

Chapter 5 Social Infrastructure

Reinstatement of Lifetime Neighbourhoods Policy

The Policies in this chapter do not give space to any community led activity and they lack an integrated and holistic approach. There must be a reinstatement of current London Plan Policy 7.1 Lifetime Neighbourhoods.

'Lifetime Neighbourhoods' provide definition and detail for inclusive and sustainable communities. They are places that meet the needs of a local community at all stages in its life, recognising health and well-being, social networks, a thriving local economy and a sustainable environment. Lifetime Neighbourhoods are also important for fostering a sense of belonging, building networks of community organisations and enabling communities to thrive together.

The London Plan should have a social infrastructure matrix that relates number of housing units to lifetime neighbourhood indicators such as amount of green space, number of school spaces, number of GPs, number of community meeting spaces. This should be applied to the Mayor's Affordable Housing Programme and to all public land transfers.

Neighbourhood Plans are an important mechanism for the implementation of lifetime neighbourhoods and were included in the current London Plan Policy 7.1. They are a platform for communication and participation, with the potential to engage all groups in the design and delivery of planning policy and implementation. However a supportive framework is required to ensure that all communities benefit. Therefore, the Mayor should work with the Boroughs and voluntary and community sector to implement measures to support under-represented and excluded groups to take advantage of the Localism Act 2011 and especially the community right to bid and asset transfer schemes, community economic development, community right to build and community right to neighbourhood planning.

See DCLG [Lifetime Neighbourhoods](#) December 2011 and the earlier DCLG [Lifetime Homes, Lifetime Neighbourhoods](#).

POLICY S1 Developing London's social infrastructure

The protection of social infrastructure is a critical concern for London's communities and included within this are a wide range of community spaces which are the fabric of London's diversity.

Whilst Policy S1 recognises this important role, it does not evidence and base policy on the escalating loss of social infrastructure, particularly community space.

Policy S1 does not, but should, apply the principles of Policy GG1 Building Strong and Sustainable Communities which aim to ensure growth reduces inequalities and improves the quality of life for all Londoners by

- providing amenities that strengthen communities,
- increasing active participation
- planning for places where amenities can flourish and that provide important opportunities for social interaction
- taking advantage of the knowledge and experience of local people

Just Space and The Ubele Initiative produced and shared with the Mayor a manifesto for community spaces (“Reclaim Our Spaces”) , and it is disappointing that these proposals have not been taken into account in Policy S1. These include:

- Recognise the irreplaceability and uniqueness of many community spaces and look after them for future generations as part of a continuing legacy
- Access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and well being, inclusion, integration, empowerment and poverty reduction
- Social infrastructure and community spaces are essential to the achievement of lifetime neighbourhoods in which services and amenities are accessible and affordable to everyone, now and for future generations, and provide space for social co-operation and mutual aid,
- Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.
- The tool of Social Impact Assessment to gather evidence of community assets, including social infrastructure, with a methodology that ensures local community networks are fully involved through a collaborative relationship with the Boroughs and GLA. See Just Space Towards a Community Led Plan for London (2016) and Just Space policy document [Social Impact Assessments](#) (January 2018).

The principles above need to be inserted in Policy S1 A – F.

In **Policy S1 B** social infrastructure needs are only addressed via traditional Borough planning mechanisms and the community scale is secondary or non-existent.

In **Policy S1 C** the wording makes it seem that it is the physical building alone that determines quality and inclusion, ignoring social agency.

Policy S1 D encourages and supports the disposal of public sector estates with social infrastructure rationalised or facilities shared. We consider that the best use of public land is to meet social objectives; services and amenities that meet community needs should not be secondary.

In **Policy S1 E**, it needs adding that new facilities must be fully accessible (including step free), affordable and welcoming to all potential users.

In **Policy S1 F**, development proposals that may result in any loss of social infrastructure must be assessed by local communities (using the community tools identified above) so that “public service transformation plans” are fully responsive to community needs. Re-provision must be on the same terms and conditions (like for like).

Policy S2 Health and social care

Policies A1 and A5 are about the disposal of NHS buildings and land, with the language of estate strategies, service transformation plans and reconfiguration of services. This is very much a policy for the business needs of the NHS.

Good Growth Policy 3 has not been followed through and the Mayor’s Health Inequalities Strategy has not been given spatial expression in the London Plan. Policy S2 has very little to say on preventative health and social prescribing.

Furthermore, the business model approach of Policy S2 marks a departure from the current London Plan Policy 3.2 Improving Health and Addressing Health Inequalities. This emphasises the power of the Mayor to coordinate Investment and planning to improve health and recognises the role of the planning system in responding to the social determinants of health. It also promotes evaluation of the impact of development proposals on health and health inequalities through the tools of Health Impact Assessments and the Mayor’s Best Practice Guidance on Health Issues in Planning.

Policy S2 refers to a number of health structures and mechanisms, such as Sustainability and Transformation Plans, which are without community involvement. And yet Public Health England refers to extensive evidence that connected and empowered communities are healthy communities. The Mayor has the power to address this and a policy change is needed. The Mayor should require CCGs to resource community organisations in the context of social prescribing.

Policy S2 must show awareness of, and address the differentiated needs of, diverse groups and encourage Boroughs and the NHS to include the full range of specific needs in the Joint Strategic Needs Assessments (JSNA).

