

Protect Our Places coalition

C/O: Latin Elephant
Office 3, 2 Spare Street
London SE17 3EP
T: 75261 40307
E: sarah@latinelephant.org

London Plan Team

Greater London Authority
City Hall
Kamal Chunchie Way
London E16 1ZE

By email: TowardsaNewLondonPlan@london.gov.uk

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**PROTECT OUR PLACES (POP) EVIDENCE IN
RESPONSE TO *TOWARDS A NEW LONDON PLAN:
CONSULTATION ON THE NEXT LONDON PLAN***

INTRODUCTION

We, the Protect Our Places coalition (**‘POP’**; alternatively the **‘Coalition’**), are writing in response to *Towards a New London Plan: Consultation on the next London Plan* (the **‘consultation document’**), on which the Greater London Authority has invited Londoners to share their feedback. We also comment directly on policies in the existing London Plan, which we think need to be strengthened.

This response collates our insights and builds from our collective and shared knowledge and lived experience as community members, campaigners and business owners contesting unequal development and the gentrification and displacement of our local markets and affordable retail spaces.

ABOUT PROTECT OUR PLACES (POP):

Established in 2023, POP is a coalition of ten groups/communities from across London, each combating local retail and commercial gentrification. We are facilitated by Latin Elephant (Southwark) and additionally include Catford Against Social Cleansing (Lewisham), Fight the Tower/Save Brixton (Lambeth), Friends of Queen’s Market (Newham), Friends of Shepherd’s Bush Market (Hammersmith and Fulham), PlushSE16 (Southwark), Save Brick Lane (Tower

Hamlets), Save Ridley Road (Hackney), Ward's Corner Community Benefit Society (Haringey) and community members and market traders from Tooting (Wandsworth).

POP emerged from a clear need to connect local campaigns facing situated and contextually-specific gentrification pressures in a context of systemic speculative development across the capital. In our regular and sustained coalition work, we are linking our local situations and identifying pan-London challenges, including by deepening our understanding of how strategic planning issues influence our specific, place-based struggles. We understand the ways in which local development is facilitated, fundamentally, by the planning process including by the strategic guidance offered to local authorities by the London Plan.

Our town centres, high streets and markets are so much more than just the 'economic' spaces they are often framed as—they are sites of community, social sustenance and cultural expression, and especially so for migrant, working-class, and Black and minoritised communities. In each of our own contexts, we have seen the violence of displacement, erasure and the dismantling of our communities. We do not feel that the consultation document adequately addresses these systemic and pan-London patterns, nor does it take appropriate steps to prevent their exacerbation in the future.

Our collective knowledge and lived experience evidences the widespread impact of speculative development on local residents and traders, and on local economies and culture. It is this which we bring into conversation with the consultation document, to highlight where the London Plan either stands to perpetuate further inequality or has the opportunity to strategically and intentionally do better by Londoners.

Collectively and individually, we have been recognised as community-based experts on planning issues, including by the London Assembly Planning Committee in its recent work relating to social value in planning and regeneration ([9 October 2024](#)), as well as in its past consideration of community involvement in Mayoral planning applications (9 November 2021).

We speak specifically from our experiences, bringing together our situated knowledge and the lived experience of ourselves and those around us, identifying how our local stories are tied to overarching planning strategies determining London as a whole.

WHY WE ARE RESPONDING

'Race' in the planning process

POP is responding to this consultation for a number of reasons. First, our collective knowledge offers an important evidence base for strategic planning in London, and our lived experience speaks to the challenges faced by ordinary Londoners engaging with the planning process. As community experts who have built our understanding(s) of the planning process in London *out of necessity*, we believe it is our responsibility to call attention to the ways in which strategic planning in London must better serve Londoners.

Beyond this general orientation, however, we are specifically motivated by a shared recognition that the planning process in London **must take more seriously ‘race’**.¹ We have seen that in London, planning is one process by which racial inequality is exacerbated and amplified; and yet, we also see that planning can provide opportunities for intentionally addressing systematic racism and racial inequality. We implore those working on the new version of the London Plan to heed this warning and take this opportunity seriously.

Trust for London has [produced](#) analyses of Census 2021 data, looking at neighbourhood ethnic diversity and its correlation with deprivation. Their interactive maps indicate that the most deprived areas in London have higher rates of ethnic diversity. Addressing this racialised inequality should be the underlying purpose of the forthcoming London Plan.

The town centres, markets and affordable retail spaces which are the foci of our campaigns are of particular importance and cultural relevance to London’s migrant and Black and minoritised communities.² Non-white communities in London face far higher rates of poverty ([Trust for London, 2025](#)). These communities also face higher rates of ‘deprivation’ which has meant they disproportionately live in areas which fall under ‘Opportunity Area’ designations. Accordingly, migrant and Black and racialised communities — both residents *and* businesses ([Román-Velázquez & Hill, 2016, p. 10](#)) — are disproportionately impacted by regeneration. Despite ample evidence suggesting, then, that strategic planning and urban change (e.g., regeneration) disproportionately and negatively impacts non-white and migrant communities, the London Plan has yet to substantively address racialisation and racial inequality. This lack of engagement is not neutral; and in fact, a failure to strategically address how strategic planning exacerbates racialised disparities means that the London Plan runs the risk of worsening them.

Ultimately, we are arguing that the London Plan must centre and take more seriously the issue of ‘race’ and systemic racism, including in the guidelines it sets out for local authorities and for developers.

Throughout this response, we point to the places where ‘race’ — for example the perpetuation of ‘race’-based inequality and disproportionately-borne negative consequences — should be more centrally considered and intentionally mitigated via strategic planning policy.

Strategic planning should support existing local communities

We need a London Plan for Londoners *not* developers. The next London Plan cannot simply provide guidance for developers and local councils, and that its focus should not simply be the facilitation of large-scale development. We ask who this plan is meant to serve, and suggest that it *should* be serving the people of London and not just corporations and their shareholders, or the property developers and speculative land investors, who are continually

¹ A note on language: (i) **‘race’** — we put inverted commas around ‘race’ because it is not a defined category, but is a culturally-specific and socially-constructed way to divide communities according to perceived difference. (ii) **racialisation** and **racialised** — racialisation refers to the social and cultural processes by which certain communities are perceived as different and thus ‘raced’. Racialised refers to communities who have been negatively impacted by processes of racialisation.

² As opposed to BAME or BME, we have chosen to use Black and minoritised or racialised, unless we are directly citing statistics which use another term.

driving up land values so as to make life in this city untenable for most. We argue that these corporate and financial interests — who are, we suggest, being actively courted by the Mayor, London Councils and the GLA via the new London Growth Plan and Opportunity London — are overwriting our city with their exclusionary and exclusive vision, meanwhile ignoring that we are already here, that we love this city and that we want it to serve the needs of those who make it what it is: diverse, vibrant and culturally abundant.

POP members feel that we don't have robust enough policies and guidance under the existing London Plan for communities to use to protect the spaces that matter to them. We have identified that for the London Plan to successfully serve local communities, they must be able to point to it — and to clear, explicit statements within it — to prevent demolition and displacement. Accordingly, the Plan must outline what is or is not permitted, what unwavering expectations there are for developers and what protections there are for existing communities. The plan must offer legal bases by which communities can challenge developments that will directly result in their displacement or to their general loss of belonging. Without such a strengthened strategic planning framework, contesting gentrification will remain challenging, and London will remain at great risk of not only becoming an increasingly uniform and sterilised city, but also of losing well-loved, culturally-relevant and socially indispensable spaces. We reaffirm this point below ([Section 1.1](#)).

At the moment, there are limited avenues for community members to challenge and address power imbalances. But we hope the London Plan can become one of those mechanisms. This means it must be attentive to community perspectives, rather than those of developers, industry and planners who are fundamentally untethered from daily life in London for the average person.

THE FRAMEWORK FOR OUR RESPONSE

In this consultation response, we both [address existing London Plan policies](#), highlighting where they should be changed or strengthened, and [respond to the consultation document](#).

For ease, we respond to ideas and proposals in order of their appearance in the consultation document. With that said, we understand the multiple challenges and planning concerns facing London to be fundamentally interconnected, and feel that any strategic planning document must consider not only issues of housing, local economies and climate change—for example—but also the ways in which these issues intersect both within and outside of strategic planning.

Our collective knowledge and lived expertise provide substantive evidence, particularly in relation to specific topics. Thus, although we comment on a wide range of topics addressed through the consultation document, the majority of our submission focuses on [Section 3: Growing London's Economy](#).

Evidence is hyperlinked where possible. A list of all hyperlinks can be found at the end of the document, where we have also included some additional resources we recommend the London Plan team look into. Evidence that cannot be hyperlinked is attached at the end of this document.

I note that we have also submitted portions of this response as part of the consultation survey.

COMMENTS ON LONDON PLAN 2021 POLICIES

[GG1: Building strong and inclusive communities](#)

[GG5: Growing a good economy](#)

[SD1: Opportunity Areas](#)

[SD6: Town centres and high streets](#)

[SD7: Town centres: Development principles and development plan documents](#)

[D1: London's form, character and capacity for growth](#)

[S1: Developing London's Social Infrastructure](#)

[E3: Affordable workspace](#)

[E9: Retail, markets and hot food takeaways](#)

GG1: Building strong and inclusive communities

Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must ...

*(C) provide access to good quality community spaces, services, amenities and infrastructure that **accommodate, encourage and strengthen communities**, increasing active participation and social integration, and addressing social isolation;*

*(D) seek to ensure that London continues to generate a wide range of economic and other opportunities, and that **everyone is able to benefit** from these to ensure that London is a **fairer, more inclusive and more equal city***

*(E) ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, **creating places where everyone is welcome, which foster a sense of belonging**, which encourage community buy-in, and where communities can develop and thrive*

(F) promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for building relationships during the daytime, evening and night time ...

Existing good growth principles have not been enforced effectively. Under the guise of 'regeneration', intensive development across London continues to threaten social housing and put culturally-relevant and locally-beloved community space — including in town centres, traditional retail markets and affordable retail space — at risk. These principles need to be strengthened, with greater specificity as to how each policy in the London Plan builds 'belonging' and inclusion in space for groups with protected characteristics (including 'race'/ethnicity and expanded to include 'class'), addresses inequality (rather than exacerbates it, as many policies currently do) and supports social infrastructure and spaces

that support social and cultural activity *including* markets and affordable retail spaces in town centres and on high streets.

Inclusion and inclusivity *must* include not only meeting accessibility needs for diverse communities, but fundamentally countering racial inequality including in its intersections with a range of other disparities. London belongs to everyone. This does not just mean assuring access to suitable, safe, secure and genuinely affordable housing, workspaces and community spaces; it also means addressing overcriminalization and over-policing of Black and minoritised communities within public spaces.

London belongs to everyone, including immigrant communities and those in poverty. The markets and affordable retail spaces our campaigns are trying to protect are fundamental to facilitating their senses of belonging and right to space. London cannot be *inclusive* without them.

The next plan needs scrutiny mechanisms within which local communities can participate, and this scrutiny must have measurable outcomes. Developers and development must be held accountable to local people. As each of our cases exposes, current development facilitates displacement of local people, local businesses and local community and cultural space. Despite the Good Growth principles, there are no avenues for recourse or for challenging developer narratives. If the Mayor wants to prioritise these principles, they must have teeth, and communities must be able to point to them and use them to challenge development if such proposed development does not abide by them.

Particularly in relation to Principle F, we suggest that the next London Plan build from the findings in the London Assembly Planning Committee's recent report on *Social value in planning and regeneration*, and integrate the report's recommendations.

GG5: Growing a good economy

1.5.2: The things that make London's economy so strong are the same things that make London an attractive and exciting place to live, work and visit. London's ethos of tolerance and respect, its rich cultural and historic assets, the quality of its streets and public places, its spirit of creativity and entrepreneurialism – these things attract businesses of all sizes and allow them to develop and thrive. The people who these businesses employ need strong communities, good public transport connections, pleasant environments that promote good health, access to shops and local services, and good quality, affordable homes in places they want to live. The continuing success of London's economy is reliant upon making the city work better for everyone.

