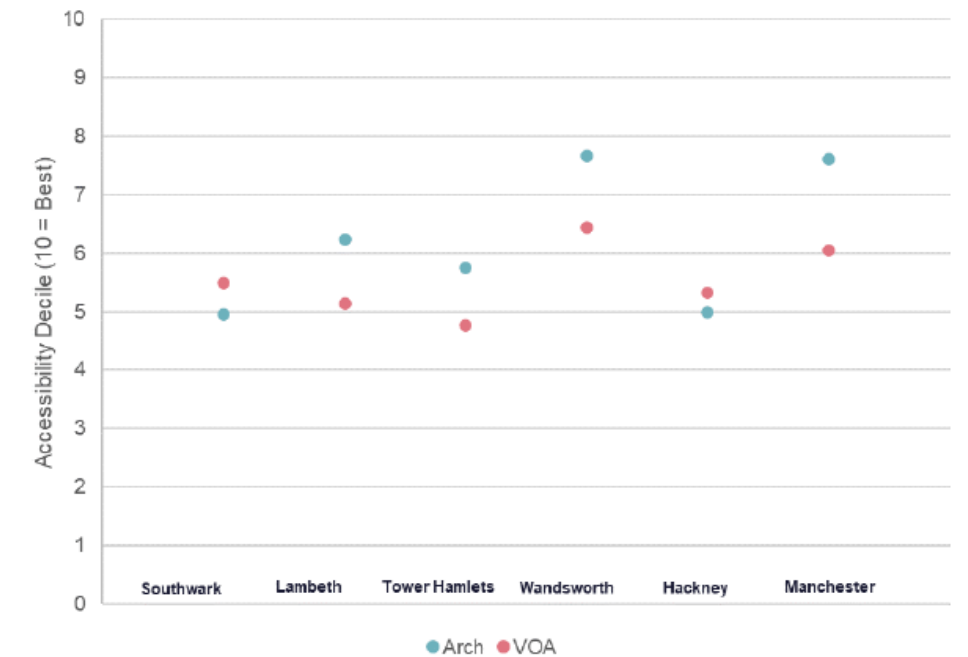
²⁷ Data on the amount of employment accessible within 60 minutes is taken from Torres and Arther, 2024. Public transport accessibility indicators to urban and regional services in Great Britain.

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Figure 3.4 – Industrial property in The Arch Company portfolio is more accessible than overall industrial space in four of the six case study areas

Average level of accessibility for industrial property within The Arch Company portfolio and total by borough



Source: Volterra estimates, 2023. The Arch Company internal data, 2023. VOA, 2023. and Torres an Arthur (2024).

3.27

These areas, generally characterised by high footfall and good transport links, may usually be prohibitively expensive for many small and micro businesses to rent in. The Arch Company acts as a gateway into these prime areas for many small and micro businesses, allowing them to participate in the local economy and strengthen the resilience of the local supply chain.

4. Industrial space in London

- 4.1 A key way that the portfolio addresses constraints in the commercial property market is through industrial space, which is the dominant type of space within the portfolio, comprising approximately 51% of total commercial space and 55% of rental value.²⁸ Industrial space has remained the dominant type of space since the acquisition of the portfolio from Network Rail, with The Arch Company continuing to support a wide range of businesses and organisations.

Pressures on industrial space in London

- 4.2 In recent years, the amount of industrial space in urban areas has fallen significantly across the UK, largely because of conversion to housing.²⁹ In London, the amount of land in industrial use has fallen from approximately 8,250ha in 2001 to 6,900ha in 2020, with this decline occurring faster in inner London (inner London saw a 36% decline in space compared to an overall 18% fall). This decline is predicted to continue in future years.³⁰
- 4.3 The declining stock for industrial space aligns with a period of rising demand. The growth of e-commerce and last-mile logistics has meant that industrial space near consumers and businesses is increasingly highly sought after. Some estimates suggest that already in the UK, more than 500 football pitches worth of last-mile space is required to serve this demand, and this figure is growing rapidly.³¹ This last-mile delivery space is crucial to ensuring local economy principles, particularly in the supply chain, are still applied in urban centres, with this type of space being used by businesses across a wide range of industries that support the urban economy.
- 4.4 Industrial businesses and industries are crucial to sustaining economies and communities, enabling businesses to meet their supply chain requirements and providing jobs for local residents. However, the cost and availability of industrial space continues to be a barrier to business activity. This is particularly true in urban areas where industrial land faces increasing conversion pressures.
- 4.5 In urban areas in particular, industrial and logistics space is being lost at a rapid rate. In London, the city lost 26% of its industrial floorspace to other uses between 2001 and 2023.³² Similar declines can be seen in each of the largest urban centres in which The Arch Company operate: in Manchester 34% of the city's industrial floorspace has been lost. In the central areas of cities and towns, this figure is even higher.

²⁸ Of the properties used for commercial purposes, excluding car parks, residential properties, and properties for which the use class is not recorded. 'Industrial' encompasses general and light industry, storage & distribution, and vehicle repair and servicing.

²⁹ Centre for London, 2022. *Making Space: Accommodating London's Industrial Future*.

³⁰ Greater London Authority, 2023. *London Industrial Land Supply Study 2020*.

³¹ Knight Frank, 2021. *How much space is needed to service the last-mile and where is consumer demand greatest?*

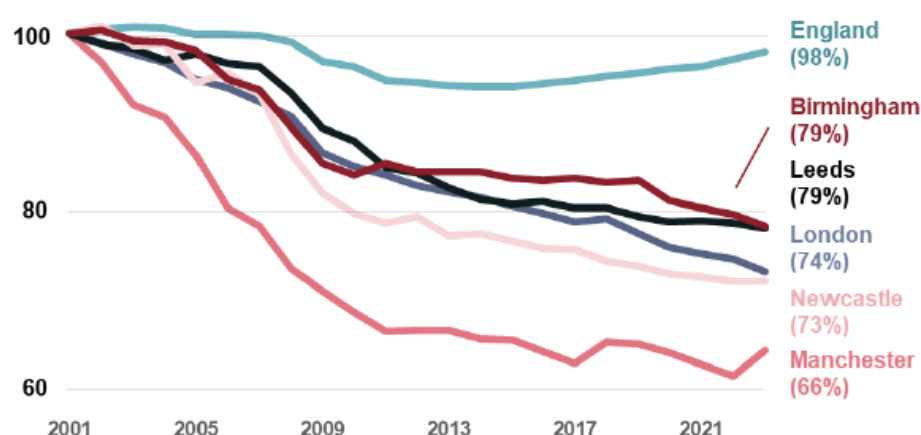
³² Centre for London, 2022. *Making Space: Accommodating London's Industrial Future*.

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Figure 4.1 – The amount of industrial space has been declining across urban centres and nationally

Index of amount of industrial floorspace by geography (2001 = 100)



Source: Valuation Office Agency, 2023. Non-domestic Rating: Business Floorspace 2023

- 4.6 The loss of urban industrial floorspace has occurred despite significant and growing demand for industrial space. Whilst London lost 26% of its industrial floorspace, the vacancy rate for floorspace dropped from 16% in 2001 to 4% in 2021. The data recording this shift is most widely available for London, but similar trends are happening across the UK's urban areas. Such low vacancy rates undermine the healthy functioning of the sector. The lack of industrial floorspace prevents businesses from creating jobs and meeting the needs of residents and businesses.

Arches as spaces for light industry

- 4.7 Within London, The Arch Company portfolio contains more industrial space than has been delivered by new industrial development across London over the last 10 years for which data are available.³³ The high volume of commercial space provided by The Arch Company is true across all sectors, with the portfolio providing more commercial floorspace than 11 of the 33 individual London boroughs.³⁴ This becomes even more pronounced when looking at industrial space, where the amount in the portfolio is greater than the amount in 14 of the 33 individual London boroughs.³⁵
- 4.8 The role of the portfolio in supporting businesses can also be seen through the lens of industrial space. Industrial space (including manufacturing, logistics and storage space) is a vital piece of infrastructure to support the national economy. It supports millions of the UK's jobs, approximately 14% of the country's economic output (£232bn in 2021),³⁶ and many of the inputs and products needed for the functioning of the economy and our everyday lives.

³³ The GLA, 2021. London Development Database records a total completion of 496,000m² of B2 floorspace over the period FY2009-FY2019.

