London –
Planning for a Just City?

Exploring how local planning authorities are
embedding equality and inclusion in planning policy
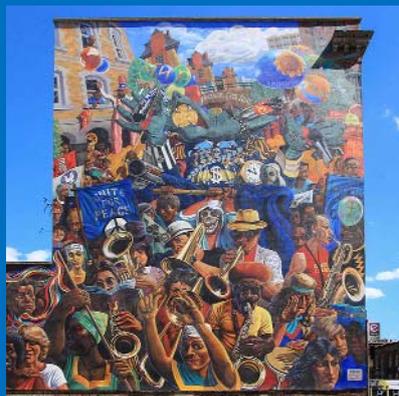
London Planning for a Just Society? Exploring How Local Planning Authorities Are Embedding Equality and Inclusion in Planning Policy

Town and Country Planning Association
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Foreword

What does urban planning have to do with tackling poverty and promoting equality? If you asked the average Londoner that question one suspects you would get a blank look. Other things would probably be higher priorities. Perhaps if someone had a little knowledge they might mention the lack of social housing, or problems with housing for disabled or older people. A few may have had planning issues intrude on their lives and got involved with a local campaign. But for most people urban planning is signs on lamp-posts, impenetrable jargon, and something other people do.

This report shows that urban planning at its best can contribute to making London a place where communities come together with local authorities and developers to shape the future of their area. The prize is a system that effortlessly promotes equality between different groups, contributing to a more just society where communities' local knowledge is valued.

Trust for London works with groups of low-income Londoners affected by the sharp end of London's housing crisis. We are routinely made aware of ways in which people feel discriminated against, ignored and disempowered. Dysfunction and lack of resources in the planning system is one of several important causes.

We therefore warmly welcome these insightful recommendations, and call on central, London and local government to take heed, and work to implement them. We ourselves will be seeking ways that we can contribute – financially and practically through our convening and policy work – to enabling communities to engage. Let's also, as a sector, come together in calling loudly and clearly for the system to meet us half-way.

Susie Dye
Grants Manager
Trust for London

Executive summary

How we collectively organise communities can have a profound impact on people's health, wellbeing and life chances. The planning system can deliver outcomes which create a safe public realm for the LGBTQ+ community; it can create walkable neighbourhoods and play spaces to enhance the health and wellbeing being of children; it can ensure that homes and the public realm are designed to be accessible; it can protect social and cultural spaces; and it can help tackle economic inequality by providing affordable homes and ensuring the provision and protection of employment opportunities. The system has the potential to shape outcomes for people in ways that promote social justice. It also has a major role to play in making decisions in an open and participative way, creating space for all sections of society to participate in decision-making within a democratic framework. Planning decisions matter to people, and how they are made can help build trust in local democracy.

The problem we face now is that far too often the contemporary planning system fails to achieve these vitally important outcomes. Austerity and deregulation have made the job of local planning much harder. Entrenched planning practice and a system too often dominated by the needs of the real estate sector are long-running problems that have got in the way of achieving positive outcomes for communities. Above all, there is a widespread lack of trust between communities, planners, and the development sector.

It is within this context that the TCPA, supported by the Trust for London, has created a detailed evidence base on how the planning system in the capital is facing up to the challenge of promoting equality. This ground-breaking report has looked in detail at all of the London Boroughs' Local Plan policies and analysed how they are addressing the equalities agenda. It has examined the varying application of the Equality Act and of the role of Equality Impact Assessments in developing plans. It has also produced case studies of good and not-so-good practice, highlighting the challenges faced by communities trying to participate in planning decisions.

This report makes clear that there is a major gap between the potential of the system to deliver participative and inclusive decisions and implementation on the ground. While there are examples of good practice, much more could be achieved. The 20 recommendations set out here provide a framework for improving practice, and they also make the case for a fundamental shift in the purpose of London's planning system, to focus on the health and wellbeing of all sections of the community.

Recommendations

Theme 1: **The aims and ambitions of planning**

Recommendation 1: Local planning authorities must ensure that Local Plans are ambitious and aspirational in promoting equality and reducing socio-economic exclusion. Local planning authorities must also ensure that corporate strategies and other strategies that relate to inclusion and equality fully recognise the key role that planning plays in achieving these ambitions.

Recommendation 2: Built environment institutions should urgently consider introducing a 'Do no harm' obligation in built environment professional codes of conduct and should strengthen their ambition to actively challenge patterns of inequality and exclusion.

Recommendation 3: Built environment institutions (and/or other relevant organisations) should introduce into existing award programmes new categories that recognise excellence in planning for equality and inclusion.

Theme 2: Meaningful public participation in planning processes

Recommendation 4: Local planning authorities should strengthen their Statements of Community Involvement by including targeted methods to include under-represented groups, improve the inclusivity of public participation processes, ensure that wider public engagement directly feeds into Local Plan development, and ensure that proactive engagement takes place at all stages of the planning system.

Recommendation 5: Local planning authorities should improve the usability and transparency of their websites and planning portals and the accessibility and readability of planning documents, in particular the Local Plan, and they should ensure that hard copies of planning documents are made available to all.

Recommendation 6: The Greater London Authority and local planning authorities should create new mechanisms to make funding available for community-level planning initiatives, professional and mutual/reciprocal support, and advice services for local people, and they should enable community groups to have access to planning officer support at a pre-application stage.

Recommendation 7: Local planning authorities should ensure that their Statements of Community Involvement and Local Plans fully recognise and support neighbourhood planning.

Theme 3: Meaningful consideration of how planning policies impact different groups of people differently

Recommendation 8: Local planning authorities should ensure that Equality Impact Assessments conducted in developing a Local Plan are not merely tick-box exercises, and that the Equality Impact Assessment process starts early and is embedded within the iterative process of policy development and implementation.

Recommendation 9: Local planning authorities should ensure that Equality Impact Assessments evaluate the impact of policies on socio-economic status in addition to the protected characteristics outlined in the Equality Act.

Recommendation 10: Government should publish Planning Practice Guidance on Equality Impact Assessments in relation to Local Plan development.

Recommendation 11: Local planning authorities should ensure that there is adequate monitoring and evaluation of the impacts of planning policies – and that this information is publicly available. They should also proactively learn from cases where an absence of a strong or specific policy may have contributed to negative outcomes for people.

Theme 4: Embedding inclusion and equality within thematic policy areas

Recommendation 12: Local planning authorities should develop ambitious, positive, precise and clearly worded policies which specify detail on reducing inequalities and exclusion and which express the needs and aspirations of local communities. Assessment of the effectiveness of

such policy should be a key aspect of local planning authorities' annual monitoring reports.

Recommendation 13: Local planning authorities should build into Local Plan policy opportunities for communities to define the social value of spaces and buildings.

Recommendation 14: Local planning authorities should develop Local Plan policy that supports community-led initiatives – for example through policies to support community housing and community stewardship, management and ownership of assets.

Theme 5: Local authority resources, skills and diversity

Recommendation 15: The local planning service must be adequately funded to provide an effective system that can shape outcomes in the public interest and meet the aspirations of local communities.

Recommendation 16: Local planning authorities should upskill planning officers to ensure that they have the skills, knowledge and confidence to undertake Equality Impact Assessments and to engage in community engagement processes effectively. These skills must also be a mandatory part of the professional qualification of planners and other built environment professionals.

Recommendation 17: Local planning authorities should take action to proactively support greater diversity of staff within planning teams and related sectors.

Theme 6: Addressing the undermining of Local Plan policy

Recommendation 18: Government should remove centrally imposed barriers to Local Plan policy goals being achieved by further reforming the viability process and by rescinding the central imposition of permitted development rights.

Recommendation 19: Government should reinforce the legal status of the Local Plan to support a genuinely plan-led system, providing certainty for local communities and the development sector on how and when development will take place. Policy in Local Plans should be expressed accessibly and precisely, in language that communicates the key outcomes for communities.

Recommendation 20: Government should institute a limited community right of appeal.

Section 1

Introduction

1.1 Planning for equality and socio-economic inclusion

London is a highly polarised city 'with deep and persistent inequalities across a range of economic and social issues',[1] including high rates of child poverty and inequalities in health and wellbeing, housing quality, and educational attainment.

The planning system has the transformative power to reduce inequalities in wealth and quality of life between groups and to create the conditions for an environment in which all communities can thrive and realise shared and individual aspirations. But planning processes, either through action or inaction, can also do real harm, by reinforcing entrenched inequalities and forms of exclusion.

Planning decisions impact different people in different ways. London has a diverse population in which particular people and communities face discrimination or social exclusion on the basis of personal characteristics. It is important to note how these characteristics 'overlap and interact with one another'[2] and therefore produce intersectional identities that can in turn lead to distinct patterns of discrimination and disadvantage.

The Equality Act 2010 identifies personal characteristics that might lead people to experience discrimination and inequality. These 'protected characteristics' include sex, age, disability, ethnicity and race, religion, sexual orientation, and gender expression and identity.[3] Socio-economic characteristics determined by social class and income level, notably absent from the protected characteristics, are also vital considerations as they increase the likelihood of experiencing poverty, deprivation, ill-health, and other related outcomes.

A number of other smaller groups within London's population are particularly at risk of disadvantage and social exclusion: the needs of looked-after children, homeless households and rough sleepers, the Gypsy and Irish Traveller communities, refugees and asylum seekers, UK armed forces veterans, people with experience of the criminal justice system, and children and adults with learning disabilities are often poorly captured in many sources of equalities data.[4]

The TCPA's *Planning out Poverty* report highlighted that 'planning has multiple and complex effects on people's lives because its decisions often involve the allocation of resources. Crudely, there are winners and losers from planning decisions, and planning therefore has the power to help promote greater or lesser levels of equity and social justice.'[5] There is thus a need to establish a distribution of positive and negative consequences from planning policy and decisions that is considered morally and ethically just across an already heterogeneous population.