*GG5: To conserve and enhance London's global economic competitiveness **and ensure that economic success is shared amongst all Londoners**, those involved in planning and development must ...*

*(B) seek to ensure that London's economy diversifies and that the **benefits of economic success are shared more equitably** across London...*

*(D) ensure that **sufficient high-quality and affordable housing, as well as physical and social infrastructure** is provided to support London's growth*

Local economic spaces like markets, which are themselves rich cultural and historic assets that support creativity and entrepreneurialism are under threat, despite the above policies. They are being threatened by large-scale development that displaces them, fails to relocate businesses and erases much needed affordable workspace and commercial space. These independent, culturally-specific and locally-embedded businesses range in size, from micro-businesses run by sole traders to larger enterprises that employ other community members. They are also fundamental to ensuring that economic success is 'shared amongst all Londoners'. Existing policy could be strengthened by providing specific protections for these spaces, whether that be through their designation as heritage assets or through specific planning policies that prioritises long-term security of tenure for existing businesses and ensure the necessary internal investment to maintain and sustain them.

We also note that existing policy around 'growing a good economy' does not recognise that local economies serve diverse purposes beyond their contribution to financial flows, and that this activity must also be encouraged and protected. Local economies, such as markets and affordable retail spaces, meet specific community needs by providing culturally-specific and affordable goods and services that cannot be found or accessed elsewhere. Given the high rates of inequality across London — and that poverty and deprivation are disproportionately experienced by Black and minoritised communities who are served by markets and affordable retail on high streets — these spaces must be protected, sustained and fostered.

We also note that 'high-quality and affordable housing' must explicitly be the priority within the new London Plan, and that housing need (e.g., tenure and rent level) should be the driving force behind the development of housing. All housing is not equal, and this must be

explicitly laid out in policy, with avenues for contesting market rate and purpose built student accommodation that exacerbates local housing and health crises. We also explore this point in greater detail [below \(Section 2\)](#).

Physical and social infrastructure must explicitly include the markets and affordable retail that support local communities, and particularly communities who are facing compounding inequalities including housing, economic and health inequality. Such inequality is, as already mentioned, disproportionately borne by racialised communities.

SD1: Opportunity areas

*(A.1.C) [To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will provide support and leadership for the collaborative preparation and implementation of planning frameworks that] support **regeneration***

*(A.5.) [To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will] ensure that Opportunity Areas **maximise the delivery of affordable housing** and create mixed and **inclusive communities***

*(A.6.) [To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will] ensure that Opportunity Areas **contribute to regeneration objectives by tackling spatial inequalities** and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration*

In 2013, Dr Ben Campkin at UCL problematised the 2011 London Plan for failing to define ‘regeneration’ beyond suggestions that business- and property-led redevelopment will ultimately result in improved quality of life for nearby communities, even while the ‘strategies the Plan promotes have been widely criticised for working directly against such objectives, **reducing the amount of genuinely affordable housing, instigating the demolition of estates rather than their renewal, alienating communities** instead of engaging with them, and so on’ (p. 5). Despite further iterations, regeneration remains blurrily defined in the plan, and there has been minimal effort, if any, to address community concerns relating to displacement. In the next plan, if the language of ‘regeneration’ or ‘renewal’ remains in use, these terms must be specifically defined, including what outcomes are expected of ‘regeneration projects’ and how this ‘regeneration’ will materially support existing communities’ use of space and social and cultural life. Otherwise, ‘regeneration’ of estates or town centres will remain in practice — for existing local communities — ‘state-led gentrification’ (Lees, 2014a; 2014b; Smith, 2011) and displacement.

Many of the beloved markets and retail spaces at the centre of POP campaigns fall within or adjacent to established Opportunity Areas, including Canada Water, City Fringe/Tech City, Elephant and Castle, Lee Valley, New Cross/Lewisham/Catford and White City. Throughout our neighbourhoods and beyond, we see that development in these Opportunity Areas repeatedly prioritises unaffordable ‘market’ housing, and that developers are able to manipulate policy in order to *minimise* their delivery of ‘affordable’ housing, *including* in areas where they have demolished council and social rented homes. Often, they point to

viability assessment to do so, despite repeated challenges to them, including in the GLA's own 2023 draft LPG on Viability.

Mixed and inclusive communities are *not* the outcome of Opportunity Areas, but not only because these designations result in the proliferation of unaffordable housing. They are not inclusive because Opportunity Areas and related town centre 'regeneration' threatens local economies including markets and affordable retail spaces, replacing them with commercial spaces that do not meet local need. We discuss this in greater detail throughout the rest of our response, informed by our lived experience and extensive knowledge, gained over years of scrutinising local planning decisions and the planning process.

(B) Boroughs, through Development Plans and decisions, should:

(B.2.) support development which creates employment opportunities and housing choice for Londoners

Much of the development that we have seen in our communities has negatively impacted our local economies and housing provision, reducing affordable workspace and retail/commercial space and demolishing homes for social rent. These spaces are then replaced with unaffordable commercial space and homes, which our community members cannot afford. Elephant and Castle is a particularly egregious example of this trend — the demolition of the Heygate Estate and Elephant and Castle Shopping Centre has resulted in the mass eviction of over 3,000 residents and in the devastation of our local economy, as evidenced in two recent reports by Latin Elephant ([2023](#); [2025](#)).

(B.3.) plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities, working with infrastructure providers where necessary

We want to advocate for specific recognition of markets and affordable retail spaces as necessary social infrastructures that support 'inclusive' communities.

(B.4.) recognise the role of heritage in place-making

Heritage designations must be more expansive, so that culturally, socially and historically relevant places *and activities* — like our local markets and affordable retail spaces — can be recognised. If activities and markets are recognised for more than their 'architectural' significance, communities can use this to protect local economic activity and sustain inclusive economies that meet the needs of diverse working-class and marginalised communities.

(B.9.) ensure planning frameworks are informed by public and stakeholder engagement and collaboration at an early stage and throughout their development

Existing consultation and 'stakeholder' engagement is largely tokenistic, and fails to give local communities the necessary powers for shaping and planning the spaces they rely upon to sustain their daily lives. In each of our experiences, communities are not given the same ability, time or access to resources to shape urban space as are external investors without connections to the land, spaces and infrastructures in question.

SD6: Town centres and high streets

*(A.1.) [The **vitality** and viability of London's varied town centres should be promoted and enhanced by] encouraging strong, **resilient**, **accessible** and **inclusive** hubs with a diverse range of uses that **meet the needs of Londoners**, including main town centre uses, night-time economy, civic, community, social and residential uses*

The vitality of our town centres and high streets comes directly from communities who rely on them, and on the relationships fostered between community members and the independent businesses and market traders who serve them. For high streets to be resilient, accessible and inclusive, markets and affordable retail spaces must be protected. These spaces serve working class Londoners including immigrant and Black and minoritised communities, and *these* Londoners' needs must be met.

These markets and retail spaces stand in stark contrast to what we observe in White City and in Stratford, where nearly identical and undifferentiated retail palaces say nothing about the communities living around them, upon which they have been inflicted. High street retail, for miles, has been impacted. For affordable retail, increasing rents threaten widespread displacement of the essential economic, social and cultural infrastructure provided therein. Destination shops on high streets have also lost business and footfall, and are closing or moving elsewhere, diminishing local offer.

There is already a surfeit of high end retail, and yet planning applications continue to favour it at the expense of much needed diverse and affordable goods and services. We have seen this across the city but very obviously in the case of Shepherd's Bush.

(A.2.) [The vitality and viability of London's varied town centres should be promoted and enhanced by] identifying locations for mixed-use or housing-led intensification to optimise residential growth potential, securing a high-quality environment and complementing local character and heritage assets

In practice, this policy has meant 'exploiting' so-called Opportunity Areas for the purpose of maximising land values. 'Optimising' residential growth potential and 'complimenting local character' are euphemisms for displacement and unaffordable housing that is not accessible to local people.

(A.4.) [The vitality and viability of London's varied town centres should be promoted and enhanced by] strengthening the role of town centres as a main focus for Londoners' sense of place and local identity in the capital.

If town centres are meant to support Londoners' sense of place and local identity, this land should not be sacrificed to financially benefit international developers with no connection to the local community and the vibrant environment that it's created organically. Importantly, any profits from this type of speculative development do *not* benefit the local community. On the other hand, independent businesses and traders immediately and enduringly contribute to the local economy.

(D) The particular suitability of town centres to accommodate a diverse range of housing should be considered and encouraged, including smaller households, Build to Rent, older people's housing and student accommodation.

Luxury flats, smaller homes, build-to-rent and student accommodation do not meet most Londoner's needs and actually exacerbate the housing crisis, which is really a housing affordability, overcrowding, temporary accommodation and homelessness crisis. Developers construct unaffordable homes instead of the social rented homes that are essential to addressing this crisis. Thus, these forms of housing should not be prioritised. The question should not be whether diverse housing is 'considered and encouraged' but rather whether certain forms of housing — in this case quality homes for social rent levels — are prioritised over others.

Substantive evidence, including from the GLA suggests a need for family sized homes. Build to rent extends an already exploitative private rental sector and produces largely unaffordable homes. Student accommodation has repeatedly been called into question, including within the consultation document.

(H) The delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, seating and public toilets.

Explicitly, there should also be reference to 'an inclusive town centre environment that meets the needs of all Londoners, including Londoners from **immigrant, Black and minoritised, and all working-class backgrounds**'. 'Race' must be more specifically considered, especially in relation to inclusive design and planning to support access to culturally-relevant and much needed goods and services.

(I) The varied role of London's high streets should be supported and enhanced.

'Varied role' suggests that high streets should meet local needs rather than some singular and reductive vision of what commercial and economic spaces should look like. This means that existing local provision, such as local businesses, must be protected within planning policy. We have yet to see this, and hope that the next London Plan will incorporate such considerations.

In some Local Plans, local authorities are taking greater initiative in keeping local businesses in place (e.g., Southwark Plan P31, P32 and P33). The London Plan needs to be able to take these approaches pan-London, ensuring that local and independent businesses across the capital are better protected against speculative development. Relevant local policies are a great place to start, but they are not always sufficient; the next London Plan should explicitly learn from local communities how these have been insufficient thus far, and implement policies that provide more substantial safeguards.

(J) The provision of social infrastructure should be enhanced, particularly where it is necessary to support identified need from town centre and local residents, and facilities should be located in places that maximise footfall to surrounding town centre uses.

Building from the report on *Social value in planning and regeneration*, markets and affordable retail spaces including arches should be considered as social infrastructure in town centres, and valued by policy accordingly. These spaces provide local communities with important social and cultural goods and services, and their losses are devastating.

D1: London's form, character and capacity for growth

London boroughs should not be planning for growth but to address inequality and inequity. This change would lead to housing delivery that meets local need and supports investment into the places that are already important to people — e.g., local retail markets and community centres — supporting these spaces' abilities to meet local and culturally-specific needs. This would more successfully address the current housing crisis, which is not simply one of provision but one of suitable provision, as well as local employment, health and social infrastructure needs. This means that 'defining an area's local character to understand its capacity for growth' requires surveying what existing spaces matter to local people and protecting them, even if that means that an area cannot be as intensively redeveloped as alternative measures of 'potential' for development might suggest.

S1: Developing London's Social Infrastructure

*(C) Development proposals that provide high quality, inclusive social infrastructure that addresses a **local** or strategic need and supports service delivery strategies should be supported.*

*(F.1.) [Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should only be permitted where] there are realistic proposals for **re-provision** that continue to serve the needs of the neighbourhood and wider community, or;*

*(F.2.) [Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should only be permitted where] the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet **future population needs** or to sustain and improve services.*

Development proposals should address local need, even where local need requires culturally-specific infrastructure. Further to this point, markets and affordable retail spaces should be considered social infrastructure, and protected, maintained and invested in accordingly. The next London Plan should expand this section on social infrastructure by including the recommendations from the *Social value in planning and regeneration* report by the London Assembly Planning Committee (2025), to support such an expanded definition of social infrastructure and protect these spaces through strategic planning guidance.

London might consider doing a Land Commission and developing a ‘social purpose of land framework’ — as has been/is being done in [Southwark](#). This will improve understanding not only of how land is currently being used, but also how communities want/need land to be used. This will support maintenance and investment in existing uses/purposes/roles of land that already meet the needs of existing communities, especially where that need is differentiated and unique, such as culturally-specific economic spaces.

In addition to requiring an assessment of existing *and historic* ‘social value or purpose’, the London Plan should acknowledge how developers, including local councils, have chosen an approach of ‘managed decline’ of both housing and retail spaces in order to justify subsequent ‘regeneration’ proposals. This must be prevented in future instances. On the Shepherd’s Bush Market site, for example, this pattern has manifested as under investment in the infrastructure — leaving the place looking more shabby — and pushing out traders — refusing them secure leases and leaving more stalls empty.

