

Comments on the Mayor's Draft Culture Strategy

1. Introduction

The London Sustainable Development Commission was set by the Mayor in 2002 to advise him on sustainability issues in London. Further details on the Commission can be found on the GLA website www.london.gov.uk

2. Methodology

In keeping with other English regions the Commission is developing a London Sustainable Development Framework. A draft Framework has been developed that contains a vision and set of high level objectives aimed at moving London towards a more sustainable future (attached as appendix 1). It is hoped that the Framework will be agreed by Summer 2003 following consultation early in Spring.

The Commission has used this draft Framework as a means of commenting on the draft Culture strategy - see Section 4, below. Section 3 sets out a summary of the Commission's main comments drawn from the Framework appraisal.

3. Summary of Commission comments

3.1. Introduction

The draft Culture Strategy (dCS) is welcomed and much of its policy content reflects a sustainable approach. For example, it is particularly strong on: developing respect for people, using London's diversity as a key strength, enabling opportunities for self-fulfilment, improving access to activities, events and spaces, promoting economic development, contributing to employment, linking culture and health. The emphasis on the promotion of ethnic minority cultural provision is welcomed.

However, there are areas where the Commission feels that improvement can be made. These are detailed below.

3.2. Approach to sustainable development

In keeping with other Mayoral strategies, the draft Culture Strategy (dCS) fails to recognise sustainable development as *the* integrating, underlying concept which focuses all our strategies, policies and programmes towards an agreed goal. Rather, the dCS treats sustainable development more as a single-issue box to be ticked towards the end of the document (paras 409 and 410).

Yet the dCS could be much more positive in showing how culture contributes significantly towards the achievement of sustainable development. Much of the content of the dCS accords with the sustainability agenda – for example: contributing to

economic development; creating employment; measures aimed at tackling poverty and social exclusion; provision of appropriate skills; improving the health of Londoners; reducing crime or fear of crime; and seeking to promote public transport (to some extent). These are all key contributors to achieving sustainable development in London – but the dCS doesn't make this link. It also fails to look at mutually reinforcing benefits across these issues.

This could be addressed by including a section near the beginning of the document which sets the scene about sustainable development and makes these appropriate links. These could be followed up with more detail in appropriate later sections.

3.3.Environmental issues

Sustainable development provides the framework for integrating economic, social and environmental concerns over time, not through trade-offs, but through the pursuit of mutually reinforcing benefits¹. The dCS is strong securing economic benefits from cultural activity, goes some way in meeting social concerns but is much weaker on environmental benefits.

Therefore, the culture sector will evidently contribute to London's GDP and will maintain employment levels. It will also help to improve the health of Londoners, increase social contact and participation and help tackle aspects of social exclusion. These are all very valuable aspects of sustainable development and are welcomed. But the sustainable development agenda means doing things differently and looking for projects and solutions which will provide economic, social and environmental benefits at the same time and prioritising these over lesser options.

Thus, how the dCS contributes to the resource use and environmental agenda is less clear. There is no indication that the policies and proposals set out in the dCS are the best possible for tackling key issues such as the causes and impacts of climate change, improving air quality, maintaining and improving biodiversity, using energy efficiently, promoting renewable energy, minimising waste, promoting recycling and reducing noise.

This is a major deficit and will need to be addressed in the final strategy.

3.4. Social progress

The dCS addresses some social aspects well but is weak in other areas. For instance, there is a lack of a clear explanation how economic benefits, particularly from tourism, would favourably impact on those most excluded, such as the historically marginalised BME communities. The dCS recognises that the cultural sector suffers substantial pockets of low pay and poor conditions, especially in the subsidised sector and that London's high living costs present a threat to the sector. However, the strategy fails to address this key issue in any depth and has no policy to improve the situation.

The strategy content aimed at tackling the e-divide is poor. Proposal 8.5 includes a deliverable to "*promote libraries as key access points for new technologies*". This appears to be an inadequate mechanism for ensuring that excluded communities gain

¹ Quote from 'Agenda: Where Next for Sustainable Development'. The UK Sustainable Development Commission's 2003 Annual Report.

access to such services given that such communities find themselves increasingly out of walking distance of remaining libraries. For instance, voluntary and community groups could potentially play a much more important role in providing access and tackling the e-divide – but the dCS ignores this (and other?) options.

This is symptomatic of a wider point – in that the dCS is far weaker on the potential local contribution (local needs and aspirations) compared to the big play on London as an international centre. There is little mention of the key role of voluntary and community organisations (the term ‘cultural organisation’ is not clear enough to cover these groups) which brings into question the plan’s social sustainability.