Notes

1 *Equality, Diversity and Inclusion Evidence Base for London*. Greater London Authority, Jun. 2019 update. https://data.london.gov.uk/dataset/equality—diversity-and-inclusion-evidence-base

2 *Ibid.*

3 Termed as 'gender reassignment' in the Equality Act, which does not explicitly recognise non-normative and fluid expressions of gender

4 *Equality, Diversity and Inclusion Evidence Base for London*. Greater London Authority, Jun. 2019 update. https://data.london.gov.uk/dataset/equality—diversity-and-inclusion-evidence-base

5 *Planning out Poverty: The Reinvention of Social Town Planning*. TCPA, Oct. 2013. https://www.tcpa.org.uk/planning-out-poverty

The process of how planning decisions are made, the need for meaningful public participation in shaping and making decisions, and the impact of what is delivered (and specifically the impacts on different groups in society) are all of key importance in terms of social justice.

Communities can be people that have formed a group around a shared interest, characteristic, incentive, motivation or identity aspect, or a unique spatial distribution or geography. How people define what a 'socially inclusive' community means also varies. In responding to our online survey question 'How would you define socially inclusive communities?', planning officers gave a range of responses, including 'One where the benefits of economic growth are shared amongst everyone in the community'; 'One where people with a wide range of backgrounds, social and economic characteristics can live fulfilling lives'; and 'One where everyone has a say if they want to'. In response to a separate question, planning officers all agreed that planning *can* contribute to creating more socially inclusive communities.

Fundamentally, there are multiple groups in society who are both under-represented in engagement with planning processes and often at most risk of being disproportionately negatively affected by planning outcomes. When done well, planning has the potential to play a key role in achieving greater social and economic inclusion, promoting equality, and reducing poverty.

1.2   Research objectives and scope

The relationship between planning, inclusion and equality is crucial. As discussed above, it is important to consider this relationship both in terms of planning's potential to promote equality and inclusion and in terms of understanding and mitigating the risk that planning processes can further entrench and reinforce existing inequalities and forms of exclusion. This report tries to get under the skin of this agenda, to explore and illuminate what is being done from multiple stakeholder perspectives – including local authority officers,

councillors, voluntary sector organisations, and grassroots community groups and activists. Informed by that analysis, it offers recommendations to embed equality and inclusion in Local Plan-making processes and to strengthen the ability of Local Plans to lead to positive outcomes for people.

The research focuses on the local planning authority level and the effectiveness of London's Local Plans in planning for inclusive communities. In doing so it contextualises Local Plans within the wider planning policy framework and broader planning processes. In analysing planning policy documents the research purposefully does not go into in-depth analysis of the draft new London Plan.

The research explored the following questions:
- What can an analysis of Local Plans reveal about how inclusion and equality are considered within plan-making and policy-making processes in London?
- How are citizens able to engage in and influence planning processes?
- What can the experiences of community groups reveal about challenges of inclusion and equality in planning policy?

1.3   London's planning policy framework

1.3.1   The National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the key national planning priorities for England. It is non-statutory guidance and is a material consideration in plan-making and development management. The NPPF, revised in February 2019, is structured around sustainable development – with economic, social and environmental sustainability objectives.

Within the NPPF there are repeated references to the 'social' aspects of sustainable development, but these are not articulated in terms of distributional outcomes. While the NPPF makes some references to creating inclusive places and shared spaces for social interaction, the words 'poverty', 'equality' and 'social justice' do not appear in the NPPF.

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1.3.2 The London Plan

The London Plan is the statutory Spatial Development Strategy for Greater London, prepared by the Mayor of London in accordance with the Greater London Authority Act 1999 (as amended) and associated regulations. Local Plans in London must be in 'general conformity' with the London Plan.

The current London Plan dates from 2016. A draft new London Plan was published by the Mayor for consultation in December 2017.[6] The Examination in Public for the draft new London Plan took place between December 2018 and March 2019, and at the time of going to press the Panel's report had just been published.

1.3.3 Local Plans

In London there are 35 local planning authorities, including the 32 London Boroughs, the City of London, and the two Mayoral Development Corporations (the London Legacy Development Corporation, and the Old Oak and Park Royal Development Corporation).

Each local planning authority is responsible for developing a Local Plan to set out a vision for their area through a set of planning policies to guide and manage development and investment. While Local Plans must be in 'general conformity' with the London Plan, Local Plan policy is more detailed and specific to the local area, and local authorities have the opportunity within Local Plans to go above and beyond regionally and nationally prescribed policy requirements. Local Plans are accompanied by a set of Supplementary Planning Documents that support policy in Local Plans either through providing more detail on a specific theme (for example on the public realm or affordable housing), or through providing more detail on the vision for a specific area within the borough through an Area Action Plan or area regeneration strategy.

The research reported here has a strong focus on the role of the Local Plan, and of local planning authorities more broadly, in promoting equality and inclusion and reducing poverty and inequality. Local Plans are a key tool through which local planning authorities can outline planning aims and ambitions, which then set the tone for and are translated into practical policy measures.

1.3.4 Neighbourhood Plans

The Localism Act 2011 introduced Neighbourhood Plans, which were intended to be a powerful mechanism by which communities could shape localised development. Parish councils and neighbourhood forums have the power to apply to the local planning authority to adopt a Neighbourhood Plan. If the Neighbourhood Plan passes a referendum, the local planning authority must then adopt the plan as part of its local development plan unless there are good legal reasons not to.

Note

6   *The Draft London Plan – Consolidated Suggested Changes Version.* Greater London Authority, Jul. 2019.
     https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-london-plan-consolidated-suggested-changes-version-july-2019

Summary of project activities

Throughout the course of the research the project team engaged widely with a range of stakeholders. Key findings are discussed within the analysis section (Section 3) under key themes.

2.1   Local Plan analysis

As a core part of the research we carried out an analysis of London's 35 Local Plans (for 32 London Boroughs, the City of London, and the two Mayoral Development Corporations – the London Legacy Development Corporation, and the Old Oak and Park Royal Development Corporation).[7]

The analysis used a series of 36 indicators to assess if and how Local Plan-making is embedding processes and policies to reduce poverty and inequality and promote social justice. The analysis focused on three main areas:
- the aims and ambitions of Local Plans to reduce inequalities and promote social justice;
- the process of Local Plan development and community involvement; and
- thematic policy areas within Local Plans that affect the social position of communities, including housing quality and affordability, amenity and public space, green space, local employment and commerce, health, transportation and mobility, and community spaces and heritage.

It is important to note that the indicators used in the Local Plan analysis are not intended to form a comprehensive list of all elements that contribute to inclusive planning, but rather form a selection of factors to give an indication of if and how local planning authorities consider plan-making and planning policy in relation to inequalities and social exclusion. Appendix 3 contains the full summary table of the Local Plan analysis, which shows how Local Plans performed against this set of indicators.

2.2   Case study development

As part of the research we worked with a number of community groups and voluntary sector organisations to develop a series of case studies. These case studies draw on these bodies' experiences and perspectives of seeking to influence planning processes in order to protect and support their livelihoods and communities and realise positive and inclusive outcomes.

The case studies draw out a number of key points around how inclusion and equality are considered, adequately or otherwise, within planning policy and plan-making, and how Local Plan policies and processes can impact social exclusion and inequalities. The seven case studies focus on the perspectives and experiences of the following groups:
- Friends of The Joiners Arms – Tower Hamlets;
- Grand Union Alliance – Old Oak and Park Royal;
- Hackney Quest – Hackney;
- Latin Elephant – Southwark;
- Thames Ward Community Project – Barking and Dagenham;
- Tonic Living – pan-London; and
- Vital Old Kent Road and Southwark Law Centre – Southwark.

Note
7   Further information on the Local Plan analysis methodology can be found in Appendix 2

The selection of case studies aimed to highlight a variety of circumstances and approaches, in terms of:

- scales of intervention – from community groups working to protect a specific building use of significant importance, to groups engaging with large-scale redevelopment in Opportunity Areas;
- different approaches to influencing planning processes – including through campaigning, submitting formal responses to planning applications, engaging in Local Plan consultation, and conducting community-led research;
- cases involving groups with a range of protected characteristics – including young people, people who identify as LGBTQ+, low-income communities, communities formed around common ethnicity and language, and older people;
- place-specific and non-geographically defined communities; and
- cases from a range of different parts of Inner and Outer London.

The case studies provide powerful accounts of efforts being made to positively impact change. They can be read in full in Appendix 1.

2.3 Workshop with community activists, community groups and voluntary sector organisations

In May 2019 we held a workshop with a group of 18 community activists and representatives of community groups and voluntary sector organisations such as borough Community Voluntary Services.

Ahead of the workshop we carried out mapping of existing community-focused planning guidance, identifying nearly 200 documents, which informed the discussion on experiences of engagement with planning processes, and helped to identify the gaps that exist in current guidance, resources and support.

Points emerging from this workshop are discussed further in Section 3.2.4.

2.4 Summit event

In May 2019 we held a summit event with over 50 participants, including community activists, representatives of neighbourhood planning groups, community groups, and voluntary sector organisations, local authority officers and councillors and Greater London Authority officers, to share and discuss interim findings of the project.

