# ft'work

## Comments in response to the Draft New London Plan Consultation

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Following a career as a producer and director of social interest documentaries, Clare Richards became an architect believing she could help transform the living conditions she had witnessed. In 2010 she was awarded the RIBA President's Dissertation Medal, for *Happy Communities: And How to Create Them.* In 2016 she founded Footwork, a not-for-profit company, to help create and sustain thriving communities and to ensure that social principles are adopted as a fundamental component of good design and development.

At a local level Footwork collaborates in generating fresh ideas and in identifying and supporting existing projects. This might include advice, financial support or helping them to evaluate what they do, so that the best ideas can be rolled out elsewhere.

Footwork campaigns at a national level to create a more socially aware built environment, by communicating the key elements of a successful community and by stimulate debate.

2nd March 2018

## Introduction

In the draft New London Plan the Mayor has laid out the challenge of "delivering a more socially integrated and sustainable city, where people have more say and growth brings the best out of existing places while providing new opportunities to communities". This commitment demonstrates a new acceptance of the fundamental importance of the social purpose of design. The design of places is a social science and a failure to take this into account undermines the building of sustainable communities.

The Mayor has also set a new benchmark for the scrutiny and delivery of major projects across London. The task of implementing and policing the new policies and guidance, as they apply to the built environment, will be difficult enough, but they are at least clearly defined. On the other hand the extensive social aspirations within the Plan, although impeccably researched and well described, are not defined within the detailed policy. Unless they are given teeth and made enforceable, the Mayor's challenge, to create lively and diverse communities with a strong sense of their own identity, cannot be delivered.

**In response, Footwork has risen to another challenge, to pull together and simplify these important social aspirations, so that they can be more readily understood, applied and scrutinised.**

We have defined a set of 'social design principles', carefully referencing the Plan, with the aim that they be embedded within each stage of the planning process; and given equal status with 'spatial design principles' in the preparation, planning and assessing of development and regeneration proposals. Although these concepts are increasingly acknowledged by politicians and planners, developers and designers, they are not applied collectively or consistently. New development is often driven by short-term interests, or good intentions compromised for reasons of economic expediency.

Each of the 10 *Social Design Principles* below is a tool to aid the design, scrutiny and delivery of London's major building projects. Together they address the question: how can we create communities when we build places? They are informed by the wealth of available research in areas ranging from the impact of health inequalities to harnessing social capital (specific references can be provided if required). In each case we have provided a *description* and suggestions for their *application*. Where a process of *assessment* is also needed we have included it. The relevant policies or points in the New London Plan are referenced in brackets.

Where there already exists a framework into which these principles could be added, we have indicated it, but there is a general need for policy, guidance and enforcement mechanisms to work much harder and for meaningful scrutiny at every stage. We have therefore also suggested when this might take place.

[The word 'social' before any term tends to disguise precise meaning and to create a nebulous sense of 'social' awareness and good intentions. Yet when properly understood and applied these expressions can be very useful. They are employed extensively in the New London Plan, so on page 11 we have provided a set of definitions. The rest of this submission applies them in the way described.]

## Principle 1

*Social needs must be identified and addressed as a prerequisite to development*

Description:

Whether creating a new neighbourhood, or regenerating an existing one, to transform the built environment alone will not provide for social needs. There must be a thorough understanding of social context and existing problems, then specific steps identified to address them. Until these social factors are tackled, built environment professionals cannot create the physical conditions to help a community thrive. It is essential to avoid repeating the mistakes of the past and to learn from what has worked, through developing and implementing mechanisms for the measurement of success.

