Chapter 1: Good Growth Principles: Changes proposed from CFGN context

For GG2: The existing text is:

To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:

A. prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.

B. proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach.

C. understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.

D. protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.

E. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.

F. maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance

My proposed edits are: GG2

To create liveable-density, mixed-use places that make the best use of land, engaging those involved in planning and development, which should incorporate local community representation, and which must:

A. prioritise the environmentally and socially sustainable development of all London land with a view to optimising the use of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.

B. proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach and prioritising the development of lifetime neighbourhoods with pro-active food supply hubs.

C. understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.

D. **Protect London's open spaces, including the green belt, metropolitan open land, designated nature conservation sites, allotments, public gardens and other local green spaces, and promote the creation of new green infrastructure and urban greening activities which value the**

productive use of green space, such as integrated food growing hub development, which supports and enables health and well-being in the city.

E. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock **sustainable** growth.

F. maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance **as well as the well-being and livelihood of communities living in the area**

G. be mindful of the need to optimise the use of space, so that intensification planning at borough level incorporates sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a 'world city'.

The support narrative for changes to GG2 will need to read as follows:

1.2.2. The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently, **but also better for the people who use them, creating lifetime neighbourhoods which recognises the need for developments to reflect the social and cultural impact of any proposed changes**. This will mean creating **and rehabilitating** places of higher, **but still liveable, densities in appropriate locations to get more out of limited land, encouraging a mix of land uses, including those associated with increasing London's food security in accordance with the good sense of the Sustainable Development Goals** and co-locating different uses to provide communities with a wider range of services and amenities.

and changes to 1.2.6

As London develops, the Mayor's Good Growth by Design programme - which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, **to recognise the critical importance of the food system of London as being central to the maintenance of London's food security, as it has been since London's inception as well as improvements to green infrastructure, which centres the productive use of green space for food growing,** biodiversity and other environmental factors, delivering 50 per cent **productive** green cover across London, will be important to help London become a National Park City **which is also attentive to the need to provide for food security and the provision of a way for Londoners to have an accessible way to support and promote health and well being.**

and to 1.2.7

London's distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, **and contribute to shaping,** such as cultural, historic or natural elements, can be used positively to guide and

stimulate **further** growth, **mutual respect and cohesion**, and create distinctive, attractive and cherished places

The changes here can be supported by wording in GG1 to the effect of anchoring the proposals in a discussion about Lifetime Neighbourhoods, social cohesion through respect of diversity and supporting accessibility in a broad way. It also needs to embellish the idea that a home is place from which the occupants can easily accessible productive opportunities, which contribute to growth of the local economy and accord with the other aspirations of the plan with regards to sustainability, walking, cycling and use of public transport and supporting the local heritage and culture of communities.

Policy GG3 Creating a healthy city

1.3.1

The health of Londoners is, to a large extent, determined by the environment in which they live. **Londoners also shape that environment by how they are able to live.** Transport, housing, education, income, working conditions, unemployment, air quality, green space provision and access, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by **an inclusive** planning system, and local authorities are accordingly responsible for planning and public health.

1.3.2

The scale of London's health inequalities is great, and the need to reduce them is urgent. Healthy life expectancy is lower in more deprived areas, and the differences between parts of London is stark – more than 15 years for men and almost 19 years for women. London's ongoing growth provides an opportunity to reduce these inequalities, and delivering Good Growth will involve prioritising health in all London's planning decisions.

1.3.3

The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city, **so this will need to be regulated and improved by the creation of green opportunities as a part of all housing development and rehabilitation.** Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good, **inclusive**, planning can help address all of these issues. **Such planning means councils having to work alongside food sector expertise and communities and work across sectors in a joined up way.**

1.3.4

The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London's public space. It will tackle London's inactivity crisis, improve air quality and reduce the other health impacts of living in a car-dominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. **It will ensure that green spaces are more widely distributed across London and that their use can be productive, providing Londoners with the opportunity to grow food and be environmental stewards, providing for good mental health activity.** It will also ensure that streets become more social spaces **for all Londoners**.

1.3.5

The social and environmental causes of ill-health are numerous and complex, and the people who are most affected by London's health inequalities tend also to be affected by other forms of inequality. Creating a healthy city with reduced health inequalities will make London fairer for everyone. The Mayor plays a pivotal role in bringing together a diverse range of stakeholders from service providers, boroughs, communities and the private sector in order to provide a more integrated approach to promoting a healthy city and reducing health inequalities. The Mayor will co-ordinate investment and

focus regeneration initiatives in those parts of London most affected by inequalities, including health inequalities.

GG3

To improve Londoners' health and reduce health inequalities, **all those** involved in planning and development, **which includes community representation**, must:

A. ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.

B. promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. **Developing Food Hubs which are centred on local food growing and development of integrated food trading places, provides a range of healthy and local economic and social activities across London**

C. use the Healthy Streets Approach to prioritise health in all planning decisions.

D. assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of **Social and** Health Impact Assessments.

E. plan for improved access to green spaces and the provision of new green infrastructure **integrated into all new and rehabilitated developments.**

F. ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.

G. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options **by working closely with the food sector and communities to allow for more widespread awareness of the importance of creating a more food secure city in terms of quality and quantity.**

Narrative support for GG3, G:

1.3.6.

A healthy food environment is underpinned by a London wide integration of the sub-systems which enable people of all classes, ages, genders and ethnicities to eat a diversity of healthy foods. This includes the knowledge systems which educate everyone on healthy eating practice.

Whilst this cannot be centrally controlled for, the Spatial Development Strategy (The London Plan) calls for a good understanding of London's food history and a systemic understanding of how people access food in way that supports their sovereignty, dignity, social cohesion and health. This should strongly inform how policies across the different sectors can support not only every Londoner's health, but also contribute to a thriving London economy and support a decentralised social infrastructure that embraces the other Good Growth policies in each sector.

This calls for a greater degree of inter-sectoral working on behalf of the different elements of the plan; housing, transport, heritage and culture, etc as well as by recognising the distinct nature of how each Londoner accesses opportunities for health and ensuring each sector supports this diversity.

Chicken Shops, Community Food Growers, The new draft London Plan and Sustain's response

London Plan Policy E9, C and D

C.   Development proposals containing A5 hot food takeaway uses should not be

 permitted where these are within 400 metres walking distance of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also consider whether it is appropriate to manage an over-concentration of A5 hot food takeaway uses within Local, District and other town centres through the use of locally-defined thresholds in Development Plans.

D.   Where development proposals involving A5 hot food takeaway uses are permitted,

these should be conditioned to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard.

6.9.6

Obesity is one of the greatest health challenges facing the capital. In London 38 per cent of Year 6 pupils (10 to 11 year-olds) are overweight or obese – higher than any other region in England. Children living in the most deprived areas of London are twice as likely to be obese as children living in the least deprived areas[93]. The creation of a healthy food environment, including access to fresh food, is therefore important. The number of hot food takeaways in London has been steadily rising, with London boroughs having some of the highest densities of hot food takeaways in England. More deprived areas commonly have a higher density of hot food takeaways than other areas[94].

[93] From Evidence into Action: Opportunities to Protect and Improve the Nation's Health. Public Health England, Oct. 2014. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366852/PHE_Priorities.pdf

[94] Public Health England (2016) Fast Food Map https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578041/Fast_food_map_2016.pdf

6.9.7

Hot food takeaways generally sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables. There is evidence that regular consumption of energy-dense food from hot food takeaways is associated with weight gain, and that takeaway food is appealing to children. It is recognised that the causes of obesity are complex and the result of a number of factors, and that a broad package of measures is required to reduce childhood obesity within London. A wide range of health experts recommend restricting the proliferation of hot food takeaways, particularly around schools, in order to help create a healthier food environment. Shift and night-time workers also find it particularly difficult to access healthy food due to the limited options available to them at night time.

Sustain Response to this policy

Policy no for reference	Amendments	Justification
Policy E9 C	We welcome the ban on new fast food takeaway outlets within 400m of school. We would like to see this extended to include a ban on outdoor advertising of unhealthy food and sugary drinks (legal High Fat Sugar and Salt (HFSS) definition used by Ofcom), especially on public transport routes used by school children; or a levy on such advertising hypothecated to pay for children's health promotion.	London has a serious challenge in addressing obesity and other diet-related conditions such as diabetes. Schools represent symbolic areas and should be healthy food zones. Proliferation of fast food outlets and highly processed food undermines good work being done by London schools to improve the food environment for children. There is a duty of care to take action on their everyday food environment.

There are many questions to be raised around the way in which the Policy E9 has been phrased and the fact of its articulation around Hot food takeaways and Sustain's response to this.

What, for example, is the response of food growing networks and the larger Food Systems of the UK to the proposed closure of 'chicken shops', used here in lieu of 'hot food takeaways', but recognising that the meaning is probably also applied to kebab shops, fish and chip shops, Chinese, Indian, African and Caribbean take-aways. Who owns the narrative discourse around this policy move?

It is noted that the media have immediately seized upon the nomenclature of 'chicken shops' and informal discussions have mostly focussed upon these kinds of outlets, but we note that many of the A5 license hot food takeaways are primarily owned by those of visible ethnic difference and so are easy to target. We also note the absence of consideration of larger outlets which may well contribute to childhood obesity and diabetes as well as form a basis of night time and support service worker source of food.