Priority should be given to infrastructures that meet existing **local needs**.

There need to be greater statutory expectations and mechanisms for re-provision of existing infrastructure; better yet, existing infrastructure should be protected in development proposals. Displacement of infrastructure — including markets and affordable retail spaces — should be avoided wherever possible.

We dispute the expectation that it is acceptable to lose existing social infrastructure if development plans provide social infrastructure for ‘future population needs’, particularly where ‘future population needs’ are the direct result of the eviction of working class communities (e.g., demolition of council and social rent homes) and the construction of unaffordable luxury and student housing. This intentional ‘replacement’ of existing communities, and the eradication of existing infrastructure in favour of new infrastructure serving anticipated future residents is not only unacceptable but explicitly facilitating social cleansing.

E3: Affordable workspace

We argue that planning obligations should not just be ‘used to secure affordable workspace’ but also to protect existing affordable workspace, particularly in redevelopment of town centres. As recognised, this is especially important for ‘disadvantaged groups starting up in any sector’. Research indicates that businesses owned by Black and minoritised community members are — by virtue of being overrepresented in Opportunity Areas — at greater risk of displacement by regeneration schemes (Román-Velázquez & Hill, 2016, p. 10).

More unaffordable office space is unneeded, especially as offices remain empty across the city. ‘Affordable’ office and work space should not only be built when developers are sweetening their proposal by pretending to meet need.

We know from our own experiences that a distinct dearth of affordable workspace across the city makes it harder for community members already facing marginalisation — e.g., from backgrounds with ‘protected characteristics’ — to participate fully and equitably in the London economy. For example, the markets and affordable retail spaces at the hearts of

campaigns are important because they have allowed immigrant and Black and minoritised community members to support their families better than they were able to in more exploitative industries where these communities are overrepresented: e.g., the gig economy, informal care work and cleaning. Existing affordable retail should be protected, and those within it should be offered secure leases that fall under the 1954 Landlord and Tenant Act, even where these spaces are not owned by the public sector.

E9: Retail, markets and hot food takeaways

*(A) A successful, competitive and **diverse retail sector**, which promotes **sustainable access** to goods and services for **all Londoners**, should be supported in line with the wider objectives of this Plan, particularly for town centres*

*(B.1.) [In Development Plans, boroughs should] identify future requirements and locations for new retail development having regard to the town centre policies in this Plan and strategic and **local evidence of demand and supply**.*

We agree that there must be attention to the *diverse* retail sector, and by that we mean specifically that there should be greater attention and protection within planning guidance to the retail sectors that provide culturally-relevant and affordable goods and services to *diverse* communities. Sustainable access to goods for all Londoners demands that the retail and amenity spaces which specifically support migrant, Black and minoritised and working-class Londoners need to be explicitly protected within strategic planning guidance. These enterprises, CICs, charities and community organisations often compete for space with larger and wealthier businesses that are often less accountable to local people.

Sustainable access means that Londoners can continue to afford goods and services, even during times of economic crisis, like those we have seen over the past several years. Local market traders and independent businesses can often meet local needs more cheaply and more specifically. Sustainable access also means that important community businesses are kept in place, invested in and maintained.

Local evidence of demand and supply should prioritise *existing* communities, not imagined communities of the future.

This policy orientation must permeate all levels of planning policy and guidance: at the GLA level as well as in local plans. Where it is not included in local plans, there should be avenues for challenging local planning decisions. At the moment, one of the only avenues for doing so is via the Mayor's call in process; however, our collective experience suggests that local challengers' rarely succeed even where they have significant evidence that uncovers the failures and even spatial violence within a proposed plan. The decision making process is not just opaque but from our experience it mostly by-passes any of the mechanisms of democratic accountability. Meetings and correspondence between developers and local authorities are deemed commercially sensitive and even when requested are only made available in severely redacted form. This highlights the imbalance in the current way in which the planning system is functioning. Accordingly, we ask: Do local people really have any say in the future of the place where they live?

*(B.3.) [In Development Plans, boroughs should] set out policies and site allocations to secure an **appropriate mix** of shops and other commercial units of different sizes, **informed by local evidence** and town centre strategies. Particular consideration should be given to the contribution large-scale commercial development proposals (containing over 2,500 sq.m. gross A Use Class floorspace) can make to the **provision of small shops and other commercial units. Where justified by evidence of local need, policies should secure affordable commercial and shop units.***

There should be greater emphasis on the role of local authorities in securing affordable commercial space and shop units for local, independently owned businesses and sole-traders.

*(C.3.) [Development Plans and development proposals should] provide a policy framework to **enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping.***

There should be greater emphasis that ‘to enhance local and neighbourhood shopping facilities’ means investment in and maintenance and refurbishment of existing markets and affordable retail spaces. At the moment, however, many of these spaces are subjected to organised neglect and managed decline, or sold by public authorities (e.g., TfL) to private landlords who have no intention of keeping them for local communities, instead transforming them into exclusionary (‘luxury’) spaces, in order that their often “off-shored” investors can profit from the speculation

Preventing the loss of retail — specifically *affordable* retail — should be a priority of London Plan policy. Essential convenience and specialist shopping must include explicit reference to culturally-appropriate goods and services that respond to the needs of diverse communities, particularly those of Black and minoritised and working class backgrounds.

*(C.5.) [Development Plans and development proposals should] **support London’s markets in their full variety, including street markets, covered markets, specialist and farmers’ markets, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres and the Central Activities Zone***

(C.7.) [Development Plans and development proposals should] manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including:

- a) town centre vitality, viability and diversity*
- b) sustainability and accessibility*
- c) place-making or local identity*
- d) community safety or security*
- e) mental and physical health and wellbeing.*

Artisanal markets, including farmer’s markets and specialist markets (e.g. Borough Market, Broadway Market, Camden Market, Columbia Road Flower Market, Portobello Road), have received great support from local authorities, in part because they are recognised as being draws for tourists and visitors from other boroughs and beyond. In our experience, visitors

also come to other traditional retail markets as they exist in their current form. In our experience, modifications to these spaces are less about attracting tourists and more about pandering to office workers. By removing what are the essential, unique and diverse features of these spaces, development is damaging London's heritage and making markets *less* appealing to out-of-town visitors.

Meanwhile, the street markets and covered markets that local people depend upon have seen systematic disinvestment, despite being essential to local communities and especially to diverse working class communities. These markets, some of which have been serving local communities for over a century, are fundamental to local identity. They are multigenerational, both in terms of the traders and the shoppers. Their loss — or their transformation into markets that no longer serve local people — would be devastating to local communities. These markets enable communities to support themselves and to access affordable food, goods and services. They are central to senses of belonging in London. Finally, we know that the social support offered by these markets helps provide community safety and wellbeing, and promotes physical and mental health and wellbeing.

Research by [Markets 4 People](#) will be helpful for expanding the GLA's understanding of traditional retail markets and the community value they contribute.

While the Mayor has established the London Markets Board ([LP 6.9.4](#)), we have concerns about who is represented on this board and how well it advocates for the traders within traditional retail markets. We are not confident that it remains an active body or functions in any meaningful sense, as the last posted meeting was 22 July 2024. In October 2022, the Mayor wrote: 'I announced the appointment of my new London Markets Board in September 2022. The group of 19 sector experts, operators, business leaders, and entrepreneurs will advise me on action to support and promote the capital's wholesale, street and covered markets and help to deliver a London markets strategy'. It is concerning that while there is a mention of wholesale markets, there's been nothing from the Board in relation to the current displacement facing Smithfield and Billingsgate wholesale markets.

COMMENTS ON THE CONSULTATION DOCUMENT

[Section 1: Introduction](#)

[Section 2: Increasing London's housing supply](#)

[Section 3: Growing London's economy](#)

[Section 4: London's capacity for growth and design quality](#)

COMMENTS ON SECTION 1: INTRODUCTION AND ON THE GENERAL LONDON PLAN FRAMEWORKS

GENERAL CONCERNS

Growth vs Inequality

The Mayor's new plan will purportedly 'fix the housing crisis in London and deliver sustainable economic growth that benefits Londoners across our city' (p.4). However, there

is no indication that this plan will correct the mistakes of prior strategic planning guidance, and instead we are concerned that it will only exacerbate existing inequality and untenable conditions. This is especially the case if the economic frameworks underpinning London planning build upon those in the recently published London Growth Plan or within programmes like Opportunity London. In their pursuit of profit-motivated, the London Growth Plan and Opportunity London actively work to attract profit-motivated and speculative international investment which has a proven track record — including within our own communities — of facilitating the displacement of already-local communities.

To this point, we suggest that since its first iteration, the London Plan has actually worsened the housing crisis, exacerbating housing unaffordability for the majority of Londoners, instead contributing to land speculation within the city, driving up land values and allowing a rapidly expanding and unregulated private rental sector to increase rents with impunity. Poor housing conditions, homelessness and overcrowding have ballooned as a result.

Thus, we want to challenge the premise that ‘growth’ should be the framework underpinning strategic planning policy in London, instead suggesting that the focus of the next London Plan should be inequality and lack of equity, and specifically that the policies and guidance outlined within the document should first and foremost work to address the substantial inequality (racial, class, health, gender, housing, educational, etc.) that characterises London at present.

We explore this further throughout this document, in response to specific paragraphs or proposals within the consultation document. In doing so, we offer insight into where a focus on addressing inequality might produce superior outcomes than a focus on growth.

Relatedly, we also want to call attention to what we see as contradictions between the ‘growth’ frameworks being applied throughout this document, specifically that the principles of ‘good growth’ seem in tension with the new principles laid out within the recently published London Growth Plan. We note that while the principles of good growth seem more likely than those in the London Growth Plan to support local communities, the friction between the two helps to evidence the problem with ‘growth’ as an overarching framework generally.

COMMENTS ON SECTION 1 PARAGRAPHS/PROPOSALS

Section 1.1 The London Plan

Policies in the London Plan are used to help shape and determine development proposals for all planning applications across Greater London, and any conditions or legal obligations that may be applied... When local authorities write their own plans, they must be in ‘general conformity’ with the London Plan. This broadly means that the local policies can’t harm implementation of the London Plan.

As local authorities are the planning authorities on most planning applications, the London Plan must provide clear expectations and be diligent about calling out those applications which violate the principles underpinning the Plan. As we have stated above, communities need for the London Plan to not only represent their needs and interests, but to also be able to then point to the London Plan when they are challenging planning applications. They need

the Mayor and GLA to meaningfully enforce the policies intended to protect local communities, and challenge development proposals that will cause harm.

The London Plan should have a cohesive framework that supports communities across London, especially because some local plans are lacking. Local markets and independent retail also require access to wholesale suppliers, which suggests that there must be greater strategic coordination between hyper-local economies and the London-wide economy. This has become increasingly evident because wholesale markets are also under threat from speculative development in our city. London needs to *work* like a city, not just *look* like a city.

Despite this, the consultation document has some concerning language which stands to further displace existing communities in London, exacerbate the housing crisis and lead to lower standards of living for most people in the capital.

Section 1.3 How many homes will it plan for?

*Unlike other parts of the country, the London Plan sets housing targets for each borough to achieve. This is based on where those homes can be built, **rather than necessarily where the need for those homes arises locally**... For planning, London is treated as one large housing market.*

This approach has the potential to exacerbate London's astounding inequality and reinscribe spatial injustice, especially in relation to housing. First, this approach ignores how house building trends and planning decisions have substantially worsened the city's housing crisis. This framework, like current guidance, weighs all forms of housing equally, regardless of whether it is affordable or unaffordable to local people. While this framework might help to simplify housing planning in London, it does so at the expense of local people. It ignores local contexts and views London as a singular housing market — rather than as a mosaic of existing communities with culturally-specific needs. In doing so, it has the potential to exacerbate racialised and class-based displacement.

This is especially astounding where there is potential in local areas to build more homes for local people and to meet local need, but land is *not* used for this purpose and instead local communities are evicted and replaced to facilitate the construction of numerically more homes but fewer which address housing need.

In Elephant and Castle, for example, the eviction of over 3,000 residents from the Heygate Estate and the slow, ongoing decanting of the Aylesbury Estate have both demonstrated how an increase in numbers of homes has had disproportionately negative impacts on the local communities. The eviction of Heygate Estate residents occurred between 2011 and 2014, and this part of Southwark saw extreme 'gentrification' and displacement between 2010 and 2016. In fact, research from The Runnymede Trust ([2021](#)) exposes that the Elephant and Castle Opportunity Area had some of the highest rates of displacement (measured as a proxy indicator of population churn) compared to elsewhere in Southwark (p. 6).