Assessment:

Methodology is already in place to assess local social needs:

- *Index for Multiple Deprivation* (the generally accepted measure)
- *Joint Strategic Needs Assessment* and *Joint Health and Wellbeing Strategies* (see Marmot Report and the Social Care Act 2012 – aimed at reducing health and social inequalities)
- *Healthwatch* (for local anecdotal data)

Application:

- Each borough to provide a **Social Needs Assessment** within their *Development Plan* and *Local Plan*, referred to within the *Core Strategy* and detailed as a Supplementary Planning Document, which must be kept updated

- This requirement could be inserted at Policy D2 of the Draft New London Plan, by dividing item 'A' into two parts. New 'A' to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new 'B' an evaluation of the data relating to physical and environmental factors (all the remaining points)

- Local authorities, Clinical Commissioning Groups and other service providers to take steps to address existing social needs, identified in the Social Needs Assessment and against agreed benchmarks, as a pre-requisite for designating *Opportunity Areas, Local Areas for Regeneration* and *Strategic Areas of Regeneration*

- *Supplementary Planning Guidance (SPG)* to be prepared (perhaps combined with the SPG on Social Infrastructure currently being reviewed - see below). This must be referenced in all strategic and major development proposals, with the inclusion of a Social Needs Assessment and a strategy for how identified local social needs and well-being are to be taken into account

- *Design Review Panels* to consider strategies to address social needs and well-being as an agreed component of the quality of a design. This must also to form part of the Mayor's planned Guidance on Design Reviews

- *Post-occupancy Surveys* (*RIBA Plan of Work* Stage 7) to become a contractual obligation for all major housing developments, at 1 year and 5 years after full occupancy. This will be an invaluable reference point for Development Plans and should be obligatory

[Policy GG2: 1.3.1, 1.3.2
Policy GG3: A, D
SD9: 2.10.2, 2.10.1, 2.10.3, 2.10.4; 2.10.5
Policy D2: A
Policy H13: 4.14.1
Policy S2: A: 1; 5.2.7, 5.2.8]

## Principle 2

*Social infrastructure, both formal and informal, must be assessed and its value understood so that it can be protected where it exists, or provided for within new development plans and proposals*

Description:

'Informal' social infrastructure evolves and changes over time, the product of a thriving community, as diverse social networks, representing common interests, needs or age groups, are made and interact. 'Formal' social infrastructure is frequently confused with facilities and is too often determined by negotiation between developers and planners. However they are interdependent and must both be facilitated to ensure inclusivity and equality of opportunity.

Assessment:

Informal social infrastructure in existing communities is best identified from within, through local knowledge. Social infrastructure planning must then take account of it:

- A *Social Infrastructure Survey* to be conducted by or with local partners and accessing the range of social groups, including those considered hard to reach
- A *Social Infrastructure Needs Assessment* (as proposed in Policy S1 A) to be undertaken in the light of these informal networks and of identified local need, to ensure that proposals for new infrastructure are carefully aligned with it

Application:

Social infrastructure can only support local diversity and inclusivity if taken into account at the earliest opportunity, not left to be negotiated between developers and planners

- *Neighbourhood Plans* to view the Social Infrastructure Survey as a fundamental component of local consultation and planning; its inclusion should be a requirement

- Each borough to provide a Social Infrastructure Needs Assessment (as proposed at S1 A) within their *Development Plan* and *Local Plan*, clearly informed by local Social Infrastructure Surveys

- As with Social Needs, this requirement could be inserted at Policy D2, by dividing item 'A' into two parts. New 'A' to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new 'B' an evaluation of the data relating to physical and environmental factors (the remaining points)

- Supplementary Planning Guidance (SPG) on Social Infrastructure is being updated. The Social Infrastructure Needs Assessment to be a key component, so that it is referenced in all strategic and major development proposals. In turn these must specifically address local requirements and demonstrate how the infrastructure is to be delivered

[Policy D6: B 3
Policy S1: A, B, G; 5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.8, 5.1.9
Policy HC7: 7.7.1, 7.7.2]

## Principle 3

*'Social heritage' must be assessed alongside 'built heritage' and afforded equal value and protection*

Description:

Social heritage (or 'intangible heritage' as it is enshrined in the UN Convention on Human Rights), describes the local identity and character that make each place unique. Again it is the product of time, generated from within or between groups in response to their environment and giving people a shared sense of continuity. It is inclusive, an intangible network between diverse groups, and it might only be recognised as having value from within. Although not named, social heritage is frequently referred to in the Plan, as a 'sense of belonging', 'sense of place', 'local character', along with the need to 'understand existing character and context'. For these descriptions to have meaning and be identifiable, the term 'social heritage' must be given its name and its value acknowledged in line with 'built heritage'.