Are those articulating and responding to this policy looking at the entire food system in which such shops sit: the supply chains, the alternative employment possibilities, the impact on where the 'school pound' is spent? Are they also looking at the local economies, relationships between the different social infrastructural relationships, especially from a local community perspective? What might be the social/integrated impact assessment of a called for closure of 'chicken shops' in a locality, especially one in which the local community members were involved as well as other private/corporate agencies which are engaged in the food supply system for school children in such a locality?

Further narrative:

Chicken shops and other fast food outlets in London have evolved partly in response to a number of factors which come together to determine choice: the standard of school dinners, corporate advertising and the expressed desires of school children under a range of circumstances to purchase a gratifying, calorie laden, 'attractive' alternative to uninspiring food offered at schools or at home.
There are other considerations: for some children this may represent not only a lunchtime alternative, but also an after school (or even breakfast) meal in households where there may be few low cost alternatives.

In an atmosphere with high levels of corporate advertising to school children and young adults, there has also developed a culture of indifference to food quality on a nutritional level but innovators like the 'Chicken Connoisseur' have identified a gap in the market of 'food style-ism', a kind of working class alternative to rampant and inaccessible 'foodism' which pervades corporate TV and other media (and which remains beyond the pale of criticism although contributing to practices of corporate exploitation of a wide range of tropical food and farming systems and highly appropriative and not always 'healthy').

The uptake of 'chicken shop' provisions cannot be viewed in isolation from child food poverty statistics, which of course relate to discussions on family poverty, regional deprivation, closure of traditional markets, access to good, cultural foods by working class families and of course, not to be overlooked are traditions of good food even where there is poverty because of food practices which value sound offerings of wholesome vegetarian and vegan food, *as a tradition.*
https://www.nationalgeographic.com/people-and-culture/food/the-plate/2016/07/for-rastas--eating-from-the-earth-is-a-sacred-duty/

Such foods might include offerings from African, Caribbean and South Asian communities, despite the stereotypes applied to these communities by mass media and corporate advertising. Even the research is contradictory:
http://shura.shu.ac.uk/12926/3/Healthy%20eating%20and%20minority%20ethnic%20households%20final.pdf
A question is to be asked as to the level of racial stereotyping that takes place to further disadvantage lower income families and whilst 'chicken shop' owners might be complicit in this behaviour, they are probably no

more so than the innovators behind, for example, supermarket offerings of cooked, hot food, which is often predominantly chicken based and for whom the queues are not made up of school children, but often well heeled and white adults!

A further question needs to be asked of the alternatives under discussion: What are the alternatives should many of these fast food outlets disappear? Will the children be driven to source food from supermarket 'local' shops? What innovation could community food providers come up with and what are the barriers and opportunities to this possibility? How many ethnic minorities are involved in food growing in the city? How are they able to access land for food growing and what are their needs for initiating and maintaining food hubs to cater for their communities?

What of the food outlets themselves? Many are chain food suppliers, so perhaps operate on a similar degree of scale to other large fast food outlets. However, are the even larger chains being similarly penalised? Are certain well known big brand fast food outlets to be also targeted, if they are within the target zones? Have they a greater capacity to relocate, due to economies of scale?

How many of the 'chicken shop' outlets are small scale single owner outlets and how will their own economies fare under this directive? What might be the links between these outlets and small scale local grocers or multipurpose corner shops which enable local low income families to purchase essential foodstuffs and green groceries?

Often the inefficiencies in the welfare benefit system and the location patterns of larger outlets mean that such small scale provisions make the difference between the ability to purchase foodstuffs and the existence of near food desert conditions.

Many of the above issues may not occur to those who live even slightly more privileged life styles and for whom there are more options beyond the scale of where they live (hence implying issues of transport in the London Plan and the fact that many more households in Britain are spending more of their household income on transport than ever before, especially families without children).

If an analysis were to be done of the areas in which 'chicken shops' appear at a greater density, compared with the middle class/higher income alternatives such as the various niche delicatessens, bakeries, patisseries, charcuteries, tobacconists and wine sellers, can a similar argument be made in relation to their contribution to poor health outcomes of their main users, or is there no focus on the lifestyle and health practices of privileged groups in the London Plan?

There are many other considerations, but suffice it to say for the sake of relative brevity, critically, there is a need for carefully controlled integrated impact assessments to be carried out with full community involvement before this aspect of the London Plan, which has been uncritically acclaimed by many - on the single measures of childhood obesity and diabetes - without looking further at the implications and opportunities this has for the affected communities and for the development of more comprehensive and inclusive lifetime neighbourhoods respectively..

Community Modalities, London's Good Growth and a Plan to go forward with

The written submission below, is by Mama D and Marina Chang as participants of the Just Space network.

Mama D is a food and social justice activist and a social and community justice facilitator and trainer and also a curator of immersive experiences: The Food Journey, The London Journey and others which support citizen access to agency and voice. She researches, informally, on what it means to operate collectively and on a community basis in terms of social and cultural modalities of community experience and shared cosmo-visions of justice and balance in a changing world. She is a champion of community based research and action. Dr Marina Chang is a university researcher at Coventry University as well as a board member Calthorpe Project – a community garden/centre located around King's Cross, Central London. Her research is focused on developing new modes of self-organisation, co-operation and innovation between universities and communities. The two have been in discussion with Just Space members about the various elements of the London plan - a Spatial Development Strategy (SDS) – produced under the mayoral leadership of Sadiq Khan.

Our discussions have mainly focussed on the health, environmental and social infrastructural elements of the SDS, but not exclusively, because we understand that all elements of the SDS interweave to produce a discourse of what it will mean to **be a part of** London, or, given our concerns about its future impact, **apart from** London.

We first present our ideas overall concerning where we see there to be key flaws in the current draft SDS and where we feel a Just Space approach can address such shortcomings. We then we go on to point out particular policies which exemplify how such an approach could be put into practice to support the core focus of Just Space – the idea that the community perspectives that Just Space and all of its affiliate organisations gather around is that in spatial terms, what we are looking to realise is a London as an area of composite lifetime neighbourhoods. What are these? In the document '**Towards** a community-led London Plan: policy directions and proposals, produced in August 2016' this is defined as:

'…***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***.'

Although the term 'Lifetime Neighbourhoods' was introduced in the London Plan in 2011, the current (and previous) emphasis in the plan on the economic dimensions of what London means to its inhabitants, appears to not clearly support the strengthening of the socio-cultural dimensions and the necessary environmental issues in a linked way, one which communities can understand so as to be able to implement them. It also does not present a defined understanding, at a micro level, of how a complex history of place, when shared, gives rise to a working understanding of a neighbourhood that then has the possibility of being self-supporting, sustainable and a desirable place for all Londoners to live in a socially cohesive and inclusive way.

A Lifetime neighbourhood is therefore a place which reflects best practice ways of integrating economic, social, environmental and cultural concerns expressed by people living and working in London that reflect the history of each locality **as well as** the way in which the configuration of its spatial qualities defines it. In this way we have a container to hold the all the narratives and all the histories and, most importantly offers a sense of agency to each Londoner, as member of a community of place and interest.

We feel that it is a key mayoral responsibility to ensure that social cohesion and inclusiveness is accessible to and made possible by and for all Londoners – of all and any estate and also that, as representatives of a wide swathe of community interests, community organisations be enabled to represent the voice of London and be given equal status and regard as is offered to any corporate voice or other interest which is consulted as to London's future. Not only this, but there should be sufficient understanding that in order to effectively factor in wide ranging community voices, there is a corresponding requirement that sufficient leverage is given by creating spaces for these voices to express themselves and that such spaces are well enough resourced to occupy them effectively.

 A failure to ensure these things tends to mean a diminution in effective consultation, in terms of both quality and quantity and therefore a failure to factor in both the creativity and concerns of everyday London in a culturally comprehensive way.

Key to our reading of the London plan is that all Londoners matter and this affirmation is particularly poignant given the pattern of migration of people into and out of London the historical, economic narrative that supports this reality.

In terms of London being the capital city of London, the pattern of movement of people to far flung parts of the UK and the pattern of in-migration to London from the home-counties has been popularly referred to as a form of ethnic or social cleansing, or more popularly, 'gentrification'. Much of this appears to arise from the wave of corporate designed, local government supported 'regeneration' of many of London's inner city areas, an activity which has created a lot of disaffection and grief for Londoners who have been separated from family and other social connections and which has culminated, in 2017, with the outpouring of anger and grief following what appears to be corporate-local government collusion around the withholding of community rights which culminated in the Grenfell tragedy.

The term 'Home' and 'Housing' appears to be used interchangeably throughout the document. We define a home as a place from which each occupant is able to realise, within her locality, a reasonable access to all of those things which support 'Good Living', such as: access to affordable foodstuffs, educational and child care facilities, health maintenance and well-being facilities, spaces to socialise, exercise and experience leisure and creativity. If places where productive occupation which yields an income can be accessible from the home then this is also considered desirable.

The kinds of housing that are on offer, apart from the confusion of the many terms for price accessibility (affordable, genuinely affordable, social etc) appear to simultaneously refer to either a structure of a place that can become a home: the building/buildings or refer to a partial fulfilment of what we have described above. We feel this creates a confusion which is not helpful and mis-directs the reader of the plan. It is not the kind of use of language that we feel is supportive of a clear consultation process with London communities.