³⁴ VOA, 2023. Non-Domestic Floorspace: Stock of Properties Including Business Floorspace

³⁵ VOA, 2023. Non-Domestic Floorspace: Stock of Properties Including Business Floorspace

³⁶ NLA, 2023. Industrial & Logistics: Can London Deliver?

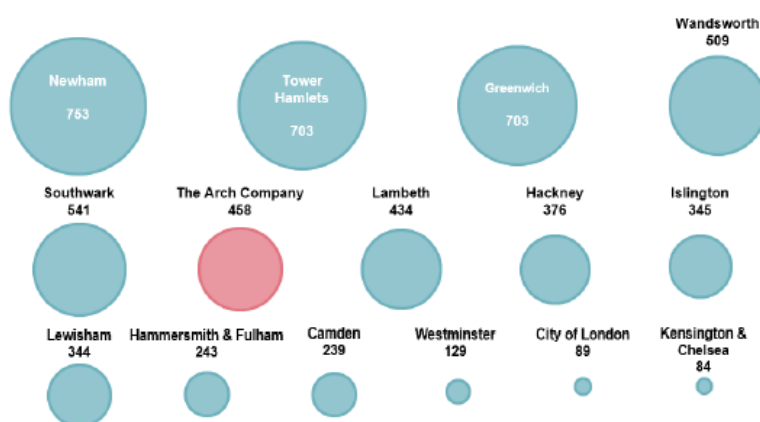
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- 4.9 Arches play an important role in supporting smaller manufacturing and craft businesses, who are often highly specialised in what they do. They play an important part within wider supply chains, for example food production and distribution where proximity to local restaurants and retailers is crucial. The Arch Company spaces can promote the clustering of businesses, a phenomena whereby businesses group near to one another, drawing from common talent pools and collaborating with each other. This can have particularly large benefits for SMEs, leading to higher survival rates, increased innovation, and improved productivity.³⁷ Indeed, there is evidence of this occurring organically within The Arch Company portfolio, such as the clusters of breweries in Bermondsey and taxi repair and servicing businesses in Bethnal Green.
- 4.10 Within London, the industrial space within The Arch Company portfolio is vital for the capital to meet its required provision of space. The Arch Company portfolio contains more industrial space than has been delivered in new development across London over the last 10 years for which data are available.³⁸ As of 2023, there is more industrial space supported by The Arch Company in London than there is in 14 of the 33 London boroughs.³⁹ This comparison becomes more pronounced when only Inner London boroughs are considered, with The Arch Company portfolio containing more industrial space than 9 of the 14 Inner London boroughs. Note that when looking at commercial space as a whole (across all use types), the Arch Company's total portfolio is larger than 11 London boroughs, still a substantial relative quantum. Given the focus of the company on smaller flexible spaces in the heart of urban areas, this space supports many of the capital's small and growing industrial businesses.

Figure 4.2 – There is more industrial space in The Arch Company portfolio in London than in the entirety of many London boroughs

Amount of industrial floorspace by inner London borough and The Arch Company (2022 000s m²)



Source: The Arch Company internal data, 2023. VOA, 2023. Non-Domestic Floorspace: Stock of Properties Including Business Floorspace. NB: Space within The Arch Company portfolio is excluded from borough totals.

³⁷ JP Morgan and Chase, 2014. *The Missing Link: Clusters, Small Business Growth and Vibrant Urban Economies*

³⁸ The GLA, 2021. London Development Database records a total completion of 496,000m² of B2 floorspace over the period FY2009-FY2019.

³⁹ VOA, 2023. Non-Domestic Floorspace: Stock of Properties Including Business Floorspace

5. Economic impact assessment

5.1 The businesses and organisations located in spaces managed by The Arch Company support a range of economic impacts. This section groups these impacts into:

- The 'direct' impacts within the commercial spaces themselves, such as the number of jobs supported, the corresponding economic activity, and the tax revenues this activity generates; and
- The 'indirect and induced' impacts delivered elsewhere as a result of their operations in property managed by The Arch Company, such as the local spending by workers and supply chain impacts.

Direct economic impacts

Employment

5.2 The Arch Company portfolio provides space that in turn supports employment by businesses and organisations who use that space. The exact level of employment within the spaces operated by The Arch Company is not accurately known, and likely changes daily based on the working patterns of occupants. However, this section estimates employment by applying industry average employment densities split by the use type of space.

5.3 Industry standard measures of the average density of workers supported per area of floorspace are applied to occupied space to calculate the number of FTEs within each space.⁴⁰ These figures are then converted into an estimated number of jobs (accounting for the fact that some workers work part-time) using industry averages for the level of part-time working.⁴¹ This estimation process is repeated across each property in the portfolio to provide high level estimations of overall employment.

The total quantity of employment supported by the portfolio is presented in Table 5.1. As shown, the businesses and organisations currently operating in The Arch Company portfolio are estimated to support 25,600 FTEs, or 30,300 jobs once accounting for part-time working patterns. For reference, this is roughly equivalent to the total number of people employed across Europe by the company Shell, the largest company registered in the UK.⁴² Table 5.1 also breaks down the 25,600 figure into broad groups, showing that the largest source of jobs is from industrial uses, a grouping that incorporates manufacturing, food and beverage production, and motor vehicle service and repair, amongst other industries. This category is closely followed by retail and leisure uses.

Table 5.1 – The largest share of FTEs supported is in industrial uses

Estimated FTEs supported in The Arch Company portfolio by use type

Use class	FTEs supported
Industrial	12,100
Retail	5,200
Leisure	4,300

⁴⁰ For each space in The Arch Company portfolio, an estimated use class (retail and F&B, office, light industrial, general industrial, storage and distribution, and leisure) is applied based on the anticipated usage of the space, and then the employment density for the relevant use class is taken from the standards in Homes & Communities Agency, 2015. *Employment Density Guide* and CAG Consultants, 2022. *London Employment Sites Database 2021*.

⁴¹ Assuming 2 part-time employees = 1 FTE, then the density ratio is multiplied by $((1-(PT/2))/1)$, where PT is the share of part-time workers in an industry.

⁴² As of 2022, Shell PLC reports employing 30,000 workers in Europe. See Shell, 2023. *Annual Report and Accounts 2022*.

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Use class	FTEs supported
Office	4,000
Total (current occupation)	25,600
Total (if all spaces occupied)	33,800

Source: The Arch Company internal data, 2023. Volterra estimates, 2023. NB: jobs figures are rounded and do not sum to total

Economic activity

- 5.4 The employment supported by businesses and organisations in the portfolio deliver economic output. This contribution is commonly measured through the Gross Value Added (GVA) of the output delivered by these organisations, defined as the additional economic value created by these organisations.
- 5.5 To measure the economic activity of the businesses and organisations in the portfolio, assumptions are obtained based on the average level of activity supported by each worker within a given industry and area of the country. Through this methodology, the activity currently supported within The Arch Company portfolio is estimated to total £2bn in GVA terms each year, with £1.4bn of this figure falling within London.
- 5.6 In Southwark, it is estimated that approximately £1 of every £70 of economic activity generated in the borough (1.6%) is through an organisation located within one The Arch Company's spaces.⁴³

Tax revenues

- 5.7 The economic activity supported by the portfolio acts to generate tax revenues for local and national government. By comparing national statistics on GVA in the years 2001 to 2021 with public sector receipts in each year, it can be shown that tax revenues typically account for between 30% and 40% of GVA, through business rates, value-added tax (VAT), corporate, and income tax (among other smaller taxes).⁴⁴ Applying these benchmark figures to the GVA generated by businesses within The Arch Company portfolio, it is estimated that currently occupied spaces in the portfolio support between £590m and £790m in tax revenues for the UK government each year.
- 5.8 Locally, the direct contribution of The Arch Company portfolio can be felt through its generation of business rates payments for local authorities. Using estimates of the level of business rates payments for local spaces,⁴⁵ The Arch Company portfolio is estimated to generate £42m of business rates payments each year. £21m of this figure is estimated to be generated in the six local authorities of Southwark, Lambeth, Tower Hamlets, Wandsworth, Manchester and Hackney, with £6.8m of this figure being retained by local authorities. Table 5.2 breaks down these figures for each of the six case study areas, presenting the retained business rates and contribution to the local authority's budget for each area.

