



**London Sustainability Exchange**  
**Response to the public consultation on A City for all Londoners**

**December 2016**

**Introduction**

London Sustainability Exchange welcomes the opportunity to contribute to the ongoing development of the London Plan and to participate in the development in the new vision for London in these challenging times.

Here we set out our response in supporting this which draws on the findings of policy seminars held by LSx during the summer and autumn of 2016

**Scope of our response**

We are excited about the direction of travel that is set out in the document. Our communities' agree with the challenges that the Mayor sets out and at this point would like to extend support in meeting them.

Our response to this consultation is informed by LSx's direct experience of delivering our behaviour change programme of work, aimed at improving air quality and public health across London. Our programme includes the following projects:

- Cleaner Air 4 Communities
- Cleaner Air 4 Schools
- Well London
- Other projects tackling wider issues such as health and well-being in particular our Future London series that we have held over the past six months, that we have held in partnership with Siemens at the Crystal at Royal Docks.

Our comments are focused on part three of the document.

We will comment on the approach the document has made on:

1. Accommodating Growth
2. Housing
3. Environment Transport and Public Space

## 1 Accommodating Growth

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We support the concepts set out by the Mayor in particular addressing inequalities by developing good and green growth and we look forward to working with the Mayor in developing these concepts further.

### Good Growth

We warmly welcome the Mayor's notion of 'good growth'. Growth that includes the provision of good homes, green space, culture, social infrastructure and healthy streets would be greatly preferable to growth that serves the interests of a relatively small number of already wealthy individuals, which degrades both local and global environments and which – through 'crowding out' effects, the development of 'gated communities' and a range of other mechanisms – depletes the public realm and the provision of accessible social infrastructure.

Steps such as protecting spaces for small- and medium-sized enterprises and establishing an 'Economic Fairness Team' are to be welcomed; but the notion of 'good growth' is seriously underdeveloped in the document; and we fear that the Mayor and his team has significantly misjudged the scale of the challenge ahead. Does good growth, for example, relate directly to health, both physical and mental? We would argue it should. Growth that is 'good' for mental health might mean a profoundly different perspective on commuting, on the provision of social infrastructure, even on the kinds of jobs that the Mayor might seek to encourage in the capital.

We do, however, welcome the Mayor's implication that more economic activity should be accommodated in the outer London boroughs. (This would be consistent with his housing ambitions, too.) The last time this kind of economic policy was attempted with any seriousness was in the 1960s – and we presume that the Mayor will not be repeating those efforts too directly. A legacy of empty office blocks at the ends of the Piccadilly, Metropolitan and Northern Lines is surely not what is intended. We shall make more detailed comments about this issue at a later stage of the development of the London Plan but, at this stage, we would offer the suggestion that there could be a much stronger link drawn between the Mayor's new vision of 'good growth' and the existing provision of 'mini-Hollands' in some outer London boroughs. These mini-Hollands, suitably extended and enhanced, could expand beyond merely a transport remit and could act as hubs for new kinds of sustainable economic growth.

We are particularly excited by the focus on developing an infrastructure for people and communities such as the commitment to reducing car use in outer London. We have over the last year we have engaged with over 350 community groups and have explored a range of topics that may be of interest to the Mayor in developing in the work programme of the infrastructure board:

- Broadband
- Green Infrastructure
- Social infrastructure.

### Broadband infrastructure

In order for London to maintain its leadership position as a global city and investment destination, the Mayor will need to set a vision regarding broadband infrastructure delivery. This

would enable both high-speed internet and the wide range of technological progress required to become one of the Smart Cities optimised through mobile applications and technically literate citizenry. London as a world city is highly connected on the global stage, however to keep pace with the rate of technological change and the needs of a growing population, and to ensure the most vulnerable are included in the digital revolution; broadband needs to be a significant component of the spatial development, and is recognised as being part of the need to compete with ultra-modern business hubs in Asia.

To increase resilience among communities, this investment in the technical delivery of broadband infrastructure needs to be complemented with the necessary skills, training and educational opportunities to be made available to all Londoners.

### **Recommendations<sup>1</sup>**

- The mayor can encourage tech companies to work together with supply and installations.
- We need a bigger, more ambitious, long-term vision for London. The advent of 5G will require more ugly infrastructure and equipment on the streets.
- It could be transformational: bigger pavements, fewer cars. Road works can happen overnight to overcome the practical issues of installing fibres during the day.