There are four areas which we particularly feel unaddressed by the way the SDS/London Plan is structured and presented.

We welcome the idea of overarching Good Growth principles which can act to provide a framework for London developments because it is good to have a framework which speaks to the underlying principles of all policy making. However, do these principles enshrine what it means to be a *de facto* Londoner in the sense of responding to what the key concerns are from local community perspectives?

The term 'Londoner' arises frequently within the pages of the London Plan, but we question the extent to which it has any consistency which can be helpful to implementing the plan meaningfully at either London or Borough Council level. So we feel we have to raise the question:

Who is a *de facto* Londoner?

      a. Londoners who have been living in London for generations and who have most of their connections in London

      b. Londoners who have lived in London for generations but who have found themselves displaced in the most recent generations out of London, but who still have social, familial or economic links to London

      c. Those who spend more than half their day for more than half the week in London because of work or other social/cultural/relationship reasons but who have their primary habitation outside of London

      d. Those transient who live in London temporarily because of either being a **student** or who are here for **business** or **tourism**

      e. Those who have not been here for generations, but are relatively recent arrivals, maybe in the last 20 years and who are from other parts of the UK, or from Europe, America or other parts of the globe.

Is there any other category of Londoner that we should be considering if we are to plan for London more realistically or appropriately? What is the impact of each of these groups upon how London is being shaped?

We feel that these categories help bring focus on who really are functional Londoners. Do we need to look more carefully at the relative influence different categories really make in a 'City for all Londoners'? Who really has the most agency or voice is the most powerful in this respect. How does this arise and why?

In terms of the systems and structures which define our thinking about the city, we feel the following four points are critical to understand better how the contexts for our thinking about London and it's planning is organised: Each of these systemic relationships are invoked when various of the policies are spoken of, but as underlying concepts they are not mentioned directly and do not seem to factor in the way in which statements are articulated within the Plan. In order to make this clearer, mention will be made of Chapter 1's policies on Good Growth (GG); these state the underlying principles governing all the other policies in the chapters of the plan. So it is important that it gets things right. We can look at GG1-6 and see how the systemic and structural factors below are relevant to the fundamental thinking behind this spatial development strategy.

      1. Intersectionality: the measure of diversity for Londoners which recognises that any one person is a composite of many identities (read vulnerabilities and opportunities) and how this complex nature is made invisible by the monolithic nature of institutions that plan, implement and monitor London's

development. This might apply to economic, political and social structures and systems whose policies and programmes impact upon how everyday lives are lived.

In GG1 which begins: '***To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must…'***
Does not acknowledge that the planning and development structures are founded upon systems which in themselves are colonial, predominantly white, patriarchal, male and cis heterosexual by heritage and so do not convey an idea of 'openness', which has largely been brought about by London's informal structures and the diversity of traditions that have co-existed in London. Intersectionality, therefore, would be a function of enabling these diverse communities to have adequate say in the planning and development process.

2. 2. Formal and informal divide (formal planning has a very rigid framework and inherent incompatible attitude that fails to recognise/appreciate let alone to incorporate 'informal' inputs into the current planning system). Informal in this sense connotes the sectors which are not considered as part of the mainstream institutions which are responsible for policies, legislature or governance. The Informal might be community organisations (of place or of interest/identity) but they might also be constituted by commercially shared interests/activity without having the 'clout' to influence in the mainstream.
Again in the Good Growth Policies a part of the narrative states:
'***London's growth and development is shaped by the decisions that are made every day by planners, planning applicants and decision-makers across the city…'***
Which excludes the reality that also the everyday decisions of ordinary Londoners also shapes London's growth and development. It does not acknowledge the ways in which both private, commercial as well as public are interdependent in the way in which London develops and how it grows – or shrinks and is diminished – as the result of the interplay of the roles of its different inhabitants as well as the public sector. At the very least the use of '***decision makers***' in the sentence could be broadened to include every day Londoners.

3. A lack of historical and temporal depth - how there seems to be an insufficient factoring in of how London has been evolving over centuries and how this evolution has been shaped by everyday London as well as by institutions and the corporate sector. The SDS is a Spatial Strategy, but meaning and interpretation can only be derived by understanding **place** in the context of **time** and these are multiple and micro interpretations and are of a complex nature. However, to fail to be able to incorporate those resistances and arguments based upon the logic of time ***x*** place means that the strategy fails to be responsive to its citizens own understanding of how their own contributions have shaped London.
It would seem that the Good Growth Policies are couched in the language of a passive Londoner who responds only to a shaping idea: in **1.0.8** it states:
'***A city that is planned well can improve as it grows. Planning for the right number of homes and higher levels of affordable housing will take advantage of London's growth to re-balance the housing market. Planning for mixed-use developments in all parts of London will spread the success of London's economy and create stronger communities where everyone feels welcome. Planning new developments to reduce car dependency will improve Londoners' health and make the city a better place to live. Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners***.'

Where in this does it incorporate the idea of an active citizenry who make decisions proactively, who have been, over time, considering the options and making decisions on the basis of this? Citizens who protest, plan, organise and communicate amongst themselves to determine what they want out of their London which may be different to what *loftier* planners and developers are considering whilst taking the city in a direction arrived at without sufficient consultation with such communities.

4. Inter-sectoral ways of working at the level of the main institutions, particularly the GLA internal structure, but also at borough council levels which still make recourse to archaic procedures which might not suit the objectives of facilitating a much more modern and inclusive city. Such procedures rely on reducing the city to concepts which are monolithic and do not incorporate the lived reality of communities on the ground.

In contrast to this, the immediacy of the grassroots, of communities, of lived experience is able to better capture the living, dynamic complexity of society. How can academics, policy makers, planners, activists develop methods, tools, indicators and reporting which draw upon a multi-disciplinary mode to bridge meaning and impact shared across sectors?

The Good Growth policies need an overarching narrative to speak to the need for each of the GG policies to make sense **between** them. Where is the overarching idea that **combines** each GG policy so that it makes sense to an everyday Londoners life?

There is an idea of 'a historical commitment to change' which 'a Londoner' has which may be different to that held by GLA bureaucrats, especially in those cases in which they are not Londoners themselves.

However committed each sector within the GLA machinery may be committed to growth and development across London it cannot replace an authentic consultation with the considered voices of a wide ranging London Community so as to get a necessary 'value added' and to capture the complexity of the everyday.

The community level is inter-sectoral through and by experience. Where it lacks the capacity to express this, it is expected that the best - inter-sectoral - practice of the GLA can offer guidance and support to optimise communication and cohesion between community sectors and to show how open and lifelong learning between the people of London is the most powerful tool for the way we move ahead.

Beyond identity- the inter-sectorality of systems and structures and incorporating the ecology of place and beings in relationship, we need to engage with both natural/biological and social systems simultaneously. What has London in terms of its own *cosmovision* which reflects the unique plural nature of how it has come to be and where it can go to next?

We consider the case of the Calthorpe Project a green community oasis in Kings Cross and of the diverse communities of Vassall and Coldharbour Wards in Brixton, vying for leadership and recognition and most importantly an acknowledgement that they are **continuously contributing to the economic, cultural and tourism capital that Brixton has become.**

The London Plan is subject to an Integrated Impact Assessment. A Just Space vision asserts that any impact assessment, if not closely co-ordinated with community organisations on the ground sets itself to fail, or at least be **significantly unrepresentative** of the experienced realities of complex community.

How is it possible to explain the relevance and implications of an externally conducted Integrated Impact Assessment to the different community members at the Calthorpe Project or Brixton communities?

We recommend that ways are found, through working with the already formed strategic networks within Just Space, ways to encourage and support them community participation in their own self-assessment? This has multiple benefits:

1. The GLA will have a ready-made inter-sectoral body with an intersectional perspective: the community!
2. It is inevitably less expensive to run a series of community led activities which result in harvesting more direct feedback, insight and understanding of impact
3. The process of community involvement and engagement in Impact assessment and in the monitoring of the Plan has the added benefit of forming stronger relationships, not only between GLA sectors and communities, but also between community elements themselves as they work to understand themselves and how they operate in situ.
4. Just Space has already been innovating in this respect by producing local and London-wide mapping tools and other interactive experiences, such as learning journeys, which capture community behavioural patterns and relationships and help with social integration at the grassroots, improving shared understanding and cohesion

This 'everyday' relevance surely must be preferable to an imposed, isolated and possibly marginalising official procedure.

In relation to this must be raised the issue of resourcing. Just Space and many affiliated community organisations have already been digging deep into their pockets to do the kind of work to build, strengthen, share and educate, but with increasing austerities, this has been compromised. We feel that it already understood that this kind of work needs resourcing and ways can be found for the GLA to support community organisations, either directly or through offering leverage for other London Based resources to be brought into play, to ensure this vital input continues.

We all wish for this new plan to build an integrated London, sensitive as the plan and Impact assessment to issues of gender, ethnicity, class and race as lived everyday realities of Londoners? If the plan is made for 'economic man' or to a lesser extent 'economic woman', then in what ways will it choose to work to strengthen and deepen an appreciation of the complexity of 'everyday person' who lives, works and breathes the capital city?

