

**M51. Would Policy S1 provide an effective and justified approach to the development of London’s social infrastructure?**

- 51.0 Yes, Policy S1 provides an effective and justified approach to supporting the development of social infrastructure across London. The Policy sets out an overarching strategic framework to enable boroughs to take a proactive, positive and collaborative approach to the development of social infrastructure that will meet the needs of existing and new communities in supporting their health and social and cultural wellbeing.
- 51.1 Policy S1 sets out an overarching approach that supports the strategic policy framework for the provision of social infrastructure in Chapter 5 of the draft Plan. This framework enables boroughs to deliver and support the development of key services and facilities including healthcare, education and childcare, play, sports and recreation, public toilets and burial spaces, specific approaches for which are set out in Policies S2 to S7. Policy S1 ensures the effective delivery of these services through joint working between the Mayor, London boroughs and social infrastructure providers to ensure these facilities are of high quality, are inclusive and address local and strategic needs across London.
- 51.2 The Policy provides an appropriate framework, based on comprehensive evidence of educational and childcare needs<sup>1</sup>, health care needs and service delivery changes<sup>2</sup>, play, sport and recreation needs<sup>3</sup> and burial space requirements<sup>4</sup>. To support the health and social wellbeing of communities and to help boroughs fulfil their role in achieving sustainable development, the Policy ensures that the current and future needs of local communities for social infrastructure underpin planning policies and decisions. This approach complements the Mayor’s wider strategies for social integration, and equality, diversity and inclusion.<sup>5</sup>
- 51.3 Boroughs are required to have a thorough understanding of local and cross-borough needs (including those in areas that will see significant new development – primarily Opportunity Areas) to inform local and neighbourhood plans. These identified needs in turn inform development management decisions relating to the provision of social infrastructure.
- 51.4 To ensure that land is used effectively when considering the location and use of community facilities and services, Policy S1 supports the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities; for example, where the provision of services is being reconfigured. Supporting the co-location of different forms of infrastructure helps these facilities and services to develop and modernise in a sustainable way so they can benefit from shared proximity to the communities they serve.

---

<sup>1</sup> NLP/SO/006: GLA Intelligence, GLA School Place Demand Projections, March 2018; NLP/SO/005: GLA Economics, Demand for childcare in London - drivers and projections, March 2018

<sup>2</sup> NLP/SO/009: Mayor of London, The London Health Inequalities Strategy, September 2018; NLP/SO/008: NHS England, General Practice Forward View, April 2016; NLP/SO/007: NHS Digital, NHS Workforce Statistics (website), April 2018

<sup>3</sup> Mayor of London, Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance, September 2012; NLP/SO/001: Sport England, Strategic Assessment of Need – Artificial Grass Pitch (APG) Provision in London 2017-41, September 2017; NLP/SO/002: Sport England, Strategic Assessment of Need – Sports Hall Provision in London 2017-41, September 2017; NLP/SO/003: Sport England, Strategic Assessment of Need – Swimming Pools Provision in London 2017-41, September 2017

<sup>4</sup> NLP/SO/004: Cemetery Research Group for GLA, Audit of London Burial Provision, 2010

<sup>5</sup> Mayor of London, Inclusive London - The Mayor’s equality, diversity and inclusion strategy, May 2018; Mayor of London, All of Us - The Mayor’s Strategy for Social Integration, March 2018