### **Green Infrastructure**

London Plan ideally should include a Green Infrastructure approach to spatial development, which reflects the need to recognise how green spaces are key to improving quality of life as outlined in page 57 of *A City for All Londoners*,

As rising temperatures and increased rainfall will place pressure on the city's existing heating, ventilation and drainage systems the implementation of green growth measures such as incorporating innovative approaches such as green roofs and green walls into spatial development planning, will both mitigate flood risk, as well as further integrating the range of green spaces, which are already in place.

The infrastructure board should work with partners to ensure that it supports studies to explore the impact of green infrastructure and pollution, in particular the relationship between trees and air movements and how they trap or pollutants in their foliage.

### **Recommendations**

- We support the ambitious, long-term vision for London, that includes open spaces and green infrastructure
- The mayor can include green infrastructure including the all London Green Grid in the work of the LEP and infrastructure board.
- Green infrastructure metrics should be included in the performance indicators to support urban cooling, and adaptation to climate change and pollutants.

### **Infrastructure – social**

To accommodate growth, our communities, both residents and businesses have indicated that social fabric needs to be part of a comprehensive plan for spatial development in the city. This could include childcare facilities, community spaces, health and care services need to be strategically aligned to new developments and a more holistic method of allocating space on the basis of sustainability. This element of infrastructure was often an important part of the section 106, and could be included in the pan London infrastructure discussions.

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<sup>1</sup> <http://www.lsx.org.uk/docs/page/3741/Siemens%20seminar%2014th%20July%202016%20-%20Connectivity%20in%20an%20Ever%20Growing%20City.pdf>

Another benefit of this approach will be the focus on social integration, which will complement both the development of cultural infrastructure, which the Mayor's Cultural Infrastructure Plan, will ensure that London remains at the cutting edge of global culture. Other initiatives where the delivery of a social approach to infrastructure would be both an exemplar to urban planning in the UK and beyond will be the move towards pedestrianisation, enabling reduced traffic, encouraging walking, engaging the retail sector and exemplifying how a high-pace shopping district can be spatially redeveloped with a focus on sustainability and quality of experience for people.

In a broader sense the concept of Inclusive Neighbourhoods, reflects the need for a more sensitive approach to social integration, with recognition that citizens need both effective infrastructure to conduct their working life, but also an understanding that they could integrate further, creates the necessary components to deliver a socially sustainable infrastructure for the city. In addition, London Sustainability Exchange has delivered a stream of social marketing interventions, which have generated a range of positive outcomes among marginalised groups such as young people, women, and the unemployed and ethnic minorities.

Ensuring that the city is planned with recognition at the individual community and neighbourhood level will facilitate a more integrated approach to social infrastructure.

#### **Recommendation**

- Including conversations with communities – including those who traditionally miss out on mainstream messages on issues facing and tackling future long-term challenges not just delivery for today and tomorrow
- Greater community engagement with simple messages for anybody to understand
- Empowering communities to reduce the demand on future infrastructure

### **3 Housing**

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We welcome the priority given by the new Mayor to London's housing crisis. It is simply unacceptable in a wealthy city such as London that so many of our fellow citizens should be experiencing difficulty accessing the basic right of a secure home.

We welcome, too, many of the propositions sketched out in 'A City for All Londoners' to address the crisis: high density development near transport hubs; linking future housing developments to future infrastructure development; ensuring sufficient housing development in outer London; 'housing-led, mixed-use development'; thinking across all the tenure types; providing support to small and medium-sized contractors; and the target that 50% of housing should be affordable.

We do, however, have a number of concerns which we feel should be addressed in future developments and refinements of the London Plan:

- The resolution of London's housing crisis will come about through the determined and disciplined implementation of hard, practical actions. Notwithstanding the fact that 'A City for All Londoners' is a vision document, there is excessive reliance in the document on future discussions and/or engagement with housebuilders and other stakeholders (via, presumably, the Homes for Londoners Board) whose interests

may not align with those set out in the vision and, as such, we are not persuaded that the ambitions set out in the document will be realised.

- We are concerned that the target of 50% affordability is unachievable and, potentially, meaningless. Previous efforts to enforce affordability targets within London have been unsuccessful; and house prices in London are now so high (relative to incomes) that the GLA definition of affordability has been overtaken by events. A very different approach to the provision of new homes (though e.g. community land trusts) may be required.
- We are concerned, too, about a lack of transparency within the commercial housing market in London. One participant at our workshop on this issue suggested that profit margins on London housing developments are markedly higher than in other UK and European cities, and that these margins, rather than being available to cross-subsidise affordable housing in London are in fact being used to cross-subsidise corporate profitability. Extremely muscular engagement with the large housebuilders will clearly be required; and the Mayor should thus expect considerable resistance (including, for example, to his idea for working more closely with the smaller and medium sized enterprises).
- Finally, we noted the inference that the housing opportunity provided by new infrastructure is to enable large new sites to be developed. One obvious problem with this is the implication that future Londoners will be condemned to long commutes. This is not a sustainable solution. Commuting is antithetical to well-being and a much stronger presumption against the need to travel (via decentralised economic development) is required. There is also an opportunity being missed, here: the true social benefit of new infrastructure is the uplift in land values created. The Mayor should, in our view, be looking to capture the uplift in value associated with new infrastructure (currently and invariably in the hands of private investors) and deploying it to fund housing development (and, conceivably, to subsidising that development so as to make it available on reasonable terms to Londoners).