How we go about co-evolving an idea of London which is responsive to all the many diverse impulses which makes up its being is up to all of us. How we capture a sense of London beyond the formal, named edifices of space and to a lesser extent time, and move into a palpable vision of London as a living being, which we are collectively moved to protect for the future of all Londoners will, in the end, be the result of not just a paper Spatial Development Strategy, but a London Plan which decisively works **with all** Londoners.

Mama D Ujuaje and Marina Chang, 2017/18

Heritage and Culture:

Chapter 7 Heritage and Culture

Mama D

The Food heritage of London is rooted within its deepest past - but in what way is this fact acknowledged in terms of how the planning of its built environment is spoken of and designed?

Engagement with food is a basic activity of all Londoners and the diversity of this engagement is embodied in the variety of food system practices Londoners engage in; from the curried eel and mash shop to the haute cuisine Latin American offerings of Soho, from the occasional herbal supplement trader to Fortnum and Mason's food counters. Some few may keep goats for milk and others grow lettuces underground, to cater for the salad eaters of the city. The range in London food cultures derives from often turbulent histories which also relate to the detailed designs of London architecture, the characters of the town centres and the ways in which decisions are made about London's spaces, writ small as well as in how opportunity areas are configured, so writ large.

Markets ancient and modern have defined the central layout of London, the need to access local breweries, and a good supply of milk, meat and bread for the nobility have shaped the spaces which we take for granted in the West End and in the City, the plantation investments of distant shores defined the location of gentlemen's clubs, coffee houses, hotels, inns and trading places. The internal docklands have received the bounties plundered by City exploits bringing in tobacco, sugar, cotton and chocolate and wholesale markets have grown up around the associated businesses. Even the educational institutions which were built for the elite to learn how best to extract from and protect British territories abroad, which largely consisted of plantation economies or natural resource extraction operations form part of the capital's current heritage and culture today.

Knowing this, it is not possible to think of the spatial planning of London, with respect to heritage and culture, without factoring in the heritage and culture of the city's food and the diverse populations who have made parts of London their own and conferred unique cultures of trade, music, arts and ways of relating with each other, unique to them and shaping the way in which a place is understood, not only by its longer term citizenry, but also by those who have moved in, in waves of new settlements across London, with varying degrees of intensity.

It is therefore quite disingenuous to speak of the historic culture and heritage of London without referring to these things, yet this is what this chapter has done. It sets the tone for a 'development' of London which ignores the culture of its current citizens and treats history, the idea of heritage and the sense of culture almost as boxed artefacts to be handled as one might preserve or conserve an archive, an artefact, a history that is now dead and past, not as the living culture and heritage that continues this London tradition of constant change and stable traditions, diversity and constancy, a creative interplay of identities: ethnicity/race, class, creed, belief and more.

In responding to this, food growing networks have the opportunity to seek to insert into this chapter how the heritage and culture of London ought to recognise food growing traditions, however modern or however ancient; those associated with local knowledge and those knowledges from shores a great distance away and seek to preserve them and their benefits they bring to the practice

of growing as well as to the diverse communities of London. It might also argue that heritage and culture are concepts that are ongoing, rather than static and so should be embraced by policies and plans pertaining to London which make use of reconsidered changes to the land and natural resources of the city, in light of new understandings of the environment and food growing practice, such as that referred to as agroecology, which promises a positive renewal and adaptation of food growing in the context of human land use.

The use of the term heritage and culture might also be referred to by London's food growing networks as needing to include and refer to London's food heritage (which is diverse) and understanding that much of London's current popular 'culture' revolves around food, its sourcing: local, its marketing: specialist, local farmer and 'fresh' and its consumption: specialist 'foodie'.

What this approach ignores, however, is the food culture of the lower and working classes, children and the elderly, disabled, ethnic minorities and homeless.

Food is arguably a more important factor in the well-being of this part of London's citizens than for others. A greater proportion of the income of the poor is spent on food than on any other basic household need.
https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/familyspendingintheuk/financialyearendingmarch2016

https://www.kelloggs.co.uk/content/dam/europe/kelloggs_gb/pdf/R3_Facts%20about%20Food%20Poverty%20ReportFINAL.pdf

What kind of culture exists and continues to emerge in relation to these groups and how able have food growing networks been in responding to these cultures and their food system demands or needs and how do such networks visualise any spatial planning to enable a more full response to this sector of London's humanity to be better met by a plan for London.

However, given that the plan is considering all of London's structures: housing, transport, green infrastructure, etc., each of which interfaces with different aspects of the food systems of London, (which are, in themselves, connected to the food systems of the nation and indeed the globe), London's Food Networks will need to ensure that its responses reflect the current realities of how different types of Londoners interface with the food systems held within London cultures and researches and understands the factors which drive their development (or demise).

What, for example, is the response of food growing networks to the proposed closure of chicken shops and the narrative discourse around this policy move? Are they looking at the entire food system in which chicken shops sit: the supply chains, the alternative employment possibilities, the impact on where the 'school pound' is spent alternatively, the local economies, etc.? What might be the social impact assessment of a called for closure of chicken shops in a locality, especially one which involved the communities and other private/corporate agencies which are engaged in the food supply system for school children in the locality.

The awareness and pro-activity of a food growing advocacy network in holding this complexity is limited to how it frames its own work and the level of partnership it undertakes to foster with the range of institutions which represent other aspects of the food systems which feed all of diverse London.

So let us look at the specific policies under the London Plan Draft chapter on Heritage and Culture to see what might stand out for editing.

Firstly, what is the Good Growth framework policy that it sits in?

From GG1 policy D

> **promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.**

And a suggested addition to GG2:

> **G. That, mindful of the need to optimise the use of space, intensification planning at borough level ensures there is sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a 'world city'.**

And From GG5 policy F

> **promote and support London's rich heritage and cultural assets, and its role as a 24-hour city.**

We can bear these in mind when considering the H&C policy recommendations:

In HC1

Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

1. setting out a clear vision that recognises and embeds the role **of the relevant cultures and heritages** in place-making

2. utilising the heritage significance of a site or area in the planning and design process

3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place

4. delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing **in a manner which reflects the local values of all communities which have helped shape its heritage value.**

Where heritage assets have been identified as being At Risk, boroughs should, in consultation with **local community representation**, identify specific opportunities for them to contribute to

regeneration and place-making, and they should **collaboratively** set out strategies for their repair and re-use.

To the series of maps in this section a further map could be added: to indicate those community assets which contribute to the place making of a location within London, identifying those which are under threat and those which have disappeared in the last five and ten years.

From HC3:   G

> Boroughs should clearly identify important local views in their Local Plans and strategies. **Green space views and Waterways should be considered an important aspect of what a Borough plan considers an important local view.** Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

From HC5

The entirety of this can be rewritten substituting land/land based resources/production for where reference is made to cultural facility and creative industry

HC5

A. The continued growth and evolution of London's diverse cultural facilities, food production, supply and creative industries is supported. In Local Plans and through planning decisions, boroughs should:

1. protect existing cultural and food supplying venues, spaces and facilities and uses where appropriate and support the development of new cultural and food supply venues and spaces in town centres and places with good public transport connectivity

2. identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, food supply spaces, venues and related uses defined as Cultural Quarters or food hubs, especially where they can provide an anchor for local regeneration and town centre renewal

3. identify, protect and enhance strategic clusters of cultural attractions and food supply hubs

4. consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural, food supply and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas

5. seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues, food supply hubs and/or facilities and spaces for outdoor cultural events.

B. Boroughs are encouraged to work with the Mayor and relevant stakeholders to identify Creative Enterprise and Zones and Food Supply Hubs in Local Plans:

1. in areas that have emerging or existing clusters of creative industries and food hubs or

2. in areas of identified demand and more deprived areas where there is evidence that the designation of a Creative Enterprise Zone or Food Hub will enhance the local economy and provide facilities and workspace for the creative and food related industries.

C. Where a Creative Enterprise Zone/Food Hub has been identified, Local Plan policies should:

1. develop, enhance, protect and manage new and existing creative workspace, food growing/market spaces providing flexibility for changing business needs, and an attractive business environment including related ancillary facilities

2. support existing, and the development of new, cultural venues and food supply centres within the Creative Enterprise Zone/Food Hub

3. help deliver spaces that are suitable, attractive and affordable for the creative industries, taking into account the particular requirements of established and emerging creative businesses, economic and health promoting businesses in the Creative Enterprise Zone/Food Hub in accordance with Policy E2 Low-cost business space, Policy E4 Land for industry, logistics and services to support London's economic function and Policy E8 Sector growth opportunities and clusters

4. encourage the temporary use of vacant buildings and sites for creative workspace and associated activities

5. integrate public transport, digital and other infrastructure and service provision such as leisure, recreation and community facilities in the establishment and development of the Creative Enterprise Zone/Food Hub

6. support a mix of uses which derive mutual benefits from, and do not compromise, the creative industries and cultural facilities in the Creative Enterprise Zone/Food Hub in line with the Agent of Change principle (see Policy D12 Agent of Change)

7. contribute to the achievement of wider objectives for the business location such as the economic vitality and diversity of a town centre or the intensification of an industrial area.

