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I am the volunteer coordinator of Peckham Vision and coordinator of the Southwark Planning Network (SPN).

Peckham Vision is a member of both the SPN and Just Space, and active on planning and development and other issues in Peckham town centre. [www.peckhamvision.org](http://www.peckhamvision.org)

SPN is an informal network of community groups in Southwark which work on planning issues in their neighbourhoods and share information about these issues in the borough for planning policy.

**These are my initial comments on the Draft New London Plan. I will be able to expand on these points for the Oral Examination in public.**

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## **Chapter 1 Good Growth Policies**

### **GG1 Building strong and inclusive communities**

Para 1.1.2 says that *'London must remain open and inclusive, allowing everyone to share in and contribute towards the city's success'*, and Para 1.1.5 says *'Taking advantage of the knowledge and experience of local people will help to shape London's growth that works better for the full diversity of its inhabitants.'* I agree totally with both of these statements. However I can't see how the Plan as it is drafted will achieve either of these.

There are two key aspects that need to be developed to make these aims achievable.

- The Plan needs to acknowledge that London is made up not just of the built and physical environment but also the social environment comprising all the social relationships and interactions between people.
- Formal and informal community organisations are a fundamental part of the nature of the community that citizens use to develop their collective voice, and they need to be integrated properly in the planning process to be able to contribute their knowledge and experience.

**These points can be seen in these sections:**

Para 1.0.1

'London's growth and development is shaped by the decisions that are made every day by planners, planning applications and decisions-makers across the city.' It is noticeable that this omits totally the fact that millions of decisions by Londoners, in a whole variety of social, economic and physical contexts taken every day, also shape the environment of London. There are two distinct social systems interacting continuously to shape London. One is the institutional and corporate public and commercial system, and the other is the horizontal system of informal social and personal decisions of the millions of Londoners. That this fact is missing in this first defining statement is maybe why important elements and aspects of this other fundamental part of the system-shaping are missing in some of the policies. I would like to elaborate on this for the further statement and representations for the Oral Examination.

Point B: The aims here are welcome *'...increasing active participation and social integration, and addressing social isolation'*. But they cannot be effectively achieved without recognising and providing explicitly for the informal social and personal systems mentioned above. This should be provided for possibly in a new point in this section to develop a Mayor's statement of

community involvement and a continuing community engagement process, and for support for such processes to ensure informed involvement. To be effective this needs to be developed with the assistance of the London-wide community sector.

Point D. The recognition of the crucial role of town centres in a wide cross section of the lives of Londoners is welcome. So also the importance of face to face contact and social interaction. But this spreads beyond what the Plan defines as 'town centres' and must include High Streets and all the other spaces where the informal living system expresses itself.

Point E. It is also welcome that the need for new buildings and the spaces they create are designed to be resilient and adaptable to changing community requirements. But equally important are existing spaces that are vital to social and personal interactions which need recognising as immensely valuable and need more protection from the planning system.

### **Policy GG2 Making the best use of land**

This section needs to recognise that to realise the Plan's aspirations to benefit all Londoners, the best use of land must include making the best of what already exists as well as what might be built new.

Point C. One of the characteristics of existing liveable places is their nature as low rise historic neighbourhoods with significant flexibility and lower cost buildings. This point as drafted could reinforce the incorrect idea that this essence can be taken out of a neighbourhood and still retain its character.

Some other points:

\* The idea of lifetime neighbourhoods in the current London Plan Chapter 7 needs to be included somewhere in Chapter 1, and this seems to be an appropriate section. The quote from Ch7 is:

"1 can get around – neighbourhoods which are well-connected and walkable;  
2 as far as possible, can have a choice of homes, accessible infrastructure and services, places to spend time and to work, with a mix of accessible and adaptable uses; and  
3 belong to a cohesive community which fosters diversity, social interaction and social capital."

This approach is a way to bring together many of the aspirations of the Plan for all Londoners and to ensure that development does create healthy and sustainable environments for existing residents and future generations

\* There should be an additional Point or it could be incorporated in Point C: At the earliest stage, there should be a social, physical and economic audit of what exists on the land including a social and economic impact assessment, and subject to public consultation before plans are developed.

\* The best use of land in urban areas for the forthcoming decades for a number of different compelling reasons, including health and the need to reduce delivery mileage, must include provision for community food growing. I suggest this should be included explicitly in this policy section.

### **Policy GG3 Creating a healthy city**

The role of social and community networks is usefully recognised here in contributing to the health of Londoners. As this role and relationship is not well understood an additional point should be inserted in this section or maybe in GG1:

New Point. Develop with the community sector an approach to planning and development which enables local organisations, groups and networks to flourish and facilitate informed,

effective and healthy means for communities to contribute to the planning and development of their neighbourhoods.

