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4 February 2007

Dear Mr Watling

**London Assembly Planning and Spatial Development Committee –
investigation into London's suburbs: Groundwork London response**

Thank you for the opportunity to contribute to the London Assembly's Planning and Spatial Development Committee's investigation into London's suburbs. This response is from Groundwork London, the Regional Office of Groundwork UK with the federation of Groundwork Trusts serving Greater London.

The context

As a leading UK-wide regeneration organisation supported by central Government to build sustainable communities through joint environmental action in areas of need, it is central to Groundwork London's own strategy to support appropriate policy developments in partnership with regional and local governance. We are therefore working with the GLA, other statutory agencies and the voluntary sector to shape and deliver relevant aspects of the London Plan.

In addition to our pan-London strategic work, a majority of our local programmes are being delivered in locations that the London Plan classifies as suburbs. Our comments were also informed by a pilot project whose purpose it was to test the Mayor's 'Tomorrow's Suburbs' Toolkit (now published as BPG) in practice with a number of suburban areas across London. The pilot was developed and delivered by Groundwork London in partnership with the existing Tomorrow's Suburbs consortium, and funded by Groundwork London, the GLA and LDA.

Seven pilot areas across London were selected, covering a range of different circumstances that could provide an indicative test bed for the Toolkit approach. With the exception of one, all pilots are classified in the London Plan as Major or District Centres. A copy of the full report is available from <http://www.london.gov.uk/mayor/strategies/sds/toolkit/index.jsp>.

Detailed response

1. What is the role of the suburb in 21st century London?

We suggest that the role of suburbs in 21st century London is twofold:

1. Suburbs are centres in their own right that provide services, leisure and recreation facilities, housing, employment and commercial opportunities for their population.
2. Suburbs support the inner-city areas by responding to some of the pressures that these face, for example the demand for housing for London's workforce and business locations.

In the past, the second aspect has been given too much weight, which led to uneven, single-focus development, for example dormitory towns for commuters or isolated industrial locations, resulting in the decline of suburbs as vibrant places in their own right.

In order to balance both aspects, we suggest that suburbs need to adopt some of the following planning principles:

- Re-define the existing network of streets and the wider public realm as the setting for all aspects of suburban life, not just as traffic conduits.
- Design layouts that encourage social interaction and encourage pedestrian journeys.
- Develop integrated transport models that enable smooth interaction of different modes of transport.
- Create clusters of housing and mixed uses around transport hubs in order to benefit from multi-purpose visits to suburban centres. Reinforce those clusters through facilities that accommodate different services such as libraries, GP surgeries etc. under one roof.
- Introduce design codes for new housing that reflect the principles of sustainable development – social sustainability through mixed tenure and size; environmental sustainability through the use of sustainable construction techniques and materials, and resource efficiency standards; economic sustainability by creating social investment opportunities and models for long-term maintenance of both housing and the public realm.
- Create investment partnerships for upgrading existing housing to comply with strict environmental standards.
- Place a stronger emphasis on the importance of a well-designed and maintained public realm, in particular green space.
- Take into account local knowledge and needs by involving local communities and a wide range of other stakeholders in every stage of the decision-making process for interventions in the suburbs, as this will help to ensure relevance of the proposed measures and foster a sense of ownership.
- Develop integrated environmental management strategies covering waste, energy, transport and biodiversity solutions.

2. What are the main issues facing the viability and sustainability of London's suburbs?

The majority of London's population now lives in the suburbs. This should be reason enough to challenge common perceptions of 'suburbia' as wealthy and stable areas that do not need and therefore should not qualify for targeted regeneration interventions. The reality of suburban life reflects the massive social, environmental and economic challenges that these localities have experienced over time. Their impacts, although often disguised by high percentages of affluent owner-occupied housing interspersed with pockets of high levels of multiple deprivation, manifest

themselves in some key problems: A lack of local employment opportunities, services and facilities in combination with poor public transport provision results in high car dependency. Traditional suburban high streets and neighbourhood shopping parades were not designed to cope with today's volume of car traffic and cannot compete with the centralisation of services in out of town retail centres. As a result, a diverse range of independent local shops is no longer viable, which has also got a detrimental effect on other local services. Low-density housing leads to urban sprawl and high-energy demand, while ageing housing stock creates a maintenance backlog. This in turn leads to the decline of whole suburbs and a polarisation of communities.

3. What mix of local shops/jobs/schools and other community assets do you believe are required to ensure that the suburbs remain desirable places to live?

Suburbs remain desirable not just from a mix of assets, but from the quality, maintenance and sense of community ownership of those assets. Local jobs, shops, schools, community facilities, open spaces, employment areas and services are all necessary in suburbs. However, London's suburbs are diverse, and there is no 'one size fits all' solution. The mix of social infrastructure does therefore need to be determined in consultation with local communities – residents as well as businesses, and public service providers.