3.5. Making the *sustainable* case for London

The dCS highlights the difficulties of promoting London on the one hand, and the wider requirement of contributing to the achievement of sustainable development in the UK (a GLA duty). The GLA Act also states that the Mayor has a duty to encourage people to visit Greater London, and to encourage people from outside the UK to visit the UK by way of Greater London.

In terms of sustainability, this presents significant challenges. The Mayor needs to promote sustainable modes of visitor transport both in terms of transport trips to London, and within London. The Mayor needs a sustainable approach to air travel which ensures that the polluter pays the true environmental costs, for example by ending the tax exemption on aviation fuel (this is proposal 57 in the Mayor’s draft Energy Strategy). It also creates a challenge for national government, in deciding whether to continue to support the centralisation of London as a visitor centre, rather than dispersing activities elsewhere and seeking more balanced regional economies.

Another potential conflict exists over e-matters. There is a popular view that developing the e-agenda will have considerable sustainability benefits, particularly in terms of flexible work location and therefore reduced need to travel. If this is proved to be the case, then developing an e-inspired flexible working approach in London may be seen to threaten the case for increased public transport investment in London. Firstly, there is a real need to examine the pros and cons of e-working and how it can be best employed to deliver mutual economic, social and environmental benefits for London – this work should be commissioned by the GLA and inform the final Culture Strategy (and other Mayoral strategies).

Secondly, it is clear that London needs both measures to minimise travel AND improved public transport: the Mayor needs to make the case for public transport investment within this context.

3.6. Tourism

The issue of tourism brings the sustainable development debate sharply into focus. On the one hand, tourism contributes 12% to London’s GDP and supports 13% of London’s workforce. This economic contribution has social benefits in tackling social exclusion and as a major health determinant – although the dCS is weak on making these links. But tourism has its downside in terms of environmental impacts (pollution, CO₂ emissions, noise), its volatile nature in relation to creating stable communities (recent downturn after September 11th and the foot and mouth crisis) and its concentration in a Central London location. Paragraphs 132 to 136 raise some of these

issues – yet these are not consistently addressed in any of the policies or proposals. Policy 5 for example, makes no attempt to make London’s tourism more sustainable – it seeks more of the same in the same places. Only the centralisation issue is tackled specifically – by policy 10 which seeks cultural provision throughout London.

The dCS needs to contain practical proposals detailing how tourism to, and within London will become more sustainable. This was also a major point to emerge from the recent London Regeneration Network cross sectoral event held in Feb 2003: a report on voluntary and community sector involvement in sustainable tourism is expected later this Spring.

3.7.Late night economy/24 hour city

Promotion of the late night economy/24 hour city may impact negatively on sustainable development. The dCS sees the benefits as contributing to London’s dynamic world city image, contributing to the ‘urban renaissance’, creation of new jobs (e.g. entertainment, food), a positive impact in terms of more people on the streets outside office hours (safety) and increased creativity and social mixing. However, there are also many negative impacts, some of which are highlighted in the dCS. These include: impact on local communities (noise, nuisance, anti-social behaviour, crime), impact on local services (as bars, clubs and cafes replace shops and other community facilities), impact on police and health services, and impact on resource use (e.g. energy use).

To an extent, parts of London already exhibit a late night/24 hour city economy and policy 4 can be seen as improving the management of what is already happening. Establishing a pilot Entertainment Management Zone, promoting good practice guidance, tackling licensing and promoting safer travel at night are all to be welcomed in this respect. However, this activity is spreading in London and the dCS should undertake a sustainability appraisal of its impacts.

3.8.London leading the way – taking responsibility

The Mayor’s vision is for London to become an exemplary sustainable world city. Clearly the Culture Strategy and creative industry (including the media) have a crucial role in communicating London’s sustainable image. This is not reflected in the dCS. Not only do we need to learn to do things differently, which has implications for the creative sector as much as any other (e.g. advertising), but we also need to champion our own achievements in a way that will influence other cities (as well as Londoners).

The dCS misses an opportunity to harness the creative industries to ‘sell’ sustainable lifestyles and hence contribute more positively to an exemplary sustainable world city. There is a real need for this sector to be employed by the Mayor to make different ways of doing things (e.g. waste recycling) more attractive than they currently appear.

3.9.London Olympics

One of the ways in which London could demonstrate in sustainability credentials is in ensuring that a London Olympic bid is built on civic participation and is also founded on sustainable development principles and sets the highest sustainability standards. A London Olympics would be an enormous sustainability challenge, not least in relation to how London’s transport system would cope with an estimated 9 million spectators. The Commission offers its assistance to the Mayor in this respect.

4. Assessment of draft Culture Strategy using Commission's Framework

Overall objective

We will achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade offs between competing objectives are unavoidable, these will be transparent and minimised.