Through a series of presentations and discussions, the aim of the summit was to bring a range of stakeholders together to collectively explore the scope of inclusive planning, and to discuss how London's planning policy framework could be made more effective in planning for inclusion and equality. We also asked for specific feedback on the emerging research during the summit, which we incorporated into the project findings.

2.5 Local authority survey, roundtable and training development

A survey was circulated to local authority planning departments in January 2019, which aimed to better understand the perspectives of planners on the links between planning and social inclusion. This was followed by a local authority roundtable hosted by Southwark Council, in which initial findings of the Local Plan analysis were discussed.

In October 2019 we undertook a series of training events with local authority planning and equality officers on 'embedding equality and inclusion into planning policy'. In developing the scope of the training we spoke with a number of local authority officers about their experiences of undertaking Equality Impact Assessments.

Key themes – findings and analysis

This Section draws together findings and analysis under six key themes that emerged through the research process. There is a focus on the role and effectiveness of Local Plan-making and Local Plan policy, but this is contextualised within broader planning processes – for example, public participation in Local Plan development is explored within the wider context of how people experience and try to engage with and influence planning processes.

3.1   Theme 1: The aims and ambitions of planning

The key objectives and top-level vision for the area outlined within a Local Plan set the goal and the tone for what the plan as a whole is trying to achieve. The Local Plan analysis considered whether Local Plans include aims on poverty reduction, addressing social and economic inequalities, social inclusion and/or social justice. The analysis shows (see Fig. 1) that only 23% of plans include clear and strong wording on this, with a further 46% of plans making some

■ No reference to these terms (31%)
■ Yes, some reference made (46%)
■ Yes, clear strong wording as key objectives (23%)
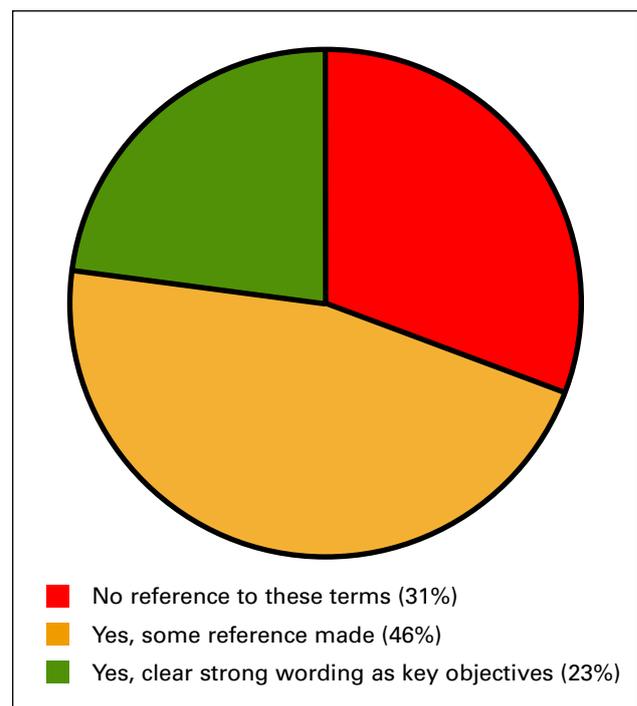
Fig. 1 Indicator: Does the Local Plan make reference to social justice, social inclusion, poverty reduction, and/or addressing social and economic inequalities as key plan objectives?

Box 1
Policy example 1: London Borough of Hillingdon – extract from 'The Vision for Hillingdon 2026' within Hillingdon's Local Plan

The social and economic inequality gaps in Hillingdon are being closed: The social and economic contrast between different parts of the borough have been improved. Hillingdon residents are benefiting from safer and more inclusive communities with issues such as health inequalities being addressed and regular community engagement being provided on local planning matters. Successful strategies have identified and addressed the particular reasons for inequalities in areas of identified need.

Source: A Vision for 2026. Local Plan: Part 1 – Strategic Policies. London Borough of Hillingdon, Nov. 2012, p.21.
https://archive.hillingdon.gov.uk/article/24461/Local-Plan-Part-1—-Strategic-policies

> **Box 2**
> **Policy example 2:** London Borough of Islington – extract from the introduction to the 'Inclusive economy' section within Islington's emerging Local Plan
>
> 4.1 *The Council is currently developing its overarching strategy for delivering an inclusive economy. An inclusive economy works better for local people and benefits the community as a whole. It is an economy where:*
> - *inequality is declining rather than increasing;*
> - *people are able to participate fully in community and economic activity, with a greater say over their future;*
> - *secure and well-paid work opportunities – with increasing incomes – are available for a wide range of people, especially for poor and excluded communities;*
> - *individuals, households, communities and businesses are secure enough to invest in their future and sustain a level of wealth and wellbeing to enable a stress-free cost of living;*
> - *there is greater diversity of businesses, with a range of smaller businesses; worker co-operatives and social enterprises, rather than being dominated by a small number of larger firms;*
> - *more money generated in the local economy stays in the local economy; and*
> - *growth is balanced against consideration and mitigation of environmental impacts.*
>
> 4.2 *This inclusive economy model can deliver wider social, economic and environmental benefits in a more holistic manner than more conventional economic models, which heavily prioritise growth above other considerations with limited (if any) subsequent direct or indirect benefits for local economies (e.g. trickle-down).*
>
> 4.3 *The Council's Inclusive Economy Strategy will expand on the concept of an inclusive economy, and provide clarity on what an inclusive economy in Islington looks like. The strategy will include a number of objectives to deliver an inclusive economy in the borough.*
>
> 4.4 ***Planning is an integral part of this delivery, particularly maximising opportunities for the growth of micro and small businesses, e.g. by providing affordable workspaces; and ensuring that the borough's Town Centres, high streets, and street markets continue to be successful places for local businesses to trade and thrive. …*** [Emphasis added]
>
> *Source: Islington Local Plan: Strategic and Development Management Policies.* London Borough of Islington, Sept. 2019, p.112. https://www.islington.gov.uk/-/media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicconsultation/20192020/20190904localplanstrategicanddmpoliciesdpdproposedsubmissionregulation19.pdf?la= en&hash=FF3732C05A253BDA47D04FB825CCD3730779D15A

reference to these terms but not strongly. 31% of plans did not include these goals for planning (outcomes) in their key objectives. The analysis also showed that only 20% of plans clearly identify a number of inequalities that the plan will address, with a further 37% of plans identifying one or two forms of inequality but doing so less clearly.

The majority of Local Plans could therefore be much more ambitious in identifying the reduction of inequalities as a key purpose of planning. The example from Hillingdon given in Box 1 shows how this can be done in setting a vision for an area. The example from Islington's emerging Local Plan given in Box 2 demonstrates how Local Plans can create

Section 3

Box 3
Policy example 3: London Borough of Croydon – extract from the 'How Croydon involves stakeholders' table within the London Borough of Croydon's Statement of Community Involvement

Engaging less visible members of the community

Examples of those who commonly experience barriers to participation include: people with mental health conditions, people with learning difficulties and disabilities, Gypsies and Travellers, people undergoing/considering or who have undergone gender reassignment, older and young people, pregnant and breastfeeding women, asylum seekers, refugees, people with caring responsibilities, people on low incomes or benefits, Black and Minority Ethnic (BAME) groups and people who are lesbian, gay or bisexual and transgender (LGBT).

Some people may not want to participate because sharing their experiences could compromise their privacy. Some people face barriers due to their location e.g. areas of high deprivation. Croydon encourages a broad range of people to participate. Representative groups are regularly engaged in order to advise the Council about how to consult certain groups. The Council will often use groups, such as Croydon Voluntary Action, to help publicise and assist public consultations. Opportunities for people to participate in supportive and safe environments, where they feel their privacy will be protected, or via technology such as the internet, also offer useful solutions. The Council will continue to engage with representative groups (such as the Community Networks and Croydon Youth Parliament) in order to ensure compliance with the Equality Act 2010.

Source: Statement of Community Involvement. London Borough of Croydon, Nov. 2018, p.9.
https://www.croydon.gov.uk/planningandregeneration/framework/localplan/sci

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hooks for related strategies seeking to reduce inequalities, and how specific policies – with reference to the overarching aims and ambitions – can contribute to the inclusion of disadvantaged groups.

Boroughs can have separate corporate strategies that focus on inclusion and integration – for example Barking and Dagenham's *No-one Left Behind*,[8] and Hackney's *Hackney – A Place for Everyone: Building a Fairer, Safer and More Sustainable Hackney*[9] – but it remains important that clear links are made with the Local Plan to ensure that both the plan as a

whole and individual policies contribute to these wider ambitions.