⁴³ Estimated GVA supported in The Arch Company space in Southwark totals £320m per year, with Southwark recording a total GVA of £22bn in 2022 in ONS, 2024. Regional GVA by Industry and Local Authority

⁴⁴ ONS, 2023. Public sector finances and ONS, 2023. Regional gross value added (income approach). For an example of the application of this assumption, see DfT WebTAG (2022) guidance for the appraisal of transport interventions.

⁴⁵ And after accounting for the business rates discounts given to small businesses and charitable organisations.

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Table 5.2 – Estimated business rates generated each year by property within The Arch Company portfolio compared to total spending power of local authorities

Local Authority	Business rates generated by the portfolio	Business rates retained by local authority	Retained business rates as a % of local authority core spending power
Southwark	£7.8m	£2.3m	0.6%
Lambeth	£5.9m	£1.8m	0.5%
Tower Hamlets	£3.4m	£1.0m	0.3%
Wandsworth	£2.1m	£0.6m	0.3%
Manchester	£0.6m	£0.6m	0.1%
Hackney	£1.4m	£0.4m	0.1%

Source: Volterra estimates, 2023; Department for Levelling up, Housing and Communities, 2022. Core spending power: provisional local government finance settlement 2023 to 2024.

Indirect and induced economic effects

Note on methodology

It should be noted that gross, and not net, impacts are presented in this section as displacement is not considered within this study. In other words, the calculations in this section do not account for the likelihood that economic activity directly supported by The Arch Company would displace economic activity elsewhere to some degree. Displacement is not considered as the wide range of types and locations of businesses within The Arch Company portfolio make it difficult to accurately determine the level of displacement across the portfolio. The displacement rate will also vary dependent on the geography or study area being assessed.

Worker expenditure

- 5.9 Indirect and induced effects result from the knock-on activities of the organisations located in The Arch Company portfolio off-site. The most common framework for understanding these effects groups them into supply chain (or indirect) effects, associated with the products bought and businesses supported by The Arch Company occupants, and income and expenditure (or induced) effects, associated with the increased income and expenditure of workers.
- 5.10 Worker expenditure is often one of the most significant impacts of development and economic activity for local communities. In general, worker expenditure is spent in proximity to places of work, and therefore has impacts within the local economy.
- 5.11 A recent GLA study estimated that office workers in London spent on average £13 a day in the local area around their place of work.⁴⁶ By adjusting this figure for the differences in pay between industries and regions, and applying it to the direct jobs supported within The Arch Company Portfolio, it is estimated that the 25,600 FTEs currently estimated to be located in The Arch Company spaces would support a total of £47.4m in worker expenditure each year in the local areas surrounding their places of work.

⁴⁶ GLA, 2021. *Lost worker vs. tourism expenditure in the Central Activities Zone (CAZ) during the COVID-19 Pandemic*

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Supply chain and multiplier impacts

- 5.12 The Arch Company portfolio indirectly supports employment through its interactions with supply chains. Businesses operating at The Arch Company properties support employment in their respective supply chains by buying supplies, employing business services, or providing goods upon which other businesses rely.
- 5.13 The 'multiplier' measures the magnitude of this supply chain effect, providing an estimation of how many additional jobs are supported by a job in a given industry. For example, the manufacture of motor vehicles, which requires a large number of specialised parts and equipment, has a high multiplier. Conversely, veterinary services, whilst important, do not require large-scale supply chains and logistics and so has a low multiplier.
- 5.14 In this report we combine existing ONS national multiplier estimates for industrial classifications with workspace and employment data to estimate the multiplier for each category of job supported by the portfolio.⁴⁷ These multipliers are then applied to the number of FTEs supported by industry to estimate the indirect FTEs associated with the portfolio.
- 5.15 In addition to the number of workers generated by activity within the supply chain of organisations in The Arch Company portfolio (indirect employment generation), The Arch Company would support additional employment through the spending by workers located in The Arch Company spaces. Taking the total of £47.4m spent by workers locally each year, it is possible to estimate approximately how many jobs this would deliver in addition to those supported by the supply chains of organisations within The Arch Company portfolio.
- 5.16 The supply chain impacts of the currently operating companies in The Arch Company spaces are estimated to indirectly support a further 16,100 FTEs, and worker expenditure is expected to support a further 1,400 FTEs on top of this figure. This creates a combined figure of a further 17,500 FTEs supported in addition to those directly based within the portfolio. By analysing the composition of each industry's supply chain in conjunction with industry standard multipliers, it is estimated that the indirect and induced FTEs generate £1.3bn of GVA. When combined with the current GVA that is directly supported by the portfolio, the total GVA associated with the portfolio is £3.3bn. If the commercial property occupied within The Arch Company portfolio were a local authority, and these indirect and induced impacts are taken into account, it would rank above 162 of the 375 local authorities in the UK in terms of its economic contribution.

Economic impact within six case study areas

- 5.17 This report presents the key economic impacts of The Arch Company in six case study local authorities of Southwark, Lambeth, Tower Hamlets, Wandsworth, Manchester, and Hackney. These local authorities represent some of the local authorities with the highest amount of commercial floorspace operated by The Arch Company, together amounting to 46% of the total commercial space within The Arch Company portfolio.
- 5.18 As shown in Table 5.3 below, The Arch Company space supports an estimated 4,900 FTEs within the borough of Southwark alone. Taking these six areas in combination, The Arch Company portfolio supports over £870m in economic activity (as measured through GVA) every year.

⁴⁷ Multiplier impacts taken from ONS, 2023. FTE multipliers and effects, reference year 2019