In general, the dCS recognises the role that culture can play in meeting economic objectives, emphasis some social benefits, and is weaker on making a contribution to resource/environmental issues. Notably, it fails to adopt the integrated thinking required to meet sustainable development goals – to look at policies which will deliver these benefits together. This means doing things differently and looking for projects and solutions which will provide economic, social and environmental benefits and prioritising these over lesser options.

Therefore, the culture sector will evidently contribute to London's GDP and will maintain employment levels. But the links to social exclusion are weak and to resource use/environment almost non-existent. Some of these issues are explored below.

For instance, there is a lack of a clear explanation how economic benefits, particularly from tourism, would favourably impact on those most excluded, such as the historically marginalised BME communities. The dCS recognises that the cultural sector suffers substantial pockets of low pay and poor conditions, especially in the subsidised sector and that London's high living costs present a threat to the sector. However, the strategy fails to address this key issue in any depth and has no policy to improve the situation.

The e-agenda could have provided a useful example of a policy direction which delivered on economic, social and environmental at the same time. But the strategy misses this opportunity. The policy content aimed at tackling the e-divide is poor and there is no attempt to investigate the resource use and environmental benefits that might accrue from promoting this sector (e.g. in terms of flexible working).

How the dCS contributes to the resource use/environmental agenda is not clear. In drawing up the dCS, is the Mayor satisfied that the policies and proposals chosen are the best possible for tackling key issues such as: the causes and impacts of climate change, improving air quality, maintaining and improving biodiversity, using energy efficiently, promoting renewable energy, minimising waste, promoting recycling and reducing noise?

Para 79 discussing a London Olympic bid hints at this approach. Any London Olympic bid must enshrine the highest standards of sustainable development. The organisers of the Sydney Games gave sustainable development a high profile and whilst positive benefits were made in some areas, opportunities were missed in relation to other aspects of sustainability.

The issue of tourism brings the sustainable development debate sharply into focus. On the one hand, tourism contributes 12% to London's GDP and supports 13% of London's workforce. This economic contribution has social benefits, although it is not clear how tourism tackles social exclusion and improves health. But tourism has its downside in terms of environmental impacts (pollution, CO₂ emissions, noise), its

volatile nature in relation to creating stable communities (recent downturn after September 11th and the foot and mouth crisis) and its concentration in a Central London location. Paragraphs 132 to 136 raise some of these issues – yet these are not consistently addressed in any of the policies or proposals. Policy 5 for example, makes no attempt to make London’s tourism more sustainable – it seeks more of the same in the same places. Only the centralisation issue is tackled specifically – by policy 10 which seeks cultural provision throughout London. The dCS needs to contain practical proposals detailing how tourism to London will become more sustainable.

A further example is the Mayor’s objectives for his events programme (para 100). These relate primarily to social issues (equality, diversity) and promotion of London (economic). The events programme should also champion London as an exemplary sustainable city, and a city of environment quality. European Car Free Day would clearly come into these categories.

Although para 204 refers to culture’s contribution to environmental issues, this is not followed up in any of the detail on policy or proposals.

Taking responsibility

1.As citizens of a world city, we will be aware of the impact of our actions on the rest of the UK and beyond, and will take a responsible world leadership role which contributes to the planet’s sustainability.

This objective relates to three themes: being aware of London’s impact on the rest of the UK; being aware of our impact globally; and ensuring that we take a responsible, sustainable world leadership role.

In terms of the impact of the dCS on the rest of the UK, proposal 1.1 seeks to champion London’s role, whilst taking account of the “broader transport, spatial and economic issues”. Unfortunately, these broader issues are not consistently addressed in any of the deliverables. Transport is considered under proposal 10.2 – but mostly in relation to transport links within London and the wording on deliverables could be much firmer on the promotion of public transport given the policy directions in the draft London Plan. Policies and proposals in the dCS seek to strengthen London’s role as a national centre of culture – policy 13 for example. This is to be expected given the Mayor’s role in ‘making the case for London’, yet has obvious impacts on the rest of the UK. However, the question of balancing regional economies is an issue for national government.

The dCS makes many links with international issues, mainly in relation to London’s cultural connections with other cities or countries, or in its promotion as an international destination and location of world-class events. It fails to consider London’s impact on the global environment, in terms of say its ecological footprint (use of resources, emissions of CO₂ etc), or its contribution to alleviating global poverty.

Again, tourism is a key issue. The strategy needs to demonstrate how international tourism can become more sustainable. One mechanism would be to offset CO₂ emissions of visitors. For example, the World Summit Summit on Sustainable Development in Johannesburg last year created a Climate Legacy organisation - visitors offset their CO₂ emissions by contributing to a fund for developing local sustainable energy projects in South Africa. This is the sort of integrated thinking that the GLA’s sustainable development duty requires – positive proposals that would reinforce the

Mayor's other programmes, in this case helping to implement his Energy Strategy. Visitors to London would be helping to develop renewable energy technologies in the capital, such as photovoltaic or hydrogen technologies.