Given that diverse working class — including migrant, Black and minoritised — communities disproportionately reside within Opportunity Areas (including Elephant and Castle), resulting displacement is not just disproportionately classed but also disproportionately racialised.

This perspective also ignores how communities emerge and sustain themselves, suggesting that fragmentation of communities is an acceptable solution to the housing crisis, even as land is being taken from them or from areas surrounding them to be sold to developers. Thus, this framework demonstrates the racialised nature of London's planning system, and reinforces existing spatial prejudice.

Section 1.4 Viability and delivery

The London Plan will need to identify the capacity to deliver 880,000 homes over 10 years and how we can achieve Good Growth.

As we've mentioned above, if the delivery of 880,000 homes does not respond to actual housing need (specifically concerning rent levels and size), we are concerned the Plan will fail to address the housing crisis, instead likely exacerbating it. Viability assessments — as presently undertaken — compound existing housing inequality and exacerbate local housing need. They allow developers to build homes that local people cannot afford, or which are not for local people whatsoever (as in the case of purpose built student accommodation). Viability assessments view housing strictly as a more or less profitable asset, and ignore that housing (quality and longevity of housing stock, security of tenure, affordability) is an important determinant of mental and physical health, quality of life, educational attainment and community cohesion.

At the moment, developers are permitted 20% profit on developments. This allowed profit margin has historically been lower, but it has increased over the years. When developers calculate their expected profit, they are allowed to use current land values, despite the likelihood that land values will continue to increase, meaning they are permitted to justify building little luxury housing based on underestimates in their favour. They are also allowed to factor in the costs of lawyers, surveyors and other experts whom they may employ in the future. Communities, meanwhile, struggle to access the same expertise to contest or scrutinise this process. Viability assessments, then, are allowing developers to fudge their numbers in the present and sustain future power disparities between themselves and community members in the future.

If the Mayor of London and GLA want to ensure that Londoners thrive, then viability assessments — and their disastrous consequences — must be reconsidered. Ultimately, we question viability as a framework. Conceptually and in its material impact, viability facilitates spatial injustice and inequality across the city.

In the case that these insights are not taken forward, and viability remains a consideration within development and planning decisions, we urge the Mayor and GLA — and the London Plan team — to ensure the rules around it are stricter, particularly around what is considered profit. At the moment, there is too much flexibility in what is allowed to be recorded as profit or recorded as losses to be recouped before 'profit' can be considered as such. We note that

communities have no adequate avenues for contesting viability statements. This must be included in future strategic guidance.

There is nothing ‘viable’ about unaffordable housing when it makes the housing crisis worse. There is nothing ‘viable’ about unaffordable housing that is reliant on the demolition of council housing, which local people can afford to live in and within which many have secure tenancies. There is nothing viable about any housing that is made poorly, and puts communities at risk of death and ill health. Unaffordable housing is not a public good. To the contrary, it is a public drain because it exacerbates existing housing need and puts greater pressure on local governments to provide temporary housing, address homelessness and manage emerging housing-related health crises. Housing cannot be a neutral calculation.

Viability has allowed developers to escape responsibility for ensuring that their land speculation does not cause harm to communities. Ultimately, elected officials cannot continue to promote a system that allows for profit for shareholders to excuse harm to constituents, and the London Plan must be one of the ways that challenges existing trends.

COMMENTS ON SECTION 2: GROWING LONDON’S HOUSING SUPPLY

GENERAL CONCERNS

Given the multiple housing crisis facing London, housing is understandably one of the main priorities to be addressed within the new London Plan. We want to raise several, general concerns relating to the consultation document’s approach thus far, and offer some evidence and insights which we hope might influence policy makers as they draft forthcoming strategic policy.

Housing demand must be understood holistically; it is not simply a matter of how many homes need to be built but what kinds of homes need to be built and *for whom*.

The consultation document reports that 880,000 homes are needed in London to meet housing demand for the next ten years. We argue that this number masks key details — particularly those relating to affordability and size — and ignores clear connections between the housing crisis today and house building trends from the last 20 years.

The standard method used to produce this calculation is flawed as has been made clear by many. This should not determine how housing construction is planned for in London. Similarly, we raise concerns about new wording in the NPPF (paragraph 125C) which suggests that if housing is being delivered on ‘brownfield land’ — effectively any development in London — that planning permission should be granted it unless there are *significant* harms. Yet, this makes it difficult for communities to challenge housing developments that they feel would have devastating consequences (e.g., raising rents to unaffordable levels, thus forcibly displacing people). We are already seeing developers across the city take advantage of this change. They are breaching multiple local plan policies, put in place to protect communities, and yet are claiming no *significant* harm is being done.

Housing demand in London is closely linked with demand for affordable homes, and the consequences of a largely unregulated private rental market. Recent data reveals that there are 336,366 households on London local authority waiting lists, but it is reasonable to assume that even this substantial number is an underestimation. It is well known that local authorities periodically purge their waiting lists, particularly of households for whom the likelihood of receiving social rent homes is unlikely. However, eliminating people from a housing waiting list does not eliminate their housing need.

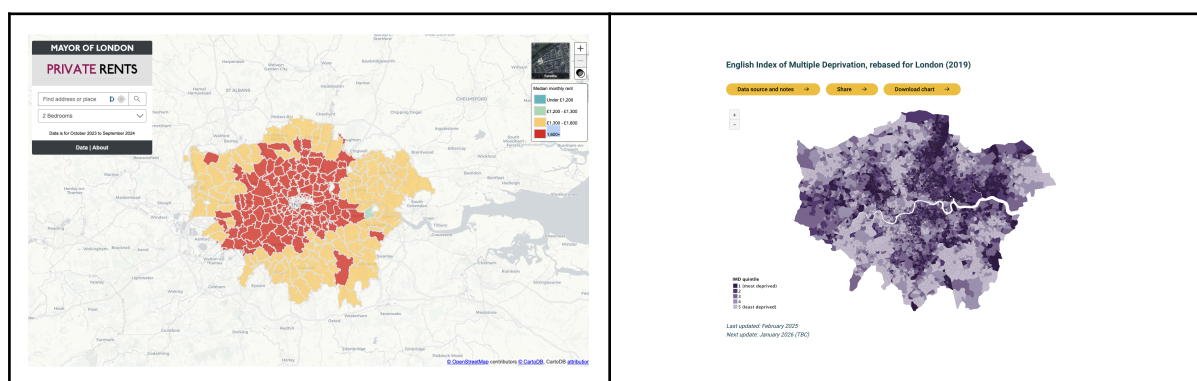
Further to this point, we recommend reading Dr Joe Penny's [report](#), *The promise of cross-subsidy: Why estate demolition cannot solve London's housing emergency*, commissioned by the Public Interest Law Centre (PILC).

Londoners don't just need homes, they need homes they can afford. Our housing crisis is, primarily, a crisis of affordability.

Across the capital, [rent as a percentage of Londoners' gross pay](#) far outpaces that of the national median (24.9% income). At a minimum, Londoners in Sutton are contributing 32.3% of their gross pay towards rent. The London median is a contribution of 46.4% of gross pay towards rent. That is nearly 50%. In the boroughs where our campaigns are based, Londoners contributed the following percentages of gross pay in 2022-23:

- Hackney: 53.7%
- Hammersmith & Fulham: 53.1%
- Haringey: 46.4% (London median)
- Lambeth: 51.4%
- Lewisham: 41.5%
- Newham: 47.1%
- Southwark: 49.7%
- Tower Hamlets: 54.7%
- Wandsworth: 52.2%

In fact, in the areas surrounding nearly all of our markets and affordable retail spaces, private rents are consistently in the highest category (marked as red on the [London rents map](#)), despite our communities simultaneously falling within some of the most deprived communities in London. In fact, juxtaposition of the London rent map with the map of multiple index of deprivation rebased for London (Trust for London), show clear and problematic overlap, including around the areas where our markets and affordable retail spaces are located.



Existing data from London Datastore ([Residential starts dashboard](#)) exposes that, over the last 20 years (since 2004/2005), there have been three times more starts on market rate unaffordable homes than on a broad range of 'affordable' homes, including those for intermediate rent. In fact, there have been over ten times more starts on homes for market homes for sale (over this period in comparison to those for social rent (there is a marginal difference if starts on homes for market rent are also included, as homes for market rent make up only 1.6% of total homes started since 2004/2005).

Similar findings emerge from the [Residential completions dashboard](#). Whereas only 72,000 homes have been built for social rents since 2004/2005, over 476,000 homes have been built for 'market rents' or 'market sale'.

There is a need for the London Plan to give boroughs funds and powers to build council homes. Currently the only way that boroughs can hit Mayor of London targets to build 'affordable' homes is by doing deals with developers and housing associations (who are now mostly just developers dressed up as social housing providers). On the Shepherd's Bush Market site this meant a land swap - gifting approximately £11 million of council land in exchange for the promise of 40 units of 'affordable' housing. The definitions of types of tenure are significant and the confusion allows developers to game the system even before you get to issues around viability. Also, even within councils there is a principle of maximising revenue that distorts their decision making regarding 'affordability'. Friends of Shepherd's Bush Market has an example from the Planning and Development Control committee meeting for the Shepherd's Bush Market Yoo Capital proposal. There was discussion about the different tenures of the proposed 40 'affordable' housing units, during which a planning officer said that London affordable rents were 'better' than social or council rents. When asked how it was 'better', he said that they would be better for the council as they were higher and would bring in more revenue.

The existing *and* proposed approach will not tackle the affordability crisis.

London's housing crisis is also an overcrowding crisis.

Overcrowding is not simply the result of too few large and family-sized homes but also the result of too few affordable family-sized homes.

In 2011, the London Assembly Housing Committee [evidenced](#) that building larger, family-sized homes has a greater impact on housing waiting lists. Whereas the construction of a 'one or two bedroom home takes one family out of temporary accommodation or from the waiting list and so meets the housing need of two, three or four Londoners. This is the outcome of the current policy that sees increasing the absolute number of new homes as the top priority' (p. 25). Building family-sized homes 'is a more efficient approach' to solving housing need (p. 26).

This report also highlights several key characteristics which require addressing, and which also evidence how 'race' needs to be considered more concertedly in planning policy.

'Overcrowding disproportionately impacts communities in social housing' (p. 21). However, the London Datastore [Residential completions dashboard](#) indicates that of 72 thousand social housing completions since 2004/2005, only 7,315 have been 4-bedrooms or more. Of 96 thousand low cost rent homes built (including London Affordable Rent, Social Rent and Affordable rents that are not at LAR benchmarks), only 8,545 homes were 4-bedrooms or more. (This data is *not* net, and does not include 'losses'. 27,000 homes for social rent were demolished over this period).

Black and minoritised communities are disproportionately in social housing and in need of social housing. Relatedly, 'overcrowding ... tends to be concentrated in particular neighbourhoods, is more likely to affect some minority communities, and is linked to poorer health and educational outcomes' ([London Assembly, 2011, p. 22](#)).

The London Housing crisis is a health crisis and a matter of life and death.

As Impact on Urban Health (IoUH) [explains](#), 'growing evidence that secure, affordable homes that are in good condition can protect our health and wellbeing, reducing the incidence of long-term health conditions'. Precarious housing — not only in terms of the physical infrastructure, but in terms of security of tenure — puts people at greater risk of deteriorating physical and mental health: 'People facing housing insecurity can experience intense levels of mental distress – we know that 45% of renters experience anxiety as a direct result of their living situation'.

Notably, IoUH suggests that the most precarious housing conditions are found in the private rental sector; and yet, this housing sector is the one fed by developer-led housing production, facilitated and promoted within both the consultation document and the London Growth Plan.

The housing health crisis is a distinctly racialised crisis. Within Southwark and Lambeth, for example, Black people are disproportionately homeless, and their share of the homeless population is twice that of the general population.

Eight years ago, 72 women, men and children were killed in a horrific, avoidable fire in Grenfell Tower, in Kensington and Chelsea. A public inquiry interrogating seven organisations has revealed that 'serial incompetence and negligence, complacency and inaction, and blatant dishonesty and greed' directly led to the fire. In fact, private companies' 'disgraceful, mercenary behaviour put profit before people and exploited the regulatory regime to evade accountability with fatal consequences'. This statement, however, finds resonance not only in relation to the cladding and building negligence crisis, but also to the housing crisis generally. Profit driven construction, development and regeneration is killing people. Government - national, regional and local - should protect people with strong regulation and enforcement. The new London Plan can play its role by making explicit all the necessary safeguards.