### **Policy GG4 Delivering the homes Londoners need**

I can't see how the housing market alone is going to meet the housing needs of Londoners. All it seems to do is build more unaffordable housing and lead to the loss of more existing homes that people on middle and low incomes can afford. It is clear that developers view all homes that most Londoners can afford as not something they provide for profit so maybe the Plan needs to be clear about this and provide for 'not-for-profit' homes explicitly.

Point A. This could be amended to say 'Ensure that fewer unaffordable homes are delivered each year until enough not-for-profit homes are provided until the waiting lists are cleared.

Point B. Cease using the word 'affordable' because it is now the opposite of the fact. Instead use 'unaffordable' to express percentages, so in this case it would be 'Support the delivery target of 50% of all new homes being unaffordable.' as that is what is being proposed.

### **Policy GG5 Growing a good economy**

All Londoners depend on a well functioning domestic foundational economy which is essential for the healthy city in all its aspects. Without it London as a competitive global city cannot exist. This needs to be recognised in this section by the insertion at the beginning of something like: 'To protect and nurture London's everyday foundational and diverse local economies and conserve and enhance ... ...'

Point C. The focus in the new and the global in the Plan seems to take away mention of provision for the everyday foundational economy and lifetime neighbourhoods. For example in this point C it is good to mention 'sufficient employment and industrial space in the right locations' but coupled with 'economic development and regeneration' it ignores employment and industry already part of and supporting the existing foundational economy. Maybe this could be added here: 'and support and maintain the existing economy'.

### **Policy GG6 Increasing efficiency and resilience**

There is a welcome reference to the community sector in contributing to the resilient city, in point D '... by ensuring that public, private, community and voluntary sectors plan and work together.' In emergencies of a wide variety, the social networks in the community are essential for resilience. The strengthening of the support systems and how they fit within the overall pattern of organisational sectors, as mentioned in my comment above under GG1 Point B pages 1-2, are relevant here especially.

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## **Chapter 2 Spatial Development Patterns**

### **SD6 Town Centres**

### **SD7 Town Centre Network**

### **SD8 Town centres: development principles and Development Plan Documents**

In the current economic climate, high streets are facing threats. Retail habits are changing but other factors also present challenges. However, 47% of businesses outside Central London are on a high street and 1.45 million employees work on or within 200 metres of a high street, and this number is growing. Nearly 70 per cent of London's high streets don't fall within a town

centre boundary. This means that the majority of high streets have no formal policy designation and are potentially vulnerable to the pressure to deliver housing through redevelopment [1].

We are very aware of these pressures in Peckham in SE London three miles south of the CAZ. Our town centre is undergoing rapid change because of the pressure of residential development encouraged by the Council's regeneration policies. This is in spite of the town having regenerated itself over the last 10 years and become a very successful place on the London cultural map both for entertainment and cultural industries, and also for a diverse food offer, with a wide range of micro support businesses in all these sectors. All of them are dependent on low cost and flexible spaces with the ability to be co-located with other micro businesses.

The policies need to recognise the shrinking capacity of work space in town centres and high streets (beyond the retail frontage). The purpose of the policy should be to protect and sustain capacity – similar to the industrial land policies. Boroughs should ensure that they include all uses (beyond what is prescribed in NPPF). 'Surplus' work space should not be automatically released for residential development – it is the low cost capacity that allows for growth, adaptation, innovation. Where high streets are sections of continuous A-road or centripetal arterials, the A-road continuum should be recognised as a key setting for highly varied commerce. The arterial spaces allow local businesses to identify with more than one primary shopping frontage and to move premises to lower-cost positions along the same arterial. The variation in the cost of premises along arterial routes is an extraordinary strength in the traditional urban system.

The main evidence document, the 2017 Town Centre Health Check Analysis report is based on high level statistics and projections. It is based on particular assumptions (e.g. a few high level centres will prosper, most small centres will not), which don't reflect a sound and fine grain understanding of what happens on the ground, in terms of the dynamics of local businesses and organisations, how people live, shop, access education, health, other social infrastructure etc. Research from Suzanne Hall on super diverse high streets for example shows that Rye Lane in Peckham has more retail outlets, jobs and is more profitable than Westfield Stratford [2]. This is also brings in strong evidence of the benefits of subdivision of units for a range of very diverse activities.

