

# Smart Urban comments

## The Selby Trust (sona@selbytrust.co.uk)

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [N/A](#)

While the introduction to the policy note the role of the community sector the actual policy itself is fairly weak on this point and does not acknowledge the threat that community sector organisations and facilities have come under.

The Selby Trust runs the Selby Centre which delivers community facilities across a range of areas from healthy living project, youth work, refugee support, foodbank, employment advice, support and skills training, social care, offender support, mental health amongst BME communities to community events and sports coaching.

The Selby Trust is neutral on this policy as it does little to protect a key and threatened part of the London Economy - community spaces.

The Selby Trust would like to see policy worded that 'specifically protects and enhances existing community facilities as well as developing new facilities'. We would like the policy 'to recognise the irreplaceability and uniqueness of many community spaces and to look after them for future generations. The policy should recognise the role of community spaces to the achievement of neighbourhoods, social co-operation and mutual aid.'

It would help if the policy recognises the 'social value that is increasing being delivered by the voluntary and community sector especially for London's hard to reach communities and the need for spatial policy to support existing and develop new community infrastructure where needed'.

Also the policy should recognise that 'community spaces are not just physical buildings but also social spaces where cultural expression takes place, providing movement and interaction between different cultures'.

A stronger, London specific policy would also be more in line with NPPF Policy 70. To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments
- guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs
- ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community
- ensure an integrated approach to considering the location of housing, economic uses and community facilities and services

Page: [Policy D3 Inclusive design](#)

Section: [N/A](#)

The Selby Trust is neutral about this policy. There is one key area where we would like the policy to be much clearer and to speak more articulately to inclusive design.

That is that where there are incumbent users on a development site that the policy requires that they be included in the design and development process. This could relate to a community facility, such as the Selby Trust or to residents of a housing estate which may be going through intensification or redevelopment. There are numerous circumstances where the act of engagement in the process would lead to more inclusive design.

Examples of how this inclusive design would then materialise through such engagement would vary from the macro eg these are our space requirements; these are our financial issues; how can development be mitigated so we are not harmed during the process; this is the type of housing we need to the more detailed eg our new community centre needs confidential one-to-one spaces, disability accessible spaces, community kitchen facilities, appropriate toilet and mother-&-baby changing facilities, noise protection and improving airflow.

Page: [Policy H5 Delivering affordable housing](#)

Section: N/A

The Selby Trust is neutral on this policy. We have specific concerns about the requirement for all development on public owned land to deliver 50% affordable homes. Much public land already has users within or on it. This is the case with the Selby Centre which is an independent community centre located on land owned by the local authority. However, despite our specific example this issue has wider instances than just our case eg small shops in low density units, estates etc.

The Selby Trust is very supportive of affordable housing and many of our clients need access to social housing or low cost housing. However, the organisation is occupying buildings on land allocated for mixed use development. The redevelopment of the site cannot afford to cross subsidise a new community facility capable of delivering the full extent of our current services AND 50% affordable housing. As the incumbent we would prefer the policy position of public owned land to recognise that there will be many public owned brownfield sites with infrastructure requirements, existing users needing to be relocated on site (or in other instances elsewhere) and that therefore 50% affordable housing may not be the first priority nor a viable outcome. In our instance no housing redevelopment can take place until new community provision is reprovided and paid for by the enabling development. After this point we consider that 50% affordable housing of any surplus development may be acceptable (in both our and other similar circumstances).

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [N/A](#)

The Selby Trust is neutral towards this policy due to the wording which we consider could be stronger. The policy focuses very heavily on new social infrastructure but this does not consider the fact that there may be existing social infrastructure that requires ongoing support.

The policy asks the Boroughs to review their social infrastructure but this does not entirely allow for the fact that if that infrastructure is on their own land they may under value its contribution in the drive towards austerity. It has been the case that councils putting up rent on community centres has driven them into decline, enabling the release of land back to councils for sale or other value generating purposes.

Where Boroughs do acknowledge the social value of sites the Selby Trust would welcome a stronger policy on supporting the retention and enhancement of those facilities wherever possible. This includes strong support for all facilities registered as assets of community value and also to support longer term protection of such places eg through asset transfer or protection in s106 agreements.

We would welcome a stronger policy supporting existing social infrastructure and deeming its loss acceptable only under the higher test of exceptional circumstances or where the services have not been operating for 2 years (in a similar vein to policies to stop loss of offices) as well as drafted in section G only after other forms social infrastructure have been considered.

Please also reference our comments in regard to policy GG1 Good Growth, especially the need for stronger wording as found in NPPF policy 70 albeit in a London context, which are also relevant here.

Page: [Policy HC5 Supporting London's culture and creative industries](#)

Section: N/A

The Selby Trust support this policy but would welcome the addition of a recognition that the voluntary and community sector and community spaces have an enormous role to play in the cultural and creative sector. Furthermore that these community run spaces have different challenges to the private sector and are sometime not recognised as part of cultural hubs but also need separate protection as community spaces. Boroughs should be asked to be open about their definition of cultural hubs and to include voluntary and community organisations and also to look to culture provided by different ethnicities and sectors (not just mainstream services).