

ft' work

Matters for Consideration at the Examination in Public

Statement relating to Matter 51, Delivering Social Infrastructure
ft'work (Footwork Architects Ltd.) 1968

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Introduction:

The term 'social infrastructure' has been misappropriated by developers and planners to refer only to amenities or services, largely determined by negotiation and therefore bearing no relation to identified needs. It is essential for the new Plan to include a **new definition** that conveys its full meaning. Proper time needs to be devoted to discussion of M51b, in order to arrive at a definition, which should then appear both within Policy S1 and in the Glossary.

S1 is the location in the Plan where consideration is given to how space is used by communities and therefore how to provide for it. It must clearly state that addressing social infrastructure is a requirement, based on needs already identified. This information must be in place as a standard element of area-based planning, so that it can inform all development proposals. To ensure that spaces meet the needs of communities and are fit for purpose, S1 must therefore have embedded within it a requirement for thorough assessment and for collaboration.

The themes of **initial assessment** and **community engagement/collaboration** have been repeatedly discussed in previous EiP sessions. Like many other participants it is believed that to embed these two key requirements within the Plan is fundamental to delivering the ambitious aims of the Good Growth policies. **The interests of London's diverse communities simply cannot be met after the red lines of site boundaries have been drawn.**

The community's role in delivering social infrastructure is crucially important in promoting thriving neighbourhoods with a sense of their own identity. There is strong evidence to show that where services are community-driven and derived in response to the needs and wishes identified by and within that community, they make an important contribution to its success.

General context to Policy S1:

What is social infrastructure?

The definition in the Glossary, lifted verbatim from the current London Plan, is in fact not a definition at all, simply stating '*social infrastructure covers facilities such as...*' followed by a long list.

As the current Social Infrastructure SPG explains the 'Social' dimension of sustainable development (NPPF Para 7) means '*supporting strong, vibrant and healthy communities - creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural wellbeing*'. Of the 12 'core planning principles' (para 17), one relates specifically to social infrastructure, stating that planning should: '*take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.*'

The current London Plan (at 3.86), provides a broader definition encompassing within it '*...many other uses and activities which contribute to making an area more than just a place to live*'. This correctly indicates that besides amenities or services (the **formal** component of social infrastructure) there is an **informal** component which is **a product of community – the diverse social networks, representing common interests, that evolve and interact over time.** Understanding its value is key to accessing local opinion and identifying needs, so as to deliver appropriate and targeted services.

The social interest think tank, Civil Exchange, identifies three different, interdependent dimensions: facilities and built environment; services and organisations (including strong voluntary and community-led sectors); and strong and healthy communities. This last provides a useful description of informal social infrastructure: '*Positive relationships and interaction, trust and cohesion within the community (social capital); social norms which help ensure a well-maintained and safe environment; influence and control over services, building and facilities; wide civic participation; strong partnerships within and between sectors; ... positive relationships across different parts of the community*'.

They also emphasise the importance of enabling people to have control and influence, because *'This helps create communities where local people are agents, not victims, of change and are able to shape the course of their own lives'*.

Strong social infrastructure helps build resilient communities, creating the foundations for community activity, local enterprise and social justice. **It is the glue that can bind diverse communities together.**

The Plan must therefore stress that social infrastructure includes the spaces in which local social, economic and cultural activity come together – often in ad hoc ways. To plan for spontaneous activity is not a contradiction in terms, because this kind of social integration often occurs naturally, over time. This is what gives places a sense of identity. Equally it is essential not to destroy what is already there, but to build on it.

The Panel's Questions:

Q. Would Policy S1 provide an effective and justified approach to the development of London's social infrastructure?

ft'work believes S1 cannot be effective in its current form, for two key reasons:

- the **lack of a clear definition** of social infrastructure, to underpin the policy
- insufficient clarity and emphasis on the requirement for social infrastructure needs to be assessed. Without this services **cannot be targeted** and the policy is **unenforceable**

(These points are addressed in our answers to parts 'a' and 'b' of the question, below.)

In particular would it be effective in meeting the objectives of policies GG1 and GG3 in creating a healthy city and building strong and inclusive communities?

As currently written, S1 does not adequately reflect parts B, C and D of Policy GG1 which together help to define social infrastructure:

- GG1 B 'provide access to good quality community spaces, services and amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation'
- GG1 C 'ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy-in, and where communities can develop and thrive'
- GG1 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 building relationships during the daytime, evening and night time'

None of this is achievable while social infrastructure is defined as 'facilities' (Glossary and S1F) or 'a range of services and facilities' (Clause 5.1.1).

To meet these objectives S1 needs to promote an environment of autonomy and self-sufficiency, in which communities can identify, create and run their own social infrastructure, harnessing the social capital that results from collaboration between networks of groups and individuals.