The socio-economic impact of businesses in the railway arches

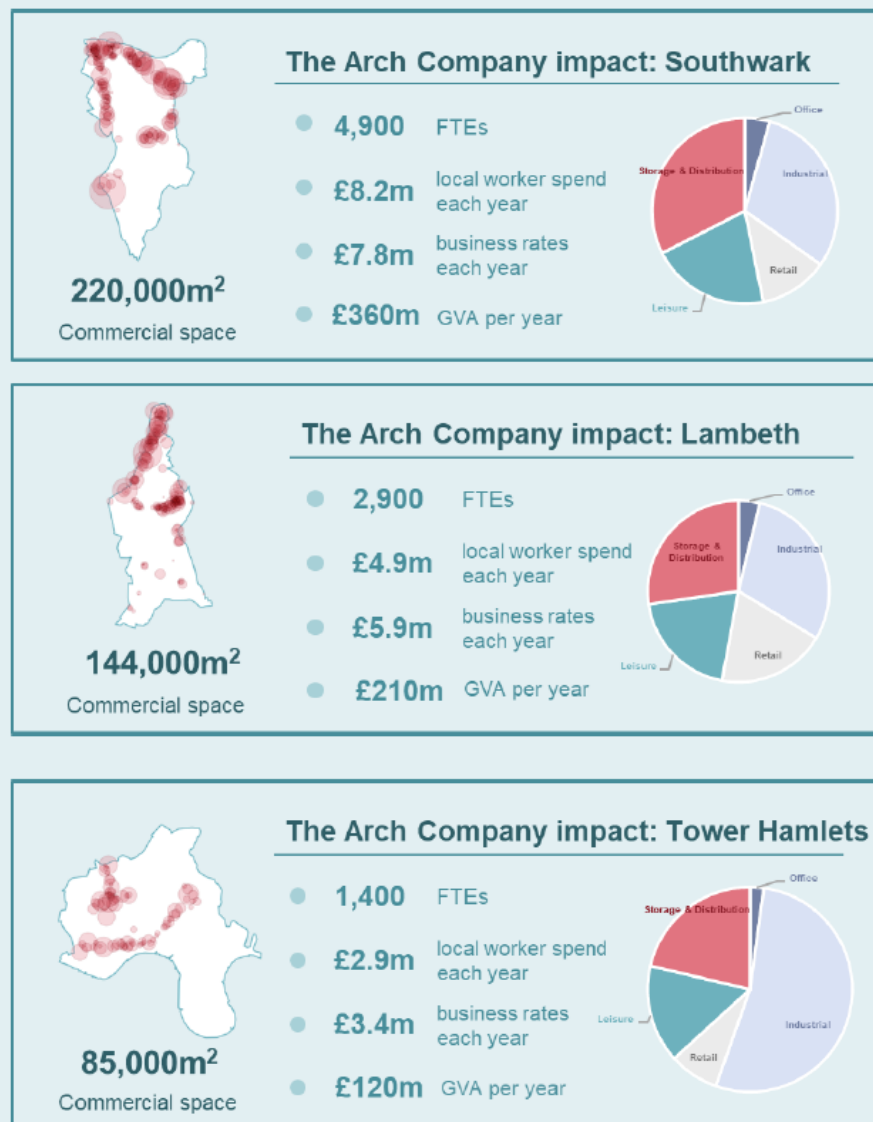


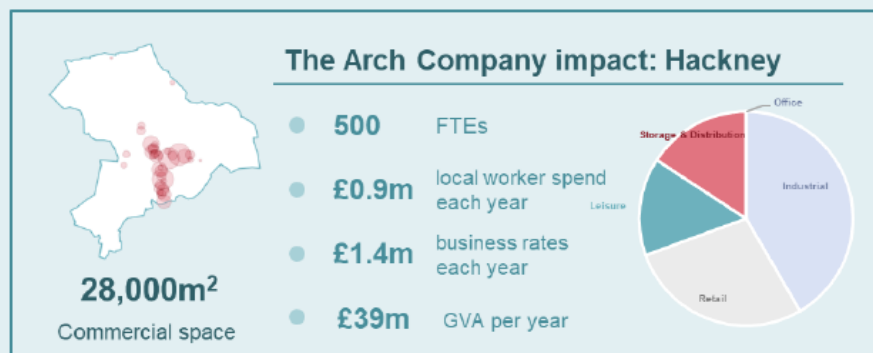
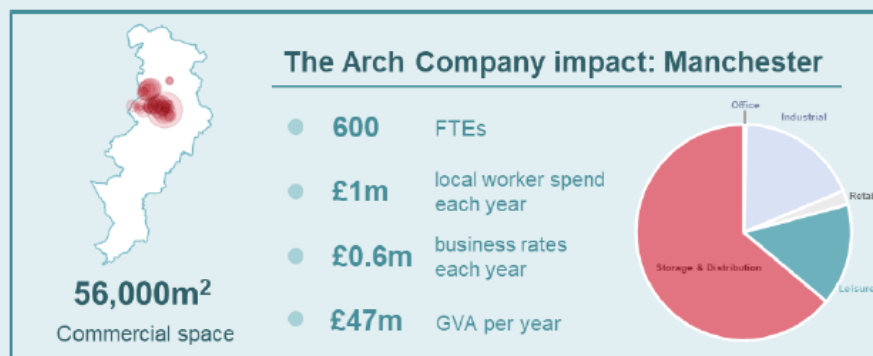
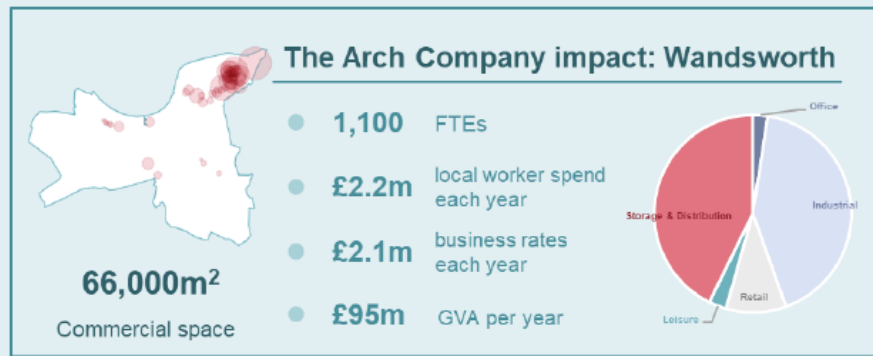
Table 5.3 – Summary of the economic impact within the six case study local authorities

Local authority	Total commercial space	FTEs supported	Business rates payments	Economic activity supported (direct GVA)
Southwark	220,000	4,900	£7.8m	£360m
Lambeth	144,000	2,900	£5.9m	£210m
Tower Hamlets	85,000	1,400	£3.4m	£120m
Wandsworth	66,000	1,100	£2.1m	£95m
Manchester	56,000	600	£0.6m	£47m
Hackney	28,000	500	£1.4m	£39m

Source: Volterra estimates, 2023. The Arch Company internal data, 2023.

Case study areas: local impact of The Arch Company





6. Social and community impact

- 6.1 The Arch Company supports a number of impacts that go beyond the direct economic impacts associated with investing in and managing space. By prioritising the refurbishment of existing spaces, particularly underused spaces tailored to small and local businesses, the company not only contributes to the conservation of historical and urban landscapes but also promotes sustainable development and regeneration practices.

Supporting the foundational economy

- 6.2 The foundational economy describes the services, social infrastructure, and goods that people in a community need for their everyday life. The concept is often linked with that of 15 minute cities, which expresses the goal that essential goods and services as well as cultural and social infrastructure should be accessible within a 15 minute walk, cycle, or journey on public transport for any person within the city.
- 6.3 The Arch Company portfolio is largely composed of small properties, which disproportionately support small and micro businesses. These businesses, owing to their size, can be expected to largely sell their goods and services in a relatively small geographical area. The portfolio acts to support and provide space for businesses that service local communities, and so support the concepts of the foundational economy and the 15 minute city.

Providing sustainable spaces

- 6.4 The most sustainable space is usually one that already exists. At its core, The Arch Company is a business that takes existing spaces and delivers investment to make them usable and attractive to occupiers in the market. The operations of The Arch Company reduce the requirement to develop new spaces, and therefore reduce the emission of spaces.
- 6.5 Previous research has highlighted that the retrofitting of existing arches that are currently vacant could produce 50% less carbon compared to building new industrial space.⁴⁸ Each square of light industrial space retrofitted by The Arch Company has been estimated to produce 148kgCO₂e of embodied carbon, compared to between 300kgCO₂e and 700kgCO₂e for newly developed space.
- 6.6 The approximately 109,000m² of space unlocked under Project 1000 could result in a carbon dioxide equivalent (CO₂e) savings of up to 60m kgCO₂e compared to the new development required to support future occupants. This reduction in emissions is comparable to eliminating the carbon footprint of taking 35,000 cars off UK roads for one year.⁴⁹
- 6.7 As of 2023, all future improvements and refit spaces in the portfolio are targeted to be brought up to an Energy Performance Certification standard of B as a minimum. This is not a straightforward task given the nature of many of the derelict spaces and historical developments that are managed by the company.

Local employment opportunities

- 6.8 The businesses and organisations within The Arch Company portfolio contribute to local social and economic outcomes through providing employment opportunities. There are many examples of the

⁴⁸ Engineering Services Consulting Ltd., 2022. *Embodied Carbon Assessment & Benchmarking: New Light Industrial Space*.

⁴⁹ In the UK the average car is estimated to produce 1,682kgCO₂ each year. Sourced from: Nimblefins, 2023. *Average CO₂ Emissions per Car in the UK*.

The socio-economic impact of businesses in the railway arches



(primarily small) businesses in The Arch Company portfolio underpinning wider networks of activity. The food and beverage manufacturing spaces in Battersea are vital for serving economic activity across London's West End, whilst logistics space in Manchester City Centre enables residents and visitors access to the products they need. The organisations supported by The Arch Company spaces are the 'quiet backbone', providing foundational activity for local economies.

- 6.9 Using data for the level of employment going to local residents from the areas in which organisations and businesses are located, it is possible to estimate the number of FTEs and employment opportunities within the railway arches that are taken by local residents.⁵⁰ This methodology takes the average share of employment (all employment including The Arch Company and other workers) within local areas that come from within the local authority and applies this share to the number of FTEs estimated to be supported by The Arch Company's spaces.
- 6.10 Through this methodology, Table 6.1 presents the estimated number of jobs within The Arch Company portfolio in a given local authority that are filled by local residents. For example, of the 4,870 FTEs in space owned by The Arch Company in Southwark, approximately 860 FTEs are estimated to be taken by local residents. Overall, 32% of workers in the portfolio are estimated to live in the same local authority as they work.
- 6.11 In most cases, the proportion of local employment supported in the railway arches is close to the borough-wide averages. It would naturally be expected that the railway arches support lower levels of local employment given their often highly accessible locations via public transport (particularly rail), allowing people to commute to work from further afield.

