ft'work

Matters for Consideration at the Examination in Public

Statement relating to Matter 9, Good Growth
ft'work (Footwork Architects Ltd.) 1968

Introduction:

ft'work''s aim is to foster thriving communities by ensuring that clear social principles, evidenced in research, underpin development and regeneration. It is commonly believed that well-designed built environments have a transformative effect on people's lives. But, just as pulling down and rebuilding a failing school will not in itself turn it into a successful one, the regeneration of an estate or neighbourhood cannot on its own create the potential for a sustainable community. To achieve this requires foresight, local knowledge, collaboration and long-term planning. The Plan provides the opportunity to put this into effect.

General context to the Good Growth policies:

Communities evolve over time, yet can quickly be destroyed. Research has detailed a recurring cycle of decline and recovery. In thriving communities people stay put; they have a sense of self-determination, are mutually supportive and feel secure. Equally a transient population and loss of cohesion are features of a failing community, with displacement as a result of regeneration or social policy, partly to blame.

In response to the consultation, ft'work defined a set of **social design principles** to help focus the Plan's social ambitions:

- identify and address social needs as a precondition for development and regeneration

- protect social infrastructure where it exists and provide for it in all new development

- make integration and inclusion the drivers of major planning decisions

- give 'social heritage' the same value and protection as 'built heritage'

- ensure self-determination and collaboration within the planning process

- prevent the displacement of existing communities

The Good Growth policies set out the Plan's overarching principles and argue the need for building strong and inclusive communities. The Chapters describes *why* this must be achieved, but not *how*. **The rhetoric does not translate into the detail and as such the policies lack the teeth to ensure effective implementation.** ft'work's aim is to work with the Panel to ensure that these principles are clearly reflected in the policy.

Our general position is that in order to create communities when we build places, the Plan must:

- require a clear understanding of social context prior to development

- build foresight into the planning process, through proper assessment and early intervention

- ensure long-term vision and planning

- collaborate, not consult, allowing greater autonomy for communities

- introduce effective scrutiny

Addressing the Panel's questions:

M9 (a) Are GG1 to GG6 consistent with national policy and/or justified; would they help ensure that the Plan provides an effective strategic framework to achieve sustainable development?

The policy:

A clear principle of the NPPF 2012 is a more democratic planning process, aimed at giving communities a greater role in decision-making. It states that 'the purpose of the planning system is

to contribute to the achievement of sustainable development', by performing three mutually dependent roles: Economic, Social and Environmental. We will focus on 'Social', defined as 'supporting strong, vibrant and healthy communities...' [Please refer to the policy document]

Of the 12 'core principles' we refer to:

- 3. should be proactive in driving and supporting sustainable development

- 5. should take account of the diverse character of different areas

- 12. should support health, social and cultural wellbeing

The Framework proposes proactive engagement and collaboration with neighbourhoods, local organisations, businesses, voluntary, public and private sector organisations. Communities are afforded greater control over planning decisions, with powers to develop a Neighbourhood Plan, which must conform to the strategic policies in the Local Plan.

Response:

[Areas of inconsistency with NPPF indicated in **bold**. Proposed new wording in *italics*]

GG1: Building strong and inclusive communities

1.1.2 and 1.1.3 describe the challenge to create communities that are "strong, open and inclusive". The answer is to address the mix in anticipation, plan long-term and ensure effective scrutiny. This requires a thorough understanding of the social make-up of well-integrated communities and a commitment to addressing the factors that enhance or damage them.

Proposed addition:

Policy D2 A, advocates a process of extensive initial evaluation 'using demographic and socio-economic data (for an understanding of: social context; existing social and housing needs etc). ft'work believes such **Area Profiles** be used, formally, to provide a baseline against which integration is measured and to identify the local barriers to inclusion. With this data, Local Authorities can ensure that planning policy and decisions are building towards well-integrated, mixed-use communities. With a requirement to be kept updated, the profiles will be invaluable in underpinning the important social aspirations of GG1. They can be introduced within the body of the Plan in D3, SD10, H3, H8. H10 and S1.

1.1.5. d**oes not fulfil the requirement of 'core principle 3, or satisfy the NPPF's definition of the 'Social role' of the planning system in achieving sustainable development.**

1.1.5. states 'Early engagement with local people leads to better planning proposals…Taking advantage of the knowledge and experience of local people will help to shape London's growth...'

