



## OUR RESPONSE TO THE CONSULTATION ON THE LONDON PLAN

### A. General Points about Consultative Process

1. We welcome the opportunity to input into the London Plan
2. We are concerned, that as with most Consultations, paid officers have months to prepare drafts, and volunteers have weeks to respond. As you know, voluntary and community organisations are desperately strapped for time and money already after years of austerity.
3. We welcome the consultative events organised by Just Space with GLA officers at City Hall which have helped clarify many issues and enabled organisations to discuss ideas. However again these events are only open to the informed few. In order to consult properly with our members and all Londoners far more resource needs to be given to facilitate this. This means more time, more venues, more officer time for Q and As in all the boroughs, more advertising, more explanations.
4. We have concerns that given the huge amount of work already completed by the GLA that there may be some reluctance to make significant alterations to the Draft. However having been assured by Rob McNicol that all comments will be carefully considered and the Draft amended accordingly we would comment as follows.

### B. General Points about Voluntary and Community Sector

1. We consider that the Voluntary and Community Sector merits a chapter to itself in the London Plan

### C. General points about Scope and Powers

1. We understand that the Mayor's powers frequently lie more in the areas of persuasion than directive. We think it would be good if there were more clarity about which elements of the Plan can be enforced. For example where a community opposes a project put forward by a local authority, how will decisions be made?

### D. Rooms of our Own

1. Rooms of our Own was established as a company limited by guarantee in 2012 to try to address the ever-increasing problems of voluntary and community groups in desperate need of affordable, accessible and suitable premises
2. Rooms of our Own is particularly interested in the Women's Sector, and has seen many valuable organisations fold due to loss of premises
3. We have developed a model for creating premises that will be held by and for the community with an asset lock in perpetuity. The community facilities are funded by income streams from housing. This model has been tested by several property developers and an investment banker.



4. In 2013 we were offered a suitable site to pilot our innovative project by London Borough of Waltham Forest. We agreed heads of terms including a capital receipt of £1mn to be paid on project completion. We had over 40 organisations signed up to take space in the proposed centre. We had thousands of local supporters. The GLA consequently gave us a grant of £165,000 towards professional fees. We engaged architects who drew up a feasibility. We found a suitable developer. Then post the 2014 elections LBWF reneged on the agreement. The site is still empty. We are still looking for another suitable site, and have high hopes that the GLA's Small Sites programme will find us something suitable to purchase. Please contact us if you can assist at [roomso4own@gmail.com](mailto:roomso4own@gmail.com)

## E. Comments on Chapter 5 Social Infrastructure

### 1. Policy S1A.

- i. The Plan is heavily focused on statutory provision, but must also promote the provision of safe, permanent, affordable and accessible premises for the voluntary and community sector
- ii. Over the decades following the abolition of the GLC, voluntary groups have suffered massive cut-backs to funding for their activities and also loss of affordable and suitable premises for delivering them. Important organisations are now back meeting in people's living rooms.
- iii. The Plan should reference the need for specific communities to be able to meet separately. It is extremely important for groups sharing experiences and problems to be able to meet, discuss, support and advise each other in a safe environment. From such gatherings come innovation and improvements that can be campaigned for in the wider society. The policy should reference the nine protected characteristics age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- iv. Rooms of our Own is particularly concerned about keeping women only spaces. In these days of #metoo #timesup and #genderpaygap it is as important as ever for women to be able to meet together to discuss their experiences and identify ways forward.
- v. However it is also important for other groups not referenced in the Equality Act to have places to meet. Examples are people with issues such as substance abuse problems, people wanting to gather to produce neighbourhood plans, or simply people who share a common interest in something like music or art.
- vi. Any needs assessment should therefore take all these issues into account
- vii. The GLA could use its own physical assets to promote the work of the voluntary and community sector by allocating space to suitable organisations



## **2. Policy S1C**

- i. The Plan needs to recognise that social infrastructure is not just about service provision
- ii. We need voluntary and community groups to innovate and experiment. Many of the practices taken for granted in our society today were first dreamed of and piloted by the VCS.
- iii. We need people to campaign. It is not possible for groups whose income comes almost entirely from public body commissions and contracts to speak out about all the important issues that only people on the ground know about. The commissioning process has outsourced most of the activities that should be delivered by public bodies to get a cheaper delivery from underpaid charity staff. The commissioning process has also effectively gagged the people who used to speak up about problems in our communities and lobby for improvements. The Plan needs to recognise the benefits of a campaigning and vibrant voluntary sector which is not just there to deliver services.
- iv. Since the loss of many funding streams, what few grants there are cause massive competition between organisations that would love to be co-operating
- v. Many groups spend as much time on fundraising as they do on their activities
- vi. Although some restoration of GLA funding would be extremely welcome, there would still be the danger of organisations in receipt of such funding refraining from speaking out about problems. GLA officers in consultation with voluntary groups should have a think about how this issue could be addressed