Table 6.1 – Top 10 local authorities where the largest number of workers at space in The Arch Company portfolio are estimated to both live and work in the same local authority

Local authority	Total FTEs	No. FTEs taken by local residents	% local FTEs (Arch areas)	% local FTEs (borough wide)	Explanation and notes
Croydon	2,310	1,200	52%	53%	The Arch Company's space in Croydon supports a relatively high number of jobs due to a larger provision of office workspace. Much of the employment is driven by large office spaces in South Croydon.
Leeds	430	300	68%	69%	Space in Leeds is located further outside the core of the city, particularly in industrial-focused areas such as Holbeck and Southbank where more residents commute locally.
Southwark	4,870	860	18%	22%	The Arch Company's space in Southwark is primarily along the railway corridor from London Bridge to Bermondsey. The area is highly accessible and office-centric, leading to significant in-commuting and a lower share of local employment.
Manchester	550	210	38%	42%	The Arch Company's properties in Manchester are found in traditional industrial zones to the northwest and southeast of the city centre. These areas typically support businesses that hire locally, contributing to a higher proportion of jobs for Manchester residents.

⁵⁰ This methodology relies on estimated commuting patterns data for workers in 2021 for each Middle Layer Super Output Area (MSOA) area (roughly equivalent to 10,000 residents) in England and Wales, and the proportion of workers in each MSA who reside in the same local authority. Data used is taken from ONS, 2023. Travel to work estimates using assumed pre-coronavirus travel behaviours

The socio-economic impact of businesses in the railway arches



Local authority	Total FTEs	No. FTEs taken by local residents	% local FTEs (Arch areas)	% local FTEs (borough wide)	Explanation and notes
Birmingham	250	160	62%	63%	Birmingham is one of the largest local authorities in the country, with a large resident pool to take jobs. The Arch Company space is located to the southeast of the city centre in traditionally industrial areas, notably around Digbeth, and as a result is estimated to have a high local jobs share.
Westminster	700	60	9%	7%	Differing from Southwark, spaces in Westminster are positioned away from the City's main office district, particularly around Queen's Park. These areas record higher local employment rates, though they still attract significant in-commuting.
Newcastle upon Tyne	380	110	29%	45%	Similarly to Birmingham, Newcastle is a relatively large local authority area with a large resident pool to take jobs, explaining the high local jobs share. Much of The Arch Company space in Newcastle is located in proximity to the central train station within the city centre, with other clusters to the south such as Gateshead.
Sheffield	210	150	70%	71%	The Arch Company space in Sheffield is located to the northwest of the city centre, away from the traditional core of the city in industrial-focused areas such as Castlegate. These areas support businesses that disproportionately hire local residents, explaining the high local jobs share.
Exeter	210	130	65%	49%	Most of The Arch Company in Exeter is located around the Exeter St Thomas station, away from the city centre with relatively lower levels of in-commuting.
Tower Hamlets	1,440	440	30%	22%	Similarly to Southwark, The Arch Company space in Tower Hamlets is in highly accessible areas that generally experience higher levels of in-commuting.

Source: Volterra estimates, 2023. ONS, 2023. Travel to work estimates using assumed pre-coronavirus travel behaviours. ONS, 2021. Census 2021: Location of usual residence and place of work by ethnic group.

6.12 However, the most significant impact of The Arch Company and its customers on skills and training is not a result of the formal programmes or placements they operate, but is delivered by the types of organisations operating in the spaces and the job opportunities they offer. By offering spaces for small businesses, The Arch Company disproportionately supports employment that is accessible to people with a range of educational backgrounds.

6.13 Figure 6.1 presents estimates of the share of jobs supported by The Arch Company portfolio under different occupational classifications compared to London and England and Wales. As shown, jobs supported within the portfolio are generally more accessible to people without formal qualifications than the average across London and England and Wales. Jobs within The Arch Company portfolio include a lower proportion of 'professional' jobs and a higher proportion of 'sales' and 'machine operatives' occupations. The differences are significant in some cases, with the proportion of 'machine operatives' being twice as high in the portfolio as they are in London, for example.

The socio-economic impact of businesses in the railway arches



Figure 6.1 – The Arch Company has almost double the rate of plant or machine operatives than London

Estimated proportion of jobs falling within different categories by borough, in The Arch Company portfolio, London and England & Wales



Volterra estimates using: UKCES, 2016. UKCES labour market projections for the UK: 2014 to 2024, and The Arch Company portfolio data

7. Future economic impact

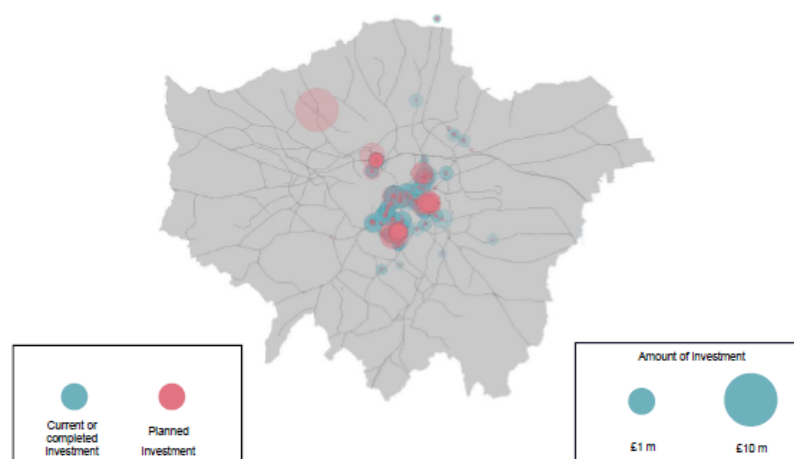
- 7.1 This section estimates the potential economic impact of the portfolio as a whole, in line with The Arch Company's ambition to renovate spaces and bring them back into use, thereby delivering economic activity in spaces that were previously vacant. Whilst the portfolio's combined economic impact is already significant, it has not yet reached its full economic potential with occupancy at 70%. Hundreds of the empty spaces are derelict and in need of significant investment before they can be occupied.

Project 1000

- 7.2 Project 1000 is The Arch Company's plan to invest £200m to bring 1000 previously empty and derelict spaces into use by 2030.
- 7.3 The Arch Company has undertaken or planned 356 capital projects as part of Project 1000 to date. As of February 2024, The Arch Company has invested £47m into capital projects since 2019. These projects range from minor projects focused on the maintenance and upkeep of the portfolio to large-scale redevelopments aimed at improving or regenerating parts of the portfolio. Altogether, the capital investment into these projects will amount to over £200m once complete.
- 7.4 Figure 7.1 provides an overview of where this investment has taken place and is currently ongoing within The Arch Company's spaces across London.⁵¹ Each circle represents an investment into a property, with a larger circle indicating a larger investment. Likewise, a darker point represents a greater density of properties that have received investment.

Figure 7.1 – Where has Project 1000 already delivered investment in commercial space in London?

Amount of current and pipeline investment by location. Bubble size indicates scale of investment



Source: The Arch Company internal data, 2023. © OpenStreetMap Contributors, 2024.

⁵¹ NB: The investment shown in the graph includes both investment to date and planned investment

The socio-economic impact of businesses in the railway arches



Estimated economic impact

Employment

7.5

At present, approximately 70% of space in the portfolio is occupied. If the remaining space were to be occupied, and assuming that it adheres to the same mix of use classes as the occupied space, then an additional 8,200 FTEs could be supported.⁵² This uplift is presented in Table 7.1, which breaks the current and potential economic impact into FTEs and jobs.

Table 7.1 – The Arch Company portfolio supports an estimated 30,300 jobs, with the potential to rise to 40,000 if fully occupied

Estimated FTEs and jobs supported within The Arch Company portfolio

	Estimated FTEs supported	Estimated total jobs supported
Currently supported in occupied spaces	25,600	30,300
Maximum impact if all spaces occupied	33,800	40,000

Source: Volterra estimates, 2023.

Economic activity

7.6

Were all the spaces in the portfolio to be occupied, this would support an additional estimated total of £630m in GVA each year (across both London and others areas of the UK), bringing the total for the whole portfolio to £2.6bn. Additionally, if all spaces within the portfolio were to be occupied, an estimated additional £190m to £250m would be derived from annual tax revenues.

Indirect and induced economic effects

7.7

The additional direct FTEs would support an estimated £15m in additional yearly worker expenditure. The impacts of this, as well as the increased supply chain and indirect impacts the new FTEs would support, are presented in Table 7.2.