Assessment:

If it is to be identified, protected and enhanced, the value of social heritage to all communities, not just conservation areas, must be acknowledged. This involves a general commitment to collaborate with local people, to benefit from their local knowledge and to understand the value of landmarks and institutions which create a powerful sense of identity.

- Discuss and agree a definition of 'social heritage'
- Instigate *Area Character Appraisals*, conducted by local partners to access knowledge held by social networks
- Alternatively, broaden and rename the existing *Conservation Area Character Appraisals and Management Plans* to encompass all areas and to include social heritage
- Social and cultural heritage often overlap, so they should be assessed together wherever appropriate

Application:

- The term 'built heritage' to be replaced by 'social and built heritage' in all policy descriptions, including in the New London Plan; adopt the term 'social heritage assets' alongside 'heritage assets'

- Include social heritage (via an Area Character Appraisal) as a formal component of a Neighbourhood Plan, Local Plan and Development Plan

- Include social heritage in the designation of *Local Areas for Regeneration* and *Strategic Areas for Regeneration*

- Award valued social assets protected status, through local listing; and extend the use of ACVs (Assets of Community Value) as appropriate

- Strengthen local planning protection for smaller industrial, cultural workspaces and pubs

- Include social infrastructure in the Mayor's proposed *Cultural Infrastructure Plan*

- 'Social heritage' to be inserted at Policy D2 A of the Draft New London Plan, at current point 7 (historical evolution and and heritage assets)

- Insert a paragraph after SD4 2.4.7, to describe how the social heritage and assets of the CAZ can preserve a sense of character and identity

- In Policy H10 insert a paragraph D to explain the need to take into account the potential loss of social heritage, identity and character, through demolition as part of estate regeneration

[Policy GG1: 1.2.7
Policy SD6: 3.7.2, 3.7.6
Policy SD6: 2.6.1
Policy SD8: B 4h
Policy SD9: 2.10.4, 2.10.6
Policy D2: A 7
Policy D7: A, B
Policy H2: 4.2.7
Policy HC1: B, E; 7.1.5, 7.1.6
HC5: A, C; 7.5.1, 7.5.4, 7.5.8, 7.7.2, 7.7.5, 7.7.6]

## Principle 4

*For communities to be inclusive, integration must drive major planning decisions*

Description:

Strong evidence suggests that the more integrated a community – culturally, economically and socially – the more likely its success; and the less integrated, the greater the disconnect between its inhabitants and the social and economic activity around it. The need to address integration applies to projects of every type, yet new development is often driven by short-term interests, or good intentions compromised for reasons of economic or political expediency. It is essential for all those involved to understand the social make-up of well-integrated, inclusive communities and to commit to addressing the factors that enhance or damage them.

The Draft New London Plan details specific policies to improve the integration on which social inclusion depends - from the mix and balance of land uses and affordable housing tenures to a greater variety of delivery options and the co-location of services and facilities. The challenges are how to address the mix in anticipation and how to provide effective scrutiny and enforcement.

Assessment:

The methodology to assess social inclusion, and barriers to it, is currently inadequate. ('Inclusion' tends to be limited to 'accessibility', relating to disabled access and older people (see Social Infrastructure SPG)). This must be broadened to encompass both physical/spatial and social aspects of inclusion: mix of tenures, mix and balance of land uses, variety of delivery options, co-location of services, live-work, equality of opportunity and affordability (and others)

- *Census* (for demographic data); see proposed *Demographic Profile* below
- *Joint Strategic Needs Assessment* and *Joint Health and Wellbeing Strategies*
- Instigate a *Demographic Profile*, to provide baseline data on social and spatial integration, with specific local barriers to inclusion also identified
- Accessibility and social inclusion often overlap, so they should be assessed together wherever appropriate

Application:

- Each borough to prepare a Demographic Profile, forming the basis of the *Local Plan* and *Development Plan.* This be inserted at Policy D2 A, as a formal component of the proposed 'evidence gathering and evaluation'