Accepting predictions of infinite growth in air travel (and likewise visitors to London) – regardless of the costs is not compatible with the concept of sustainable development, which requires that environmental costs be also taken seriously.

The dCS contributes to the maintenance of London's world city role and an exciting destination for visitors and residents alike. But it misses an opportunity to market London as an exemplary **sustainable** world city. How will London do things differently and lead by example in terms of sustainable cultural and tourism policies?

Addressing sustainable international tourism and setting the highest standards for an Olympic bid would help London become an exemplary sustainable world city and thus lead by example.

London's has an advantage in this respect with its cutting-edge creative industries. More could be done in the strategy to harness London's creative industries to communicate the message of sustainable development and to promote London as a world leader in the field.

2. All of us - individuals, households, businesses, local and regional government, voluntary groups — will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable.

Cultural activities and particularly the creative industries sector have significant potential in terms of informing and motivating people to make sustainable decisions. This is an area where the Mayor and the dCS could do more – harnessing London's media and creative sector to persuade Londoners to make the lifestyle changes required to move London towards a more sustainable future (e.g. recycling more waste, favouring public transport over private car use etc).

Policy 7 promotes education and life-long learning in the creative sector. It includes deliverables targeting young people, cultural workers, higher education and black, Asian and minority ethnic business.

Policy 8 states that access to culture should be right of all Londoners. It also tackles access issues, disabled people, raising awareness and dissemination of information via ICT and libraries.

However, the strategy content aimed at tackling the e-divide is poor. Proposal 8.5 includes a deliverable to "*promote libraries as key access points for new technologies*". This appears to be an inadequate mechanism for ensuring that excluded communities gain access to such services given that such communities find themselves increasingly out of walking distance of remaining libraries. For instance, voluntary and community groups could potentially play a much more important role in providing access and tackling the e-divide – but the dCS ignores this and other options.

Policy 9 recognises the role of culture in empowering London's communities. Deliverables include communicating key health messages, promoting best practice with young people

and targeting key groups (e.g. asylum seekers and refugees, volunteers). However, the dCS is weak at supporting the role of voluntary and community organisations. More is needed on training provision, support for local activity (e.g. room space available for local meetings) and promoting these groups as employers and key partners.

This perceived imbalance away from the local towards London's international activity significantly weakens the social sustainability of the draft strategy.

3. We will seek new and creative ways to overcome the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective.

Clearly, cultural activity and the creative sector can provide creative solutions to help overcome some of the barriers to sustainability. The promotion of these sectors is likely to contribute to the generation of new and innovative solutions over time (although the dCS contains nothing specific in this respect). Nevertheless, the inclusion of 'creativity' as one of the four key objectives of the dCS is welcomed.

Ironically, the creative sector provides an example in terms of barriers to sustainability. The predominance of small and medium enterprises in the creative sector – and even individual creative artists – presents problems in behaving sustainably. Whilst such businesses and activities can contribute considerably to local economies and in regeneration initiatives, they face difficulties in raising finance to survive, as well as being able to manage their activities in an environmentally friendly manner (e.g. considering their resource use, CO₂ emissions, green economies of scale etc).

E-business and the digital and multimedia sectors provide an opportunity to help overcome some traditional barriers, in that they not only allow greater access to information (for most) but they also enable greater flexibility in terms of working practices (flexible locations, working from home, less travel). However, this can be seen to potentially work against the Mayor's 'making the case for London' agenda: the more businesses and individuals have the flexibility to work where they please (including at home), the weaker the case for increased funding for London's public transport infrastructure. London needs both measures to minimise travel AND improved public transport: the Mayor needs to make the case for public transport investment within this context.

The dCS is strong on seeking to identify the particular barriers that prevent people participating in cultural activities – this is welcomed (paras 209 to 224 culminating in policy 8). Policy 14 also tackles the funding structures that may be constraining Londoners' best access to and use of cultural facilities.

The dCS is not consistent in promoting the consideration of a 'long-term perspective'. For the creative industries, it proposes the development of a "sustainable long-term action plan". Yet for other aspects, e.g. tourism and international travel to London there is no apparent long-term view.

Finally, the advertising industry can be seen as a potential barrier to sustainable lifestyles. It promotes unsustainable production and consumption and can mislead and market damaging stereotypes. Again, this is an issue that the culture strategy needs to address.