Examples are:

- Victims of Domestic Violence (DV) need access to both refuges and to suitable move-on accommodation. The stability created by having suitable accommodation has considerable positive health impacts for women and children whose lives have already been traumatised by their experiences.

- Cuts to children’s centres, youth clubs and play spaces across London contribute to child obesity and depression. We support the aspiration of the *Alliance for Childhood London Forum* to make London a Child Friendly City and this requires all of the proposals in this chapter to be looked at from a child’s point of view.
- The Mayor to champion accessible and inclusive health services and to use his power to elevate groups who are being excluded, like Gypsies and Travellers, migrants, refugees and the BME community.

Policy S2 should include a “healthy places” requirement on Boroughs and developers. Suggested wording is as follows:

A space is healthy

- a. Because it has a **healthy mix of opportunities, economic, social and environmental, to express healthy behaviours**
- b. According to the **cultural specifics of a community** and so needs to incorporate opportunities for different communities to express themselves in an integrated and complementary way.
- c. When it has the **capacity to experience growth in ways which are harmonious** as determined by its inhabitants and which accord with agreed requirements for sustainability, public health and social justice.

The reason this is required is that the rupturing of healthy places has important impacts on health. Across London many communities are being displaced and there is a lack of research on the extent of this and the impact displacement is having on people’s health, as well as the particular impacts on protected groups. A survey in Camden showed 70% of those displaced were BME.

Policy S2 should also require High streets and town centres to contain a drop in health advice centre that is welcoming and accessible to all borough residents, and that offers NHS primary health care guidance, phone up schemes and a wide range of leaflets advertising local health provisions, all coordinated with Healthwatch and local community networks.

These proposals are taken from the Just Space [Health Policy](#) document (January 2018).

Policy S3 Education and Childcare

As with health, the promotion of educational facilities is business driven and does not combat the issues of poverty and inequality. The contribution that supplementary schools make to increasing the self confidence of children from minority ethnic communities, grounding children in their heritage, tackling social ills and increasing the Black child’s access to higher education should be recognised by the Mayor. Proposals could resolve some of the challenges they face (such as inadequate premises). The Mayor could enable their

access to mainstream education establishments, politicians and the business community. There are linkages with policies E3 and E11.

Whilst we welcome the inclusion of childcare, there are no targets, despite the major shortfall in provision identified in paragraph 5.3.3. An audit of existing provision needs to be undertaken, with assessments of need, so that the Borough is in a position to plan for childcare services. The criteria for childcare provision need to take account of accessibility and affordability.

The policy on healthy routes to school needs to include proximity. The closer their home is to school the more likely children are to walk or cycle. This is a further example of the benefits of looking at policy through the lens of lifetime neighbourhoods.

The Mayor has direct responsibility for Further Education Colleges which require a distinct policy.

Policy S4 Play and informal recreation

There should be consultation with children and young people in the design of play provision to understand their needs. Policy B5 would be better if the onus was on maintaining existing play provision (rather than no net loss) or replacing it like for like.

The accessibility of Policy S4 is not helped by high level language such as independently mobile and incidental play space. There are references to safe and independently, but for younger children there needs to be contact between home and play space, so that parents can see them.

The following should be included in the policy:

- Supervised and non-supervised play
- Play as an important part of childcare
- Links between play and health, housing and safer streets
- Turning streets into places for permanent play
- Natural play is important
- The recommended distances to play facilities for different age groups should be spelt out.

There should be more cross-referencing to play throughout the London Plan. For example, in D3 Inclusive Design and T2 Healthy Streets where play is not mentioned.

Both Policy S3 and S4 are ignoring issues important to local communities, like school playing fields and informal spaces. These can be lost because they are listed as brownfield sites. New schools have to consider how close to a park they are, so they don't have to make playing fields provision, but school children shouldn't have to walk down the road and cross a busy street to get to their play space at break time. Some schools are putting playgrounds on

the roof, which is again unacceptable – children should have access to the ground level for their play.

Policy S6 Public toilets

We support the issue being included, but public toilets need to be widely available, not only in major commercial developments. They are a social asset and the lack of easy access to public toilets is a barrier to going out and increases social isolation.

The policy should be amended to apply to medium sized developments, all supermarkets, all eating places, and all transport hubs (underground stations and bus interchanges).

The text recognises these are a vital facility, so requirements must be placed on Boroughs and not just businesses. Local Plans should be required to set a target for free, safe, accessible and clean public toilet provision and the boundary maps for designated town centres should show their location. Boroughs should also be encouraged to introduce Community Toilet Schemes, where businesses make toilets freely available to the public during trading hours without a requirement to purchase (see Richmond and Merton Borough Councils).

The specifications in 5.6.3 and 5.6.5 should be included in the policy box to ensure that a wide range of needs are met by the toilet facilities.

Some of the chapter responses have made comments on indicators that could be usefully used at this topic level whilst still having a set of higher level KPIs that are meaningful and relevant. Evaluation and monitoring, consequently, will be problematical without further targets, milestones and indicators relevant to the various Policies of the Plan.

Reviewing the progress of the Plan is not only an issue for the Plan-Monitor-Manage methodology of plan-making, compliance with the Strategic Environmental Assessment Regulations but one of wider democratic accountability whereby Londoners can participate in the process, enabled by ready and easy access to information.