- Demographic Profiles to be considered, against agreed benchmarks, as a pre-requisite for designating *Opportunity Areas*, *Local Areas for Regeneration* and *Strategic Areas of Regeneration*

- Require *Design and Access Statements* for all development proposals to detail measures to create or improve integration, referencing the demographic profile of the area

- Integration to be addressed as a standard part of *RIBA Plan of Work Stage 0*

- Novation to be required on socially complex projects, to ensure the design teams continued scrutiny

- Pre-application and planning processes to ensure that measures to address integration and inclusion (such as tenure mix, proportion of social rent and affordable homes) are non-negotiable

- Limit the use of 'exceptional circumstances', by restricting it to a percentage of applications

- *Design Review Panels* (and the *Mayor's Design Advocates*) to have a specific responsibility to address social inclusion and integration, against agreed criteria; also to be included in the *Mayor's Guidance on Design Review*

- GG1 (Building Strong and Inclusive Communities), is only outlined as generalities, or aspirations. This should be adjusted in light of the above

- D3 (Inclusive Design) must be broadened to include social inclusion as well as spatial/physical inclusion


[Policy GG1: A to F
Policy GG4: C, D
Policy SD1: A: 5, 6, 7; B: 3,4; 2.0.7, 2.1.4
Policy SD5: 2.5.9
Policy SD6: A: 1; C; 2.6.1, 2.6.2
Policy D1: A: 2; 3.1.9
Policy D2: A, E, F, 3.2.10
Policy D3
Policy H2: A, B
Policy H5: A: 4, 5; B; 4.5.5, 4.5.6, 4.5.9
Policy H7: A; 4.7.1, 4.7.9
Policy H14: A; 4.14.1
Policy H15: 4.15.4
Policy H18: A; 4.18.5
Policy S1: 5.1.8
Policy S3: B: 2, 5, 6
Policy S4: 5.4.4]

## Principle 5

*Enshrine self-determination as a key component of a democratic planning and development process*

Description:

Self-determination, the independence of individuals or groups to act or decide for themselves, without pressure from others, is both a basic human right and a human need. There is a clear correlation between the degree of control people feel they have over their lives and their physical and mental well-being. This also underpins the importance of mutual support and the benefits of collaboration. Social capital, the resources inherent in social groups and which prompt collective action, is a feature of a thriving community and a measure of a it's sense of identity, yet it is an undervalued resource. It has also been shown that a failing community is unlikely to recover unless the impetus comes from within and engages a significant proportion of the community in a genuinely collaborative way.

Assessment:

Like social infrastructure, the degree of autonomy and social capital within existing communities is best identified from within, through local knowledge.

- *Joint Strategic Needs Assessment* and *Joint Health and Wellbeing Strategies* to outline the need for (and benefits of) self-determination to individual and collective well-being
- A *Social Infrastructure Survey,* conducted by or with local partners, should include measures to determine the level of social capital and to identify local institutions who could be engaged in facilitating collaborative planning processes
- A *Social Infrastructure Needs Assessment* (as proposed in Policy S1 A) to identify areas of low social engagement and steps to address this

Application:

It is essential for the built environment profession to take a lead in acknowledging the collaborative nature of architectural endeavour and the clear social advantages it provides.

- The importance of autonomy and the value of early and comprehensive engagement to be acknowledged at all levels of government and by relevant professional bodies

- The requirement for 'consultation' to be replaced with 'participation' to ensure the active involvement of local people in determining the planning policies that will affect them, to include peer-led consultation among diverse individuals groups and ballots in the case of estate regeneration

- Training in consultation, participation and collaboration techniques to be compulsory for built environment professionals, to include the sharing of examples of best practice

- In the place of self-referral, active local groups and institutions to be formally approached and engaged in the preparation of *Neighbourhood Plans*

- Offer the option of self-management, with appropriate training and support, in all housing schemes

- Each borough to indicate local levels of social capital, as identified in the Social Infrastructure Survey, within their *Development Plan* and *Local Plan,* along with clear measures to reach unrepresented groups

- *Development Plans* to identify and detail sites and opportunities for community-led initiatives, including community ownership, community-led housing, co-housing and self-build