4. We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm.

The dCS is fairly strong on developing ownership, in terms of its emphasis on utilising London's diversity and creativity. Developing community empowerment through local cultural provision and support for community activity (e.g. local festivals) is an example.

However, there are issues around building responsibility. The appraisal for objective 1 shows that the dCS could do more for London in terms of setting a responsible world role. But at the more local level, the dCS has huge potential for building a sense of responsibility for London – through the cultural messages from the events programme, the organisation and running of major events, the creative/media/advertising messages, and the management of 24-hour city activities.

Cultural messages must include key sustainable development issues – whether in events like major festivals or more importantly through the activity of the media sector. Advertising obviously has a huge influence over lifestyles and consumerism – two key areas for sustainable development.

But in undertaking our activities we must also be responsible and consider the needs of others, particularly local residents. Major events and 24-hour city activities create nuisance for local people in terms of noise, disturbance and impact on local environmental quality (damage to parks, litter and waste etc). They also have an impact in terms of resource use (energy use – but also local police services and health services).

The organisation of cultural activities must involve local people and take into account their concerns. The highest sustainability standards must be employed and efforts made to ensure that the delivery of this activity contributes to the achievement of the Mayor's other sustainability objectives including waste management (and procurement of recycled products), noise management, improvement and protection of open spaces, promotion of public transport, energy efficiency, promotion of renewable energy, promotion of fair trade products etc. This approach needs to be made explicit in the strategy.

Parts of London already have a 'late night/24 hour economy'. Policies in the strategy to seek to manage this activity are welcomed – this should help to reduce the negative impacts and maximise positive aspects.

The dCS recognises the importance of encouraging participation and contains various proposals/deliverables in this respect. It recognises that this would be crucial to any London Olympic bid for example.

Developing respect

5. Our city will have a culture of tolerance, fairness and respect, for people and the environment, recognising London's diversity as its key strength. The right of all London's citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others.

The promotion of equalities and diversity is a key aspect of the strategy and is welcomed. London's diversity is recognised as its key strength. The strategy is strong on addressing 'target' equalities groups. The strategy is also strong at seeking synergies

between culture and health and helping to address health inequalities. Policies and proposals on access and education are also welcomed.

Respect for the environment is not addressed (see our comments in relation to the overall objective, above).

The strategy promotes fulfilment – culture is particularly important in this respect. However, the late night/24 hour economy is an example of a cultural policy that could deleteriously impinge on the rights of some Londoners. It has obvious economic benefits – but it needs to be thoughtfully managed to ensure that the full remit of sustainable development issues are addressed and local residents are not disadvantaged.

Similarly, there are issues around tourism. In seeking to cater for increased national and international travel focussed upon London, is the Mayor disadvantaging communities in other parts of the UK or globally? Are there more equitable ways of achieving the Mayor's objectives e.g. through greater use of rail travel, dispersal of cultural activity or a Climate Legacy programme?

The creative sector has an obvious influence and responsibility over perceptions of 'fulfilment' particularly in relation to advertising, creating consumer demand and lifestyle expectations. The strategy could do more to harness the power of this sector in doing more to deliver sustainable solutions.

6. Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion.

Clearly, the strategy will contribute significantly to Londoners' feelings of enjoyment. Policies supporting entertainment activity, cultural events and tourism will directly and indirectly (job and wealth creation) contribute to feelings of well-being.

There is also a range of policies and proposals concerning safety and security. For example, policies aimed at managing the late night/24 hour economy should ultimately result in improvements and reduce negative impacts on residents and participants. Policies supporting community empowerment and volunteering should also contribute to safer, more social communities. Also policies targeting social inclusion, aimed at specific groups (refugees, asylum seekers, the disabled and the elderly) will help in this respect.

In addition, there is useful content on health aspects – looking at links with alcohol and drugs for example, where the strategy will assist in making London a safer city.

However, there are areas where the strategy could have potentially negative impacts. Support for the late night/24 hour economy (and any expansion) will not be universally popular with some local residents – although to some extent the strategy aims to better manage what is already happening (e.g. promotion of safer travel at night actions). Tourism can also be seen as an intrusion to some Londoners, for example noise from planes using Heathrow airport. The strategy fails to make the links between increased international travel to London and noise intrusion. There is also a perceived concern over mobile phone masts – although this would be better tackled by the Mayor's London Plan.

7. Our communities will be dynamic, stable, adaptable, innovative, progressive – creating a city in which conflicts will be resolved as part of a transparent and participatory process.

The strategy clearly aims to foster and champion many of these qualities within London's communities and individuals. Creativity is a key objective. There is considerable support for the creative industries, the city is well-placed in the digital, multimedia and e-commerce areas and the 24 hour city nature of London contributes to its dynamic image. The strategy contributes significantly to education and access to opportunity.