Table 7.2– Number of direct FTEs supported by organisations within The Arch Company property by use class and indirect FTEs supported within the supply chain

	Direct FTEs	Indirect FTEs	Induced FTEs
Total (current occupation)	25,600	16,100	1,400
Total (if all spaces occupied)	33,800	21,200	1,800

Source: Volterra estimates, 2023. The Arch Company internal data, 2023. NB: Figures are rounded and do not sum.

⁵² The uplift applied to estimate the total economic potential of the portfolio utilises the current split of economic activity and use types in the occupied properties. As vacant spaces are often unclassified in terms of use class, this assumption of the future portfolio being brought forward in a similar composition to the currently occupied properties is considered a reasonable one. A proportion of properties are currently occupied but used for activities that don't support direct economic activity, such as residential or railway uses. This is accounted for in the uplift calculation – i.e. that a proportion of vacant properties would be brought into a non-employment supporting use – to remain conservative.



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Appendix 2 – GLA briefing on social value

Briefing

To: Assembly Planning and Regeneration Committee

From: Ellie Howard, Principal Project Officer – Place Unit; Sarah Considine, Head of Design – Design Unit; and Nina Miles, London Plan Manager (Acting) - London Plan and Strategic Planning

Re: Social Value in Planning and Regeneration

1 Strategic context - Social Value in Planning and Regeneration

1.1 Social Value as a concept in the planning system

The National Planning Policy Framework (NPPF) establishes the purpose of the planning system as contributing to sustainable development which means the pursuit of three overarching objectives – an economic objective, an environmental objective and a social objective, defined as being;

“to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”

1.2 Social Value and the London Plan

The London Plan 2021 includes only a limited number of references to the term ‘social value’. This includes references to town centres and high streets as having social value, use of the term in the affordable workspace policy in describing particular sectors such as charities and the voluntary and community organisations as well as social enterprises; the term is also used in describing the intrinsic value of public houses that are under threat.

While the London Plan policies are not expressly couched in terms of social value, the concept is one of the foundational pillars underpinning the planning system, and is woven throughout the London Plan, from its approach to incentivising increased delivery of affordable housing through the ‘threshold approach’ to viability testing, to

its focus on walking, cycling and public transport. It is also inherent in the six ‘good growth objectives’^[1] in chapter 1, which frame and underpin the rest of the plan. We have previously mapped all of the policies in the plan against social value criteria in the ‘Successful Places Framework’ and found good coverage, and a number where it could be strengthened.

^[1] GG1 Building strong and inclusive communities, GG2 Making best use of land, GG3 Creating a healthy city, GG4 Delivering the homes Londoners need, GG5 Growing a good economy, GG6 Increasing efficiency and resilience.

2 Definitions of social value

2.1 Planning for London Engagement and the London Sustainable Development Commission Report

As part of the early engagement work on the future London Plan, the team undertook a multi-stranded and extensive programme of stakeholder and public engagement including deliberative engagement, workshops and co-designed engagement with other organisations. One such strand of co-designed work led by the London Sustainable Development Commission, resulted in the publication in August 2024 of Embedding Social Value into the London Plan.^[1]

This report discusses the definition of social value, noting the concept is closely tied to the Public Services (Social Value) Act 2012 requirement to consider the potential additional benefits that can accrue through procurement. “*This report treats social value as multi-layered, contextual and relating to the positive impact that planning and development can have on society beyond its financial or economic outcomes.*”

Recommendations

It includes 6 recommendations and 21 actions aimed at strengthening social value in the London Plan. The report forms part of the London Plan call for evidence – i.e. part of the wider library of material for the future London Plan.

2.1.1 Considerations on the LSDC report

1. The planning balance

Many of the recommendations and actions proposed in the LSDC report are designed to secure additional social value benefits over and above what would have been otherwise delivered, and *beyond economic or financial outcomes*. In effect it seeks to elevate social objectives over economic or environmental objectives, but this is in tension with the national planning policy under which all three objectives are “*interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)*”. It also sets this at odds with other definitions of sustainable

development, e.g. The UN, which envisage a balanced approach. Furthermore, the English planning system is what is known as a ‘discretionary’ system, with inherent flexibility, which entails trade-offs and consideration of decisions in the round, judged against the development plan as a whole unless ‘material circumstances indicate otherwise’. In other words planning policies are **not a checklist**, and for this reason attempts to skew policy to strengthen only one element of sustainable development are difficult. As the NPPF states:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

*c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy*

These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”

2. Examination in public

Assembly Members should also be aware that the London Plan is required to undergo an Examination in Public (EIP) before it can be adopted. Independent

Planning Inspectors will assess the plan against legal and technical criteria, including viability and deliverability. It is therefore essential that individual policy approaches provide clear policy intent/pathways which can be evidenced as *deliverable* rather than aspirational aims.

While the LSDC report sets out examples of interest and attempts by some boroughs to include specific ‘social value’ policies, this has proved challenging, in part due to the lack of clarity over what social value means given its wide scope, and in the context of planning policies which must already deliver sustainable development, difficulty in establishing exactly what it means in practice. There are few successful examples of specific social value policies making it through examination. Both Islington and Merton had draft policies deleted at EIP.

3. Viability

The viability of the London Plan will be tested at the Examination in Public and must be evidenced to ensure that the Plan is found to be sound. The Plan will therefore be subject to an area wide viability assessment to assess whether the types of development likely to come forward over the Plan period are able to do so taking into account the cumulative impacts of all the relevant policies in the Plan, together with other relevant national, Mayoral and local policy requirements.

The assessment will be undertaken through a residual valuation model for a range of development typologies and locations based on likely development values and costs. This will determine whether the land value generated in different scenarios is sufficient to meet specific benchmarks/ policy requirements for a site to be brought forward for development.

The likely development costs associated with different policy options should be identified at an early stage because this may have a bearing on its inclusion in the Plan and it may affect other policy objectives. These will need to be weighed up when considering the Plan as a whole. Therefore, policies which might seek to deliver additional policy benefits over and above others that are costed will come under significant scrutiny.

The current economic climate is considerably less favourable than was the case when the current London Plan was prepared, therefore cost-effective policy approaches need to be thought about carefully, and for this reason caution would be needed with any policy approach that seeks to elevate poorly-defined social considerations beyond economic considerations, particularly where that would risk the viability and deliverability of the plan as a whole.

2.2 Understanding London's Markets

The Mayor published Understanding London's Markets in 2017. The report set the context for a new, strategic approach to London's markets. It defines social value as follows;

*"In line with the Mayor's 'City for all Londoners' and the principles of good growth, the diverse value experienced and delivered through markets can be considered across three main aspects: people, prosperity and place. Together, these can be understood as 'social value'."*³¹

2.3 Thinking from elsewhere

[2.3.1](#) RIBA Social Value Toolkit for Architecture

The RIBA's Social Value Toolkit for Architecture (2020) was developed to help demonstrate and evaluate the impact of design on people and communities. *"This RIBA source book understands social value to be much broader than the social capital of a place but rather the holistic social, environmental and economic benefits to society."*

*"Based on an extensive review of wellbeing literature we argue that the social value of architecture is in fostering positive emotions, whether through connections with nature or offering opportunities for an active lifestyle, connecting people and the environment in appropriate ways and in providing freedom and flexibility to pursue different lifestyles (autonomy). There is also social value in participation, supporting communities to help design and build their homes and neighbourhoods. This version of the SVT focuses on the social value benefits of housing design, but these qualities are also applicable to other building typologies."*³²

3 Mayoral work

3.1 Design Research – Good Growth by Design Inclusive Design suite

The Good Growth by Design programme has taken a collaborative approach to design research to support the preparation of guidance – bringing MDAs together with policy and delivery teams across the GLA Group. Our work has addressed some of London's most acute urban challenges:

Our **Expanding London's Public Realm** design guidance was published alongside the Public London Charter, which sets standards for how London's public spaces should be accessible to all – an increasingly important consideration during the COVID-19 pandemic, when public spaces became ever more central to social life

³¹ Greater London Authority (2017) Understanding London's Markets, 13

³² Royal Institute of British Architects (2020) Social Value Toolkit for Architecture, 7

and individual mental health.

Our **Women, Girls and Gender Diverse Peoples' Safety in Public Space** report supports Mayors Design Advocates and wider built environment sector in implementing gender inclusive design processes to affect perceptions of safety and to inform the production, programming, and occupation of public space.