3.2 Theme 2: Meaningful public participation in planning processes

3.2.1 Local Plan consultation
All local planning authorities are required to publish a Consultation Statement outlining the consultation process that was undertaken in the development of their Local Plan. We were able to find published Consultation Statements on only 60% of local

Notes

8   *No-one Left Behind. Corporate Plan 2018/2022*. London Borough of Barking and Dagenham, Mar. 2018.
    https://www.lbbd.gov.uk/sites/default/files/attachments/No-One-Left-Behind-Corporate-Plan-2018.pdf
9   *Hackney – A Place for Everyone: Building a Fairer, Safer and More Sustainable Hackney. Corporate Plan 2018-2022.* London Borough of Hackney, undated. https://hackney.gov.uk/corporate-plan

■ No (89%)

■ Yes, but weak phrasing (9%)

■ Yes (3%)
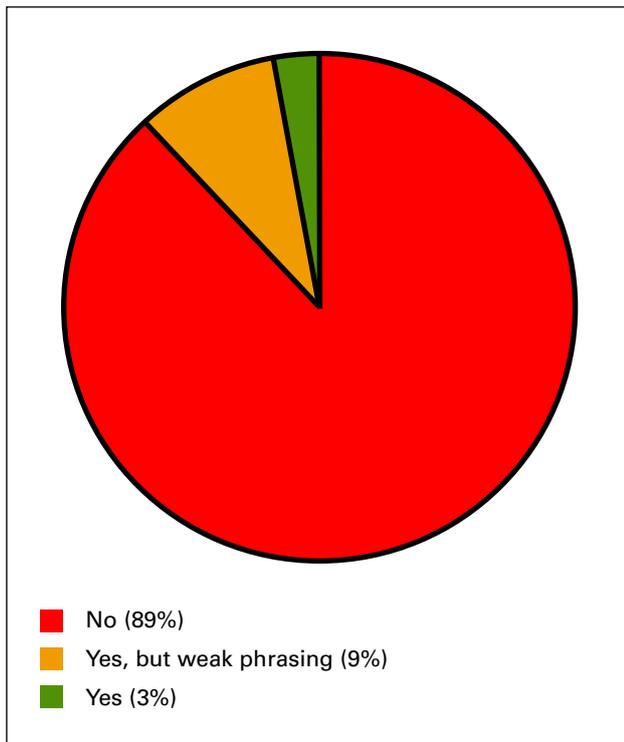
Fig. 2 Indicator: Does the Statement of Community Involvement include a commitment to collaboration/ co-creation/co-production with residents in relation to planning?

planning authority websites. For two local planning authorities (6%) these were missing as their consultation is still ongoing, leaving 34% unaccounted for. Only 29% of authorities' Consultation Statements covered all stages of the consultation process.

For the Consultation Statements that we were able to view, the number of people submitting individual consultation responses on draft Local Plans was extremely low across all boroughs. The highest number of individual responses recorded by a borough equated to approximately 1% of the borough population, with the lowest approximating to 0.01%. It should be noted that these numbers provide a borough-wide figure, and do not show the geographic or demographic spread of responses or the percentage of responses from more deprived areas or groups with specific protected characteristics.

Through the research we heard examples from council officers of positive efforts to engage with communities and reach out to under-represented groups in Local Plan consultations. These examples included using more conversational approaches and visiting places of worship. However, the low numbers of participation raise the question of what should be considered to be a 'good' or 'good enough' level of public response as there is no clear national guidance on this.

3.2.2   Statements of Community Involvement
Local planning authorities are required to have a Statement of Community Involvement (SCI) in place to outline their approach to engagement with communities, which must be updated every five years.

Our analysis shows that while all local planning authorities have an SCI in place, 23% of these are more than five years old. 83% of SCIs make reference to reaching under-represented groups, with only 26% of SCIs outlining targeted methods of reaching specific groups. The example from Croydon given in Box 3 demonstrates one of the more detailed examples.

Only 3% of SCIs include a commitment to collaboration, co-creation and/or co-production with residents in relation to planning, recognising the value of the skills and knowledge of local people to the planning process (see Fig. 2), with a further 9% having quite weak wording on this point.

The Grand Union Alliance (GUA) case study (see Appendix 1) highlights a set of 12 'Ground Rules' developed by GUA members to guide how the Old Oak and Park Royal Development Corporation (OPDC) and developers involve and engage with the local community. It demonstrates a positive example of how an alliance of community groups has worked to influence the development of an SCI, with the OPDC having adopted the majority of the 'Ground Rules' within their SCI.[10]

Note
10   See the Grand Union Alliance website, at https://grandunionalliance.wixsite.com/grandunionalliance/responses-to-consultations

While all local planning authorities are required to have an up-to-date SCI, this requirement does not exist for the Greater London Authority. As outlined in the GUA case study, GUA members propose that the 'Ground Rules' could form the basis of a potential Mayoral SCI, which could demonstrate good practice to London local planning authorities in the development of their own SCIs.

3.2.3   Neighbourhood Planning

As outlined in Section 1.3, within London there are three formal tiers to the planning system since neighbourhood planning was introduced through the 2011 Localism Act. Neighbourhood planning processes provide one route through which people are able to influence change in their areas, and a recently published report has sought to better understand the specific challenges faced by neighbourhood planning processes in areas with high levels of deprivation.[11]

Research from Neighbourhood Planners.London published in 2017[12] looked at whether Local Plans in London included clear and sufficient explanation of the statutory status of a 'made' Neighbourhood Plan. The research showed a range of approaches across Local Plans, with some being very supporting of neighbourhood planning and others making minimal mention of it.

Further research published in 2018 into SCIs[13] sought to understand how local planning authorities implemented new requirements on support for neighbourhood planning in SCIs brought in under the 2017 Neighbourhood Planning Act. The research found that all but one of London's local planning authorities had failed to take account of the new measures within their SCI, either through amendment or integration of the new measures within a new, updated version.

3.2.4   Wider engagement in planning processes

Public participation in Local Plan development does not sit in isolation, but rather is linked to how people engage with and try to influence planning and processes of development, regeneration and change more broadly.

Across England, engagement in the planning system in generally low, with 56% of the public reporting that they have never engaged with the planning system, and 54% of people not feeling at all involved in planning and housing decisions in their local area. Nationally, homeowners and those with higher incomes are significantly more likely to have engaged in the planning system than renters and people with lower incomes. In London residents are far more engaged in the planning system, with 75% having engaged in comparison with a national average of 44%.[14] Our research identified multiple factors relating to public engagement in planning processes, as outlined below.

Engagement in different aspects of the planning system
- ***The urgent and local often takes priority:*** Many stakeholders described how communities find themselves in crisis situations. Community groups and local activists often have to give priority to reactive engagement in local planning decisions and development processes over engaging in more strategic aspects of planning, through Local Plan consultation for example, due to the urgency and the magnitude of the local impact of development proposals, especially in cases where a place of importance is at risk of being closed or demolished.
- ***The 'abstract' nature of Local Plans:*** Local Plans were described by many as being abstract and difficult for people to engage with. One

Notes

11   *Neighbourhood Planning in London: Investigating its Potential in Areas Experiencing High Levels of Deprivation.* Neighbourhood Planners.London, May 2019. https://docs.wixstatic.com/ugd/95f6a3_b02c020c0242437a8a5a096b77325c88.pdf

12   *London's Local Plans: Are they Supporting Neighbourhood Planning?* Neighbourhood Planners.London, Mar. 2017. https://docs.wixstatic.com/ugd/95f6a3_6d2d4b5b624c44fd963fedcea470d28d.pdf

13   *Statements of Community Involvement: Are London's Supporting Neighbourhood Planning?* Neighbourhood Planners.London, Nov. 2018. https://docs.wixstatic.com/ugd/95f6a3_25c3511ec1ed46f4b76dff9a9deb3821.pdf

14   B Glover: *People Powered Planning: How to Better Involve People in Planning to Get More Homes Built.* Demos, Sept. 2019. https://demos.co.uk/project/people-powered-planning/

peeterv/iStock

suggestion was for planners to better engage with people in Local Plan consultation through holding focused sessions with local groups and organisations on thematic areas that are relevant to them. This might be, for example, about support for small businesses to better outline how Local Plan policy relates to tangible impacts. Many stakeholders commented that people are more likely to get involved in planning at a more local and tangible level – through engaging in community-level campaigns, neighbourhood planning, or with Area Action Plans or area regeneration schemes. The long timescales of Local Plan development make it difficult for residents to remain engaged in the plan-making process, while opportunities to comment last only for a few weeks. People who have engaged in plan-making often receive no feedback on whether their contributions have been incorporated.

■ *Planning is not the best conversation starter:* Many stakeholders commented that if you want to engage with people on planning-related issues, especially with people who are not already involved in planning, opening by talking about planning is not the best way to go about it. Talking to people about their daily lives, about rising rents, their local park or the closure of a local GP surgery is much more engaging. 'Planning' is often perceived as being abstract or irrelevant, and the strategic role of planning is often not well understood or explained.

■ *From reactive to strategic engagement:* Some stakeholders noted that the outcomes of a planning decision (for example when a scheme has been approved or an application has been made) are common entry-points to engaging in planning, at which time it is often too late to significantly influence the course of development. Some stakeholders reflected that local and reactive engagement in planning can lead on to broader involvement in planning processes such as engagement in Local Plan development, as a result of people then having a better understanding of the points in the planning system at which substantial policy influence is possible. This is, however, often a hard realisation for people following what is often a disappointing outcome of a labour-intensive process.

Section 3

Barriers to participation and co-creation

- ***Fundamental imbalance of power:*** The case studies highlight the very real challenges that citizens are facing in trying to engage with and influence planning processes and outcomes. Stakeholders referred to the fundamental imbalance of power between citizens, local authorities and developers in relation to planning processes, and the sense of disempowerment that this brings. Stakeholders stated that the public sector needs to acknowledge this imbalance of power. Local authorities also need to recognise that resident participation takes place within this context, and that this poses a serious threat to the continued motivation of people to engage in the planning system as they increasingly lose the belief that they have a real say in the course that development takes.