The need to build at least 50,000 homes in London every year until 2041, is a challenge indeed, not least that within this timescale the city will be exposed to the effects of climate change.

The growth in will also need to correspond to growing demand for domestic consumption of water, electricity and heating systems and the resulting pressure to acquire relevant resources ranging from fresh water reservoirs, power stations and internationally sourced fossil fuels.

Energy efficient homes are an essential ingredient to London to ensure that living in the city is affordable, the Mayor has highlighted that smart-meters and mobile apps can play an important role in ensuring that living in London is affordable, retrofitting in the home and the adoption of a range of new energy efficient devices and products such as LED lighting. London has a strong record for developing this work – including the maintaining of realistic and visionary planning guidance for developers that include guidance on both adaptation to as

well as mitigation to climate change. This work is essential if we are to maintain good quality of life for all London's communities and remain an important element of the effective planning teams, but we cannot afford for these standards to slip or be ignored due to other pressing needs.

Failure to update standards (or supplementary planning guidance), include new standards such as planning guidance for pollution busting or address the challenges of adapting to climate change will result in more startling inequalities, as the poorer communities will suffer as a result.

#### 4 Environment, Transport and Public Space

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We are excited by the Mayor's vision to making the city healthy, resilient and fair, and by making it a resource efficient, low carbon and green city. Our communities are keen to work with the Mayor and team to develop the environment strategy. Our communities are delighted that the Mayor has made pollution busting a high priority for London. Our comments on air quality are made more thoroughly in response to the Mayor's air quality programme. Over the past few months our communities have met and identified the can contribute recommendations in the following areas

- Behaviour Change
- Community Energy
- Pollution busting
- The circular economy

##### **Behaviour Change**

In order to ensure that London and Londoners maintain a strong quality of life; it is essential that London and Londoners are engaged, enabled and empowered to be part of the solution. Such an engagement is crucial not only because it is ethical, but the massive changes that are outlined can only occur with the consent of Londoners.

The most effective behaviour change models indicate a targeted approach, identifying specific behaviours that can be made by a segmented audience. The social marketing benchmark established and consolidated by the London Councils behaviour change programme created a behaviour change framework based on the work of the social marketing centre provided a sound framework that can be developed for all pan London programmes. This used the best principles of co-design with meaningful sense of collaboration following either the Mindspace (Messenger, incentive, Norms, Defaults, Salience, Priming, Affect, Commitment, Ego) 4 E's model (Enable, Encourage, Engage and Exemplify). These models would be effective to support change in London's myriad of communities, LSx work 'What Really Works'<sup>2</sup> identified how these concepts can be deployed in London's myriad of communities

##### **Recommendation**

- Establish a strong community facing team to facilitate an effective behaviour change model as part of the delivery of the London's environment policies.

##### **Community Energy<sup>3</sup>**

Community energy can play a very strong role in developing a sustainable future for London. The work of the London energy team has been exemplar in developing this thus far. We are excited to hear about how Energy for Londoners will be developed in order to take community

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<sup>2</sup> <http://www.lsx.org.uk/docs/page/2508/Whatreallyworks.pdf>

energy to the next step in supporting a sustainable and affordable London that delivers against the following:

- Reduction in CO<sub>2</sub> emissions and hence London's impact on climate change
- Enhance London's energy system's reliability during a period, over the next decade, when the UK will rely on increasing imports of fuels, and will also have to invest up to £200 billion in the country's ageing energy infrastructure
- Tackle the scourge of fuel poverty and cold homes in London.

Enabling Community Energy approaches would provide London with the grassroots connectivity to initiate, develop and sustain a range of emissions reductions, increase energy security and efficiency aligned to significant energy infrastructure investments in the UK and tackle fuel poverty and cold homes in London which result in barriers to economic development and further pressures on health services.