In this context, we also suggest that use should be made of existing tools such as the *Social Infrastructure Framework*, which was originally developed for the Thames Gateway.

4. How far do the new policies proposed in the London Plan provide a sufficient strategic planning framework that promotes the viability and sustainability of the suburbs?

We support the commitment (under new Policy 2A.1i) to address the quality of life and other key issues facing suburbs.

However, we feel that the strong emphasis on the opportunities related to new housing (Policy 2A.6) is misleading and would welcome a more explicit commitment to prioritise the upgrading of existing housing. This would also take into account the Government's Urban Task Force's findings that at least 80 per cent of the buildings we will use in 30 years time are already built, as well as the fact that it is generally more sustainable to repair and make better use of existing housing stock. This should be complemented by a commitment to improving both the physical and social infrastructure in existing areas with poor quality housing in order to prevent their further decline and tackle the geographical imbalance of housing need and opportunities for growth across London.

We recommend that the London Plan should not only place an emphasis on conserving open space, but also on enhancing the quality of existing and, where possible, creating new open space. There should also be a reference to the benefits of a multi-functional green infrastructure for the suburbs.

In particular in deprived areas, these spaces, if well managed, are key to providing much needed, safe recreational and play opportunities, strengthening social cohesion and fostering a 'sense of place'. Local communities' environmental concerns are linked directly with the wider sustainability agenda of balancing development and reducing sprawl since they are the biggest single factor fuelling demand for new homes in clean and safe neighbourhoods.

The proposed high suburban densities are sustainable only when they go hand in hand with long-term mechanisms for the management and maintenance of housing stock as well as of green and open spaces. Community involvement in planning and long-term obligations on developers and landlords may help to promote viability and sustainability of higher density settlement in suburbs

5. Are other approaches, policies or tools for promoting the viability and sustainability of suburban London needed? If so please give examples of best practice.

There is already a plethora of approaches, policies and tools that have been specifically developed for or are relevant to London's suburbs. The main challenge is to ensure that these are accompanied by simple implementation and enforcement mechanisms, better design guidance and stronger planning and development control at the local level that does not reinforce unsustainable patterns. Existing partnerships such as LSPs, neighbourhood management structures or VCS networks should be used to develop integrated approaches for making suburbs more sustainable. In particular, Boroughs' emerging Local Area Agreements provide opportunities to pool resources and align budgets in order to reflect such an integrated approach. We believe that this is an area where the work of intermediary agencies in the non-governmental sector can play a vital role at the interface between the statutory duties of the public sector and the interests of the private sector and communities and individuals.

6. How can the quality of life be protected and improved in the suburbs? Again if possible please give examples of where the suburbs have prospered or gone into decline.

Suburbs provide a unique context for sustainable development: The size of their population and the geographical areas they cover are sufficient to provide critical mass for the provision of a wide range of functions and services and to test innovative interventions. At the same time, they are small enough to remain manageable and enable integrated governance models.

In our experience, even comparatively low cost interventions can have a significant impact if they are tailored to the local context.

For example, Groundwork's SRB-funded small grant schemes for shop front improvements and visual merchandising in West London provided an inexpensive but effective way of addressing the decline of suburban high streets and of significantly increasing footfall in local shops. Another example are our Resource Efficiency Clubs, which help to engage with small local businesses and support them to both reduce their environmental impact and enhance their competitiveness by reducing operational costs.

We believe that the suburbs provide the right scale to develop interventions that link training and employment initiatives such as Intermediate Labour Markets for long-term unemployed people and other hard-to-reach groups, with new developments, the refurbishment of existing homes and the maintenance of green and open spaces. Groundwork has been able to demonstrate the effectiveness of such schemes for many years, and we suggest that they would be particularly effective in conjunction with RSLs that could recruit their tenants to the programmes and thereby make a direct local impact on the overall quality of life in neighbourhoods through physical improvements as well as tackling local worklessness.

In our experience, there are many opportunities for local communities to get involved in shaping their environments that go beyond the design stage. Examples include our programmes of substantial physical improvements on social housing estates and in local parks, which are designed and delivered by residents.

The Mayor's 'Tomorrow's Suburbs' toolkit provides a wide range of interventions that can help suburbs to become more sustainable. One of the key findings from our pilots was, however, that suburban communities needed support in assessing their needs and the opportunities for change arising from them. We therefore suggest that enablers and access to seed corn funding to start the process of regeneration of some of London's suburbs be made available.

We shall be happy to discuss any aspects of this response on request, and provide further information and support if you would find this of assistance.

Yours sincerely

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