For similar reasons, S1 does not adequately address Part D of GG3:

- GG3 D 'assess the potential impacts of development proposals and development plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities'

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

ft'work strongly believes that the starting point has to be a full understanding of both *existing* social infrastructure and of social infrastructure *needs*, through a formal process of initial assessment. It is therefore right that S1 A should require boroughs to identify social infrastructure needs as a formal component of area based planning. The initial assessment must, however, include a **survey** as well as identifying need.

We propose a rewording and reordering of part A, which replaces '*needs assessment of social infrastructure*' with '*social infrastructure survey and needs assessment*'.
(New or reordered wording in *italics*)

- The first sentence of Part A to become: '*In order to meet the needs of London's diverse communities Boroughs, in their Development Plans, should undertake a social infrastructure survey and needs assessment, working in close collaboration with local social groups, so that both existing and proposed new infrastructure can be carefully aligned with identified need*'.

But, as stated in clause 5.1.4, there also exists a major risk of *losing* existing social infrastructure during regeneration and development. A clear policy statement is needed to ensure that what is already there, once identified, is protected and enhanced.

We propose an additional Part BA (ie between A and B):

- '*The loss of existing social infrastructure, identified by the social infrastructure survey and needs assessment required under Part A, should be avoided*'

However, the value of such assessments depends on how they are conducted. It is essential to work collaboratively with local partners to access social groups and informal networks, to fully understand how and where they interact. 'Informal' social infrastructure in existing communities is best identified from within, using local knowledge. Infrastructure planning must then take account of it. An example might be an area where young people are used to congregating and which, for them, represents local identity. A proposed play area, often the token gesture towards 'outdoor facilities', is likely to be inadequate for their needs. Yet by understanding how this group uses local space and by giving them a say, their needs can be properly addressed – while also avoiding the negative effect of potentially displacing them.

We propose some additional wording and reordering to clause 5.1.3:

- '*...It is therefore important that boroughs work collaboratively with stakeholders and local partners, to access social groups and informal networks, as well as service providers, to fully understand existing and future social infrastructure needs...*'

With regard to cross-borough collaboration, neither Part A nor the clauses explain in what way it should be used and for what purpose. If it leads to facilities and services being pooled between boroughs, therefore making them less accessible to communities within individual boroughs, then it is essential for this to be spelled out (eg. sports facilities and emergency services). Otherwise the policy will be open to misinterpretation or, worse, exploitation.

Q. b) Would it provide a justified definition of social infrastructure?

No. (Please see 'general context' above)

'Social infrastructure' is not adequately defined in the Plan, either in S1 or in the Glossary. Clause 5.1.1 compounds the problems we have explained above, by listing types of facilities and services, but omitting those aspects that would help deliver the 'strong and inclusive communities' and 'social integration and desirability of place' mentioned in 5.1.2.

We think this should be addressed by inserting a definition before Part A, or as a new Part AA and replicating it in the Glossary.

Other participants will wish to contribute to the phrasing of a definition, so rather than suggesting one here, we have provided a list of components from which a definition might be formed:

Formal social infrastructure

- *'the interdependent mix of facilities, places, spaces, programmes, projects, services and networks that maintain and improve the standard of living and quality of life in a community, an appealing place to live'*
- *'the spaces in which local social, economic and cultural activity come together'*
- *'a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural wellbeing'*

Informal social infrastructure

- *'the uses and activities which contribute to making an area more than just a place to live'* (from the current London Plan, clause 3.86)
- *'the diverse social networks representing common interests, needs or age groups, that interact and evolve over time'*

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

No, because without a full definition, Policies S1D, F and G cannot be delivered. We agree with the principles outlined in these policies, once underpinned by a clear definition. However, D and F require minor rewording to ensure they are not open to misinterpretation or misuse.

The second line of Part D refers to 'the rationalisation or sharing of facilities', which could be interpreted as an invitation to reduce facilities.

We propose the following additional wording:

- *'...the rationalisation or sharing of facilities, where it can be demonstrated that this meets the needs of existing and future populations'*

Similarly, Part F2 could lead to changes in social infrastructure being imposed on communities.

We propose the following additional wording:

- *'unless the loss is part of a wider public service transformation, agreed through a process of engagement with local communities, which requires investment in modern...*

Both clauses must also be adequately supported by clause 5.1.6, which makes reference to them, to ensure the policy is subject to the participation and buy-in of local communities.

We propose the following additional wording to the second sentence of 5.1.6:

- *'Where social infrastructure premises are deemed redundant, and subject to the agreement of local communities gained through a process of engagement, such losses may be acceptable...'*

To achieve an effective development management framework requires a method for how social infrastructure will be delivered. This is not currently made clear. The Social Infrastructure SPG (under Planning for Social Infrastructure Provision) helpfully identifies four distinct stages of delivery, which aids clarity:

- Stage 1: stakeholder engagement
- Stage 2: identifying existing social infrastructure
- Stage 3: identifying future needs
- Stage 4: identifying funding and delivery mechanisms

We therefore propose the addition of a clause 5.1.3A outlining these four distinct stages.