- ***Multiple practical barriers to accessing planning information:*** Local authority websites and planning portals can be unclear, difficult to navigate and slow, and many stakeholders mentioned key documents often being difficult to find or missing, further feeding the sense of distrust that people can have towards the planning process. Many local authority websites are designed to prioritise service functions on their homepage (for example practical information on housing services). Clicking through to planning functions often prioritises planning application processes, with webpages on strategy and policy being more difficult to locate and not presented in an engaging way.[15] Within discussions, there was some debate over the degree to which innovative digital processes are designed to improve transparency of information and better communicate planning information to the general public versus being designed predominantly to better manage local authority administration processes. Points were also made about the need for planning documents to be available in hard copies of different format at public spaces such as libraries, for documents to be translated into multiple languages, and for development plans to be accompanied by strategic and detailed visuals such as images, videos and scale models that make development plans more accessible to local people.

- ***Use of technology in engagement:*** Many stakeholders commented that the use of apps and online consultation platforms such as Commonplace[16] can be very useful in interacting with and engaging a wider audience in planning consultations. However, it was also noted that these types of digital approaches need to be used in combination with, rather than replacing, more traditional forms of engagement, so as to ensure that certain groups – such as those who are less digitally literate, have limited to no access to digital platforms or have a visual impairment – are not excluded.

- ***Interpreting planning information:*** Many stakeholders commented on the impenetrability of planning documents, particularly in the case of large-scale regeneration areas. Stakeholders commented on 'information overload' and the use of 'alienating' technical language in planning documents.

- ***The nature of public consultation:*** Stakeholders highlighted that public participation and evidence gathering often happens too late and as an afterthought, and that there is a need for engagement to start at an early stage of plan-making. It was also highlighted that there needs to be clarity and honesty on what can and what cannot be influenced though the process of consultation, as participation in planning consultation and wider exercises of evidence gathering are time-consuming processes for citizens, for which they are not (financially) compensated. Furthermore, some stakeholders mentioned that local authorities could be more proactive in notifying people at an early stage that they might be affected by development in their area, especially if the development is large in scale.

Notes

15 For further analysis on the accessibility of Local Plans on local authority websites see the Future Cities Catapult blog entry by Stefan Webb, 'Local Plans – Error 404 not found', at https://futurecities.catapult.org.uk/2018/05/24/local-plans-error-404-not-found/

16 See, for example, the Commonplace website, at https://www.commonplace.is/

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■ ***Pre-application discussions:*** A point was made about the imbalance of power and resources, whereby developers are able to have pre-application discussions with planning case officers and have access to their expertise and advise, while there is not an equivalent process through which community members can access planning officer support at the pre-application stage.

■ ***Engagement of under-represented groups:*** Many stakeholders highlighted examples of specific groups being under-represented in particular processes of engagement – for example business-owners and traders not being involved fully where redevelopment significantly affects businesses; cases of consultations being held in buildings that are not fully accessible; and engagement processes not being designed to proactively engage young people over change in their areas. It was suggested that there is no such thing as 'hard-to-reach groups' in the engagement of local people, as this reinforces a mindset that not all voices of community groups can be included in planning – and that efforts of engagement should be adapted in ways that enable all community groups to easily participate.

■ ***The wider definition of 'community':*** Communities can be people that have formed a group around a shared interest, characteristic, incentive, motivation or identity aspect, or a unique spatial distribution or geography. A point that comes out strongly through the Friends of The Joiners Arms, Latin Elephant and Tonic Living case studies is the question of how the needs and aspirations of non-geographically defined communities, especially those that are made up of groups that span borough boundaries, are considered within planning processes. This is the case where, for example, a piece of social or cultural infrastructure is of value to people across a wider geography.

■ ***Transparency, honesty and trust:*** Many stakeholders commented on a lack of trust in talking to councils caused by receiving conflicting information or no information at all after several requests, and on a lack of transparency that results in community groups not always knowing who specifically within a council team to talk to.

Stakeholders had suspicions that decisions regarding development proposals had largely already been made by officers and developers before the period of consultation started.

The value of community-led initiatives and sustained community voices

■ **The need for a sustained community voice:**
Many of the case studies and conversations with community activists and organisers highlight the incredible amount of time, energy and effort that community groups and local activists, with limited or no funding, dedicate to influencing planning processes – attempting to ensure that consistent community-led voices are heard, gather evidence in the form of community-based knowledge and lived experience, and hold developers, local authorities and other stakeholders to account.

■ **The need for resources, advice and support:**
The case studies highlight the role of groups such as ASF–UK (Architecture Sans Frontières – UK), Just Space, London Tenants Federation and Southwark Law Centre in providing technical support and expert advice, and in facilitating mutual and reciprocal learning between community groups, often with minimal funds or on a voluntary basis. Suggestions made included generating funding both for community groups seeking to influence planning outcomes and for support organisations, in the form of a new Mayoral Community Infrastructure Levy, or making funding directly available from local planning authorities to community groups to support their role in engaging communities in the planning process – although clear mechanisms to protect the independence of community and technical support groups would be required.

■ **Acting upon community information:** Many stakeholders made the point that it is fundamentally important to ensure that information gathered through consultation and engagement processes is genuinely acted upon by local authorities – and that consultation and engagement on specific

schemes feeds into wider plan-making processes in a structured way, to ensure people's continued involvement.

3.3 Theme 3: Meaningful consideration of how planning policies impact different groups of people differently

As described in Section 1, Londoners are impacted in a variety of ways by planning policy and by decisions on how and where resources are allocated. There are, however, a range of tools that seek to protect the rights of individuals and reduce inequality.

3.3.1 The Equality Act 2010
Under the Equality Act 2010, planners are required to assess the impacts of planning policy on equality and inclusion. The 2010 Equality Act brought together 116 separate pieces of legislation into one single Act which provides a legal framework to protect the rights of individuals and advance equality of opportunity for all. As part of the Equality Act, a public sector equality duty came into force in April 2011 and applies to all 'public authorities', including those developing planning policy. As outlined by the Equality and Human Rights Commission:[17]

> *'In summary, those subject to the general equality duty must, in the exercise of their functions, have due regard to the need to:*
> ■ *Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.*
> ■ *Advance equality of opportunity between people who share a protected characteristic and those who do not.*
> ■ *Foster good relations between people who share a protected characteristic and those who do not.'*

3.3.2 Local Plan Equality Impact Assessments
Within the process of Local Plan development, in order to discharge the equality duty most local planning authorities choose to carry out an Equality Impact
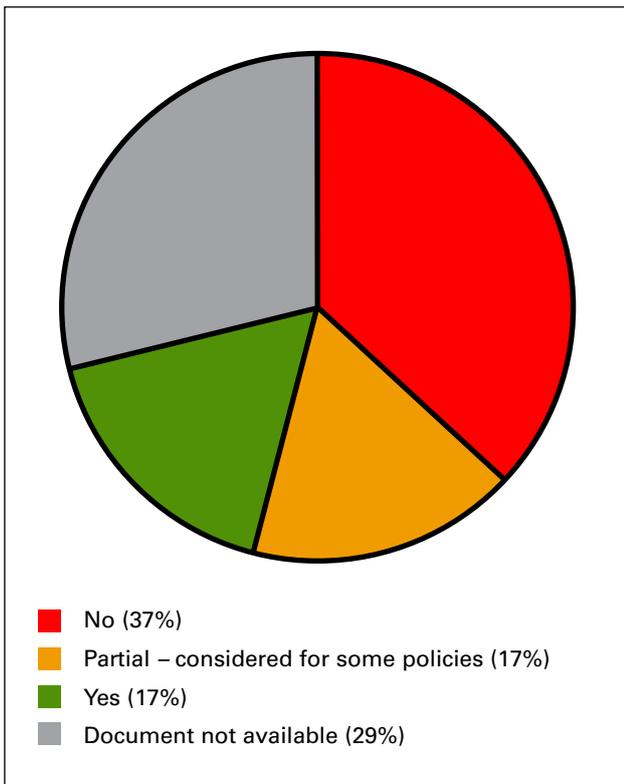
Fig. 3 Indicator: Does the Equality Impact Assessment assess policies according to their impact on socio-economic status/low-income groups?

Assessment (EqIA). The general equality duty does not prescribe a particular methodology for assessing the impact on equality, so it is up to each authority to develop the approach that they wish to take.

Planners must have sufficient good-quality information to understand the effects of Local Plan policy on the aims set out in the equality duty in order to effectively evaluate policy impacts. In working to promote equality, local planning authorities need to be clear about how planning policies will lead to positive change and reduce existing inequalities, and they also need to assess how planning policy can have negative impacts on different groups. Where there is the potential for existing policy or draft policy to negatively impact specific groups, adequate mechanisms need to be in place to recognise this, and policies should be adapted to mitigate these risks.

Through our Local Plan analysis, we were able to locate EqIAs for 80% of Local Plans. The remaining 20% were not available online or referenced on local planning authorities' websites. Many Local Plan EqIAs provide analysis with very little detail and very limited discussion on the potential negative impacts of policies. Only 34% of local planning authorities' EqIAs identified potential negative impacts from policies in their Local Plan, with only 20% clearly outlining how negative impacts would be mitigated.

As outlined in Section 1, while links exist between some groups with protected characteristics and issues of poverty and deprivation linked to socio-economic status, socio-economic status is not itself included within the list of the protected characteristics outlined in the Equality Act 2010. It is, however, hugely important to assess the impacts of planning policy on different income groups. Our analysis found that only 34% of local planning authorities have EqIAs that consider the impact of policies on low-income groups/economic vulnerability (see Fig. 3). Our analysis also found that 57% of local planning authorities undertook a Health Impact Assessment[18] as part of their Local Plan development, with all but one of these considering health inequalities within the assessment.