The development of our Green Mosques initiative, which also connects Community Energy within the Environment, Transport and Public Space elements of the London Plan, and as such is an example of community energy that has been developed along social marketing lines. Working with communities, to help them to both take ownership of and contribute to the meaningful development of solutions to issues around fuel poverty, energy efficiency and to become active agents in transitioning to LED lighting, smart metering and other types of resource efficiency highlights how a community focused approach can create social integration, improve engagement and skills in the community and generate monetary savings to be invested into community development.

We have been able to develop a targeted community energy programme, with a sustainably designed framework, by working with UK Power Networks, (DNO) for London, Smart Energy GB the public engagement arm of the UK's Smart Metering Implementation Programme and the Big Energy Saving Network, a community based initiative, designed to support communities to take a more active role in the energy market, a better understanding of how they can make savings and enable the development of networks to enhance the engagement of communities with the wider energy sector.

This has been a gradual development of working with Faith Communities, to engage with the community about their understanding of a given resource, either electricity, natural gas or water and relating this to a sense of connection to the environment and their place of worship as a centre of civic engagement and an opportunity to serve others faced with issues such as fuel poverty and other need for support.

LSx has also pioneered the utilisation of social media, to develop and foster a sense of relationship with the way energy is generated, transmitted and utilised by the public as consumers in their homes and in their public spaces. Our Faith and Power programme, delivers a series of focus groups, community engagement events and an ongoing energy saving support programmes to provide communities with necessary support to respond to practical challenges such as fuel poverty, lack of awareness of the kinds of service provision and the ability to make savings a Places of Worship for instance through energy efficiency measures.

From our engagement with our communities they have told us that they would like the London Plan to consider:

- a restored London-wide Feed in Tariff (FIT) to keep momentum up. Given the reduced support from National Government, how will the mayor fund a London FIT?

- 80 communities have collectively delivered 30MW of renewable energy. Can the Mayor develop a fund to work with Local Authorities and Community Energy organisations?
- We support the Mayor in developing the Fuel Poverty Action Plan for London. Our communities concur that there must be a more wholesale adoption of insulation and energy saving techniques. This is as important as energy generation methods. A London-wide Green Deal for those able to pay (currently being piloted in Lewisham) should be developed.
- As ECO are being reduced, it is crucial that Energy for Londoners includes a pan London programme that can reach out to Londoners who are at risk from fuel poverty and support them to combat cold and damp in winter.
- Work with National Grid and SGN to ensure all Londoners have access to a gas connection.
- The mayor should aim to make London the first zero carbon megacity, and lay out the plans for how to do it. Energy needs to come more centrally on the London Plan, setting clear energy consumption and carbon emission targets in the face of the Plan.
- Community energy is an important way forward. Create an end-to-end offer, giving people control of their energy, which will cause them to care more about consumption.
- Incorporate creation of jobs and boosting the economy in this plan.
- As indicated above the Mayor needs to lead a campaign/communications plan, which is based on morals as well as financial incentive, with many different mechanisms, e.g. Reminders when shopping, driving, working, etc.
- Interventions from technology must be encouraged where possible. We support the Mayor in his ambitions to accelerate the take up of SMART meters across the City
- Other technology include passive heat recovery systems on new developments, and city-wide variable tariffs to make energy cheaper at "off-peak" times.

### Circular Economy

We also recognise that a true Circular Economy will flip the waste paradigm. We are looking to the Mayor to work with LWARB to create a framework that will enable Londoners to see waste as a resource. And ensure that secondary materials are developed as a feedstock for a resurgence in London's manufacturing..

The LSx programme on Green Entrepreneurs connects the aspirations for Concept of the Circular Economy, particularly given that London is a global hub of investment and technology and generates results in communities across London creating economic value and increasing participation of citizens, much of the LSx social marketing approach to enable entrepreneurs to emerge from communities. Our Green Enterprise programme has both the ability to meet short term delivery cycles for local authorities, but also responds to some of the longer term and structural challenges facing start up businesses:

- Sustainability should be practiced through activities such as green enterprise. Practical workshops and demonstrations of up-cycling / re-purposing can help encourage and enable non-recycles to engage in waste & recycling – Local Authorities might want to consider this as an engagement mechanism to boost domestic tonnages and difficult to capture waste streams.
- A more strategically targeted recruitment of participants, based on social marketing techniques might prove beneficial especially if appropriate engagement mechanisms are employed
- Exposing people to existing entrepreneurs, mentors and experts in sustainability alongside appropriate support mechanisms is essential in inspiring the next generation of green entrepreneurs.

Through encouraging individuals to become upcyclers or similar kinds of environmentally responsible business, LSs is both developing the capacity of people in London, but on a city



wide scale responding to the increasing pressure on space, funding, infrastructure and materials and providing a means for the need to create jobs and economic growth.