Private developers repeatedly put communities at risk, both in the ways they construct buildings but also by suggesting that only those who can afford their ‘unaffordable’ housing (thus enriching shareholders) deserve housing. Everyone else is forced to compete for marginal amounts of new social rented homes, some of which — as in the case of Elephant and Castle — are so dangerous to live in that they continue to stand empty.

The strategic planning proposed in *Towards a London Plan* fails to address the systemic issues facing our housing system: poor quality housing built to maximise profits; systemically unmaintained housing (organised neglect) with flooding, unsafe indoor air quality, poor insulation leading to overheating or freezing, and damp and mould (as in the death of Awaab Ishak); unaffordable and culturally unsuitable housing leading to overcrowding, increases in rough sleeping and greater reliance on temporary accommodation.

COMMENTS ON SECTION 3: GROWING LONDON’S ECONOMY

COMMENTS ON SECTION 3 PARAGRAPHS/PROPOSALS

Section 3.2 Specialist clusters of economic activity

The consultation document identifies demarcated areas and clusters of economic activity including ‘innovation and technology clusters’, financial services clusters, ‘creative and cultural clusters’, and night-time economy clusters. Many of the sites at the centre of our campaigns fall or border these clusters:

- Brick Lane abuts Shoreditch and ‘Tech City’
- Shepherd’s Bush Market is on the outskirts of the White City Life Sciences Hub and ‘Innovation District’

We want to raise concerns related to the geographic specificity of some of these ‘clusters’. For example, they run the risk of facilitating the development of one industry at the expense of everything else that local people need. Compounding this, the boundaries of these clusters have proven porous despite being culturally distinct and subject to different planning strategies. This has clear, resounding impacts on local retail markets.

In the case of Shepherd’s Bush Market, for example, the nearby cluster at White City should not impact planning decisions. In fact, the Westfield Shopping Mall operates as a metaphorical and physical boundary between the cluster and market.

However, permission on the 2023/01093/FUL (LBHF) appears to have been granted in part because there were signed heads of terms with Imperial College London for double basement lab space, as a clear extension of Imperial’s White City campus and the Life Sciences cluster. Despite proposing a development widely understood by community members as destructive and resulting directly in displacement, the developers — Yoo Capital — took advantage of this strategic cluster designation to make their proposal not only palatable but desirable to the local authority and the Mayor of London.

Cluster designations should not come at the expense of the existing community; they cannot rewrite the city so that longstanding uses of space by local people — many of whom are not working within the cluster — are rendered untenable. Rather than being spaces of innovation, they are becoming spaces of destruction.

We want to ensure that there is also attention to the ways in which cluster designations might facilitate university-developer partnerships that are damaging to local communities and their social, cultural and economic lives. That Imperial College London is a partner in the Shepherd's Bush case is not exceptional. Universities across the city have partnered with developers on damaging and displacing developments. In Elephant and Castle, for example, University of the Arts London (UAL) is a partner in and directly benefits from the town centre redevelopment that has devastated the lives and livelihoods of local and independent migrant-owned businesses. The construction of purpose built student accommodation as part of this has, as is recognised in [Section 4.8](#) of the consultation document, resulted in the 'over-provision [of purpose built student accommodation] which impacts other benefits such as the overall number of affordable rooms'.

We anticipate these trends will only be amplified by the new London Growth Plan, which identifies international education (international students) as one of four sectors that are 'globally competitive, very significant economic contributors and mostly highly productive', but at the same time does not problematise how the prioritisation of this 'sector' might directly support the displacement of local people.

Section 3.3 Town centres and high streets

We value the recognition within the consultation document of the importance of town centres and high streets, although we feel that some of the roles of these spaces have not been taken as seriously as they should be. Namely, the focus remains on the economic contributions of town centres and high streets but not on their important cultural and social relevance to local people. The necessity of our respective campaigns, and of this coalition, suggest this is a glaring oversight within strategic planning in London.

As we've mentioned above, strategic planning in London should consider what our areas will look like in fifty years, and we feel that this can be supported by also looking back at the historical relevance of many of our spaces and places. Will town centres and high streets — and by extension markets and other affordable retail spaces — continue to serve generations of Londoners as they already have for decades and even centuries, or will they be wiped out in service of profit and speculative land values that render London inaccessible to those who are from here, who contribute and have contributed to our communities and neighbourhoods. This is not an empty warning. Already we are seeing our neighbourhoods transform into spaces that no longer support the social, economic and cultural lives of our community members.

We have heard testimonies from market and shopping centre/town centre patrons who speak about the life-saving role these spaces have played, for example by ensuring their families have access to culturally-relevant and *affordable* food. This has been evidence by substantive research, for example work on *migrant urbanisms* (Hasenberger & Nogueira, [2022](#); Román-Velázquez, [2022](#)) and *migrant infrastructures* (Hall et al., 2017), and on

super-diverse streets (), which speak to the roles of these spaces for racialised communities and communities of migrant backgrounds. Other work has made clear the social and community value of marketplaces, even evidencing how investment into these spaces by local authorities can help protect and foster inclusive economies ([Taylor et al./Markets 4 People, 2022](#)).

Over time, they have faced many challenges, but they have adapted, proved to be resilient and are valued by Londoners.

We want to call attention to research (González & Waley, 2013) which exposes and challenges dominant tendencies towards blaming the ‘decline’ of high streets on consumer trends. This research identifies how so-called decline is a direct outcome of national and local political-economic frameworks and policy decisions. Thus, we argue that this statement requires qualification, and suggest that resulting considerations are relevant to any strategic vision put forward by the London Plan about highstreets and town centres.

In each of our cases, the ‘challenges’ faced by our high streets are tied to lack of investment by local authorities or private landlords and their lack of prioritisation within local authority and London-wide policy. Even where funding has been provided, failures by local authorities to distribute this funding in ways that will maintain these spaces and measurably support market longevity and trader retention remain a concern. We offer several clear examples:

- In **Elephant and Castle**, long-term, organised neglect operated as a self-fulfilling prophecy and helped precipitate demolition of the Elephant and Castle Shopping Centre and the displacement of long time traders, including several who had been there for decades and nearly all of whom were from migrant and Black and minoritised backgrounds. Landlords let conditions worsen until developers and the local authority were able to point to the decline of the shopping centre as reason for its demolition.
- In **Hackney**, Good Growth funding for the market came with strings attached and caveats meant to ‘design out crime’. However, in doing so, this funding meant the racialised criminalisation of certain community members. Similarly, the new terms and conditions proposed made it harder on traders to maintain their trade.
- In **Hammersmith & Fulham**, the council seems to have abandoned any custodial role in the guardianship of Shepherd’s Bush Market. It has shown no interest in protecting the long term future of the traders or the interests of the local community. Indeed neither the officers or councillors are willing to communicate with FoSBM except for when pushed by legal representatives. Any ‘consultation’ for the current proposals have been merely a performative tick box exercise. There need to be safeguards in the London Plan that demand councils have a duty of care to protect our valuable social assets such as Shepherd’s Bush Market.
- In **Newham**, the local authority failed to distribute Good Growth funding to support market maintenance, ignoring trader and community member knowledge on market needs. Instead, they replaced two canopies that did not need replacing. Friends of Queen’s Market has [shared](#): *Where locals asked for a refurbished market roof and flooring, officers reassured them, but now years later they are lumbered with pigeon-netting that pigeons can still get into, credit card toilets, and now this wood and tin monstrosity. The Council’s consultants then hurried this through a planning application. Locals were not told nor signposted to it, and now we are in many ways in a worse position than before, and £1 million down. The Council’s co-creation*

process has been extremely demoralising for those who took part in it, and it has broken trust with citizens whose collective taxes pay for the wages of the decision makers, making a mockery of our public finances.

Regeneration of town centres and high streets — as well as markets and other affordable retail spaces — threaten their capacity to meet local need.

'Ninety per cent of Londoners live within a ten-minute walk of a town centre or high street'.

We argue that it is not sufficient to record that ninety percent of Londoners live within a ten-minute walk of a town centre or high street. We must make sure that these high streets *meet their needs* even if those needs run counter to the goals of international and external investors and investment-led development. This means that high streets must provide affordable retail space and affordable goods and services, including fresh food. Ensuring high streets — as well as markets — meet local need will also allow the Mayor to achieve objectives introduced in [Section 5.19 Healthy Communities](#).

Local retail space provision is not simply a question of geography, but one of 'race', class and culture. It is a question of whether communities — particularly those identified as having 'protected characteristics' — are able to access spaces that meet their needs. This is key to building an 'inclusive' London and 'designing for everyone' ([Section 4.10](#)). Race must be explicitly considered throughout the planning process, not only in terms of 'impact' but also in terms of planning to address and reduce existing spatial inequality.

In this section on town centres, we want to briefly comment on how policy relating to London's economy is intrinsically connected to housing policy. While we understand how categorising the two as separate might be necessary for strategic planning purposes, we caution that a failure to consider the ways in which they are mutually impacting will result in ineffective policy measures and planning guidance. Town centres must be thought of holistically, not separately as housing ([Section 2.5](#)) and economy (this section). Local estate demolition, the construction of unneeded luxury housing by developers and rising housing costs (including from a lack of related non-planning policies such as rent restrictions and rent caps) is closely connected to the destruction of local and migrant economies, retail loss and retail provision that fails to meet local need.

Town centre and estate regeneration are intertwined and both contribute to loss of community, displacement and diminished sense of belonging for Londoners. As research from Elephant and Castle [demonstrates](#), local estate demolition and the eviction of working class communities directly causes local businesses and town centres to struggle. Similarly, replacement of longstanding, independent and locally- and culturally-relevant in town centre regeneration projects directly results in the displacement of local community members — both by disrupting their sense of belonging in their neighbourhoods and by materially impacting their ability to afford basic needs. As prices go up and affordable retail spaces are displaced, local community members struggle to afford the basic goods and services they relied upon before, thereby making London more unaffordable to them and forcing them to continue struggling or consider leaving.

We know that London generally has an issue retaining young families. School rolls have been dropping so substantially that local schools are being forced to close. This is the direct

result of London no longer being affordable for families. Regeneration—including town centre regeneration—is *directly* contributing to this troubling trend.

We suggest that many existing town centres *already* meet community needs and that regeneration plans and redevelopment proposals actually result in town centres doing the opposite. There is currently nothing that evaluates how existing spaces *already* meet local need and which can inform how spaces should be redeveloped. Redevelopment, instead, is premised on meeting the needs of imaginary future communities, thus ensuring that resulting developments are exclusionary to existing communities and local Londoners. This is especially the case when new redevelopment includes large portions of purpose-built student populations which are less likely to remain local, build relationships within the community and contribute to local economies.

Given the preponderance of evidence above, we want to propose that the new London Plan considers, and even provides guidance relating to, the following:

- How do existing town centres serve communities with protected characteristics (such as 'race' and ethnicity) — e.g., local migrant and racialised communities — as well as those in poverty?
- How can we ensure that any changes to town centres do not inhibit or interfere with these spaces' ability to support economic activity and community spaces that are culturally relevant to existing communities, and particularly those of Black and minoritised, migrant and working-class backgrounds?
- Again, we offer Southwark Plan policies P31, P32 and P33 as possible examples, although stress that at times these have been insufficient. We have attached evidence of how, despite local policy around business relocation, the regeneration of Elephant and Castle still did not meet local traders needs and has failed to retain them. We hope from this, policy makers can include an improved versions of these planning policies, thus providing even greater retention of local, independent and culturally-relevant businesses.

'This must support town centre locations to adapt to include a much wider range of businesses, jobs and commercial activity. For example, light industrial, life sciences and laboratories, data centres, leisure, circular economic activity and last minute logistics'.

We want to raise several concerns relating to this statement and which we hope the new London Plan will address. First, we suggest that the Plan *must* stress the importance of *culturally-relevant* businesses that meet the needs of local communities including those of migrant, Black and minoritised and diverse working-class backgrounds.

We also want to highlight pertinent comments and concerns about the specific types of activity identified in the above quote, and hope will be reflected in strategic policy.

We welcome inclusion of 'circular economy', especially as we are facing an accelerating climate crisis. We want to highlight the ways in which migrant and Black and minoritised community members have long been contributing to the circular economy, including thorough provision of repair services, tailoring and seamstress services and via second hand shops.