Analysis of existing Local Plan EqIAs and conversations with planning officers in relation to some forthcoming Local Plans show that some local planning authorities are outsourcing the EqIA rather than going through the process in-house. As EqIAs need to be initiated early on in the Local Plan development process and run alongside policy development in order to inform it in an iterative way, the use of external consultants could inhibit the degree to which the policy development process can be truly iterative.

Analysis of Local Plan EqIAs found that there are shortcomings in EqIAs in relation to consideration of:
- the cumulative impact of policies;
- the intersectionality of multiple characteristics;

Note

18 Health Impact Assessments are non-statutory but are widely considered to be good practice

■ distinction within protected characteristic groups; and

■ cross-boundary considerations, especially when considering impacts on non-geographically defined communities.

Although local planning authorities must consider the implications of their duties under the Equality Act 2010 in developing Local Plans, there is no specific guidance provided at the national level within Planning Practice Guidance, which accompanies the NPPF, on how to approach this, despite government providing specific guidance on the other assessment processes that planners must undertake.

3.3.3   Monitoring, evaluating and learning

Guidance is clear that public authorities covered by the general equality duty must ensure that 'decision-makers review policies or decisions if circumstances change (e.g. if the make-up of service users alters). This is vital as the duty is a continuing one.'[19]

While the EqIA evaluates the expected effects of policies using a strong evidence base, contexts continually change and there may be unforeseen impacts. It is therefore vital that, once a Local Plan is adopted, the actual impacts of policies within the plan on distinct equality groups are monitored (feeding back into the wider evidence base) and negative impacts are mitigated as required. Wider learning also needs to be captured to inform future policy-making.

It was beyond the scope of this research to explore in detail the approaches being taken by local planning authorities to monitor the ongoing impacts of planning and broader regeneration and development processes. Responses from local authority officers to a question in the online survey on the approaches that they were taking to measuring the social value impacts of regeneration

and development showed a stark range of responses, with some boroughs stating that this is not done and others referring to sophisticated methods of measuring sets of indicators (for example in the case of Southwark's emerging social regeneration framework and indicators[20]).

3.4   Theme 4: Embedding inclusion and equality within thematic policy areas

Local Plan policy provides an opportunity to embed considerations of inclusion and equality through positive policy development. While Supplementary Planning Documents may go into more detail on specific areas of planning policy, it is important that Local Plans have a 'hook' for them to link to as Local Plan policies carry more weight in planning decision-making.

The indicators and policy areas outlined under this theme do not constitute a comprehensive list of what policies should be in place in Local Plans in order to achieve an inclusive approach. Rather, the aim is to explore through a series of policy areas how opportunities to embed inclusion and equality considerations through positive policy development are being taken up in the development of Local Plans.

3.4.1   Housing development

Housing affordability
Throughout the research, stakeholders repeatedly highlighted access to genuinely affordable housing as being fundamental to planning for inclusive communities. A lack of genuinely affordable housing forces people to move away from their jobs, schools and social networks, and can also lead to people living in overcrowded and inadequate housing with insecurity of tenure. The Hackney Quest case study (see Appendix 1), which explores

Notes

19 *Meeting the Equality Duty in Policy and Decision-Making.* Equality and Human Rights Commission, Oct. 2014.
     https://www.equalityhumanrights.com/sites/default/files/meeting_the_duty_in_policy_and_decision-making.pdf
20 See the London Borough of Southwark's 'Social Regeneration Indicators' webpage, at https://www.southwark.gov.uk/health-and-wellbeing/public-health/health-and-wellbeing-in-southwark-jsna/social-regeneration-indicators

No target for affordable rent or social rent (6%)

No. Target for affordable rent but not social rent (66%)

Yes, target for social rent (29%)

*Percentage total does not sum to 100% owing to rounding*
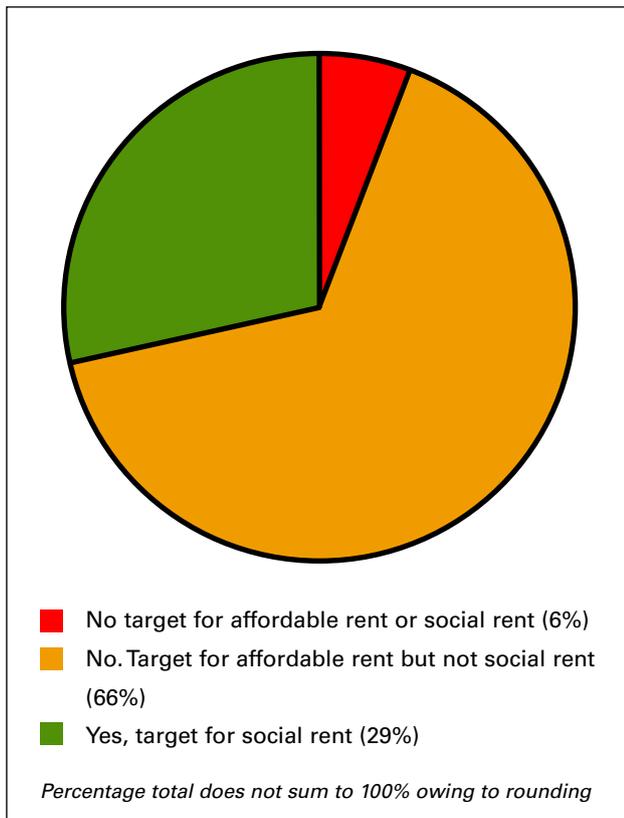
Fig. 4 Indicator: Does Local Plan housing policy specify a minimum required percentage of social rental tenure within the wider 'affordable housing' category?

the experiences of young people in the rapidly changing context of Hackney Wick, also picks up on why this is so fundamental. It shows, for example, that if you are struggling to afford to live in the area you grew up in, this can undermine your sense of belonging and lead to feelings of disempowerment.

The revised NPPF does not offer a meaningful definition of housing affordability as it includes a wide range of intermediate housing 'products' which cannot reasonably be described as affordable.[21] As affordable housing is such a broad category and no link is made between affordability and household income, it is important for local planning authorities to specify within affordable housing requirements specific targets for tenures, such as homes for social

rent, that are genuinely affordable to people on lower incomes.

The draft new London Plan outlines a strategic target of 50% of all new homes delivered across London to be affordable.[22] Our Local Plan analysis shows that 37% of plans stated a minimum requirement of 35% affordable housing in new developments, whereas 63% of plans had targets above 35%. While 95% of plans outlined a target for affordable rental housing within the broader 'affordable housing' category, only 29% outlined a clear target for social rental housing and distinguished between affordable rents (based on 80% of the local market rent) and social rent (see Fig. 4). Two plans (6%) made no mention of a target for affordable or social rental tenures within the wider 'affordable housing' category.

Beyond policies specifying the percentage of affordable housing required, our analysis also looked at the retention of existing affordable housing and whether plans protected the affordable housing stock through requiring no net loss of affordable housing on sites where existing housing is being redeveloped. Only 14% of Local Plans outlined a requirement for 'like-for-like' re-provision of affordable housing which considered the number of units and the size and tenure of the homes, 29% of plans required re-provision but did not specify that this must be 'like-for-like', and 57% of plans did not outline any specific requirement for the re-provision of existing affordable housing. The Hackney policy set out in Box 4 provides an example of a policy that specifies 'like-for-like' replacements.

Community-led housing
Community Led Housing London argues that 'when communities and future residents are at the centre of housing development and management, their creativity and inherent interest in long term value helps achieve more successful, more affordable places for

Notes

21   For further research on planning for affordable housing, see the TCPA's 'Planning for Affordable Housing' webpage, at https://www.tcpa.org.uk/Pages/Category/affordablehousing

22   Policy H5: Delivering affordable housing, in *Draft New London Plan Showing Minor Suggested Changes.* Mayor of London, Aug. 2018. https://www.london.gov.uk/sites/default/files/draft_london_plan_-showing_minor_suggested_changes_july_2018.pdf

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Box 4
Policy example 4: London Borough of Hackney – extract from the 'Meeting Hackney's housing need' section within Hackney's emerging Local Plan

LP 24   Preventing the Loss of Housing

A.   *The redevelopment, conversion or change of use of land or buildings involving loss of residential floorspace will be resisted and will only be permitted where at least one of the following conditions are met:*
   i.   *The land or buildings are no longer suitable for residential use and it is considered inappropriate to re-provide residential accommodation; or*
   ii. *Replacement housing of an appropriate type is being provided at either an equivalent or higher density, or to address a specialist housing need for which there is a particular shortage in the Borough; or*
   iii. *Redevelopment is necessary to create better quality homes and dwelling mix, and improve the living environment, as part of major regeneration schemes; or*
   iv. *A proposal seeks to combine small dwellings to create larger dwellings in the Stamford Hill Area Action Plan area; or*
   v.   *The proposal will enable sub-standard units to be enlarged to meet residential space standards; or*
   vi. *The proposal is for an essential community use or infrastructure for which there is demonstrable need, and it can only be provided by the loss of existing residential floorspace; or*
B.   *Where a loss of affordable housing is proposed, a like-for-like replacement in terms of tenure and number of units will be required.*

Source: Hackney – A Place for Everyone. Proposed Submission Local Plan. London Borough of Hackney, Nov. 2018, p.89. https://drive.google.com/file/d/1TKvAt60O8MP0aTDcdBeMnoJ25C2VUB8R/view

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us all'.[23] Our analysis looked at whether plans had specific policies that support community housing approaches.[24] It found that none outlined strategic priorities or support available for community-led housing and only 11% made any reference to community-led housing approaches. The vast majority (88%) of Local Plans made no mention of these approaches.

