

**M51 Delivering Social Infrastructure**

**Would Policy S1 provide an effective and justified approach to the development of London’s social infrastructure? In particular would it be effective in meeting the objectives of policies GG1 and GG3 in creating a healthy city and building strong and inclusive communities? In particular:**

**a) Would Policy S1, in requiring a needs assessment of social infrastructure and encouraging cross borough collaboration provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to the development of social infrastructure?**

Whilst GG1 (as amended) refers to community spaces (B) and London as a more inclusive and more equal city (BA) and to community buy in or ownership (C) and to Londoners as including people with protected characteristics (F) these are not followed through in Policy S1. Indeed to make S1 sound, all of these important intentions must be included because S1 is a key policy in the London Plan for achieving the social dimension of sustainable development required by NPPF (2012).

Policy S1 fails at the first hurdle when it says in S1A that the aim of the needs assessment is to enable the Boroughs to meet the social infrastructure needs of London’s diverse communities but fails to include community organisations and equality groups as central to the process. The local community is mentioned in the text, but without the agency of community organisation and the only reference to an equality group is places of worship at the end of 5.1.9.

Just Space has produced a report “**Social Impact Assessment (SIA) in London Planning**” (September 2018) which is included as an attachment. We would like this to be included in the EiP Library. The SIA provides a holistic and wider framework which includes existing social infrastructure as well as unmet and future needs for social infrastructure.

The report considers how one can reframe assessment processes so they start from a community-centred approach and therefore have the potential to meet the needs of diverse communities. The conclusion is that a needs assessment (which implies unmet needs) should take place alongside a local audit/ baseline study that documents existing social infrastructure, including community assets, community spaces and community networks.

The local audit will establish the current level of community activity and the profile of existing groups and organisations. Existing initiatives must be respected and helped to grow whilst new activity is fostered.

The data collected for the needs assessment should include documentation from community and voluntary sector organisations, interviews and site visits. The range of methods selected is important, as each one provides a different engagement opportunity for diverse local communities to make their voices heard. It is important to underline key principles for the needs assessment –

- valuing local knowledge, expertise and perspective,
- the scope of the assessment being set together with local communities,
- the commissioning of the needs assessment to be independent of private sector interests.

These principles and the methodology should be included in the proposed SPG. Just Space has recently produced a *DIY Guide for local audits and needs assessments* which we would also like to include in the Library.

We suggest the community centred approach of the Social Impact Assessment meets the ambition in the Mayor’s Foreword to the London Plan of “a new way of doing things, delivering a more socially integrated and sustainable city, where people have more of a say”. It will also achieve what is required by the Public Sector Equality Duty.

We agree that the policy must also work across borough boundaries and at a London wide level. The local level will not meet the social infrastructure needs of minorities that are dispersed.

For example, given the relatively small and dispersed nature of London’s LGBTQ+ population and the consequent lack of apparently substantial need perceived at borough level, the GLA has an obligation to support boroughs by undertaking needs assessment of vulnerable, dispersed communities at a citywide level. As part of its obligation, the GLA should support through funding and officer time the compilation of a comprehensive integrated evidence base demonstrating the value of dedicated spaces to vulnerable, dispersed communities.

## **b) Would it provide a justified definition of social infrastructure?**

Social infrastructure is not defined in an effective manner.

The definition provided in 5.1.1 is mainly about statutory provision and service providers. It excludes the hugely important issue of community space. Our consultation response (March 2018) details the manifesto “Reclaim Our Spaces”

with a definition that includes community centres, music venues, libraries, pubs, open spaces and public spaces, youth centres, land for community food growing and street markets. These are all features of a sustainable (lifetime) neighbourhood that need to be included in S1.

Many community spaces have been lost in recent years and others are under threat of closure. Access to and the value of community spaces should not be 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. This needs to be embedded in the definition.

The definition must also include the affordability and accessibility of the provision as well as the informal spaces where crucial social interaction takes place.

Definitions specific to a protected group are also important. The Queer Spaces Network define queer spaces as spaces created and operated by and for LGBTQI+ people to address their distinctive wants and needs, and note queer spaces as being hugely beneficial to London's social infrastructure, supporting the complex and changing needs of a vulnerable dispersed minority community.

The same definition that is agreed for 5.1.1 should be provided in the Glossary.

**c) Would it provide an effective development management framework for boroughs, particularly with regard to Policy S1D, F and G?**

No, because social infrastructure seems to be trumped by public sector efficiency measures (rationalisation, transformation plans) and housing delivery. We object to the change to G which removes an important protection for social infrastructure.

Community spaces and social infrastructure are essential elements in the work to address inequalities through providing local communities access to a range of activities suitable for their needs and adding to the development of social capital.

We would therefore argue that there should be a policy requirement to protect community spaces and social infrastructure in Policy S1 unless it can be demonstrated that there is no longer any local need for them and attempts to secure their suitable re use by other providers have **demonstrably** failed.

Any further loss of sites and buildings for social infrastructure would have hugely negative impact on London's communities and indeed harm the delivery of the Mayors vision. If a site is no longer needed for a specific purpose then there

should be a requirement to proactively seek providers – preferably local - that can make effective use of the site.

Any proposed development proposals should include the requirement to include local communities in the design and development of such proposals.

Policy S1 is therefore especially relevant to planning proposals that would incur the loss of spaces used by communities. Yet all parts seem to imply a diminution in social infrastructure. The point needs to be made that housing units only become homes to live in, within the context of a fulfilling lifetime neighbourhood. To add further housing to a locality whilst reducing the level of social infrastructure is a recipe for social disaster.

The development management policies within S1 should include tools like a social infrastructure matrix and lifetime neighbourhoods, the Localism Act as a context for Assets of Community Value (which is mentioned) and the potential for community ownership through asset transfer. A social infrastructure matrix 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.

Wording changes are proposed as follows:

- A. Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities, **with particular attention to the needs of groups with protected characteristics under the Equalities Act. This will be undertaken in conjunction with local community organisations and include social, health and equality impact assessments.**
- B. In areas of major new development and regeneration, **social impact assessments should be carried out as part of** area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, **Neighbourhood Plans**, Development Infrastructure Funding Studies, or master plans .
- C. Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies **as evaluated through social impact assessments** should be supported.

- D. Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities **as long as this does not have negative impacts for protected communities in the locality as assessed by equalities impact assessments.**
- E. New facilities should be easily accessible by public transport, cycling and walking **ensuring that priority is given to the transport needs of the most disadvantaged, especially people with disabilities**
- F. Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless **attempts to secure their re-use by other providers have demonstrably failed** and:
  1. there are realistic proposals for re-provision that **have been impact assessed and** continue to serve the needs of the neighbourhood, or;
  2. the loss is part of a wider public service transformation plan which requires investment in ~~modern~~, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services **as adjudged necessary in consultation with local community organisations.**
- G. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.

5.1.3 ....It is important that boroughs work collaboratively with **local community organisations**, service providers and other stakeholders.....

5.1.7 **Every effort should be made to retain social infrastructure.** Where housing is considered an appropriate alternative use, opportunities for affordable housing provision should be maximised **and existing social infrastructure re-provided together with additional social infrastructure to meet the needs of the growing population.**