We strongly agree, but this statement does not…
- demonstrate a "proactive" use of early engagement and collaboration
- state the necessity, for achieving "strong and inclusive communities", of understanding social context and needs

- Proposed rewording:

'Early engagement *and proactive collaboration* with local people leads to better planning proposals *and supports sustainable development… Understanding social context and* taking advantage of local knowledge and experience will help to shape London's growth…'

1.1.5. is not reflected in the GG1 clauses A to F, **thus failing to uphold the NPPF's principle to create a more democratic planning process**, giving communities a greater role in decision-making. We therefore propose the addition of a clause G:

'…those involved in planning and development must:
G. ensure that prior to development and regeneration local people have the opportunity to shape their communities, through early engagement and collaboration and by acknowledging their needs, wishes and the value of their contribution'

GG2: Making the best use of land

1.2.7.(post Minor Changes) **does not fulfil 'core principles' 5**. 'Diverse character' includes both social and built heritage, yet the 'social' aspect is not made explicit.

- Proposed rewording: 'London's *social and built* heritage holds local and strategic significance… the special features that Londoners value about a place, such as *social*, cultural, historic…' ('cultural' does not adequately convey 'social')

Clause C **does not fulfil 'core principles' 5** for the same reason.

- Proposed rewording: 'Understand the social and cultural value of existing places…'.

GG3: Creating a healthy city

1.3.2 and 1.3.5 overlap and would be clearer with reordering:
- position 1.3.5 directly after 1.3.2
- move 'creating a healthy city with reduced health inequalities will make London fairer for everyone' (currently in 1.3.5) to 1.3.2, after '…almost 19 years for women'.

1.3.1 states that 'determinants of health can be shaped by the planning system'. We agree, but to be credible **and to fulfil 'core principle' 12**, it must indicate how.

- Proposed rewording to 1.3.5: '…people who are most affected by London's health inequalities tend also to be affected by other forms of inequality. *To address this requires an understanding of social needs.* The Mayor plays a pivotal role in bringing together a diverse range of stakeholders… in order *to understand local needs* and to provide a more integrated approach'

- Proposed Insertion of a paragraph 1.3.5B, with wording as follows: *'There is a proven correlation between the degree of control people feel they have over their lives and their physical and mental well-being. This in turn produces social capital, the resources inherent in social groups that prompt mutual support and action. This is an important, yet undervalued, feature of thriving communities. When properly harnessed, greater autonomy can improve health and help to deliver sustainable development.'*

Clause A does not fulfil 'core principle' 12 because no reference is made to 'social' well-being. And although A states that 'those involved in planning and development' 'must ensure that the wider determinants of health are addressed in an integrated and co-ordinated way', this is not credible without clear direction. This can be achieved by…
- the insertion of a new clause AB, with wording as follows: '*Assess the existing social needs of communities, prior to the preparation of Development Plans, for example through the use of Social Needs Assessments*' (or Area Profiles as per D2 A if adopted)
- followed immediately by clause D. Thus the new order would be A, AB, D, B, C, E, F, G

- Proposed insertion of a clause GB: '*foster self-determination and effective collaboration at the earliest opportunity, acknowledging the clear social and health benefits of social capital and of harnessing people's ideas and wishes*'

GG4: Delivering the homes Londoners need

1.4.2 (post Minor Changes) states the need to ensure 'that London remains a mixed and inclusive place in which people have a choice about where to live'. No mention is made here or elsewhere of the displacement of existing communities, which represents as significant threat to sustainable development. This is a serious omission and, as such, GG4 **does not fulfil 'core principle 3' or adequately address the key aim of 'sustainable development'.**

- We propose inserting an additional paragraph 1.4.2.A, with wording as follows: '*Diversity, continuity and stability are features of London's thriving communities, evolved over time. The displacement of existing communities, as a result of social policy, inappropriate or poorly planned regeneration, represents a serious threat to sustainable development. The drive to build new homes must enhance existing communities, not displace them, by taking account of local needs and wishes and by providing the appropriate mix of onsite affordable homes and tenures, in the locations where they are most needed.*'

- For the same reason we propose an additional clause CB:
'*prevent the displacement of existing communities, by working with them to address their housing needs, as an integral part of development and regeneration planning.*'

Q. M9 (b) *Are the policies in Chapters 2 to 12 of the Plan appropriately informed by and consistent with Good Growth policy GG1 to GG6?*

The details of this question will be dealt with as part of other Matters. ft'work considers here just how the broad social aims of GG1 and GG3 play out in Chapters 2-5.