- Boroughs and other public bodies to adopt a 'local first' approach, to ensure that 'meanwhile' sites, redundant pubs, unused facilities and industrial spaces are offered to local groups (including voluntary groups) for community use and local enterprise

- Boroughs to devise funding and other structures to support locally-grown initiatives, such as *Community Land Trusts* and *Assets of Community Value* (ACT); also to increase local planning protection for such schemes

- Require transparency in all planning processes, particularly in relation to public procurement, viability, and the use of exceptional circumstances

[Policy GG3: 1.4.2
Policy SD9: A; 2.10.1, 2.10.3
Policy D7: K; 3.7.6, 3.7.12
Policy H2: A, B; 4.2.10
Policy H4: 4.4.1, 4.4.2
Policy H10: C; 4.10.3, 4,10.5
Policy H13: 4.14.1
Policy H15: 4.15.3, 4.15.5
Policy S1: 5.1.3, 5.1.9
Policy S4: 5.4.4
Policy HC1: 7.1.5
Policy HC5: C: 1, 2, 3, 4; 7.5.4, 7.5.5, 7.5.6, 7.5.12
HC7: B; 7.7.2, 7.7.5]

## Principle 6

*Prevent the displacement of the inhabitants of stable communities*

Description:

Communities evolve over time. In thriving communities people stay put; this continuity, stability and a sense of security increase the chances of maintaining and creating successful neighbourhoods. Equally a transient population (whether voluntary or involuntary) and loss of cohesion are features of a failing community. Research has detailed this cycle of decline and recovery: the displacement, particularly of families, is a key destructive factor, while the ability to accommodate changes in people's circumstances, is an important stabilising influence.

The Draft New London Plan makes little mention of displacement and we suggest that it should be added wherever *Local Areas for Regeneration* and *Strategic Areas for Regeneration* are discussed.

Assessment:

- *Census* (for demographic data)
- The proposed *Demographic Profile* to provide data on the turnover within communities, which should be kept updated

Application:

– Data on turnover, via the *Demographic Profile*, to be included in the *Local Plan* and *Development Plan.* This be inserted at Policy D2 A, as a formal component of the proposed 'evidence gathering and evaluation'

– Boroughs to commit to the phasing of redevelopment as a prerequisite for designating *Local Areas for Regeneration* and *Strategic Areas of Regeneration*

– 'Double decanting' during redevelopment to be prohibited to avoid displacement

– *Housing Associations* to be required to increase the ratio of social rent to affordable rent units, and to reduce speculative development, as a pre-condition of planning consent

– Boroughs to enforce rules on the off-site provision of affordable housing, currently a major cause of gentrification; also to restrict 'exceptional circumstances', whereby developers are able to negotiate away their obligations, contrary to planning legislation and guidance

– A formal commitment for existing social and affordable tenants to be protected from uplift in rent, as a pre-requisite for estate regeneration; with private owners offered 'easy terms' to buy into the new development

– *Planning Committees* to have a specific responsibility to ensure the provision of replacement housing in redevelopment projects, with reference to the Demographic Profile

– *Design Review Panels* to have a specific responsibility to ensure the provision of replacement housing in redevelopment projects, with reference to the Demographic Profile; also to be included in the *Mayor's Guidance on Design Review*

[Policy SD1: 2.0.7
Policy H5: B; 4.4.5, 4.5.9
Policy H10: C; 4.10.3
Policy H13: B; 4.13.1]

## A note about Education and Training

In the drive to build 300,000 new homes a year (the last time this was achieved was in 1969-70), local and national government, backed by legislation, expect 'built environment occupations' to take a lead in creating 'cohesive communities in which people want to live, work and play'. This is a role that design professionals do not have the tools to deliver. Design can play an important part, but the development and procurement process must become more socially responsive and collaborative.

In order to close the gap between the designer and the user, professional training needs to acknowledge the social role of architecture and adopt a socially aware approach, so that future built environment professionals can understand how places work, how people relate to their physical and social environment and so can be effective in the process of shaping them.