However, the strategy highlights problems which need to be addressed if London is to make the most of its creative potential and dynamism. The creative industries sector is characterised by self-employment and micro/small businesses predominate. Such businesses face difficulties in raising finance to survive, as well as being able to manage their activities in an environmentally friendly manner (e.g. considering their resource use, CO₂ emissions, green economies of scale etc). E-business and the digital and multimedia sectors provide a great innovative opportunity for creating more sustainable communities, but the development of this sector may be perceived to work against the Mayor's 'making the case for London' agenda: the more businesses and individuals have the flexibility to work where they please (including at home), the weaker the case for increased funding for London's public transport infrastructure.

In terms of creating stable communities, again the strategy will contribute in many respects – creation of employment and wealth, nurturing creativity, community empowerment, tackling social exclusion – these policies and others are all welcomed. There are a couple of areas where aspects of the strategy may work against stable communities: the late night/24 hour economy and tourism. There are problems with late night/24 hour activity in terms of noise, nuisance and anti-social behaviour, as well as a preponderance of clubs and bars affecting other local services. However, the strategy attempts to better manage such activity. However, as has been demonstrated recently, an over-reliance on tourism can have negative effects – with a series of recent crises (September 11th, the Foot and Mouth epidemic, the War in Iraq) having an impact on London's economy.

In terms of transparent and participatory conflict resolution, the dCS recognises the importance of encouraging participation and contains various proposals/deliverables in this respect (e.g. it recognises that this would be crucial to any London Olympic bid). However, it could do more in framing some of the bigger questions (e.g. tourism, 24 hour city) within a sustainable development context – bringing the environmental issues on to a par with economic and social issues and seeking integrated 'win-win-win' scenarios.

Managing resources

8. We will protect and improve the city's natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links.

There is little specific reference to biodiversity in the dCS. Policies promote access to open space, the cultural potential of London's green spaces, the retention of playing fields and the Blue Ribbon Network. In general, whilst the promotion of London's open space (green space) network will contribute significantly to the conservation of biodiversity, it would be

useful to make specific reference to this effect and recognise London's green spaces and wildlife habitats as being important in their own right. With potentially greater use of spaces for people and events, there is a danger that their ecology will suffer if not integrated in to appropriate management plans. The dCS should address environmental education, awareness-raising and the celebration of nature (including through faith festivals) – or at least be consistent with and help to implement the Mayor's Biodiversity Strategy on these issues.

As referred to above, the dCS addresses open spaces and seeks to maximise access to spaces and their use by people. This is welcomed in general, with the caveat above. Also, parks and gardens are important too as cultural creations in their own right – more could be made of this in the dCS.

There is little reference to the built environment, although policy 11 and proposal 11.2 pledge the Mayor to work with the London Development Agency on 'difficult buildings and spaces' in relation to cultural quarters. More could be done in terms of addressing the needs to the new digital/multimedia/e-commerce agenda and the design and use of buildings, to maximise flexible working and to minimise negative impacts (e.g. masts).

The dCS fails to address how it would impact upon the wider environment outside London – the South East, the rest of the UK and its global impact. Again, tourism, particularly international air travel will have an impact. The potential rise in air travel to London and the South East creates demand for extra runway capacity, whilst emissions from air travel contribute to climate change. The strategy should address these issues.

9. We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste.

The dCS is poor on addressing its environmental resource impacts. Yet many of its policy directions are major contributors to resource use or pollution, for example:

- Late night economy/24 hour city – energy and resource use implications (direct and indirect)
- Tourism, particularly air travel to London
- Media, entertainment industry – resource use and fuelling a consumer society (e.g. para. 410 refers to their impact in promoting "energy intensive lifestyles").

The dCS could do much more to highlight the environmental aspects of these activities in a transparent manner and seek more integrated proposals to minimise their impact. For example, currently the policies relating to these activities do not comply with this objective in terms of using energy and material resources prudently, efficiently and effectively. However, some policies in the dCS will serve to reduce resource use e.g. policy 10 seeks to provide cultural activity across London (not just in the centre) and promotes the use of public transport and walking.

Similarly, the dCS is poor on the Mayor's objective of reusing and recycling waste. The issue should be addressed in terms of major cultural events (leading by example) and the late night/24 hour economy

Although paragraph 410 refers to the fact that the media and advertising sectors can be seen to be working against energy conservation initiatives (e.g. in the Mayor's draft Energy Strategy), the dCS fails to address this issue. An action point or deliverable could be drawn up to enable the Mayor to work with advertising/media to promote more sustainable lifestyles (e.g. the 'Nine Lives' campaign cited in the UK Sustainable Development Commission's 2003 Agenda see <http://www.ninelives.tv/>).