GG1 Building Strong and Inclusive communities:

The need for creating inclusive communities is generally covered in the Chapters, but this is **not outlined as a well-informed, well-planned, long-term strategy.** *T*o build inclusion in to the planning and development process requires:

- an understanding of social context

- protection of existing communities (loss of inclusion)

- strategies to address exclusion and

- the foresight and long-term vision to build inclusive communities

Chapter 2: Spatial Development

Introduction:

- 2.0.7 Insertion '…where significant development is planned in these areas, it is crucial *that it is properly informed by local data*, that it benefits…'

SD1: A

We propose:
- modification 1. a) 'set out a clear, *long-term*, strategy for accommodating growth
- addition of a sub-clause e) '*are well-informed by available local data*'
- addition of a paragraph 5B: '*ensure engagement with and protection of existing communities within Opportunity Areas*'

SD1: B

We propose:
- modification to 3: '*assess the need for*, plan for and provide the necessary social and other… etc.'
- modification to 9: 'ensure planning frameworks *take account of local circumstances* and are subject to public and stakeholder engagement'
- modification to 2.1.4: '…Whatever model is used, frameworks must be prepared in a collaborative way, t*hrough early engagement* with local communities and stakeholders'.

[2.19 omits any mention of how to deliver equality of access or inclusion, including GG1: A/D equality of access; B/D/F social integration/interaction; C sense of belonging/community ownership; and social infrastructure.

We propose 2 additional 'principal approaches':
- a) regarding inclusion, and requiring engagement with local communities, ensuring self-determination;
- b) regarding investment in social infrastructure (crucial in protecting/creating communities)]

Chapter 3: Design

D1: A

We propose a paragraph 1B:
- *'be informed by local social context and acknowledge the value of existing communities'*

D2:
- modification to clause AA. '… boroughs should undertake *a process of formal* evaluation, in preparing Development Plans and area-based strategies, t*o be referenced in all development proposals*, which covers the following…'

We propose dividing clause A into 2 parts:
- clause A to be an evaluation of socio-economic and well-being factors, heritage/character and social infrastructure (currently points 1, 7 and 11)
- clause AB an evaluation of the data relating to physical and environmental factors (all the remaining points)
- modification to A1: '…well-being indicators, *demographic profile*, population density…'
- insertion of point 1B: *'existing social needs and social infrastructure needs'*

D2:
- modification to clause E: '… development proposals *should be informed by and refer to the above evaluation (clause A)*, and provide…'
- clause G, insert additional point 1B: '*design review comments are informed by the above evaluation (clause A), to ensure that development proposals have taken account of local social and economic factors*'

D3 must be broadened to include social inclusion as well as spatial/physical inclusion
- insertion of 3B: '*are designed to enable social integration, encounters between individuals and groups, ease of connectivity and access to local social infrastructure*'

Chapter 4: Housing

H2:
- modification to B1: 'recognise in their Development Plans and planning decisions that local character evolves over time, t*hat where it exists it should be protected, that it must be generally encouraged, but might* need to change in appropriate locations…'

H5 B and 4.5.5:

We strongly believe that to ensure inclusive communities and protect against displacement, 'exceptional circumstances' must be defined as a percentage of all development approvals. Currently it is used as a device to negotiate away planning obligations, override local opposition and prevent transparency. We would ask the panel to consider where to insert this.

GG3 Creating a healthy city

Chapter 3 Design:

Chapter 3 makes little reference to the importance of collaboration and engagement. To this extent, **it does not sufficiently reflect GG3**.

Among the positive social determinants of health, people's degree of control over their lives is of great importance. Equally, a lack of autonomy is a factor in causing communities to fail.

D2 makes no mention of engagement and collaboration as an essential factor in the preparation or process of planning and development. Thus insufficient attention is given to its social and health benefits, whether at an individual or community level. **This is a major omission**. We feel strongly that a further sub-heading, Engagement and collaboration must be inserted before 'Design Analysis and visualisation'. There is not the space here to propose wording, but we will bring that to the M9 EiP.