Our **Connective Social Infrastructure** guidance explored in more detail how public spaces and high streets can form the foundations for a more equal and socially integrated city. It set out a new definition for social infrastructure:

“Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life, facilitating new and supporting existing relationships, encouraging participation and civic action, overcoming barriers and mitigating inequalities, and together contributing to resilient communities. Alongside more formal provision of services, there are informal networks and community support that play an important role in the lives of Londoners.”³³

Design guidance on **Making London Child-friendly** explored what could be done, in public spaces, neighbourhoods and the city as a whole, to enable independent mobility for children – their freedom to use the city as safely and confidently as adults can.

Our **High Streets Adaptive Strategies** report included essays, case studies and guidance on how London's commercial centres could not only respond to changing retail patterns and the transition to net zero, but could also redefine their role as public infrastructure, acting as focal points for community participation and creating social value for all Londoners. This built on **High Streets for All** - a study that takes one of the most commonplace and everyday experiences of the city – the high street – and explores its social value from the perspective of Londoners.

“Social value is most commonly understood to be made up of economic, social and environmental aspects. Together with existing knowledge and new primary research, the study uses this evidence to set out the strategic case for advocacy, intervention and investment in London's high streets.”³⁴

High Streets Adaptive Strategies included a case study for Tottenham High Road, LB Haringey, which explores how social value can be delivered through making the best use of council assets, lease arrangements and community asset transfer opportunities.

³³ Greater London Authority (2020) Connective Social Infrastructure, 16

³⁴ Greater London Authority (2017) High Streets for All, 6

Further to championing design quality, the programme has also supported the built environment sector to address workforce diversity. Our **Supporting Diversity Handbook** has been welcomed by architectural and related professional institutes. The Handbook, first published in 2019 and updated in May 2021, sets out six sector level commitments for the professional institutes to jointly address.

We have worked with six professional institutes (RIBA, Royal Town Planning Institute, Landscape Institute, Institute of Civil Engineers, Royal Institute of Chartered Surveyors and Chartered Institute of Building), to establish a ‘Supporting Diversity Professional Institutes Roundtable’. The CEOs of each organisation have signed a Memorandum of Understanding that commits to coordinated action on creating a more diverse, equitable and inclusive built environment sector.

The Good Growth by Design Forward Plan, which sets out how the programme will be delivered over the coming years, includes a continued commitment to build on themes of inclusive design of the city – understanding what inclusivity, accessibility and participation means for different groups of Londoners, and how clients and designers can work with Londoners to create a city for all.

3.2 Social Value in Markets

Retail and wholesale markets play a vital role in London as places of employment, trade and leisure. They provide variety and diversity, history and character, and bring footfall to high streets and town centres. They are an essential part of Londoners’ everyday experience of the city, as well as London’s international identity. They are local manifestations of London’s openness to the world in terms of the diversity of goods they offer, the traders who work in them, and the communities they serve.

Through the Mayor’s Street and Covered Markets programme, research was undertaken to capture and support the social value of markets. The Mayor’s **Street Markets Toolkit: Evidencing and Capturing Social Value** accompanies the **Understanding London’s Markets** report which drew on wide-ranging experience of people working across the sector to build a better picture of London’s markets, the challenges they face, the breadth of value they offer, and opportunities to ensure they continue to flourish.

“The Mayor’s City for All Londoners established a commitment to good growth across the GLA and TfL. This provides a strong prompt for public sector bodies to think about social value and to amplify the wider nonfinancial outcomes of public policies and investment. This is also a statutory requirement in public sector procurement, encapsulated in the Public Services (Social Value) Act 2013, which

requires public bodies to give regard to wider opportunities for economic, social and environmental wellbeing.

Social value includes a wide range of benefits that can be difficult to measure. This isn't just true for markets, all sectors are struggling with the challenge of identifying and capturing useful, robust evidence on impact. This toolkit outlines a simple methodology to demonstrate social value and the wider impact of your market as defined in Understanding London's Markets report.”³⁵

The toolkit summarises the strategic case for markets, unpacks the idea of social value, and sets out its role in making the case for markets. It also sets out a three-step process to build a robust case for individual markets.

4 Project delivery

4.1 Programme

Our regeneration funding opportunities have been designed to build broad and balanced programmes of innovative and exemplary regeneration activities, underpinned by local partnerships that bring together different agencies, stakeholders and communities to achieve economic, environmental and social outcomes that are priorities for the places in which these investments are made.

4.1.1 Good Growth Fund

Since its inception in 2017, the £74m Good Growth Fund has supported investment into 79 place-based projects to support growth and community development in London.

One of the three key aims of the fund is the empowerment of local communities. It aims to strengthen civic infrastructure and networks to bring people together to share their cultures and collaborate with others in their neighbourhoods, encouraging projects that result in tangible improvements to quality of life, that foster social integration and that cater for London's diverse and changing population.

4.1.2 High Streets for All Challenge

The £4m High Streets for All Challenge formed a key programme in the London Recovery Board's mission to deliver enhanced public spaces and new uses for underused high street buildings, bringing together local authorities, community and business groups, cultural and third sector organisations. The Challenge was underpinned by the Good Growth by Design 'High Streets & Town Centres: Adaptive Strategies' guidance which emphasises the public value of high streets.

³⁵ Greater London Authority (2019) Street Markets Toolkit: Evidencing and Capturing Social Value

The generation of social value was one of five themes expressed in the call for projects, encouraging responses which for example test new models of local governance to ensure local communities have an active and equal role in the stewardship of their high streets. As part of the Challenge, we partnered with Power to Change to pilot two Community Improvement Districts (CIDs) in Kilburn and Wood Green.

4.1.3 Civic Partnership Programme

The £12.8m Civic Partnership Programme is aligned with the Building a Fairer City plan and the Economic Recovery Framework, targeting areas of need where local authority regeneration objectives align with Mayoral priorities, in order to combat long-standing inequalities and support areas undergoing change.

It aims to create open, connected and inclusive public spaces and social and cultural infrastructure; deliver projects for and with the communities they serve, particularly people from Black and minoritised communities, and younger and older Londoners; and strengthen climate resilience and tackle environmental inequalities.

4.1.4 Property X-Change

Property X-Change was an innovative pilot funded by the GLA. It established a digital platform and network led by the GLA alongside founding partners from across the business and property sector. The initiative brought together public and private landowners, alongside tenant and business organisations to explore how property can better support local economies and drive social value for communities.

The programme platformed diversity and under-represented voices in the sector through events and shared innovative practice to mainstream new approaches to asset management (such as social value leases) or meanwhile strategies. Following the pilot, the GLA with input from industry partners is considering how the learning from the pilot could be taken forward.

4.2 Projects

4.2.1 Rising Green

Responding to the needs of young people in Wood Green's town centre, The Rising Green Youth Hub has emerged as an inspiring story of co-creation and high street transformation. Through innovative design, strategic branding, and inclusive engagement, the hub empowers young voices, fosters community connections, and paves the way for a safer, more inclusive future. With support from the Mayor's Good Growth Fund, the project involved the transformation of a vacant commercial property on the high street into a vibrant youth hub, co-designed and co-produced by a group of young people known as the Wood Green Young Voices.

Local young people were empowered to create a completely bespoke space

addressing their specific needs, gaining valuable co-design, collaboration and communication skills in the process too. The Wood Green Young Voices were instrumental in every single phase of the project, ultimately resulting in the creation of a youth hub that reflects their diverse agenda and ambitions.

Rising Green Youth Hub was awarded the Best Social Value Project accolade at the Thornton Education Trust (TET) Inspire Future Generations Awards in 2022.

4.2.2 Kinglsey Hall

Kingsley Hall is a community centre in Dagenham and is a home away from home for many of the local residents who visit. Having served the Becontree community for almost 100 years, the project was an inspirational vision to restore, rebuild and revive the people and places linked to the community centre and to provide additional economic impacts through the incubation and support of local organisations that operate out of the centre. There was a heavy focus on delivering programmes aimed at young people, reducing youth violence, combating food poverty and social isolation.

The Kingsley Hall redevelopment project has refreshed the existing sports hall and previous café, which became a new social supermarket. These retained/refurbished areas are now linked to a new building with multi-purpose flexible meeting spaces (worship, theatre, dance etc.), a community cafe, roof garden, active community street and green spaces. The new and improved community spaces have positioned Kingsley Hall to increase its capacity for access for longer hours and days a week. This is particularly timely in this winter of the Cost-of-Living Crisis. Kingsley Hall is now listed as a community ‘warm space’ and promise a warm space, a hot drink and someone to chat to for whoever needs it.