We have concerns about the cohesiveness of this policy given that the circular economy disrupts some of the profit-motives that underpin some of the other industries mentioned. If this is recognised as an important industry to promote, then there is already an expectation that 'profit' cannot be the only deciding factor in how spatial decisions are made about local economies. Local markets and affordable retail spaces are also not operating under the same profit expectations as businesses backed by millions and governed by shareholders. This does not mean they are less valuable to the London economy; rather, they are more likely to reinvest money into the local community, facilitating what is known as the 'local multiplier effect'. More money spent in local, independent businesses returns to the community than that spent in chain stores. This offers justification for supporting businesses that, while they may require affordable space or other protections, fundamentally meet community need and are culturally-relevant to local people.

Beyond the circular economy, there should be recognition of the care economy and care work. Care work is severely underpaid, and immigrant communities are overrepresented in the industry. Care work and the care economy are essential to the functioning of London, particularly as the population continues to age.

We are concerned that the emphasis on data centres ignores that data centres contribute inordinately to the climate crisis. A [Guardian article](#) earlier this year highlighted that they may contribute up to 7.62 times the emissions claimed. We also believe this is a terrible use of town-centre space, and that there is nothing about data centres that provide local people the goods and services they need.

This would explicitly enable any commercial and other appropriate development (such as places of worship, health and educational uses, nursing homes) in any strategic town centre (International to District town centres) (para. 3.3, pg. 42).

While we agree that flexible use of space can be helpful for ensuring that communities have access to necessary resources including places of worship, health, education and care, we feel that this point demands greater detail. Particularly, we are concerned that '**any** commercial' development might result in outcomes that — rather than providing important social infrastructures like the above examples — fail to meet community needs and actually facilitate displacement or inequality. To this end, we believe there should be greater discussion around whether or not local communities and local authorities should be able to take a more curatorial approach to local high streets. By this, we do not mean to suggest the need for determination of what kinds of goods and services might be sold somewhere, or specifically whether there should be one type of shop or another. Rather, we think there should be greater consideration of how opportunities for local authorities to determine how commercial space in town centres and/or high streets is used might help prioritise the provision of space to businesses which are independently-owned and -operated and which meet local need, CICs and/or local organisations, as opposed to offering space to the highest bidder, which tends to mean the proliferation of chains, profit-oriented businesses serving shareholders not community members or commercial enterprises operating on venture capital at the expense of local people. There should be consideration by local authorities of how a new business might negatively impact other businesses around them, particularly when planning applications are involved.

We suggest that it might be pertinent to consider expectations around and/or mechanisms for facilitating community review. We also suggest that this may demand the inclusion of a mechanism for determining the social purpose or social value to determine what is a suitable use of the land in question. There must be ways to continue to question the effect that development will have on the general amenity in the surrounding area.

Restrictions could also be put in place where new premises are re-provided in a development specifically to replace lost facilities, such as artists' studios or maker space or social or community infrastructure (para 3.3, p. 42).

We have several comments relating to this sentence. First, we want to emphasise again the importance of 're-provision' of premises for displaced independent businesses, local organisations, artists and social and community infrastructure. We note that similar policies are already found in some local plans, for example POLICIES in the Southwark Plan. However, we argue that the London Plan should actually **strengthen and extend** these policies, to provide greater protections for these essential urban infrastructures.

We also want to make clear that we see markets and affordable retail spaces as important social and community infrastructures, specifically because they facilitate social and community life across London. This has been well documented, including by our respective campaigns, within academic literature ([Watson & Studdert, 2006](#); [Watson, 2009](#); [Hall, et al., 2018](#)) and in the recent [report](#) by the London Assembly Planning Committee on social value in planning and regeneration ([2025](#)).

The previous government made significant expansions to rights to convert business premises into homes without planning permission (using permitted development rights). The London Plan could be clearer about the circumstances when town centre boundaries are redefined to release poorly performing areas, and how housing can come forward in released areas and in designated town centres (para 3.3., p. 43)

On the one hand, we think it is important that any conversion from office to residential should go through planning permission, as homes have been converted poorly and thus put residents at risk. We want to reiterate, however, that London cannot simply build itself out of the housing crisis, and that the primary concern should not be the numbers of homes by the quality and affordability of these homes (see our comments on [para 2.1](#)).

We think this point needs clarifying, specifically in relation to what is considered protected retail space under such a policy, and what is not. We must recognise that the integrity of high streets in their entirety may be impacted by the erosion of available retail space at their edges.

We could also consider approaches to help reactivate high street properties if they are vacant for an extended time, including for meanwhile uses. This could provide more opportunities for affordable business and community space. It could also help high streets across the capital to remain vibrant, attractive, inclusive, and safe hubs for residents, workers, and visitors (para 3.3, p. 44)

We welcome the suggestion that long vacant high street properties can be 'reactivate(d)' specifically through the provision of affordable business and community space, but strongly advocate for greater clarity around this suggestion.

In the case of Ward's Corner, for example, an empty, bookable room was proposed as a community space, but there were no associated resources for a meaningful programme. Spaces for community spaces are important, and should be prioritised in planning, but the reality is that this must also come with resourcing (running costs, ongoing support, funding options for salaries, subsidised rents) to support community programmes. Built into these spaces should be avenues for revenue funding that is then reinvested into the space and community. In order for funding to be secured long term, community groups and community spaces must receive secure, long term leases.

There must also be consideration of *who* decides *which* communities can access the space, especially if the properties are privately-owned. In the latter case, there must be independent mediators to unsettle any existing power dynamics.

Powers outside planning may also be relevant. Examples include new powers for high street rental auctions that give businesses and community groups a 'right to rent' long-neglected town-centre commercial properties (para. 3.3., p. 45)

We want to make sure that the London Plan specifies that *independent* businesses and community groups should be given the 'right to rent *at affordable or peppercorn rates*' and that these uses are given 'first dibs' in 'long-neglected town-centre commercial properties'. There should not be an auction option, as this will mean that it goes to the highest bidder, and will not then support a more equitable local economy.

COMMENTS ON SECTION 4: LONDON'S CAPACITY FOR GROWTH AND DESIGN QUALITY AND ON SECTION 5: LONDON'S INFRASTRUCTURE, CLIMATE CHANGE AND RESILIENCE

GENERAL CONCERNS RELATING TO 'LONDON'S CAPACITY FOR GROWTH AND DESIGN QUALITY' AND 'LONDON'S INFRASTRUCTURE, CLIMATE CHANGE AND RESILIENCE'

We see Sections 4 and 5 as closely related, and believe that speaking about them together is impactful and necessary.

We are concerned there is nothing in the existing consultation document indicating that there will be explicit building standards written into the London Plan. This is a grievous oversight. As we have laid out above, in [Section 2](#), there are multiple crises contributing to the 'housing crisis' and poor quality housing is one of them.

There is an ongoing cladding and fire safety crisis. A recent assessment by the London Fire Brigade found that [1,448 buildings](#), including 883 high-rises over 18 metres tall, fail to meet fire safety standards. In fact, as [TCPA reported in September 2024](#), of 4,600 buildings identified as having potentially unsafe cladding following Grenfell, only half have had any work done to begin replacing it. This must be addressed immediately. But the London Plan

must also make clear that reactive responses are insufficient. There must be stringent safety standards in place as a preventative measure.

Damp and mould are prevalent throughout the city. Of the top 10 local authorities to receive complaints about damp and mould, [eight](#) were in London. A recent report found that tackling damp and mould in Southwark's council housing stock alone could save the NHS £1.8 million a year. But the issue is not just council housing. Housing associations receive [more complaints per 1,000 homes](#) than do local authorities. A Citizen's Advice Bureau [report](#) highlights that nearly half of private renters live in homes with damp and mould: 4.8m renters are currently living with cold, damp or mould, even in summer. These homes need to be better insulated and retrofitted. There must be quality demands for all new housing that ensures that any new homes will not compound this existing crisis.

Overheating remains a pressing concern, particularly as our climate in London gets hotter. London City Hall's [Heat Risk Map](#) makes clear that the climatic conditions we see today will only worsen, and failure to address poor insulation in our homes will only lead to greater loss of life and poor health. We know that heat risk is exacerbated by development, particularly in central London. In fact, ARUP found that the city's urban centre has 'extreme' urban heat island (UHI) effect 'hot-spots', with temperatures 4.5°C hotter than rural surroundings. Retrofitting homes is essential for ensuring Londoners can survive climate change.

The London Plan must specify a preference and expectation that there will be retrofit and refurbishment over demolition. The primary opposition to this position comes from the development and construction industry, who stand to profit less from refurbishment of existing homes than from the construction of new builds.

We are seeing many unnecessary demolitions in our communities — of housing, of commercial space and of sites that were 'purpose built' and remain 'fit-for-purpose'. The London Plan must put safeguards in place to prevent this from happening. This is an issue because of the way it compounds multiple concerns (housing affordability crisis, lack of affordable workspaces, closures of community spaces, losses of homeless hostels), and because of the contribution of demolition to climate crisis through embodied carbon and carbon emissions

Embodied carbon must be considered in all planning applications, particularly if plans weigh the cost of demolition and rebuilding versus refurbishment and retrofit. There should be a requirement to meet reduction targets for embodied carbon for developments, as well as other incentives to incentivise refurbishment of existing buildings. London should be leading on this.

COMMENTS ON CONSULTATION DOCUMENT SECTION 4 PARAGRAPHS/PROPOSALS

Section 4.4 London's heritage

We need a more holistic approach to heritage within the London Plan, which seeks to protect the places that are important to local communities, including the businesses that support them and which make collective life possible. We suggest that the London Plan consider

policies from other cities which seek to maintain existing, independent businesses that meet culturally-specific needs. San Francisco, for example, has created a designation for '[legacy businesses](#)', and with this designation comes important protections. Through recognising them as such, the city is working to preserve community-serving businesses that have been in operation for 30 or more years, providing them with support to ensure they can continue to make important cultural and economic contributions to the city. Learning from this example, [more than two dozen](#) cities across the United States have begun implementing their own Legacy Business programs.

Importantly, this designation explicitly recognises that businesses make cultural contributions, and that they are especially important cultural and community spaces for immigrant and racialised communities. We suggest that a similar designation should be instituted in London, both to individual businesses and to certain economic spaces such as markets. We hope the next London Plan will take this under consideration.

Section 4.10 Designing for everyone

The Mayor wants to ensure that the new London Plan continues to reflect the importance of designing new developments that respond to London's diverse population. This can help to deliver strong and inclusive communities. Despite progress, London's environment still has barriers to the inclusion of all Londoners.

We reiterate: there must be specific attention to how development has racialised impact, and this should be actively ameliorated through the next London Plan. Spaces which are important to immigrant and Black and minoritised communities must be better protected by strategic planning guidance. These spaces include markets and affordable retail spaces that facilitate daily life, community cohesion and cultural expression. We agree that if these spaces are protected and supported — including adequately maintained and invested into — they can help support strong and inclusive communities.

The London Plan could require large planning applications to demonstrate how they have been meaningfully informed by a range of lived experience. This could include, for example, through design review panels, accessibility and inclusion panels or targeted consultation and engagement.

We agree that planning applications should demonstrate that they have been meaningfully informed by a range of lived experiences, but there must be clear expectations that prevent these events or processes to be more than 'tick box'. In order to be most effective, this development of this policy should itself be done in collaboration with communities and meaningfully informed by lived experience.

This engagement should be done by independent examiners or other representatives — for example, community members themselves — to further prevent the possibility of co-optation or influence by those who stand to gain from a plan being granted permission or under recognised communities remaining excluded. This entire process should be transparent, submitted as evidence and open for public scrutiny.

COMMENTS ON CONSULTATION DOCUMENT SECTION 5 PARAGRAPHS/PROPOSALS

Several requirements in London go beyond national standards in recognition of the need to continue to drive towards net zero and tackle climate change. Many stakeholders have told us they would like the next London Plan to go further. This would avoid later costs of retrofit or replacement and recognise the wider cost to society and the economy of climate change. However, industry have also told us development costs and housing delivery can be impacted by these requirements, particularly cumulatively.

We are concerned that the London Plan will prioritise this industry statement, despite 'industry' financially benefiting from a policy that doesn't prioritise retrofit or which is stricter in terms of the contribution of construction to the climate emergency. Climate risk maps show that London is at great flooding and heat risk, and we must simultaneously prepare for these crises and actively prevent them from worsening to the extent possible. This demands a push towards net zero (or better). Less climate intensive construction might cost more, but the future of London, of Londoners and of the planet cannot come at the expense of profit. To this point, there should be clear expectations that this is the responsibility of the developers and construction firms, and that this is not 'passed on' to Londoners in the form of reduced social rented homes and viability statements that justify disastrously displacing development.