London's rich **cultural offer** includes visual and performing arts, music, spectator sports, festivals and carnivals, pop-ups and street markets, and a diverse and innovative food scene, which is important for London's cultural tourism. The capital's cultural offer is often informed, supported and

influenced by the work of the creative industries such as advertising, architecture, design, fashion, publishing, television, video games, radio and film. It is also informed by a historical legacy of Britain's diverse communities, their lifestyles, culture and faiths, including, importantly, their food culture. Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, museums, theatres, cinemas, libraries, and music and fresh and prepared food outlets and other entertainment venues, including pubs and night clubs. This also includes venues in which London's diverse communities celebrate their cultural calendars, births, weddings and deaths and hold community meetings to foster social cohesion, integration and well-being. Although primarily serving other functions, the public realm, parks, skate-parks and sports venues can provide important settings for a wide range of arts and cultural activities.

7.5.2

London's culture sector and the creative industries deliver both **economic and social benefits** for the capital. In 2015, the Gross Value Added (GVA) of the creative industries in London was estimated at £42 billion, accounting for just under half of the UK total from these industries, and contributing 11.1 per cent to London's total GVA. Cultural tourism supported 80,000 jobs and contributed £3.2 billion of GVA to London in 2013, just under a third of the overall contribution from the tourism sector as a whole. As well as being one of London's most dynamic sectors, culture also plays a role in building strong communities, increasing healthy life outcomes and generating civic pride. The more obvious of this sector revolves around the cultural production, supply and consumption of food.

7.5.3

Despite this positive general picture, London's competitive land market means that the industry is struggling to find sufficient venues to grow and thrive, and is **losing essential spaces and venues** for cultural production and consumption including restaurants, cafes, meeting spaces, theatres, pubs, clubs and music venues. Creative businesses, community leadership and artists also struggle to find workspace and secure long-term financing and business support as their activities are perceived to be 'risky' or of non-commercial value.

7.5.4

Boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, **evaluate what is unique or important to residents, workers and visitors** and develop policies to protect those cultural assets. Boroughs should draw on the Mayor's forthcoming Cultural Infrastructure Plan to assess and develop their cultural offer. Boroughs should also consider how the cultural offer serves different groups of people (such as young people, BAME groups and the LGBT+ community), and where the cultural offer is lacking for particular groups. Boroughs should, in consultation with the relevant community organisations, put in place policies and strategies to ensure that cultural facilities catering for such groups and communities are protected, especially facilities that are used in the evening and night time and at weekends.

7.5.5

The loss of cultural venues, facilities or spaces can have a detrimental effect on an area, particularly when they serve a local community function. Where possible, boroughs should protect such cultural

facilities and uses, particularly those with an evening, night-time or weekend use, and support nominations to designate them as **Assets of Community Value**. Where a development proposal leads to the loss of a venue or facility, boroughs must consider requiring the replacement of that facility or use.

7.5.6

Boroughs are also encouraged to support opportunities to use vacant buildings and land for flexible and temporary '**meanwhile uses' or 'pop-ups'** especially for alternative cultural day, night-time and weekend uses. The use of temporary buildings and spaces for cultural and creative uses can help stimulate vibrancy, vitality and viability in town centres by creating social, cultural and economic value from vacant properties. Meanwhile uses can also help prevent blight in town centres and reduce the risk of arson, fly tipping and vandalism. The benefits of meanwhile use also include short-term affordable accommodation for SMEs and individuals, generating a short-term source of revenue for the local economy and providing new and interesting shops, cultural and other events and spaces, which can attract longer-term business investment. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties after thorough consultation with community organisations.

7.5.7

Events and activities such as festivals, seasonal markets, exhibitions, performances, outdoor concerts and busking are not always dependent on using a dedicated cultural facility or venue and can make use of a range of **outdoor spaces** including streets, parks and other public areas. These types of activities, which are often free, offer a way for everyone to experience and participate in London's rich cultural life. The opportunity to incorporate these uses should be identified and facilitated through careful design. However, the lack of community spaces in which to plan and organise many of these outdoor 'free' events might mean they disappear entirely or are poorly planned and resourced. For this reason and the fact that they make an important contribution to the economy of particular boroughs and the capital, Councils must support community spaces and food hubs which may play an important role in enabling these events and activities.

7.5.8

As well as protecting existing venues and facilities, boroughs should also work with a range of partners, especially community organisations and cultures which often are excluded, to develop and promote clusters of cultural activities and related uses and define them in their Local Plan. A successful **Cultural Quarter** should build on the existing cultural character of an area and encourage a mix of uses, including cafés, restaurants and bars alongside cultural assets and facilities, to support the coherence, integration and survival of diverse communities, attract visitors and generate interest. A Cultural Quarter can be used to form the basis for sustained cultural activity but may also include temporary activities and uses such as festivals, markets, exhibitions, performances and other cultural events.

7.5.9

Where appropriate, boroughs should use Cultural Quarters to seek **synergies between cultural provision, schools, and higher and further education** which can be used to nurture a more cohesive

and integrated community sector, be the basis of diverse and varied economic activity, enable neighbourhoods to be more attractive and pleasant places to live, encourage volunteering, new talent and audiences. This can include partnerships with a range of cultural organisations, such as community cultural organisations, libraries, museums, galleries, music venues, dance studios, and theatres.

7.5.10

Boroughs, in consultation with diverse community organisations, should maximise opportunities for developing **Cultural Quarters in Opportunity Areas, other Areas for Regeneration and large-scale developments**. The inclusion of new cultural venues, hubs and facilities can assist with place-making, the creation and establishment of lifetime neighbourhoods, creating an attractive and vibrant area for residents, workers and visitors, as well as helping to form the character and distinctiveness of a new place.

7.5.11

London is internationally-renowned for its historic environment and culturally diverse institutions, which are major visitor attractions as well as making an enormous contribution to the capital's culture and heritage. There are many areas in London which are rich in cultural heritage and have a unique cultural offer. These act as key visitor hubs for Londoners and domestic and international tourists and as such should be protected and promoted. They include: clusters of museums such as the South Kensington museums complex; the theatres, concert halls and galleries of the Southbank/Bankside/London Bridge area; the theatres and cinemas of the West End; Wembley Stadium and Wembley Arena; Chinatown and the Soho area, the Greenwich Riverside and O2 Centre; the Olympic Park; and London's Arcadia including Kew Gardens, parks, historic buildings and landscapes between Hampton Court and Kew along the River Thames. Boroughs, in consultation with the relevant community organisations should identify these and other **strategic clusters of cultural attractions** in their Local Plans which often will include areas in which high populations of residents are drawn from particular cultural communities: i.e., Brick lane and environs, Ladbroke Grove area or because they have a history of being ethnically very diverse, i.e. Brixton and Shepherds Bush. The food culture of these communities is often what they are symbolised by and as such attention must be given to supporting this aspect through the creation and maintenance of food hubs and market places

7.5.12

Creative industries play an important role in London's economy and its cultural offer and as a sector, are growing at a faster rate than any other area of the economy. As part of his support for the creative industries, the Mayor is committed to working with boroughs and other relevant stakeholders to identify and set up **Creative Enterprise Zones** (CEZs). Setting up a CEZ can help boost the local economy of more deprived areas and support their regeneration. CEZs will support the provision of dedicated small industrial and creative workspaces and will seek to address issues of affordability and suitability of space for artists and creative businesses including those who work in the food supply industry.

7.5.13

CEZs should seek to **protect, develop and deliver new spaces the creative industries need** to produce, manufacture, design, rehearse and create cultural goods, as well as ancillary facilities where they can meet clients, network, share knowledge and showcase their work. Boroughs will be responsible for defining these areas in their Local Plans and developing policies to provide the workspace the industries need. This should include protecting existing workspace and encouraging new workspaces for the creative industries, ensuring that low-cost business space and affordable workspace is made available in accordance with Policy E2 Low-cost business space, Policy E3 Affordable workspace and Policy E8 Sector growth opportunities and clusters, and encouraging the temporary use of vacant buildings for creative uses, which include the output of the food supply sector.

HC6

A. Boroughs should develop a vision for the entertainment economy, supporting its growth and diversification, for the whole family and in particular within strategic areas of night-time activity (see Table A1.1 and Figure 7.7), and building on the Mayor's Vision for London as a 24-Hour City.

B. In Development Plans, town centre strategies and planning decisions, boroughs should:

   1. promote the entertainment economy, and, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available

   2. improve inclusive access and safety, and make the public realm welcoming for all entertainment economy users and workers

   3. diversify the range of entertainment activities, including extending the opening hours of existing daytime facilities such as shops, community centres, cafés and restaurants, libraries, galleries and museums

   4. address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts for residents, and seek ways to diversify and manage these areas

   5. ensure night-time economy venues are well-served with safe and convenient night-time transport

   6. protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas and music and other arts venues.

   7. Protect, support and promote family-friendly, all day and weekend cultural venues such as those that particularly apply to minority communities, such as temples, mosques and other places of worship, community centres and food outlets that sell healthy ethnic food offerings and support the sale of local food hubs.

C. Promoting management of the entertainment economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, fostering links between healthy food hubs and cooked food outlets and environmental and cleansing services are to be supported. Boroughs should work closely with stakeholders such as the police, local businesses, patrons, workers and all community residents.