The same is true of the cultural industries where the sharing of space between micro businesses is significant. A good example of this is a small enclave of railway arches which have been used as artisan studios for over 20 years with one of the studios used by several artisans in separate businesses in one arch. This is fairly typical of the use of such spaces. This enclave was saved from clearance for redevelopment by one of our citizens planning campaigns. Another of our successful citizen actions has been to save a multi-storey car park from demolition to redevelop as housing. It is now home to dozens of micro and small businesses in Peckham's new emergent industries. Laura Vaughan's research on Adaptable Suburbs points out the essential role of small centres and high streets in Outer London in providing sustainable growth.[3] Small, low cost, flexible and adaptive structures are essential for the micro economies that can use apparently but not actually surplus buildings in a well rooted organic development. A stronger resilient economy has grown because it is holistic and self generated.

[1] High Streets for All, 2017, GLA,  
[https://www.london.gov.uk/sites/default/files/high\\_streets\\_for\\_all\\_report\\_web\\_final.pdf](https://www.london.gov.uk/sites/default/files/high_streets_for_all_report_web_final.pdf)

[2]  
<https://www.architectsjournal.co.uk/news/tread-softly-for-you-tread-on-my-dreams/8687894.article>

[3] <https://justspace.london.files.wordpress.com/2014/04/falp-laura-vaughan-submission.pdf>  
And [http://www.sstc.ucl.ac.uk/sstc\\_index.html](http://www.sstc.ucl.ac.uk/sstc_index.html)

## Chapter 5 Social Infrastructure

### Policy S1 Developing London's social infrastructure

The protection of social infrastructure is critical for London's communities and included within this are a wide range of community spaces which are the fabric of London's diversity. There has however been an escalating loss of social infrastructure, particularly community space, in recent years as a result of development pressure. So existing social infrastructure continues to be at high risk. This is another example of the existing London infrastructure and life support systems being neglected because of the focus on the new.

Policy S1 does not apply the principles of Policy GG1 Building Strong and Sustainable Communities which aim to ensure growth reduces inequalities and improve the quality of life for all Londoners by

- providing amenities that strengthen communities,
- increasing active participation
- planning for places where amenities can flourish and that provide important opportunities for social interaction
- taking advantage of the knowledge and experience of local people

We have been part of the Just Space process in developing a manifesto for community spaces, which has been given to the Mayor. We would like to reiterate the principles in this manifesto and ask that they are inserted into Policy S1 A – F. These include:

- Recognise the irreplaceability and uniqueness of many community spaces and look after them for future generations as part of a continuing legacy
- Access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and well being, inclusion, integration, empowerment and poverty reduction
- Social infrastructure and community spaces are essential to the achievement of lifetime neighbourhoods in which services and amenities are accessible and affordable to everyone, now and for future generations, and provide space for social co-operation and mutual aid,
- Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.
- The tool of Social Impact Assessment to gather evidence of community assets, including social infrastructure, with a methodology that ensures local community networks are fully involved through a collaborative relationship with the Boroughs and GLA. See Just Space Towards a Community Led Plan for London, chapter on Social Impact Assessments.

I will be able to make further representations on the nature of community facilities which are vital for social functioning but which are off the radar for institutional providers. This is not their role, but the planning system needs to be aware of them and take them into account in the provision needed for the essential social networks where citizen agency is the prime energy, and which are often not understood by institutional and corporate providers.

### Policy S6 Public toilets

It is very good to see this issue covered, but public toilets need to be widely available, not only in major commercial developments. We know from our community work in Peckham town

centre that this is a major issue for the public. It is especially difficult for people with small children, for pregnant women, for the older person and for anyone with fragile health or otherwise vulnerable not to have accessible public toilets. It can be a life inhibiting factor keeping people unable to socialise and go out and about in their locality. It is a serious matter that gets in the way of the Plan's intention to enable all Londoners to have a satisfactory life in London.

The text recognises these are a vital facility, but once again the plan is restricted to new developments. The Plan should set out to increase provision for example through community toilet schemes, and encouraging partnerships between existing commerce and local communities.

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## **Chapter 6 Economy**

### **Point E2 Low-cost business space**

This is a very important provision for the economy of many Londoners who are starting in business or continuing as self employed which is essential for their business. There are even more micro businesses which are hybrid business and community functions. For example, a community kiosk providing ethnic food stuffs which are paid for but the function is community rather than commerce. It should be strengthened to include a presumption that development cannot be approved unless existing users can continue in business in that location at the same costs before any development proposals. It is essential that there is a deterrence for these small plots of land to be protected from the rapacious property market which has no interest in a sustainable community and local economy, both of which are vital if the London Plan is to benefit all Londoners.