As indicated [above](#), we hope to see the next London Plan go further than the existing one and continue to push beyond national standards.

CONCLUDING COMMENTS

We want to reiterate one of our points from the introduction: a **London Plan must be for Londoners, not for developers**. It must focus on **addressing inequality** first and foremost. This demands that the London Plan respond to *need*.

This means building council homes and homes for social rent and providing caravan pitches for the Traveller community. This means protecting London's retail markets, which ensure communities have access to inexpensive, fresh food, to culturally-specific goods and services and to spaces for cultural expression. This demands that strategic planning in London centres questions of racial impact in its consideration of guidance, and actively seeks to address racialised spatial inequality.

We hope to see our contributions meaningfully reflected in the draft version of the next London Plan. We encourage you to contact the email at the top of this document if you have any questions or would like further information about anything we have mentioned herein.

HYPERLINKED SOURCES AND ADDITIONAL EVIDENCE:

Friends of Queen's Market. Newham Council unveils £1m wood and tin "shack" funded by your taxes (blog post). <https://friendsofqueensmarket.org.uk/tag/queens-market/>

Goldzweig, S., Machado, M., Román-Velázquez, P., Peluffo Soneyra, S., Pérez, N. & Wall, S. (2023). *Migrant and Ethnic Economies in Times of Crisis*. Latin Elephant. (report): <https://latinelephant.org/migrant-and-ethnic-economies-in-times-of-crisis-new-report/>

Greater London Authority. *Residential completions dashboard*: <https://data.london.gov.uk/dataset/residential-completions-dashboard/>

Greater London Authority. *Residential starts dashboard*: <https://data.london.gov.uk/dataset/residential-starts-dashboard/>

Hasenberger, H., & Nogueira, M. (2024). Subverting the “migrant division of labor” through the traditional retail market: The London Latin Village’s struggle against gentrification. *Urban Geography*, 45(1), 53–72. <https://doi.org/10.1080/02723638.2022.2146925>

King, J., Hall, S., Roman-Velazquez, P., Fernandez, A., Mallins, J., Peluffo-Soneyra, S., & Perez, N. (2018). *Socio-economic value at the Elephant and Castle* (report). Loughborough University. https://repository.lboro.ac.uk/articles/report/Socio-economic_value_at_the_Elephant_and_Castle/9464105/1

Latin Elephant (2025). *Relocation Impact Assessment* (report): <https://latinelephant.org/relocation-impact-assessment-latin-elephants-latest-report/>

London Assembly Planning and Housing Committee (March 2011). *Crowded houses: Overcrowding in London's social rented housing* (report): <https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-publications/crowded-houses>

London Assembly Planning and Regeneration Committee (October 2024). *Transcript from ‘Panel 2’* (transcript): <https://www.london.gov.uk/about-us/londonassembly/meetings/documents/b30005/Minutes%20-%20Appendix%20-%20Transcript%20-%202009.10.24%20Planning%20and%20Regeneration%20Committee%20Wednesday%2009-Oct-20.pdf?T=9>

London Assembly Planning and Regeneration Committee (2025) *Social value in planning and regeneration: Knowing the price of everything and the value of nothing* (report): <https://www.london.gov.uk/sites/default/files/2025-04/Social%20value%20in%20planning%20and%20regeneration%20report%20April%202025.pdf>

Mayor of London and London Assembly. *London Rent Maps*: <https://www.london.gov.uk/programmes-strategies/housing-and-land/renting-home/london-rents-map>

O’Brien, I. (2024, September 15). Data center emissions probably 662% higher than big tech claims. Can it keep up the ruse?. *The Guardian*. <https://www.theguardian.com/technology/2024/sep/15/data-center-gas-emissions-tech>

Penny, Joe. (2025). *Why cross-subsidy projects can't solve London's housing emergency*. Public Interest Law Centre.
https://www.pilc.org.uk/wp-content/uploads/2024/09/The-promise-of-cross-subsidy_FULL-REPORT.pdf

Román-Velázquez, P. (2024). Resisting gentrification, reclaiming urban spaces: Latin urbanisms in London. *Journal of Urbanism: International Research on Placemaking and Urban Sustainability*, 17(3), 361–378. <https://doi.org/10.1080/17549175.2022.2071967>

Roman-Velazquez, Patria; Hill, Nicola (2016). The case for London's Latin Quarter: retention, growth, sustainability. Loughborough University. Report. <https://hdl.handle.net/2134/21844>

San Francisco Legacy Business Program: <https://www.sf.gov/legacy-business-program>

Southwark Land Commission report:
<https://www.southwark.gov.uk/sites/default/files/2024-09/Southwark%20Land%20Commission%20Report%20Sept%202023.pdf>

Taylor, M., Gonzalez, S., Waley, P., & Wilkinson, R. (2022). *Developing markets as community hubs for inclusive economies: A best practice handbook for market operators*. Markets4People, University of Leeds.
https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2022/04/220408-HB1-final-version_RW_ONLINE.pdf

Trust for London. *London's population by ethnicity: Explore what the Census 2021 shows us about London's neighbourhood ethnic diversity and its links to deprivation*:
<https://trustforlondon.org.uk/data/ethnic-diversity/>

Trust for London. *London rent as a percentage of gross pay*:
<https://trustforlondon.org.uk/data/rent-affordability-borough/>

Watson, S., & Studdert, D. (with Joseph Rowntree Foundation). (2006). *Markets as sites for social interaction: Spaces of diversity*. Published for the Joseph Rowntree Foundation by Policy Press. <https://policy.bristoluniversitypress.co.uk/markets-as-sites-for-social-interaction>

SEE ALSO:

Alexander, C., Carey, S., Lidher, S., Hall, S., & King, J. (2020). *Beyond Banglatown: Continuity, change and new urban economies in Brick Lane*. Runnymede Trust.
https://cdn.prod.website-files.com/61488f992b58e687f1108c7c/61bcbda054b2e6d474ed8d03_RunnymedeBanglatownReport.pdf

Dines, N. (2008). The disputed place of ethnic diversity: An ethnography of the redevelopment of a street market in East London. In *Regenerating London*. Routledge.
<https://www.taylorfrancis.com/chapters/edit/10.4324/9780203886717-24/disputed-place-ethnic-diversity-ethnography-redevelopment-street-market-east-london-nick-dines>

Kostourou, F., Karimnia, E., Chau, C., Cetrulo, A., Bingham-Hall, J., & Tribillon, J. (2020). *Fieldwork Journal #1: London (Urban Backstages)*. Theatrum Mundi.
https://theatrum-mundi.org/wp-content/uploads/2020/03/Urban_Backstages_Fieldwork_London_2020_Low_Res.pdf



LATIN ELEPHANT
Business Relocation Strategy & Support Package:
Problems and Solutions identified

11 March 2025

The first section summarises the problems that emerged with the Business Relocation Strategy provided by developer Delancey/Get Living to Elephant and Castle Shopping Centre traders between 2019-2021. Berkeley Group's Borough Triangle Business Relocation Strategy is in large part based on these plans.

The second section provides suggested solutions to the problems identified, and how they can be applied in the Borough Triangle context (where there are less traders affected, less money offered, no relocation units offered).

By identifying what detail was lacking or misjudged in Delancey's Strategy, LBS is in a strong position to request necessary improvements to Berkeley's Strategy, in order to secure greater protections to Borough Triangle/Mercato Metropolitano traders and ensure their relocation is genuinely *"an opportunity to grow and develop their business"* (5. Context - pg 4) rather than an end to it, as proved the case for many Elephant and Castle traders.

The recommendation is that the planning committee do not approve this scheme until these improvements to Berkeley's relocation strategy are made.

Elephant and Castle - Problems

1. Relocation Fund

1a. Problem: Not enough money

As part of the EC Relocation Strategy there was £834,700 (£634,700 from developer, £200,000 added by LBS for Elephant Arcade after objectors highlighted the initial sum was insufficient) in the Relocation Fund, for 70 recognised traders.

Based on the allowance criteria for accessing the Fund each business could claim £5000 for legal costs pre-move (Phase 1), and a certain amount based on the floor space of their new unit (Phase 2).

Business type at new location	Maximum allowance available in Phase 2
Restaurant	£32/sqft
Financial services	£30/sqft
Cafe / takeaway	£25/sqft
Hair / beauty	£20/sqft
Other retail	£18/sqft
Market stall, kiosk, or barrow	£2,000

The two largest businesses on site—if receiving a like-for-like relocation as promised by developers and recommended in the New Southwark Plan 2018—would be entitled to claim over £95,000 and £58,000.¹ Based on these figures it was clear that there would not be enough money to fully cover the like-for-like relocation costs of all 70 traders.

These same large businesses, on the advice of the developer, produced designs for their relocation units (delivered as a shell and core). The tenders for fit-out of their units totalled over £1,000,000 each (see 1c).

A cross-section of 10 smaller traders report they received amounts ranging between £1,000-£15,000 from the Phase 2 payment of the Relocation Fund, depending on

¹ Pricebusters (DIY / other retail): 299.7 sqft (£58066.2); La Bodeguita (Restaurant): 276.3 sq ft (£95168)

unit size and usage they were relocating to. Many topped this up with their own funds. (see 1b)

Each displaced market trader received £2,000 as per terms of the S106. This was topped up by a Business Transition Grant of £5,000 (£3,000 before, £2,000 following closure). A number of traders report that while this money was helpful, it was not sufficient to enable them to find a new market pitch and restart their businesses, within the context that the majority were breadwinners with young families.²

1b. Problem: Discretionary additional fund

The developer agreed to provide a discretionary additional fund to meet the clear shortfall. This was poorly advertised and prohibitively hard to access—we have evidence of only a few traders successfully accessing this fund, and a number of rejections despite traders demonstrating clear need.

A number of traders paid out of pocket for their relocation costs due to high rates of developer-selected contractors which exceeded the allowances they were given, and a lack of awareness about or dissuasion from applying to the additional fund. The developer rejected applications to refund retrospective costs, regardless of debt incurred. See responses from 21 traders surveyed as part of Latin Elephant's Relocation Impact Assessment (upcoming, 2025):

² “The way I see it, they give us some money, like for me its pocket money, £3000, what is £3000? It's nothing, it's nothing. I lost a business here. This is my living. I got three kids, wife to support” (EC market trader, [LE trader campaign video](#))

“To tell you the truth, £5000 is nothing. It's nothing at that time [...] It's zero. Because I'm a businessman. [what is important is] How was your customer, how was the environment [...] and then for how many years you are disappeared from the place, people that knew you before, now they wouldn't know you, you're like a new person. So £5000 (laughing) nothing, very zero if I tell you the truth” (EC market trader, informal interview - Latin Elephant)

Did you apply for additional funding from the developer?

This chart illustrates the efforts and knowledge of interviewed traders regarding funding opportunities from the developer towards relocation costs.

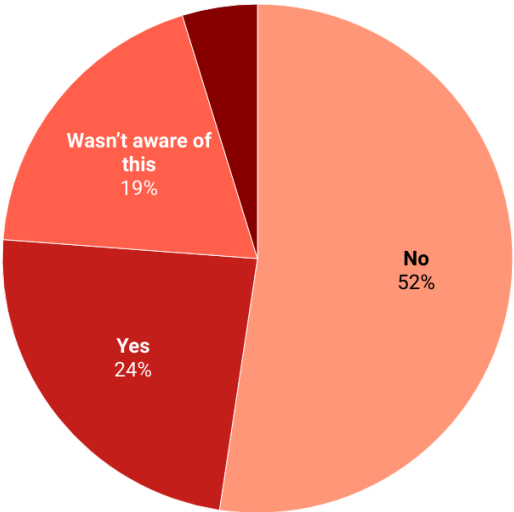
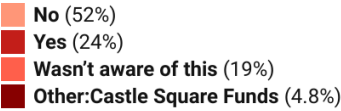
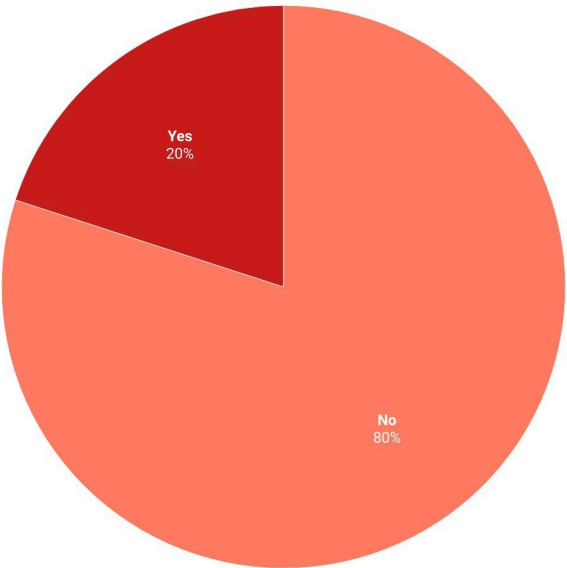


Chart: Latin Elephant • Source: Latin Elephant • Created with Datawrapper

If yes, were you successful in your application?