7.6.1

The **night-time economy** refers to all economic activity taking place between the hours of 6pm and 6am. Night-time economic activities include eating, drinking, entertainment, shopping and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport and medical services, which employ a large number of night-time workers. The entertainment economy refers to all entertainment venues whether daytime, evening or night-time, taking place on weekdays and at

weekends and include the celebration of cultural calendars, births, weddings and funerals and other special community events promoting cohesion, integration and resilience.

The night-time economy is becoming increasingly important to London's economy. The Mayor is keen to **promote London as a 24-hour global city**, taking advantage of London's competitive edge and attractiveness for businesses and people looking to expand beyond the usual daytime economy into night-time economic opportunities. However, 24-hour activities are not suitable for every part of London and its residents, and boroughs should balance the needs of local residents and their diverse community needs with the economic benefits of promoting a night-time economy. Also, such activities should seek to promote and celebrate London's diverse community presence through encouraging an atmosphere of tolerance, welcome and respect.

Comment on this section

London's night-time economy is generally focused in the Central Activities Zone and within town centres across the city. Different areas of night-time activity function at different scales and have different catchments. They have been classified, as set out in Table A1.1 and Figure 7.7, into three broad categories, all of which acknowledge the existence of areas of community value and areas which have national, regional or more than local significance because of the long term presence of particular communities of culture or interest:

- NT1 – Areas of **international** or **national** significance

- NT2 – Areas of **regional** or **sub-regional** significance

- NT3 – Areas with **more than local** significance

Comment on this section

Figure 7.7 - Town centres and night-time economy roles – distinguishing those of international, sub-regional and more than local importance
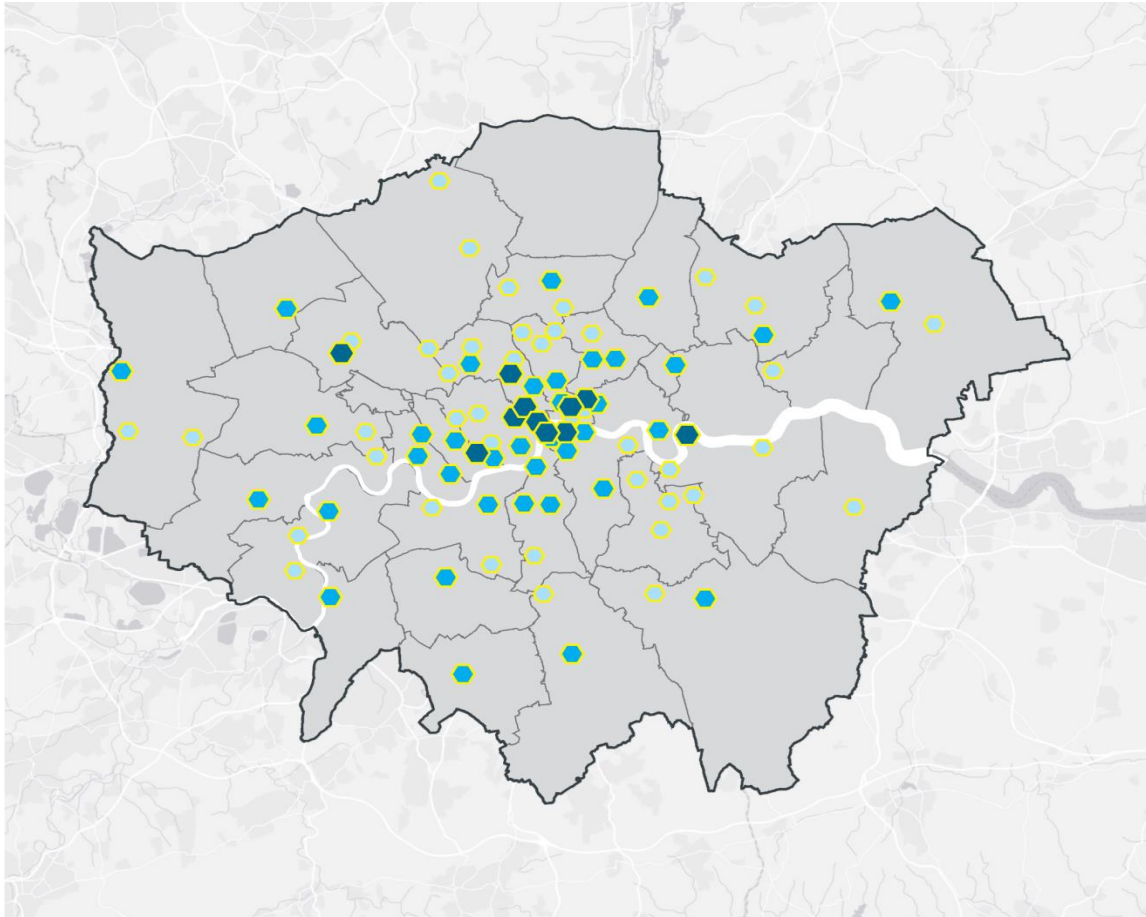
Town Centre Network
Night Time Economy

⬡ NT1 International/National

⬡ NT2 Regional/Sub-regional

⬡ NT3 More than local

Source: GLA Planning

Contains OS data ©
Crown copyright and
database right (2017)

The above map needs to be amended in order to reflect a greater diversity of areas of community cultural significance.

7.6.4

Each area will have its own character, which should be recognised and supported in order to maintain the **rich diversity of London's night-time economy**. Areas of international or national significance play a crucial role in putting London on the world stage, bringing internationally-renowned culture, performers and productions. Regional and sub-regional areas attract visitors from across and beyond London, and often have one or more larger venues and a mature night-time economy. These are generally in London's larger town centres. Areas with more than local

significance draw visitors from other parts of London and tend to feature smaller venues and premises.

7.6.5

In addition, there are some town centres where the night-time economy serves the local area as well as other specific locations – such as London's wholesale and retail markets, major hospitals, and some industrial areas – where there **is significant economic or service activity at night**. This includes some retail and service industries, health services, policing and security, and transport and logistics. In exercising their various functions, boroughs should have regard to the strategic areas of night-time activity, as well as other night-time economic functions, and should set out strategies and policies that support the specific role of these areas in order to promote London's night-time economy.

7.6.6

There are many benefits to promoting night-time economic activity such as generating jobs, improving income from leisure and tourism, and making town centres safer by increasing activity and providing passive surveillance. Managing issues such as transport, increased noise, crime, anti-social behaviour, perceptions of safety, the quality of the street environment, and the potential negative effects on the health and wellbeing of Londoners, will require specific approaches tailored to the night-time environment, activities and related behaviour. Boroughs are encouraged to consider appropriate **management strategies and mitigation measures** to reduce negative impacts on the quality of life of local residents, workers and night-time economy customers. Boroughs should also take account of local circumstances when considering whether to concentrate or disperse evening and night-time activities in town centres or within the CAZ.

7.6.7

Large concentrations of night-time activities can result in some places lacking activity and vitality during the day. Boroughs should consider opportunities to encourage the daytime uses of buildings that are mainly used for night-time activities to help **diversify the 24-hour offer, especially to community organisations**. Similarly, boroughs should explore the benefits of expanding the range of night-time economy activities to include extending opening hours and alternative evening and night-time uses of existing daytime facilities such as shops, markets, cafés, libraries, theatres and museums. The temporary use of spaces and venues in the evening and at night can enhance the vibrancy and vitality of the night-time economy, particularly meanwhile uses of vacant premises, for example as cultural arts venues, nightclubs, bars or restaurants.

7.6.8

The recently introduced Night Tube that operates on many Tube lines throughout the weekend, and the extensive network of night buses, has helped to create a public transport system that can support a 24-hour city including making travel easier for London's many night workers. Boroughs are encouraged to work with Transport for London (TfL) to take advantage of **improved night-time public transport** to identify areas where night-time economic activity can be promoted and enhanced in a safe and attractive way. This would include considering planning applications for night-time venues and activities to diversify and enhance the night-time offer in town centres,

particularly those that are within or well-connected to Areas for Regeneration (see Policy SD10 Strategic and local regeneration). Outer London boroughs, in particular, should consider the opportunities offered by an extended Night Tube and Night Bus network to increase the night-time offer in town centres for local residents, workers and visitors.

7.6.9

Boroughs should explore the benefits of **diversifying the night-time mix of uses**, particularly in areas where there are high concentrations of licensed premises, along with extended opening times of public places and spaces. This can help attract a wider range of visitors and support the uptake by families drawn from a wider range of communities, including those who feel excluded from alcohol-based entertainment activities. It can also help decrease crime, anti-social behaviour and the fear of crime.

7.6.10

The night-time economy doesn't only happen inside; many night-time activities make use of **outside spaces including the public realm**, and enjoying the public spaces of the city at night is an important part of the night-time experience. This requires careful and co-ordinated management between a wide variety of stakeholders in order to ensure that the city can be enjoyed at night to its fullest, and that the night-time economy complements rather than conflicts with daytime activities.

7.6.11

There are groups of people who avoid town centres and night-time activities for a variety of reasons, for example physical barriers and lack of facilities for disabled people and older people, perceptions around safety and security particularly for women, those who feel excluded for socio-economic and cultural reasons and issues of staff attitudes towards, and awareness of, LGBT+ and BAME groups. Making London's night-time culture **more enjoyable and inclusive** requires ensuring a wide range of evening and night-time activities are on offer to London's diverse population. Boroughs should also work with land owners, investors and businesses to address perceived barriers to accessing the night-time and general entertainment economy and enhance the experience of London at night. This can include requiring new developments to provide accessible toilets (see Policy S6 Public toilets), working with local police and businesses to make streets and the public realm safer and more welcoming, ensuring cleansing services are procured to clean up litter and sanitise streets and public areas, and working with local businesses, communities, TfL and logistics operators to optimise servicing that occurs at night or supports the night-time economy.