Provision for Gypsies and Travellers
As outlined in national guidance and the draft new London Plan, boroughs should plan to meet the

identified need for permanent Gypsy and Traveller pitches.[25] In looking at whether consideration of sites for Gypsy and Travellers based on assessed demand was included, our analysis found that 63% of Local Plans had policies on the allocation of new sites and protection of existing sites, 31% had some consideration of sites for Gypsies and Travellers but did not refer to demand or specify the protection of existing sites, and 6% (two plans) did not include any consideration of sites.

Notes
23   See the 'About community-led housing' page of Community-Led Housing London's website, at
      https://www.communityledhousing.london/
24   Including housing co-operatives, community land trusts, co-housing, tenant management organisations, self-help housing, community self-build, community development trusts and other forms of community-led housing
25   Policy H16: Gypsy and Traveller accommodation, in *Draft New London Plan Showing Minor Suggested Changes.* Mayor of London, Aug. 2018. https://www.london.gov.uk/sites/default/files/draft_london_plan_-showing_minor_suggested_changes_july_2018.pdf

No (60%)

Yes, but weak phrasing (9%)

Yes (31%)
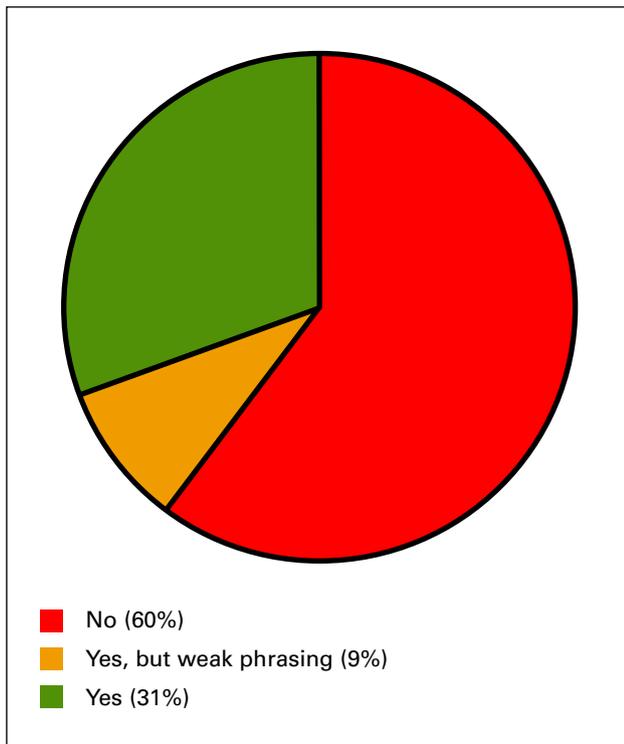
Fig. 5 Indicator: Does Local Plan housing policy require 'tenure blindness' for affordable housing units?

No (71%)

Yes, but weak phrasing (6%)

Yes (23%)

Fig. 6 Indicator: Does Local Plan housing policy prohibit gated developments?

Connectedness of different housing tenures

The design of new housing developments can contribute positively to integration and social cohesion, or conversely can intensify separation and segregation. Our analysis found that only 31% of Local Plans had clear policies against 'poor doors' through requiring 'tenure blindness' of affordable housing provision (see Fig. 5). A further 9% required tenure blindness but with weak wording, and most plans, 60%, included no requirement for tenure blindness in new developments.

The analysis also looked at whether Local Plans prohibited gated housing development. In this case 23% of plans clearly prohibited it, with a further 6% prohibiting it with weakly worded phrasing (see Fig. 6). The vast majority of plans, 71%, had no requirement that gated housing development be prohibited. The Harrow and Islington policies set out Boxes 5 and 6 clearly link gated communities to social exclusion.

Housing quality, accessibility and specialist housing

The Local Plan analysis looked at whether plans include well defined standards for housing design and quality: 69% of plans included well defined standards, 29% of plans included a commitment to standards of quality but did not clearly define them, and 3% (one plan) made no commitment to housing quality. With relation to wheelchair accessibility, the draft new London Plan requires that all residential development must ensure:

■ 'at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'', and

■ 'all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings''.[26]

Note

26 Policy D5: Accessible housing, in *Draft New London Plan Consolidated Suggested Changes.* Mayor of London, Jul. 2018.
https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_-_clean_july_2019.pdf

Box 5
Policy example 5: London Borough of Harrow – extract from the 'Character and amenity' section within Harrow's *Development Management Policies*

Policy DM 2   Achieving Lifetime Neighbourhoods

d.   all proposals must be safe and secure for everyone in line with Secured by Design principles but gated developments will be resisted.

Explanatory text also notes that:
gated development is counter to lifetime neighbourhood principles [following in footnote] *because it inhibits inclusive access to buildings and spaces, constrains the potential for social interaction between residents within the wider community and may exacerbate the extent to which perceptions of safety and crime do not coincide with the actual risks.*

Source: Harrow Council Development Management Policies. London Borough of Harrow, Jul. 2013. p.11.
https://www.harrow.gov.uk/downloads/file/23258/local-plan-development-management-policies

Box 6
Policy example 6: London Borough of Islington – extract from the 'Thriving Communities' section within Islington's emerging Local Plan

Policy H1: Thriving Communities

A.   *Islington should continue to be a place where people of different incomes, tenures and backgrounds can live in mixed and balanced communities which are economically, environmentally and socially healthy and resilient. All new housing development must be fully integrated within, and relate positively to, its immediate neighbours and locality. Gated development is not suitable, as it isolates and compartmentalises communities.*

Text in the 'What is the role of the Local Plan?' section of the plan also states that:
1.50 An inclusive place features socially inclusive neighbourhoods without barriers, which enables a range of users to access spaces and interact within them. For example, developments should increase rather than reduce permeability; residential and commercial developments should not be gated. This will enhance the dignity of individuals, supporting their use and enjoyment of facilities on their own terms. To that end design proposals that separate users and deliver an inferior experience, on the basis of a person's age, disability, race, gender, wealth, or any other characteristic, will be resisted'.

Source: Islington Local Plan: Strategic and Development Management Policies. London Borough of Islington, Sept. 2019, pp.61 and 14. https://www.islington.gov.uk/-/media/sharepoint-lists/public-records/planningandbuildingcontrol/ publicity/publicconsultation/20192020/20190904localplanstrategicanddmpoliciesdpdproposedsubmissionregulation19. pdf?la=en&hash=FF3732C05A253BDA47D04FB825CCD3730779D15A

Box 7
Policy example 7: London Borough of Hackney – extract from the 'Hackney's Green and Open Spaces' section within Hackney's emerging Local Plan

LP 50 Play Space

A. *The Council will protect existing play and recreation facilities and support the development of new formal and informal play facilities. New major residential developments and mixed-use schemes that are likely to generate a child yield of 10 or more are required to provide 10 sqm of dedicated play space per child on-site.*

B. *New play spaces should:*
    i.   *Be well located and easily accessible by pedestrian, cycling or bus routes, and*
    ii. *Be inclusive to all, and*
    iii. *Provide a range of different types of play facilities and experiences for children of different abilities, and*
    iv. *Be sustainable and easy to maintain.'*

Explanatory text goes on to state that:
Children's play space – both formal and informal space – is important for the development of physical, social and emotional skills in children and can improve health and reduce health inequalities… Play space must be inclusive and open to both existing communities and new residents.

Source: Hackney – A Place for Everyone. Proposed Submission Local Plan. London Borough of Hackney, Nov. 2018, p.142. https://drive.google.com/file/d/1TKvAt60O8MP0aTDcdBeMnoJ25C2VUB8R/view

The Local Plan analysis shows that 94% of plans were in line with the draft new London Plan requirement of 10% M4(3) and 90% M4(2), while 6% (two plans) did not specify any requirements. No plans went above the 90%/10% requirement. It should be noted that the 10% requirement for wheelchair-accessible homes is not based on the actual demand in each local planning authority area for such homes and might not sufficiently reduce long waiting times for wheelchair-accessible housing.

It was not within the scope of our Local Plan analysis to look into detail at aspects of policy for types of supported and specialist housing. However, the Tonic Living case study (see Appendix 1)

highlights some of the specific needs of older Londoners who identify as LGBTQ+, which underlines the importance of understanding the intersectionality of different equality groups in relation to their housing needs and aspirations.

Play space and amenity space
There were several news stories during 2019 about the segregation of play space within new housing developments in London,[27] with residents from private tenures being able to access play spaces and residents from 'affordable' tenures having no access. The Mayor of London responded by developing a new policy in the London Plan to ensure that, where there is a mix of tenures in new development,

Note
27 See, for example, H Grant: 'Too poor to play: children in social housing blocked from communal playground'. *The Guardian*, 25 Mar. 2019. https://www.theguardian.com/cities/2019/mar/25/too-poor-to-play-children-in-social-housing-blocked-from-communal-playground

developers will no longer be allowed to build play areas that are accessible only to people in the more expensive properties. This highlights the importance of reacting to identified negative results of development processes by strengthening planning policy to prevent the same outcomes from occurring again in the future.

The Local Plan analysis looked at whether Local Plans included policies for the delivery of play space as part of housing developments and whether these policies mentioned inclusivity and/or accessibility. All plans required play space provision, but only 54% made specific mention to inclusion and/or the accessibility of the play space provided. The example from Hackney set out in Box 7 demonstrates the need for play space to be inclusive to all.