The project has enabled more than £13M of external development into the site. Together, each phase of the broader redevelopment of the site – from the first phase of the nursery provision, to the completed community centre, and to the final stage of affordable housing, the Kingsley Hall site will form a true hub for local people – a beacon of support delivering social impact in a community of significant disadvantage for many years to come.

4.2.3 Market Garden City

Market Garden City is a flagship growing hub in Wood Green run by the Wolves Lane Consortium, Ubele and Organic Lea. The innovative design and construction approach champions low carbon technologies, sustainable construction and circular economy design principles. A key aspiration of the project is to engage directly with global majority, poor health and low-socioeconomic groups locally through the proposed skills, training, engagement and volunteer programmes, which promote community food education and distribution alongside connections to nature.

The organisation has also been shortlisted to participate in the Community Shares Pilot project that is due to run this year by the GLA Regeneration Team. This will be

an opportunity for them to benefit from targeted support from an external body to address areas such as organisational design, legal advice, governance, business planning and development of a community share offer.

4.2.4 Livesey Exchange & Old Kent Road

The Old Kent Road is a major area of change: more than 9,500 homes have been granted detailed planning permission, and major transport infrastructure will arrive through the Bakerloo Line extension which will provide better connections and access. With all this growth and change, participatory projects like Livesey Exchange are critical to give voice and authorship to local communities, to build community capacity and authentic relationships and to cement their place in the future of their neighbourhood.

The Good Growth Fund provided a £1.6m capital grant to develop a two-storey community facility delivered by a diverse team of small companies, including BAME-led contractors and an LGBTQ+-led architecture practice. Southwark Council played a critical role in facilitating the project, providing a 15-year lease for the site and committing resources and acting as accountable body for the GLA grant funding to nurture and build the capacity of the group, enabling local community organisation Livesey Exchange to maintain client leadership in the project.

4.2.5 Open Havelock

A meanwhile spaces project by Peabody and Ealing council, which has transformed 36 abandoned garages and 2,000sqm of associated undercrofts and green space on the Havelock estate in Southall.

The project consists of two clusters of converted garages at opposite ends of the long Willowbrook blocks. Different programmes reflect slight variations in the surrounding architecture and landscaping; Willowbrook North, with its generously daylight and overlooked garden, is designed to prioritise uses for children, while Willowbrook South, closer to the canal, is intended for leisure and other active uses, with storage spaces for a local kayak club, for example, and a large community room.

Access to Open Havelock will be facilitated by numerous key-holding ‘operators’ who range from established local playgroups to sports clubs, small catering businesses to bike mechanics, and will rent the spaces at low rents.³⁶

4.2.6 High Streets for All Challenge, Church End

Church End is an area with complex challenges, including an unwelcoming high

³⁶ George Kafka, The Architectural Review (2023) Regeneration Station: Open Havelock in London UK by Alison Crawshaw

street and high rates of vacancies, crime and anti-social behaviour. The High Streets for All Challenge project brings together a broad partnership of organisations, with LB Brent and the Somali Advice and Forum for Information (SAAFI) as lead partners.

The Challenge project aims to re-strengthen Church End through the delivery of the Youth Anchor community space and a suite of innovative high street recovery pilots. The main objective of the Youth Anchor is to deliver a bold and innovative high street anchor, co-designed and co-produced by young people, that will help to diversify the high street offer as well as create a space where the community feels safe and welcome to gather, socialise and learn. The high street recovery test projects aim to explore ways of diversifying and strengthening Church End's high street offer and increase footfall with a focus on health and wellbeing.

SAAFI is also leading capacity building amongst the seven community groups in the Church End Partnership with the aim of establishing a long-term governance model for future collaboration.

4.2.7 Civic Partnership Programme, Connecting Hoxton

LB Hackney's Connecting Hoxton project will use the £3m Civic Partnership Programme capital grant to improve local services and facilities, green spaces and public realm drawing on an extensive co-design process with local residents, community and cultural organisations and businesses. The project aims to significantly improve local routes across Hoxton as well as improving wellbeing, sense of belonging and reducing social isolation for local people.

4 Procurement

The procurement functions and commissioning weight of the GLA and the public sector in general, is a significant opportunity to embed social value through delivery of the built environment. The following tools have been developed to support this function:

4.1 A+U Framework

Launched in 2023 the Architecture + Urbanism Framework provides a diverse, pre-approved panel of built environment consultants, making it quicker and easier for organisations like councils and housing associations to commission high quality expertise for certain types of public sector projects in London.

The A+U Framework takes the innovations developed from the Architecture Design and Urbanism Panel (ADUP2) and pushes these even further, incorporating a new mandatory award criteria and an enhanced focus on qualitative approaches to leveraging social value, EDI and sustainability outcomes through the design and delivery process.

In line with the strategic objectives of the framework, the Mini Competition Call-Off stage is operating with a 80% Quality/ 20% Financial weighting, with the 80% quality including a minimum 10% to social value, and 5% to EDI for diverse skills and expertise, and are expected to provide a social value action plan. Scoring tender submissions against social value and EDI methodology is an innovation aimed at mainstreaming those principles in public sector delivery.

The A+U Framework can be used by the GLA Group, TfL (Transport for London) and any part or subsidiary of the GLA. It can also be used without incurring any cost by:

- All London boroughs
- Other UK Local Authorities
- Housing Associations
- Mayoral Development Corporations e.g., London Legacy Development Corporation (LLDC) and Old Oak Park Royal Development Corporation (OPDC)
- Other Public Sector bodies e.g., Central Government Departments, NHS Estates

4.2 Process notes

In support of quality procurement, a series of ‘Process Notes’ have been published to support public sector commissioners to promote social value through their procurement approaches and built environment commissions. The ‘Process Notes’ share best practice from across the GLA. Topics include:

- Social value and EDI in procurement – which provides commissioners with assessment methodology and scoring criteria to support Social Value and EDI criteria in procurement exercises.
- Commissioning co-design processes – which gives step by step instructions to commissioners in writing briefs and specifications for co-design or design briefs supporting greater input from local communities in processes of production.
- Setting up community review panels (currently in development) – providing advice on the process of establishing and running a community review panel, enabling greater ownership and oversight of the built environment and planning decisions by local people.

5 Advocacy

5.1 Mayor’s Design Advocates

The Mayor has appointed a cohort of Mayor’s Design Advocates (MDAs). The MDAs are independent and impartial built environment experts. They are a pool of built environment professionals with skills and experience to assist the Mayor in his functions related to London’s growth. They provide support, advice, critique and

expertise on London's built environment.

The pool has been selected with emphasis on skills and expertise in social value. Specifically, the pool includes social value experts Hilary Satchwell (expert critic and commentator on social value in planning) and Holly Lewis (author of High Streets for all, exploring social value in high streets, and part of the Social Value Accelerator programme).

6 Places for London – Arches Design Guide

Places for London (Places) is TfL's property company. The purpose of Places for London's Arches Design Guide is to set out a design-led, asset-oriented place-shaping strategy for the future renovation, repair, maintenance, and modification of their arch estate. The guide will help maximise the potential for Places' arches to make meaningful contributions to their surrounding neighbourhoods and communities.

Places' arch estate is distributed across London. In some places it forms distinct runs, in others it is alongside other arch ownership, or fragmented across a larger area. Each portfolio and run has a different set of needs, and will be developed on different programmes. This variety is fundamental to the design guide - finding the unique qualities of each area is the key to its future success.

In every case, the goal is to positively contribute to the wider neighbourhood in a meaningful way, building on the existing character of the place.³⁷

Places for London recognises the enormous value that this estate generates; not just from an economic point of view but also socially, culturally, environmentally, and in terms of innovation, community and resilience. The approach to arches looks beyond the 'red-line' to understand how they can fit into, and contribute to, the ever-evolving city that surrounds them. Many businesses would not exist without the unique spaces the arches provide that enable them to flourish. For Places, the arches are more than simply assets, they are pillars of the community, that embrace the heart and soul of their locale - they perform at their best when coupled with creativity and innovation.

³⁷ Transport for London (2022) Arches Design Guide