HC7

A. Boroughs should:

1. protect public houses and all community entertainment and cultural venues where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres, night-time economy area, Creative Enterprise Zones including community food hubs

2. support proposals for new public houses and community cultural centres to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate.

B. Applications that propose the loss of public houses or community centres with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub or community centre in the foreseeable future.

C. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house or community centre that would compromise the operation or viability of the public house or community centre use should be resisted.

7.7.1

Pubs are one of the cultural institutions that are a unique and intrinsic part of Britain. Other important institutions include those that fulfil a similar role in society for other cultures, such as community meeting places at which are held regular social or cultural events, places of worship and entertainment venues used by different sectors of the community over the course of the week at different times of the day. Many such places are steeped in history and are part of London's built, social and cultural heritage. Whether alone, or as part of a cultural mix of activities or venues, pubs as well as such the named social institutions, are often an integral part of an area's day, evening and night-time culture and economy. An individual social institution can also be at the heart of a community's social life often providing a local meeting place, a venue for entertainment or a focus for social gatherings. More recently, some such institutions have started providing library services and parcel collection points as well as food in different forms to increase their offer and appeal to a wider clientele.

7.7.2

Through their unique and varied roles, pubs and community centres can contribute to the regeneration of town centres, Cultural Quarters and local tourism, as well as providing a focus for existing and new communities, and meeting the needs of particular groups, such as the LGBT+ community and London's diverse ethnic communities. However, **pubs and other community centres critical to the maintenance and survival of London's diverse cultures are under threat from closure** and redevelopment pressures, with nearly 1,200 pubs in London lost in 15 years[100] (insert statistic on loss of community centres in London). The recent changes to the Town and Country Planning Act (General Permitted Development Order) (England) (2015) have however, removed

permitted development rights that previously allowed pubs and bars to change planning Use Class to shops, financial and professional services, restaurants and cafés without prior planning approval. This change in legislation offers greater protection for pubs and also incorporates a permitted development right that allows pub owners to introduce a new mixed use (A3/A4) which should provide flexibility to enhance a food offer beyond what was previously allowed as ancillary to the main pub or community centre use. Similar legal support is also required to protect the use of a variety of buildings, located on high streets, within town centres and within estates from encroachment by other uses that make community venues less accessible to ordinary people and unable to offer a greater variety of services which would improve their viability and attractiveness in ways which support social cohesion, resilience and integration.

[100] Closing time: London's public houses, GLA Economics, April 2017 - https://www.london.gov.uk/sites/default/files/closing-time-pubs-final.pdf

7.7.3

Many pubs and community centres are popular because they have intrinsic character. This is often derived from their architecture, their long-standing use as a public house and hub of community action, their history as a place of socialising and entertainment catering for particular groups, their ties to local sports and other societies, or simply their role as a meeting place for the local community. In developing strategies and policies to enhance and retain pubs, boroughs should consider the **individual character of pubs and community centres** in their area and the broad range of characteristics, functions and activities that give pubs and community centres their particular value, including opportunities for flexible working.

7.7.4

New pubs and community centres, especially as part of a redevelopment or regeneration scheme can provide a cultural and social focus for a neighbourhood, particularly where they offer a diverse range of services, community functions and job opportunities. However, it is important when considering proposals for new pubs and community centres that boroughs take account of issues such as cumulative impact zones, the Agent of Change principle (see Policy D12 Agent of Change) and any potential negative impacts.

7.7.5

Boroughs should take a positive approach to designating pubs and community centres as Assets **of Community Value** (ACV) when nominated by a community group. Listing a pub or community centre as an ACV gives voluntary groups and organisations the opportunity to bid for it if it is put up for sale. The 'right to bid' is not a right to buy and although owners of the asset have to consider bids from community groups, they do not have to accept them. An ACV listing does, nevertheless, give communities an increased chance to save a valued pub or other local facility.

7.7.6

When **assessing whether a pub or community centre has heritage, cultural, economic or social value**, boroughs should take into consideration a broad range of characteristics, including whether the building

a. is in a Conservation Area

b. is a locally- or statutorily-listed building

c. has a licence for entertainment, events, film, performances, music or sport

d. operates or is closely associated with a sports club or team

e. has rooms or areas for hire

f. is making a positive contribution to the night-time economy

g. is making a positive contribution to the local community

h. is catering for one or more specific group or community.

7.7.7

To demonstrate authoritative **marketing evidence** that there is no realistic prospect of a building being used as a pub or community centre in the foreseeable future, boroughs should require proof that all reasonable measures have been taken to market the pub or community centre to other potential operators. The pub or community centre should have been marketed for at least 24 months as a pub community centre at an agreed price following an independent valuation and in a condition that allows the property to continue functioning as a pub or community centre. The business should have been offered for sale locally and London-wide in appropriate publications and through relevant specialised agents.

7.7.8

Many pubs or community centres built on more than one floor include ancillary uses such as function rooms and staff accommodation. Potential profit from development makes the conversion of upper pub or community centre floors to residential use extremely attractive to owners. Beer gardens, community gardens and other outside spaces are also at risk of loss to residential development. The **change to residential use** of these areas can limit the operational flexibility of the pub or community centre, make it less attractive to customers, and prevent ancillary spaces being used by the local community. It can also threaten the viability of a pub or community venue through increased complaints about noise and other issues from new residents. Boroughs are encouraged to resist such proposals or ensure developers put in place measures that would mitigate the impacts of noise for new and subsequent residents.

Policy S1 Developing London's social infrastructure

S1

A. Boroughs, in their Development Plans, in consultation with the relevant community sectors, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities to express themselves and freely associate.

B. In areas of major new development and regeneration, if social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans, it means that the considerations of the community, the human beings and the human environmental relationships are being considered only secondarily. This means that it is necessary to rephrase this policy to read:

B (New) Where, at community scale or across communities working together they determine there to be, within a locality, a development challenge to be met, regional authorities should work to support appropriate responses and area action planning which are coherent with proposals for larger neighbourhood planning which, in itself, is responsive to participatory planning, sound environmental and social impact assessment and the logic of a sound planning procedure.

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

The wording of this policy makes it seem that it is the infrastructure alone that determines quality and inclusion, but in fact that role is held by the human policy making environment behind infrastructural development. There are a number of pressing challenges on city development at present, not least of which is the city's environmental and social 'footprint' with regard to pollution and energy/carbon use and management. Development proposals need to prove that they have sufficiently considered their wholesale impact which will shape how human needs are both configured and met.

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. Community Food Hubs are a good example of where town centre planning and sound community consultation come together to develop viable, community centred, environmentally sound uses of the land consistent with the ability to meet new and emerging social needs and

understandings and which ensures that co-location and efficient land use does not fall foul of participatory impact assessments.

Such land space rationalisation should reflect the need to support the development of viable, community centred, environmentally sound uses of the land consistent with the ability to meet new and emerging social needs and understandings and which ensures that co-location and efficient land use does not fall foul of participatory impact assessments.

E. New facilities should be easily accessible by public transport, cycling and walking as well as be step free and accessible and welcoming to all potential users.

F. Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:

1. there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, as assessed by community representatives of the respective 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 defined by a coherent integrated impact assessment.

Fit for purpose needs elaborating here in order to ensure it is responsive to social and environmental (integrated) assessment.

G. Redundant social infrastructure, as adjudged by a process in which all potential users are involved, should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.

5.1.1

Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes **health provision, education, community, play, youth, recreation, sports, faith, and emergency facilities**. Green infrastructure in all its forms is also a key component of social infrastructure, and is to be addressed supportively in Chapter 8, Policy G3 Metropolitan Open Land and Policy G4 Local green and open space because of the overlaps and coherence between the policies and processes that make up the basis of how land space can be supportive of community/human productive use of social infrastructure in ways which promote diverse access and use. An integrated Impact assessment must help to make consistent and link related policies in their use and impact across sectors.

Perhaps it needs to be addressed in the light of, rather than separately from, issues to do with Metropolitan Open Land, Local green and open space as examples of green infrastructure because of the overlaps and coherence between the policies and processes

that make up the basis of how land space can be supportive of community/human productive use of social infrastructure in ways which promote diverse access and use.

5.1.2

Social infrastructure plays an important **role in developing strong and inclusive communities**. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place.

5.1.3

Planning for social infrastructure in London is complex. There are a wide range of providers and stakeholders and the degree of clarity around future provision and funding varies. It is therefore important that boroughs work collaboratively with service providers and other stakeholders, including the local community, to fully understand existing and future social infrastructure needs and plan appropriately for these, including through the Community Infrastructure Levy. Supplementary Planning Guidance will provide details of how this could be approached. Social Infrastructure is still structure, not process and may not adequately capture the history of a locations use and how, over time, particular spaces, relationships between spaces or an absence of a provision have impacted the effective, efficient or productive community use of facilities or amenities. As a result the Integrated Impact assessment needs a thorough local community overview, if it is to sufficiently capture these elements.

