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28.02.2018

Dear Mayor Khan,

### **Draft New London Plan**

Thank you for the opportunity to comment on the draft London Plan which the Diocese of London recognise is a very important policy document for the future of the capital.

The Anglican Church in London is divided into three Dioceses: London, Southwark and Chelmsford.

The Diocese of London\* is overseen by the Bishop of London assisted by Area Bishops, (including myself), Archdeacons and senior staff, supported by the staff of the London Diocesan Fund. The Diocese is fortunate in its role as the part of the established church in the country because it is frequently seen as a 'spokesperson' for concerned Christians who believe they should be interested in all aspects of human life and the fulfilment of individuals' and communities well-being – 'human flourishing'. We believe that achieving this flourishing is to a large extent dependent on the policies pursued by government, the Mayor, boroughs as well as people of faith and all who play a part in the future welfare of our city.

There is much which we support in the Plan – particularly the Good Growth policies- however we are disappointed that the role of faith communities, including the Church of England, in delivering the Plan's policies on strong and stable communities and social infrastructure has not been recognised. I will expand on this below.

#### Policy GG1 Building strong and inclusive communities

We regard Policy GG1 Building strong and inclusive communities as fundamental and the one that most reflects the objective of human flourishing that I mentioned above. One of the characteristics of Anglican Christian ministry and service that underlies the geographical parish system in this country is that every community should have a place of worship and a minister who is responsible for providing Christian worship and teaching and the important rites of baptism, weddings and funerals at significant life events. Historically, as London has grown, the Church of England has found the resources to continue its mission and ministry through building new churches and halls, vicarages and

schools. (The opening last year of the first new Anglican Church in London for forty years at St Francis at the Engine Room at Tottenham Hale is the most recent example of this.) Other Christian denominations have done the same in more recent centuries. After the Second World War, the diversity of London has grown exponentially with the arrival of those from the Commonwealth, Europe, and others who have come to escape persecution or for a better life; Many of these immigrants have brought their own faith and they, together with the Christian churches, have supported their communities through good times and more tragic times. They have all contributed to the tolerance and resilience for which London is justly proud. The response to the tragedy of the Grenfell Tower disaster demonstrated this.

We strongly support GG1 and particularly the following:

- Building on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities
- Everyone is able to benefit from these to ensure that London is a fairer and more equal city.
- Providing access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.

#### Policy H5 Delivering affordable housing and Policy GG5 Growing a good economy

The need for more housing in London and housing that is affordable for all Londoners is one that many including ourselves strongly support. Policy H5 Delivering affordable housing is very important in this respect. We need to reiterate the comments we made on the Housing Strategy last year, which made the case for key worker housing for third sector workers in the communities they serve as neither the affordable housing policy nor the reasoned justification addressed this.

#### Policy GG5 Growing a good economy

The supporting text (1.5.6) for Policy GG5 Growing a good economy alludes to the issue where 'community worker' in the broadest sense could be added to the list of those on whom the city relies but who find obtaining a suitable home in the right place difficult:

'Ensuring sufficient housing at the right price is also key to the city's resilience. The shortage of affordable housing in the capital is hindering the recruitment and retention of public service workers, including those crucial to the operation of the emergency services, the health system and London's transport infrastructure'.

The ability to house a minister in the parish close to the church for which he or she is responsible is fundamental to this; the minister lives alongside and embedded with those they serve (the tenet that the Anglican Church applies, which I mentioned above). In many cases the needs of the parish have meant that additional ministers have been appointed to expand the church's activities and lay (non-ordained) workers employed to run youth and or community activities. Again without the availability of affordable accommodation close to their communities, they would be less effective in the tasks they seek to perform and lack credibility in the eyes of the community.

Paragraph 2.0.7 highlights our concern that growth and change need to benefit all Londoners and so we are pleased to see the statement 'It is important that there is a strong focus on sustainable and inclusive regeneration in these areas, with boroughs, the Mayor and other partners working closely with the local community to bring about the right sort of change and investment'.