The institutions at the forefront of design, delivery and quality control, must assume greater leadership in ensuring that social design principles have equal status with spatial design principles: RIBA, Design Council CABE, the Mayor's own agencies, the Mayor's Design Advocate Organisations

## Definitions:

The word 'social' before any term tends to disguise a precise meaning and to create a nebulous sense of 'social' awareness and good intentions. Yet when properly understood and applied these expressions can help turn intentions into actions. They are used extensively in the new London Plan, so it is important to define them, along with one or two other useful terms. The rest of this document will then apply them in the way described.

*'Social needs'*

The term became a widely accepted tenet of psychology thanks to a post war American humanist psychologist, Andrew Maslow. He defined a 'hierarchy of needs', a pyramid with 'physiological needs' at the bottom and 'self-actualization' (the need to fulfill potential) at the top. Although academics have argued about the order of importance, the elements he defined are now broadly covered by the term 'social needs': food, water, shelter, security (physical and economic); health and well-being; sense of belonging, need to form and maintain social connections (from family and friends to work associates and cultural groups); self-esteem, recognition and self-respect; self-fulfillment and self-motivation.

*'Social fabric'*

This is generally accepted to describe the demographics of an area, consisting of its wealth, ethnic composition, level of education, rate of employment and local values. It also suggests an implicit social covenant between individuals and society, including: acceptance and a sense of belonging to larger whole, fair treatment, mutual trust, recognition of the contributions individuals make to a community and the obligations members owe to each other.

*'Social capital'*

Harvard University defines social capital as 'those resources inherent in social relations which facilitate collective action... [These] include trust, norms and networks of association representing any group which gathers consistently for a common purpose. A norm of a culture high in social capital is reciprocity… and belief in the equality of citizens'. According to leading social scientist, Robert Putnam, social capital is a key component to building and maintaining democracy and is defined by "connections among individuals – social networks and the norms of reciprocity and trustworthiness that arise from them." It is widely accepted that, through collective action and collaboration, social capital can be harnessed for the benefit of a community by its own members and outside agencies.

*'Social heritage'*

Social heritage (or 'intangible heritage' as it enshrined in the UN Convention on Human Rights) is a product of time, generated from within or between groups of people and often passed from one generation to another. Practices evolve in response to their environments and they contribute to giving people a sense of identity and continuity, providing a link with the past, through the present, and into the future. Social heritage is inclusive, representing not just inherited traditions but also contemporary practices in which diverse cultural groups take part. It is community-based, depending on local knowledge being passed on to the rest of the community, and might only be recognised as having value by the groups or individuals that create and maintain it.

*'Self-determination'*

The right or power to act or decide for oneself, without consulting or being pressured by others. Like 'autonomy', the term describes the independence or freedom of an  individual or group to determine their own actions. It is considered both a basic human right and a human need and has a direct impact on well-being. There is a clear correlation between the degree of control people feel they have over their lives and their physical and mental health.

*'Collaboration'*

A dictionary will describe collaboration as the situation of two or more people working together to create or achieve the same thing. In the field of development the word 'collaboration' is often used incorrectly, and in a tokenistic way, to mean 'participation', or even 'consultation'. The key difference, though, is that 'collaboration' refers to a meeting of equals for the purpose of reaching a shared goal.

*'Community'*

Community is both a feeling and a set of relationships among people, maintained to meet common needs. Members of a community have a sense of mutual trust and belonging, an awareness that they can influence their environments and each other. This evolves over time, from shared experiences and a sense of shared history and is fundamental to human experience. Every community is organized to meet its members' needs, but they operate differently based on the cultures, religions, and other experiences of their members.

Communities often sit within other communities. In a neighbourhood community there may be ethnic or racial communities, communities based on age group, on common needs or on economic interests. Communities also form institutions (companies, schools, charities, places of worship etc.), to more effectively fulfil their needs. Equally important are informal institutions, such as social networks. Lower-income and immigrant communities, in particular, rely heavily on these.

Most people participate in multiple communities. For instance the residential neighbourhood remains essential for single mothers and the elderly, as the basis for the support they need; while for others, online communities play a much greater role.

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