5.1.4

The **loss of social infrastructure** can have a detrimental effect on a community. Where possible, boroughs should protect such facilities and uses, and where a development proposal leads to the loss of a facility, require a replacement that continues to meet the needs of the neighbourhood it serves. To further protect against the loss of social infrastructure that is valued by a local community or group, boroughs should consider approving the designation of a facility as an Asset of Community Value (ACV) if put forward by the local community.

5.1.5

In cases where social infrastructure premises may be deemed redundant and a replacement facility is no longer necessary or appropriate, **other forms of social infrastructure should be considered** for the site or part of the site to help to meet other community needs, before alternative uses are pursued.

5.1.6

It is recognised that there will be cases where social infrastructure providers are undertaking an agreed programme of social infrastructure re-provision or **service reconfiguration**, such as has been seen within healthcare. Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with parts D and F of Policy S1 Developing London's social infrastructure and Policy S2

Health and social care facilities and any related information or guidance in order to achieve the overall aims of the programme and to continue to meet the needs of Londoners.

5.1.7

In all cases, where housing is considered to be an appropriate alternative use, opportunities for genuine homes should be optimised as connected to the provisions to be made for social infrastructure. Therefore a home as a place which supports inclusive and diverse communities, if it is to be provided, then there needs to be concomitant guarantee that all new or improved housing is associated with improvements in or expansion of the social infrastructural requirements and amenities which will enable communities to grow in a healthy manner and to promote well-being for all. This is what we refer to when speaking of a Lifetime Neighbourhood.

Housing, elsewhere referred to as homes, are not disconnected from the provisions to be made for social infrastructure. Therefore, if housing which supports inclusive and diverse communities is to be provided then there needs to be concomitant guarantee that all new or improved housing is associated with improvements in or expansion of the social infrastructural requirements which will enable communities to grow in a healthy manner and to promote well-being.

5.1.8

Social infrastructure should be easily accessible by walking, cycling and public transport in accordance with the Healthy Streets Approach. It is also important to consider the way that social infrastructure integrates with other facilities and the way people who live or work in the area might want to access it. **Shared use and co-location of facilities** should be encouraged, in order to align service provision, use land more efficiently and facilitate opportunities for different groups of people to come together, encouraging further inclusion and community participation. Shared use and co-location will also help facilities and service providers to work in a more coherent and joined-up way, and share maintenance and management costs. It could also potentially reduce the need to travel thereby improving accessibility. Examples of this include schools opening their facilities out of hours for use by the community, the co-location of health and sports facilities, or the co-location of facilities with housing to ensure effective usage. A further element of co-location to be considered is that associated with ensuring people have access to fresh and locally grown, where possible, foodstuffs and a means to develop light industry around a food system which meets local needs for all groups. This means that all economic development aspects which link to well-being, good mental health promotion, the provision of green spaces for children and young people all can be interwoven in the idea of co-location. This produces a lifetime neighbourhood.

5.1.9

Voluntary and community groups often find it difficult to find premises suitable for their needs. **Unused or underused facilities should be brought into use**, where possible, to help address these needs. The additional use or reuse of places of worship should be considered for providing accommodation for other traditions or faiths and/or wider community functions.

S2

A. Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:

1. identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies

2. understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes

3. regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues

4. identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision. These will include a better relationship between food provision and public access to sites for food growing which has been shown to support and enhance community public health statistics and overall well-being.

5. identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses, including for community access to green and brownfield sites for food growing and the development of community food hubs with multiple benefits for town centres and the suburbs.

B. Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported. Some of which can offer public health routes to new care models which promote community self-reliance

C. New facilities should be easily accessible by public transport, cycling and walking.

5.2.1

London's health care services are vital to maintaining and improving Londoners' quality of life. The health service is also one of the capital's major employers, with over 200,000[63] people working in the NHS in London. Several factors affect the **demand for health services and facilities**. These include a growing and ageing population, an increase in complex and long-term health conditions that need an integrated approach, and changes in patients' personal preferences. New treatments and technologies are also transforming the ability to predict, diagnose and treat conditions. Studies on dietary intake, levels of access to green space and accessible and affordable exercise have also been shown to have an impact of public health and well-being and so should be factored in when making choices in land use and in social prescribing to promote community self-reliance and agency in determining resilience and well-being.

[63] http://content.digital.nhs.uk/catalogue/PUB23046/nhs-work-stat-oct-2016-...

5.2.2

The NHS Five Year Forward View identifies the need to **prevent avoidable illness** and **transform the way that care is organised and delivered** in order to meet increasing demands for healthcare within the resources available. It describes the following priorities:

- supporting and enabling individuals to take better care of their own health and the health of their families and communities

- undertaking a higher proportion of healthcare in community rather than hospital settings

- making best use of available assets, including more flexible approaches to how facilities are used and the overall configuration of the health estate, which requires a mix of dis-investment in older, out-of-date facilities and re-investment in more modern, fit for purpose estate

- ensuring that models of care change and continuously evolve

- ensuring that existing and planned new health infrastructure supports and facilitates change.

5.2.3

There are currently four broad **types of health infrastructure provision**:

- primary care – GP practices, plus community pharmacists, dentists and opticians

- community healthcare – this covers a wide range of diagnostic and healthcare services, including non-acute mental health services, which provide a means of delivering care closer to home than from a hospital setting, which includes a range of preventative options available based upon attention to diet, exercise and access to green space and spaces for social interaction.

- acute provision

- specialist provision

5.2.4

Sustainability and Transformation Plans (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area.

5.2.5

Whilst there is no one-size-fits-all model of care, and an increasing blurring of the boundaries between primary, secondary (acute) and tertiary (specialist) health services,

there are some broad underlying **principles that underpin the planning of new facilities** or changes to existing facilities. The NHS General Practice Forward View [64] supports the provision of primary care at greater scale, with larger practices and/or more joined up networks of GPs offering a wider range of services to patients, including extended opening hours. This means fewer GP practices serving larger patient catchments (perhaps 10-20,000 people per practice) and operating from larger premises than is the norm at present. Models of community healthcare are based around larger population catchments (50,000 or more people) or localities to ensure individual services are viable, and to maximise the benefits of integrating and/or co-locating services in community healthcare centres or hubs of all kinds including food hubs, or in more flexible ways across localities or networks of service providers.

[64] https://www.england.nhs.uk/wp-content/uploads/2016/04/gpfv.pdf

5.2.6

In **assessing the need for new health and social care facilities**, consideration should be given to the location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all of the growth. Joint Strategic Needs Assessments produced by local Health and Wellbeing Boards describe the current and future health and wellbeing needs of the local population and identify priorities for action which are set out in more detail in the Boards' Health and Wellbeing Strategies. These documents are valuable sources of evidence to inform the development and review of Development Plans. Other forms of evidence are the numerous reports produced by public health and community garden facilities, often in conjunction with specialist bodies which prove and support the link between access to healthy food and accessible exercise and green space for leisure and social interaction and improved health and well-being outcomes.[1]

5.2.7

Where population growth and change is taking place at fairly modest levels, it may be possible to accommodate this through a combination of **efficiency savings, service reconfiguration and small adjustments in capacity,** for example, through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that **new primary and community facilities or capacity will need to be provided**. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions. Design plays an increasingly significant role in how communities can access healthy spaces and health food as well as engage in more social interaction and so support health promoting behaviour.

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[1]

https://www.landscapeinstitute.org/PDF/Contribute/PublicHealthandLandscape_CreatingHealthyPlaces_FINAL.pdf
https://www.cbd.int/health/who-euro-green-spaces-urbanhealth.pdf
https://www.mentalhealth.org.nz/assets/ResourceFinder/Healthy-places-healthy-lives-PHAC.pdf

The **co-location of facilities with other uses**, such as other forms of social infrastructure or housing, is encouraged to use land more efficiently and to enable a more integrated service delivery. This is in line with promoting development of lifetime neighbourhoods in which communities can live, work and interact socially in ways which minimise the need to travel long distances by car and encourage greater social cohesion and integrated living spaces. A community hub is centred upon the attainment of well-being through a range of social and cultural factors, central to which is how we access our food.

Food production hubs can play a useful role within the city. These are light-industrial, integrated, co-located developments which involve food growing, local food processing and market/distribution outlets which provide alternative, local food systems and which provide jobs and 'green outlets' and a sense of self-determined local futures.

Imported foodstuffs can be sourced via regional wholesale centres or directly sourced from sustainable food linkages and can be processed in these food hubs. They can provide social spaces as well as job and training opportunities which are connected to a range of cultural understandings of what a lifetime neighbourhood means in practice. If designed into plans for town centres or high streets they can:

1. Encourage the start-up of SME community based food hubs
2. Work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food-waste, and addressing food poverty
3. Provide a variety of skills to encourage localised, self-reliant development within each borough, and also facilitate advantageous cross borough connections which can benefit London as a whole and households across each region.
4. Develop strategic partnerships between public health initiatives, community food hubs and social prescribing to optimise benefit to local communities in terms of well-being, reduced social isolation, improved mental health and social enterprise.

Development and regeneration proposals for an area provide an opportunity to **re-think how land and buildings are used** and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies). Rethinking of the use of public health facility space also provides the opportunity to incorporate health promoting activities such as community food growing and

open and accessible exercise facilities which also support social integration and mental health.