- 51.5 The Policy will ensure that boroughs are effectively supported to appropriately safeguard against the unnecessary loss of social infrastructure facilities in their decision making so they can sustainably meet the identified needs of their communities. Policy S1 directs boroughs to refuse proposals that would result in the loss of social infrastructure in an area of defined need, unless a realistic proposal for the re-provision of facilities that continue to meet the needs of the neighbourhood and wider community is proposed or the loss is part of wider public service transformation plan that creates infrastructure to meet future population needs or to sustain and improve services.
- 51.6 To provide further clarification on the application of Policy S1F, a Minor Suggested Change<sup>6</sup> was proposed to ensure boroughs use the social infrastructure needs assessments required under S1 A of the Policy when assessing proposals that would result in the loss of facilities.
- 51.7 In response to representations made on the draft Plan, a further Minor Suggested Change<sup>7</sup> was proposed to S1 F1 to ensure decisions made regarding proposals for re-provision consider the impacts upon the needs of the wider community as well as the neighbourhood. A Minor Suggested Change<sup>8</sup> was also proposed to S1 G to clarify that where a wider public service transformation plan will result in the loss of redundant social infrastructure, S1 G does not apply; instead the proposal should be assessed against the requirements of S1 F2.
- 51.8 To ensure that the Policy effectively encourages joint working across borough boundaries, a Minor Suggested Change was proposed to S1 A<sup>9</sup> to clarify that boroughs should undertake needs assessments of social infrastructure that should consider the need for cross-borough collaboration where appropriate in their development plans.

**Would Policy S1 be effective in meeting the objectives of policies GG1 and GG3 in creating a healthy city and building strong and inclusive communities?**

- 51.9 Policy GG1 seeks to ensure London is a fairer, more inclusive and more equal city. It supports access to good quality social and community infrastructure and a welcoming environment that promotes inclusive neighbourhoods.
- 51.10 Policy S1 complements Policy GG1 by ensuring local and neighbourhood plans and planning decisions positively contribute to the provision of good quality social infrastructure that meets the needs of London's diverse communities to help tackle disadvantage and inequality and improve social integration and inclusion.
- 51.11 Policy S1 supports boroughs to take a plan-lead approach to the provision of social infrastructure by understanding the needs of their local communities and through working with neighbouring boroughs to understand needs that cross-borough boundaries. This will ensure that the needs of communities shape the vision for the future delivery of social infrastructure, particularly in areas where new major development and regeneration is planned. This approach will ensure that social infrastructure is provided across London that reflects the needs of the city's diverse communities to help create a fairer, more inclusive city.

---

<sup>6</sup> NLP/CD/09: GLA, Table of Changes - Minor Suggested Changes to the Draft new London Plan, August 2018, Ref MSC.5.3

<sup>7</sup> NLP/CD/09: GLA, Table of Changes - Minor Suggested Changes to the Draft new London Plan, August 2018, Ref MSC.5.4

<sup>8</sup> NLP/CD/09: GLA, Table of Changes - Minor Suggested Changes to the Draft new London Plan, August 2018, Ref MSC.5.6

<sup>9</sup> NLP/CD/09: GLA, Table of Changes - Minor Suggested Changes to the Draft new London Plan, August 2018, Ref MSC.5.1

- 51.12 Policy GG3 seeks to ensure planning policies and decisions help improve Londoners' health and reduce health inequalities. It supports an integrated and co-ordinated approach to improving mental and physical health by advocating for appropriate health and care infrastructure to address the needs of London's changing and growing population. This includes improved access to spaces for play, recreation and sports.
- 51.13 Policy S1 aim to ensure that the aims of GG3 can be achieved by requiring boroughs to have a thorough understanding of the current and future health needs of their communities and securing the delivery of health facilities and related social infrastructure through the development of local/neighbourhood plan policies and decision making. This includes the delivery of appropriate play and recreation space and sports and recreation facilities, which, along with other interventions that are supported by draft Plan Policies, support the creation of an environment that will help Londoners to live healthier lives.
- 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?**
- 51.14 Yes, the requirements set out in Policy S1 provide an effective and justified framework for the preparation of local and neighbourhood plans to develop social infrastructure that meets the needs of London's diverse communities.
- 51.15 All London boroughs are projected to see a rise in population over the Plan period<sup>10</sup>, which will mean that the characteristics and demographics of communities will change over this time. Requiring boroughs to have a thorough understanding of the social infrastructure needs of their communities will help to ensure that local and neighbourhood plan policies are based on up-to-date information and can respond to changes in local demographic profiles.
- 51.16 This approach, supported by the other Policies from Chapter 5 of the draft Plan, will encourage boroughs to be flexible in the planning and delivery of key services, particularly those that are undergoing significant changes in the way they are being delivered. For example, health and social care facilities provided by the NHS are shifting toward new models of care that respond to increases in population by delivering primary care facilities at a greater scale<sup>11</sup>. To flexibly respond to this, Policy S2 of the Plan requires boroughs to work with NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and cross-boundary issues.
- b) Would it provide a justified definition of social infrastructure?**
- 51.17 Yes, the definition of social infrastructure provided in Annex 3 of the draft Plan appropriately defines key types of social infrastructure services and facilities that meet local and strategic needs to provide a good quality life for all Londoners.
- 51.18 The definition does not provide an exhaustive list of types of facilities and services, rather it notes the key types of social infrastructure services and facilities that support the health and