This chart illustrates the number of traders who received funding from the developer to cover relocation costs.



5 responses

Chart: Latin Elephant • Source: Latin Elephant • Created with Datawrapper

Of 21 traders surveyed, they spent £137,500 collectively / £6,875 per business (mean total) of their own money on relocation costs:

1 spent nothing
12 spent between £1000 - £5000
1 spent between £5000 - £10,000
5 spent between £10,000 - £15,000
1 spent between £15,000 - £20,000
1 spent over £20,000

How much from your own pocket did you spend on the relocation process?

This chart illustrates the amount of money spent by relocated traders toward the relocation cost.

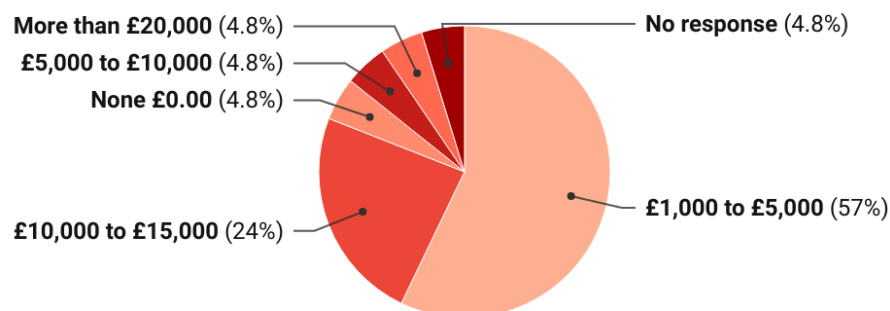


Chart: Latin Elephant • Source: Latin Elephant • Created with Datawrapper

1c. Problem: Lack of detail in s106 around level of fit-out

The two largest shopping centre businesses—La Bodeguita and Pricebusters—were forced to abandon relocation after becoming quagmired in negotiations around responsibility for fit out costs; developers were not obliged to deliver units as ready to trade within the S106, and demanded these businesses meet the gap in relocation costs totalling over £300,000 and £600,000 respectively.³

³ La Bodeguita: <https://www.youtube.com/watch?v=RXrH8EShgxc> (8m 35s)

2. Tree Shepherd

2a. Problem: Lack of trader consultation on business advisor appointment

2b. Problem: lack of certain necessary skills, lack of parity

The business advisor plays a pivotal role in ensuring the success of the support package. EC traders' experience highlights that Tree Shepherd failed to foster relationships and sustain communication that was crucial for the successful delivery and mitigating the damaging impact of the displacement/relocation on all traders. Concrete example of this include:

- Some traders never approached by Tree Shepherd ⁴
- Some traders unaware of / unable to access Database of Opportunities
- Some traders unaware of Relocation Fund guidelines and timelines
- Most traders unaware of additional fund / not supported to apply ⁵
- Some traders misinformed about development plans ⁶

It is worth noting that Tree Shepherd did effectively support a number of traders to design and submit business plans, resulting in successful relocation. We make the point that this quality of service was not equally and fairly administered among all traders - with many market traders reporting low or insufficient outreach. It is likely that traders' at a higher risk of exclusion (language barriers, digital barriers, accessibility needs, caring responsibilities) were not proactively reached and supported.

Pricebusters: <https://southwarknews.co.uk/area/southwark/im-clutching-at-straws-trying-to-survive-pricebusters-future-hangs-in-the-balance-as-crunch-time-looms/>

⁴ *"I never had contact with them [...] I never met anyone from there, never"* (EC market trader, informal interview - Latin Elephant)

⁵ *"Sometime they [Tree Sheperd] mislead you, about applying for extra money - I said I want to apply, the lady said to me, you don't need to that, she waved that off. It's a long process to do that. I had to transfer all relocation money to workman £3000. No money left for stock. Was told not to ask for more. Not very good. They should have shown me support"* (EC trader, Latin Elephant Relocation Impact Assessment)

⁶ *"In the first part, when they were doing meetings, they said they were not responsible for people in the market. Eventually, when we were in the redline, then they said they were relocating us. When asked if they would just pay us off, they said no, they're not responsible for relocating us. None of the information ever worked out for us"* (EC trader, Latin Elephant Relocation Impact Assessment)

2c. Problem: Lack of detail in S106 to ensure fair treatment

S106 wording *“The Council, in consultation with the Independent Business Advisor, will be responsible for assessing and determining those Local Independent Operators who require assistance from the Relocation Fund and how much financial support”* did not obligate the advisor to reach ALL eligible traders, leading to a higher likelihood of preferential treatment and no mechanism for traders to challenge this.⁷

2d. Problem: Lack of evaluation

We can't fully understand and learn from strengths and failings in Tree Shepherd's service delivery to some traders as there is no publicly-available evaluation of this process.

3. Database of Opportunities

3a. Problem: Database not fit-for purpose

An online database has built-in accessibility issues for certain community members affected by the digital divide, as was the case for many EC traders. The S106 wording contained no detail obligating the advisor to address accessibility issues. As a result, many traders were not aware of it, or how to use it.

Only half of the units offered via the database (with rent information) were at or below existing rent levels - with some above £100,000 p/a/. Database updated infrequently. Database discontinued as per terms of S106, despite multiple lockdowns, and at least displaced 15 traders still actively searching for a relocation space in the borough

4. Affordable retail space

4a. Problem: Very little affordable retail space in Southwark

Displaced traders struggled to secure alternative affordable retail space in Southwark due to short supply.

⁷ Shopping Centre s106 - Schedule 2 - East Site Obligations - Affordable Retail, Local Business Support & Relocation Strategy - 4.3

5. Trader Panel

5a. Problem: Traders undermined by council representatives

While the Trader Panel has the potential to strengthen the collective voice and power of the traders, a Trader Panel member and Trader Group organiser reports it was undermined due to councillors prioritising developers' wants and needs above those of the traders.⁸

This could have been avoided through external scrutiny and support of the process; for example, Latin Elephant was not permitted to take part in meetings.

Borough Triangle - Solutions

1. Relocation Fund

1a. Solution: Developers must commit to providing more than enough money from the outset

It is crucial that there is *more* than enough money to ensure successful relocation for every business in the original Relocation Fund secured when planning is approved.

If £834,700 was not sufficient to cover reasonable relocation costs of 70 businesses in EC pre 2020, then £137,000 will not be sufficient for 40 traders in Borough Triangle post 2025. The recommendation is the applicant increase the Relocation Fund to £400,000 as a minimum.

There are around 40 traders in Mercato. If Berkeley's current offer is split equally (which it won't be, as some businesses will take a larger share) that amounts to £3,425 per business from the Fund.

⁸ "We (traders) put the idea forward. They (Southwark) took the idea and said we would speak about it, and then came back and appeared to welcome it fairly. Which seemed fishy. And then they said we need the trader panel to be led by someone independent. It was one of the councillors from Southwark [...] I realised he was not really on our side as such, he was just being injected amongst the traders to support the planning application. And I was correct. Because when we finally elected all the trader panel traders, I started to see his true face. We'd ask questions and he'd say No No NO. Never gave us a chance to elaborate and at the same time enhancing the Developers comments and diminishing ours" (EC Trader Panel member, research interview - Latin Elephant)

As highlighted in the EC case, traders received between **£1000-£15,000** from the Phase 2 payment of the Relocation Fund, and spent an additional of **£6,875 of their own money (mean total)**.⁹

For those with no relocation space, the EC case highlights that **£7000** was not sufficient for traders to survive a pause and rebuild their business elsewhere.

As a result, £10,000 per trader (£400,000) is a more realistic budget. We note this would still be less money per business than with the Shopping Centre, and so ideally a larger amount could be secured.

The actual costs of relocation will only become clear once the process is started, and traders receive quotes from surveyors, solicitors etc. If the Fund money is not totally spent *it can easily be returned to the Developer*. However, if there's not enough money in the Fund, LBS and traders are in the extremely weak position of relying on the Developer to provide more money out of good-will; experience from the Elephant and Castle additional fund teaches us at best this will be difficult, and at worst impossible, to traders detriment.

1b. Solution: NO developer-administered additional fund

1c. Solution: S106 obligates developer to deliver any relocation unit as ready-to-trade from

To avoid repeating the experience of failed relocation suffered by La Bodeguita and Pricebuster, the applicant must commit to deliver any relocation unit as ready to trade from OR meeting all costs involved in fitting out identified shell and core unit: surveyor (chosen by trader), designer, MNE, whiteboxing, professional kitchen and bathroom installation.

2. Tree Shepherd

2a. Solution: Consult traders on what they need/who they want and incorporate into decision process

2b. Solution: Service that meets the needs of all (See also solutions 2c and 3b)

⁹ Latin Elephant Relocation Impact Assessment

The Business Advisor will proactively reach out to each trader to ensure they are aware of the Relocation Fund guidelines, Database, any other resource /mitigation measure. They will support traders in overcoming any barriers to understanding or accessing these resources. They will be available to traders by phone or email, will respond to all questions and queries promptly, and will check in regularly in-person on any traders who require additional support using these resources. They will support traders to report any issues with any element of the package/process.

2c. Solution: Inclusion of necessary responsibilities the Business Advisor is obligated to deliver to ALL traders in S106, in order to ensure accountability.

Wording in the s106 will obligate the above-mentioned responsibilities. To ensure scrutiny, the Business Advisor will be reviewed regularly by LBS to ensure they are meeting obligations.

2d. Solution: LBS commission evaluation as to what worked well / what went wrong in Tree Sheperd's business support package to EC shopping centre traders, to capture learnings and apply them to future developments.

3. Relocation Opportunities

3a. Solution: Consult all traders on what they require from an alternative relocation space (type, price, geographical location, size)

All spaces shared will meet their criteria, with wording in the S106 protecting this. To ensure quality and accountability, the Relocation Opportunities will be shared by a third party chosen by LBS/traders, and monitored regularly by LBS to ensure it meets S106 obligations. This support will be provided as long as necessary (see additional notes).

4. Affordable retail space

4a. Solution: Southwark and Developer proactively identify space to purchase and let at affordable rates, to meet growing need.

There is growing demand for affordable retail, in part due to the fall-out of displacement and failed relocation in Elephant and Castle, with a number of

shopping centre traders still seeking alternative trading premises. The scarcity of retail space limits the efficacy of the Database of Opportunities, requiring more space to be made available.

5. Trader Steering Group

5a. Solution : Traders supported to organise with independent support

Based on what traders themselves identify as appropriate support, an independent, informed third-party group invested in securing the best deal for traders (e.g. Southwark Law Centre) will be permitted to support Trader Steering Group

At present this role is allotted to the Advisor/ Tree Sheperd however this did not prove successful in EC case.

Additional Notes: Timescale

Current:

The Relocation Strategy is intended to operate over several months and as such may require updates to reflect changing circumstances. (3. The Relocation Strategy - pg 4)

The Developer will share details of any vacant local retail units (including those made available by neighbouring developers and landowners (including Delancey, Lendlease, Tribe (part of Aitch Group), The Arch Co and British Land) within the Elephant & Castle Opportunity Area, the wider Borough, and beyond; for a period of one year following vacant possession of the Site (10. Promotion of Relocation Opportunities, pg. 7)

Suggested:

To ensure relocation truly is an opportunity to grow/develop as promised, the applicant agrees to continue the Business Support Package and all the services/resources notes in 6. Headline Principles of Business Support, for as long as any eligible business is negatively impacted by the temporary or permanent relocation (i.e., not trading, drop in custom, drop in profit). This will ensure that they neither incur unreasonable costs due to relocation nor lose their livelihood due to time-limited support.

It is unclear *how* the developer will share these opportunities. What will this look like and will it be accessible?