## **3. Policy S1E**

- i. Many of the most vulnerable people in our society need to use vehicles, whether that be community transport, taxis or their own cars. It is essential that people who cannot easily walk, cycle or use public transport not be excluded from work, leisure, health or other activities.
- ii. We suggest that this policy includes provision for this significant section of London's population, especially the provision of car-parking spaces near significant social infrastructure.
- iii. We would welcome support and funding for initiatives that encourage the transfer to electric vehicles with scrappage schemes and provision of charging points.

## **4. Policy S1F**

- i. It would be extremely useful if the Plan could create a Guiding Formula to which all London Boroughs would be expected to conform.
- ii. Everyone understands the need for more affordable housing. However there is no point building thousands of additional "units"



without the social infrastructure to support the people living in the units. Doing this would be creating the slums of tomorrow

- iii. We suggest that the Plan devises a framework relating number of housing units to area of green space, number of school spaces, capacity of buses and tubes, number of GPs, number of community meeting places etc. Of course this could not be too prescriptive as requirements vary, but a minimum requirement for every 100 new “bedspaces” would be extremely valuable for local communities campaigning for more social infrastructure provision.

## **5. Policy S1G**

- i. The Plan should make far more reference to the provisions of the Localism Act which seem to have faded into obscurity.
- ii. We understand that cash-strapped Councils are seeking any way at all to gain income, but this is highly detrimental to the future health and sustainability of our communities.
- iii. Public land has already been paid for by the public via rates and taxes. It is already ours. It should not be sold to private developers to give some short-term boost to local authority cash-flows
- iv. Public land should be transferred to Community Land Trusts to provide affordable housing and affordable community spaces to the community that paid for it in the first place.

## **6. RE 5.1.9**

- i. We think this paragraph is much too weak to address all the issues that are facing voluntary and community groups
- ii. Thousands of groups have folded due to lack of funding and loss of premises; often those premises have been taken back by the public bodies that own them and sold to solve short-term cash-flow problems. What are they going to sell when they have spent those receipts?
- iii. Without a vibrant and successful VCS London will no longer be the great city it strives to be. Inequality will grow. Innovation will falter. Social problems will multiply.
- iv. We urge the GLA to provide support for the VCS by transferring some of the sites they own, including those being vired across by TfL, NHS etc, to Community Land Trusts for the provision of affordable housing and affordable community premises.
- v. We urge the Mayor to consider funding programmes (not commissioning of services) to support the amazing work being done by many groups across London.

## **7. Policy S2**

- i. We would like the Mayor to give a strong commitment to lobby for a massive injection of funding into our NHS and Social Care. The current government is driving these vital services further and further



into the ground every year. We need a strong voice to stand up for Londoners and demand proper level of resourcing to meet the need.

- ii. Again, vehicles are important . Most sick people cannot easily walk, cycle or use public transport. Many voluntary groups organise food banks, exhibitions, outings and all kinds of health and social care activities that require vehicles. Certainly promote electric cars but good routes and nearby parking are important.
- iii. More emphasis needs to be given to all the various types of health provision in its widest sense provided by the voluntary and community sectors; from specific illness support groups to groups fighting for cleaner air.

## **8. Policy S6 Public Toilets**

- i. Rooms of our Own, together with many other toilet campaigners, would like to see a statutory obligation for local authorities to provide free, safe, accessible, clean public toilets 24/7. It is inadequate to rely on businesses to provide these.
- ii. Lack of facilities leads to many people's lives being unnecessarily restricted
- iii. Lack of facilities leads to street urination and defecation
- iv. Lack of facilities is off-putting to potential visitors
- v. RE 5.6.3. Planners are welcome to provide gender-neutral toilets should they wish. However it is vitally important that segregated toilets are also provided for women who face dangers where men are allowed to use the same facilities. Planners need to understand the difference between sex and gender. Sex is biological and cannot be changed. We make gender up ... it changes all the time. Women are fearful of using toilets where men who self-identify as the opposite gender may be present.
- vi. Unisex toilets should be provided for families with suitable nappy changing and children's height basins.
- vii. We welcome the recommendation for Changing Places toilets