<sup>10</sup> NLP/DEM/001: GLA Intelligence, GLA 2016-based Trend Projection Results, July 2017

<sup>11</sup> NPL/SO/008: NHS England, General Practice Forward View, April 2016; NLP/SO/010: NHS England, The NHS Long Term Plan, January 2019

social wellbeing of communities. This flexibility will mean that boroughs can supplement this definition to respond to local circumstances, reflecting their communities' specific needs.

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

- 51.19 Yes. Policy S1 provides an effective development management framework by ensuring that the assessment of proposals for the investment in new social infrastructure and the protection of existing infrastructure is informed by a thorough understanding of local and cross borough needs (including those in areas of new major development or regeneration).
- 51.20 S1 D provides clear guidance to boroughs when assessing development proposals for social infrastructure. It will ensure that boroughs encourage and support development proposals that seek to make the best use of land, including the best use of public-sector estates, and the co-location of different forms of social infrastructure where the shared use of facilities can be rationalised.
- 51.21 S1 D is supported by other Policies in Chapter 5 of the draft Plan. For example, Policy S2 B supports development proposals that provide high-quality new and enhanced health and social care facilities to meet identified need and new models of care, and Policy S5 B2 requires development proposals for sports and recreation facilities to encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities.
- 51.22 Policy S1 F enables boroughs to effectively safeguard against the unnecessary loss of social infrastructure facilities. Boroughs should refuse proposals that would result in the loss of social infrastructure in an area of defined need, unless a realistic proposal for the re-provision of facilities that continue to service the needs of the neighbourhood and wider community is provided or the loss is part of wider public service transformation plans that create infrastructure to meet future population needs or to sustain and improve services.
- 51.23 To ensure boroughs can understand what their community's needs are for social infrastructure when assessing development proposals against the requirements of S1 F, a Minor Suggested Change was proposed<sup>12</sup> clarifying that boroughs should use the social infrastructure needs assessment required under S1 A to assist them in their decision making.
- 51.24 S1 G supports boroughs to make the most efficient use of land when assessing the future of redundant social infrastructure that is no longer necessary or appropriate. S1 G sets out clear criteria to make this decision by requiring boroughs to consider the premises for either full or partial use as other forms of social infrastructure in the first instance, before alternative development is considered.
- 51.25 A Minor Suggested Change<sup>13</sup> was proposed to Policy S1 G to clarify that where a wider public service transformation plan will result in the loss of redundant social infrastructure, S1 G does not apply; instead the proposal should be assessed against the requirements of S1 F2.

---

<sup>12</sup> NLP/CD/09: GLA, Table of Changes - Minor Suggested Changes to the Draft new London Plan, August 2018, Ref MSC.5.3

<sup>13</sup> NLP/CD/09: GLA, Table of Changes - Minor Suggested Changes to the Draft new London Plan, August 2018, Ref MSC.5.6