Getting results

10. We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be pursued both in London and beyond. Business transactions in London will be conducted to high ethical standards.

The dCS will contribute significantly to economic growth in London. Both tourism and the creative industries are major contributors to London's GDP and employment levels. The education and access to opportunity policies will also aid economic and social progress in London.

Whilst much of this activity, particularly the creative industries aspect, can potentially play a key role in regenerating communities and tackling social exclusion, the dCS is not clear how this will happen. In particular, how does the economic contribution from tourism specifically tackle social exclusion? The strategy should clarify these links. The quality of cultural employment is also an issue – see 12 below.

Also, to contribute to sustainable development, this activity needs to score on resource use/environmental grounds as well as social and economic: there is little evidence that these issues have been considered. Much greater consideration needs to be given to make cultural economic activity more environmentally sustainable.

The new e-commerce agenda provides an opportunity where the three aspects of sustainability could be brought together for the benefit of all, with the creation of new jobs, flexible working practices and reduced need to travel. Yet this potential 'virtual cycle' is not explored – and it raises a wider question of how such an approach would square with the Mayor's policies regarding increasing government funding for London's public transport infrastructure and 'making the case for London'.

The dCS could do more to address sustainability in the digital economy. The e-world has great potential in terms of contributing to sustainable development, but the true picture is difficult to ascertain. The dCS could include action to clarify the situation, in particular tackling the following issues:

- The impact of e-commerce on the physical world. Whilst the popular view may be that it has a negligible impact, in reality e-businesses face the same dilemmas over supply chains, energy use, transport and waste.
- Ensuring that e-commerce meets the same environmental and social standards as other more mature industries.
- Ensure that we shape e-commerce to deliver sustainability – to counter the view of 'techo-determinism'.

There is nothing in the dCS which would help to move London towards making more ethical business transactions. Yet this is a potentially important issue for the creative industries sector and the new digital/e-commerce agenda. Proposal 6.1 promotes sustainability within the creative sector and commits the Mayor to the production of a sustainable long-term action plan. This is welcomed and should tackle the difficult issue of how to assist SMEs and individuals in becoming more sustainable including ethical/sustainable business transactions (such as procurement). There is also considerable scope to move towards more ethical trading in the digital economy which should be explored.

11. All the different parts of our economy will consistently invest in new technologies, new solutions, new plans and new ideas that contribute to achieving social, economic and environmental objectives simultaneously.

The emphasis on support for creativity will assist in the delivery of this objective. Policies and proposals aimed at promoting the digital/multimedia/e-commerce sectors will assist efforts to use new technology to provide economic and social benefits (but see our response to 10, above).

However, more could be done to attempt to focus London's creativity on sustainable solutions. London has a potentially enormous contribution to make in harnessing its media power and creativity to move towards more sustainable lifestyles and choices. Culture has an important role and responsibility in this respect.

Again, the dCS could do more in tackling how the SME-dominated creative sector could contribute by the adoption of sustainable technology (e.g. renewable energy, waste recycling). As the fastest growing sector of the UK economy, this could make an enormous contribution towards meeting government and London targets on reducing CO₂ emissions, promoting renewable energy and meeting waste recycling targets.

Policy 8 seeks to maximise the potential of new technology to facilitate access to the creative sector for all Londoners, in terms of ICT. However, it is disappointing in its scope – there are more options than merely using libraries as ICT locations. The use of voluntary and community groups and support for these groups should be included.

12. All forms of work will be recognised and valued. Paid employment will be plentiful.

The dCS contains considerable policy content which recognises and values different forms of work. Much of the creative sector is characterised by self-employment, micro and small businesses. Proposal 6.1 promotes sustainability within the sector with a sustainable long-term action plan.

The dCS recognises that the cultural sector suffers substantial pockets of low pay and poor conditions, especially in the subsidised sector and that London's high living costs present a threat to the sector. However, the strategy fails to address this key issue in any depth – there is no direct policy direction for instance (although policy 7 aims to improve education and skills).

More could be made of the potential for flexible working (e.g. home working) within the digital/ multimedia/ e-commerce sectors and the economic and environmental benefits that might accrue.

Policy 9 and proposal 9.1 promote culture's role in community empowerment and specifically promote volunteering. However, as stated in 2, above, there is very little support for the role of community and voluntary organisations.

The dCS contributes enormously to ensuring that paid employment is plentiful. The tourism sector and the creative industries are both key generators of employment.

13. We will be healthy and fulfilled – through living in good housing, with wide opportunities to develop as individuals and communities, through access to services, good quality food, green space and cultural, sporting and leisure activities.