We hope that you will see the Diocese as one of these partners. With reference to the following statement 'Where significant development is planned in these areas, it is crucial that it benefits local communities, provides employment and genuinely affordable housing, and is properly integrated into the area' I would draw your attention to the work of our Strategic Development Committee and its supporting team who are actively working with local parishes and partners to ensure there is an Anglican or other faith community presence in some of the capital's largest development areas such as Queen Elizabeth Olympic Park, Earls Court, Cricklewood and Old Oak and Park Royal.

#### Policy S1 Developing London's social infrastructure

Policy S1 on social infrastructure includes much that we would support, highlighting:

- The need to undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities
- Social infrastructure needs should be addressed via area-based planning in areas of major new development and regeneration
- Development proposals should provide high quality, inclusive social infrastructure that addresses a local or strategic need
- Support for the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.
- New facilities should be easily accessible by public transport, cycling and walking.
- Protection for existing social infrastructure

However we would have hoped to see something specific about places of worship/faith communities. I would have liked to see some reference to how service providers including faith communities would be supported in securing facilities in new developments and how decisions should be made; probably the boroughs are expected to take the lead on this. Para 5.1.1 contains I believe the only reference in the Plan to faith facilities per se:

'Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, recreation, sports, faith, and emergency facilities'.

The additional use or re-use of places of worship is mentioned in 5.1.9:

'Voluntary and community groups often find it difficult to find premises suitable for their needs. Unused or underused facilities should be brought into use, where possible, to help address these needs. The additional use or reuse of places of worship should be considered for providing accommodation for other traditions or faiths and/or wider community functions'.

I suggest that in Policy S1 Developing London's social infrastructure, a new clause should be inserted after D:

*Boroughs should ensure that in development proposals, charitable organisations, such as faith communities, and those not publicly funded should be supported in securing facilities in those developments.*

In the supporting text in 5.1.3 insert a new phrase as follows:

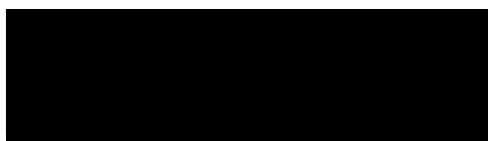
*It is therefore important that boroughs work collaboratively with service providers and other stakeholders, including community, voluntary and faith organisations and the local community, to fully understand existing and future social infrastructure needs and plan appropriately for these, including through the Community Infrastructure Levy. Supplementary Planning Guidance will provide details of how this could be approached.*

### Policy S3 Education

We endorse Policy S3 Education. The London Diocesan Board for Schools (LDBS) is part of the Diocese of London and champions education founded on the Christian faith and its values. Its existing 157 schools are open to those of all faiths and none. It has a responsibility for the leadership, support, growth and encouragement of each of these schools spread across 18 local authorities in the Diocese of London, north of the Thames. It cares for 55,000 students as well as many thousands of teachers and other members of staff working in those schools. The LDBS would be very keen to be involved in the delivery of new schools. With regard to section B6 of the policy, Development proposals for education and childcare facilities should 'encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities , faith groups/churches should be mentioned because schools might form the basis for new worshipping communities and a focus for a new community.

I hope that you find these comments constructive. The Diocese is very keen to work with you on the implementation of your London Plan. I am sure our new Bishop, the Right Reverend Sarah Mullaly, will be very keen to meet with you after her installation in May to share how we can work together.

Yours sincerely



The Rt Revd Dr Graham Tomlin  
Bishop of Kensington

\* The Diocese of London covers 277 square miles - broadly the former county of Middlesex (the London boroughs of Brent, Harrow, Ealing, Hillingdon, Barnet, Camden, Enfield, Haringey, Hackney, Islington, Tower Hamlets, Hounslow, Kensington & Chelsea, Hammersmith & Fulham, Spelthorne and part of Richmond-upon-Thames) and the cities of London and Westminster. It comprises parishes, schools, chaplaincies, missional communities and other organisations in London which are united by their common Christian faith.