"...the transition towards a more circular economy has the potential to make a real contribution to mainstream employment in the capital. With the right investment and policy interventions, Summary 3 this transition could create up to 12,000 incremental jobs and deliver lasting reductions in unemployment, especially in low-skilled to mid-skilled occupations, whilst simultaneously driving resource efficiency. This conclusion will be supported by the development of a route-map to accelerate London's transition to a more circular economy, led by LWARB, the full version of which is due to be published in Spring 2016 London Sustainable Development Commission

The London Plan along with the London Enterprise panel needs to ensure that it embeds the Circular Economy into London's spatial fabric for instance, providing recycling infrastructure, the reuse of industrial heating capacity and the necessary planning frameworks to ensure that job creation and the utilisation of green, residential, commercial, public and recreational spaces factors in the economic potential for green business, s.150 refers to this as being new forms of business services, the London Plan needs to include more specific recommendations on the kinds of business services being provided, as these considerable opportunities both in terms of the environmental sectors will need both an responsive policy landscape and to be provided with suitable space for growth within an infrastructure that is designed for sustainability, thus harnessing the full potential of the Circular Economy. In Jan 2014 we led a seminar with representatives from waste contractors, NGOs and manufacturing in developing a circular economy in London their recommendations were:

#### **Recommendations<sup>4</sup>**

- Review all policies and contracts to make sure long-term decisions are flexible and able to change for new circumstances and embrace a circular economy
- Review planning policies so new and innovative ideas regarding housing, collection and transport can be implemented swiftly
- Create standard collection to ensure clean and useful recyclates that will encourage investment whilst allowing for entrepreneurs to collect domestic waste
- Create wider collaborations – solving energy waste and carbon and air quality problems with competitions
- Increase knowledge of waste trading hubs and infrastructure to reuse construction materials
- Protect existing recycling spaces and facilities

#### **Protecting our Green spaces**

We support the Mayor's strategic vision by developing a strong relationship between the London Enterprise Partnership, the London infrastructure board and a London Local nature partnership .this would be in line with most other regions of the UK.

A London nature Partnership would be an independent board of influencers and advocates, informed by an advisory group of experts and practitioners from existing partnerships that also feeds into local decision making and delivery, is seen as the best way to deliver a Local Nature Partnership for London. It will be important to link into appropriate policies to achieve influence, and to engage more broadly with stakeholders with vested interests.

This will ensure that the broader challenges facing the city, place nature at its heart. As there is a need to ensure that there is a spatial plan to enhance Natural Capital, this will provide the

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<sup>4</sup> <http://www.lsx.org.uk/docs/page/3741/Siemens%20seminar%208th%20September%202016%20-%20Emerging%20Economies%20and%20Green%20Business.pdf>

This would build upon existing and established links between urban governance and the protection of the natural environment such as the Corporation of London, which manages land for instance in Epping Forest and Hampstead Heath.

To deliver this vision, LSx would recommend the following A LNP governance framework should:

- Consist of a 3-tier structure, comprised of an independent board of high profile influencers driving change steered by an advisory group of experts and practitioners, which itself is informed by existing partnerships
- Enable participation that is appropriate to stakeholders and objectives; rather than quarterly meetings, this might consist of issue-specific workshops or task and finish groups where not all stakeholders feel they need to participate

## About London Sustainability Exchange

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London Sustainability Exchange (LSx) aims to accelerate the transition to a sustainable London by connecting and motivating people.

As a charity we work in partnership with business, government and the voluntary sector to:

- Reduce London's environmental footprint
- Improve the lives of London's disadvantaged communities
- Improve the health of Londoners
- Improve the knowledge and skills of our communities to achieve these goals

To achieve these goals we run learning networks and innovative exemplar schemes. We also seek to influence policy and practice throughout London.

We were founded in 2001 by the City of London and a group of influential partners, who continue to shape our development. In April 2008 we became an independent charity, having initially operated as a programme of Forum for the Future.

Over the past year our work reached an approximate 2,500,000 people indirectly, through newsletters and other networks. We directly benefitted over 13,000 Londoners through events, training, mentoring and advice. By working with over 100 community groups with 3,500 volunteers we are able to report estimated savings of approximately 4,925 tonnes of waste diverted from landfill, 6,723 tonnes of carbon dioxide emissions and 2,091m<sup>3</sup> of water.

We have held a series of community facing events

[Our Future London series hosted by Siemens at the Crystal supported by the City Bridge trust and Trust for London](#)

[Our Green Entrepreneurs programme supported by Carnegie, Wakefield Tetley and Stratford City](#)

[Our Cleaner Air for Communities programme supported by Trust for London and the City Bridge Trust.](#)

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