Access is one of the strategy's four key objectives and the strategy is strong on improving people's access to cultural (including sporting and leisure facilities) as well as improving access to education and learning. Although there is some reference to public transport, this needs to be far more prominent to reflect the priority afforded by the Mayor's draft London Plan (and Transport Strategy) to this issue (e.g. draft London Plan policies 2A.5 and 2A.6).

In terms of creating a healthy population, access to cultural activities can contribute significantly to both physical and mental health. Some of the key determinants of health, particularly employment, education and safety, are well addressed by the dCS. There are policies and proposals relating to specific health links (e.g. drugs and alcohol, health and community safety).

However, other policy areas may impinge on people's health – the anti-social activity associated with the late night economy/24 hour city, for example and its potential draw on the police and health services.

Some of the other key determinants of health are poorly addressed, for example local environmental quality (e.g. air pollution), housing and road traffic. Although there are some references to use of public transport, this could be more of a theme of the dCS.

As noted above, there is nothing in the dCS that contributes to better housing for Londoners. Admittedly, this is an area that may be seen as unconnected, but there is a link in terms of enabling greater work flexibility by better design of housing. This could be particularly appropriate for the creative industries sector where work/home units are important for artists and lone creative individuals.

In terms of providing wide opportunities for development, the strategy scores highly for individual development in relation to culture. Various policies contribute to the achievement of this objective. Community development is promoted to some extent, but more could be achieved through support for and use of voluntary and community groups.

Access to services is promoted to some extent through the digital economy policies and, by other policies such as late night economy (although this may result in some services

losing out to club/bar development). Access to education and life-long learning is promoted.

There is nothing specific on access to good quality food. This could be addressed by alterations to policy 9 which looks at the role of culture in health and community safety. Other links could be made through the London café and restaurant sector (use of London brand, local or culturally traditional foods) and the growing of traditional food by London's diverse communities.

Access to green space is covered under objective 8, above, and in general the dCS scores well on this objective with policies aimed at promoting cultural access to green space, retaining playing fields and promoting the Blue Ribbon Network.

The final three aspects of this objective concern access to cultural, sporting and leisure activities. Clearly, the strategy will make a significant contribution to all three.

Annex 1. A SUSTAINABLE DEVELOPMENT FRAMEWORK FOR LONDON.

Vision for London²

London has retained its position as one of the World's great cities over many centuries because of the quantity, quality and diversity of its people, businesses, infrastructure and natural resources. However, the downside of this pre-eminence has been the associated social division, pollution and increasingly wasteful use of resources.

Our vision for the 'World Class' London of the future is a place where all Londoners and visitors feel the greatest possible sense of physical, emotional, intellectual and spiritual well-being. Our thinking and decision-making will be long-term, meeting the needs of the present without compromising the ability of future generations to meet their own needs. This means ensuring that the ways in which we live, work and play will not interfere with nature's inherent ability to sustain life.

We will achieve this by taking responsibility for the regional and global impacts of city life. With our commitment to inclusion and cooperation, we will build upon and celebrate London's diversity, in all its forms. Resources will be used efficiently and fairly and the natural and built environment protected. Our reward will be a prosperous, vibrant and healthy city, one in which we all make the most of opportunities for fulfillment.

All of us have a part to play in achieving this vision. Each step will be supported by clear objectives and targets and will be sustained by learning from success.

Objectives

Overall objective

We will achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade offs between competing objectives are unavoidable, these will be transparent and minimised.

Taking responsibility

1. As citizens of a world city, we will be aware of the impact of our actions on the rest of the UK and beyond, and will take a responsible world leadership role which contributes to the planet's sustainability.
2. All of us - individuals, households, businesses, local and regional government, voluntary groups — will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable.
3. We will seek new and creative ways to overcome the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective.

² This Vision and set of objectives is intended for all Londoners as well as those working or visiting London (i.e., the collective 'we' refers to those living or working in, or visiting the capital).

4. We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm.

Developing respect

5. Our city will have a culture of tolerance, fairness and respect, for people and the environment, recognising London's diversity as its key strength. The right of all London's citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others.

6. Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion.

7. Our communities will be dynamic, stable, adaptable, innovative, progressive – creating a city in which conflicts will be resolved as part of a transparent and participatory process.

Managing resources

8. We will protect and improve the city's natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links.

9. We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste.

Getting results

10. We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be pursued both in London and beyond. Business transactions in London will be conducted to high ethical standards.

11. All the different parts of our economy will consistently invest in new technologies, new solutions, new plans and new ideas that contribute to achieving social, economic and environmental objectives simultaneously.

12. All forms of work will be recognised and valued. Paid employment will be plentiful.

13. We will be healthy and fulfilled – through living in good housing, with wide opportunities to develop as individuals and communities, through access to services, good quality food, green space and cultural, sporting and leisure activities.

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