The Local Plan analysis also looked at whether plans included policies to ensure that new housing development will include communal amenity space (which can contribute to social cohesion in new residential development) and whether these policies included requirements for inclusive and/or accessible design. 95% of plans included policies on communal space, but only 46% made reference to quality standards and/or accessibility requirements; 6% (two plans) had no policy.

3.4.2 High streets and markets

Our Local Plan analysis looked at whether there were policies in place to protect high streets and local shops and so protect people's access to retail and local shopping opportunities, in particular for people who are unable to travel long distances. 37% of Local Plans had policies in place to protect high streets but only within designated town centres, whereas 46% had policies in place to protect high streets both within and outside of designated town centres (see Fig. 7). 17% of plans had no specific policies to protect high streets.

The Latin Elephant case study (see Appendix 1), which draws on experiences of influencing planning processes in relation to the redevelopment of the Elephant and Castle Shopping Centre in Southwark, highlights the importance of protecting and supporting

Legend:
- No (17%)
- Yes, within designated town centres only (37%)
- Yes, protecting high streets inside and outside of town centres (46%)
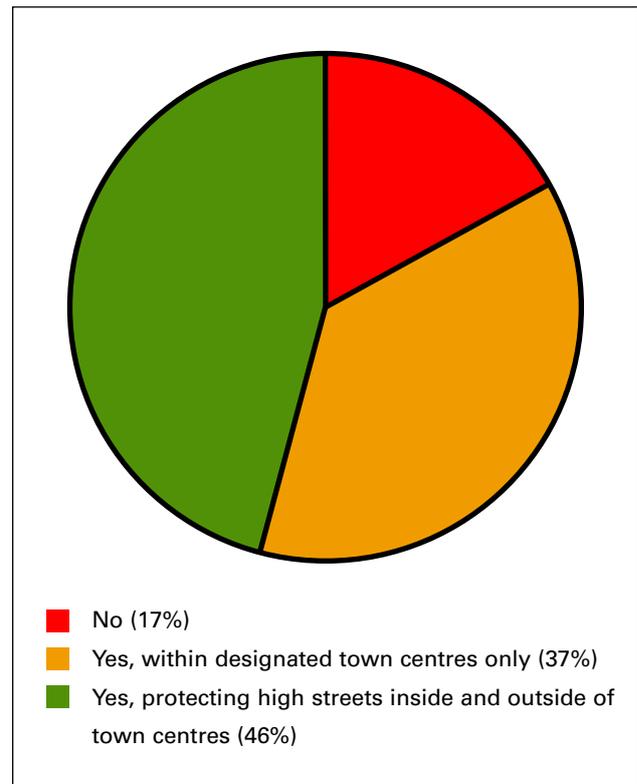
Fig. 7 **Indicator: Are there policies in the Local Plan to protect high streets and local shops?**

local shops, both to protect the livelihoods of traders and business and to ensure that communities can access an affordable local retail offer. The case study also demonstrates the social value of retail spaces, highlighting the importance of the Elephant and Castle Shopping Centre and the surrounding area as an important social hub for the Latin American community. The Hackney Quest case study (see Appendix 1) also highlights the importance of affordable local shops in connection to the sense of belonging in a neighbourhood.

Our analysis also looked at whether plans had policies to support local markets. A Greater London Authority report, *Understanding London's Markets*, published in 2017 highlights the importance of markets for local trade and also specifically highlights their social importance. The report notes that:

'Markets support a wide range of social benefits for Londoners – from the chance to buy food that is hard to find elsewhere to hearing the stories behind the products on offer, from taking part in

■ No (57%)

■ Yes, without specific recognition of social value (43%)

■ Yes, with recognition of social value (0%)
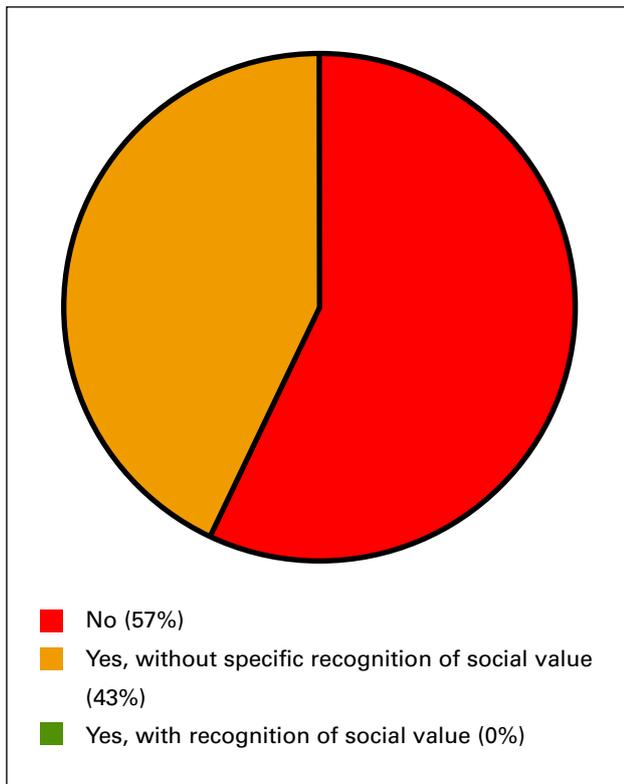
Fig. 8 Indicator: Are there policies in the Local Plan to support local markets, recognising their social value?

pop-up stalls for local community groups and charities, to promoting campaigns and issues that matter locally. Regular encounters in markets can also help break down stereotypes and bridge differences that may be felt between communities, enabling long-term cohesion within a diverse area.'[28]

Our Local Plan analysis found that only 43% of Local Plans had policies in place to support and protect local markets (see Fig. 8), none of which specifically mentioned the importance of the social value of markets.

3.4.3 Employment and workspace

With such high housing needs and an inflated housing market in London there is often a conflict with other land uses and the risk that, even with an increase in density, employment and industrial uses

will be replaced, with damaging effects on both local businesses and local residents. The Vital Old Kent Road and Southwark Law Centre case study (see Appendix 1) highlights this tension between meeting housing targets and protecting and growing local economies.

Our Local Plan analysis looked at whether Local Plans protected against the loss of employment space, their current economic uses, and the jobs they offered, with a particular focus on Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). Our analysis found that 43% of Local Plans had policies to protect employment space and specify use classes, whereas 51% had policies in place but without specifying protection of industrial uses, thus not protecting the existing employment base as light industrial spaces could be replaced with, for example, office development. Two plans had no policy to protect against the loss of employment space.

The Local Plan analysis also looked at whether plans required an amount or percentage of affordable workspace from commercial and mixed-use developments: 11% of plans had policies in place with clear targets, 54% had a policy but without a stated target, and 34% had no specific policy on this.

The Hackney Quest case study (see Appendix 1) highlights the importance of local employment opportunities, with one of the main recommendations from the *Hackney Wick Through Young Eyes*[29] report being that more should be done to ensure local job creation, especially for young people. The Local Plan analysis looked at whether plans had a requirement for developers to form agreements on local employment and apprenticeships, enabling local people to benefit from the development process through acquiring new skills, for example in the construction sector. 37% of plans had policies with clear minimum requirements in place for development of a certain size, 49% had a policy that stated some

Notes

28 *Understanding London's Markets.* Mayor of London. Greater London Authority, Nov. 2017. https://www.london.gov.uk/sites/default/files/gla_markets_report_web.pdf

29 *Hackney Wick Through Young Eyes: What Local Young People Value, the Problems they Face, and What they Want to Change.* Hackney Wick Youth Voice, Jan. 2018. http://www.hackneyquest.org.uk/images/HWTYE.pdf

commitment but without a clear target, and 14% had no policy in place.

3.4.4   Health

In the online survey, one planning officer responded to the question 'What do you consider are the main ways in which planning policy and planning processes can contribute to creating the conditions in which communities are able to flourish?' with the answer 'Making sure the social and economic determinants of health are given high priority.'

Public health data[30] reinforce the powerful link between outcomes for people's health and wellbeing and the state of their homes and built environment – this includes environmental factors such as air quality and pollution, and issues of overcrowding. The Greater London Authority's (GLA's) *Equality, Diversity and Inclusion Evidence Base for London* highlights that 'Life expectancy and mortality follow a steep socio-economic gradient, with people in more disadvantaged areas facing worse health outcomes.'[31]

Our Local Plan analysis found that only 40% of plans had policies that require the consideration of health inequalities when determining the future provision of healthcare services. It also found that 51% had a policy requiring a Health Impact Assessment to be included as part of a planning application, whereas 49% did not.

3.4.5   Transport and mobility

The GLA's *Equality, Diversity and Inclusion Evidence Base for London* highlights that:
- 'Use of London buses is higher among BAME, younger, older and low-income Londoners.'
- 'Women and people from lower socio-economic groups are less likely to cycle, due to perceptions of safety as well as a lack of confidence and low social identification with cycling.'

- 'Older and disabled Londoners face barriers in accessing London's built environment, as a result of street design and clutter, a lack of dedicated parking, and few accessible and specialised public toilets [and other barriers such as] pollution, noise and anti-social behaviour.'
- 'Younger and BAME Londoners face greater affordability barriers in using London's transport network.'[32]

Our Local Plan analysis found that while 97% of plans included policies on the provision of inclusive and accessible transportation options, only 34% included policies that specifically considered the needs of groups with protected characteristics. All plans included policies to improve walking and cycling, but again only 49% made specific reference to considering the needs of groups with protected characteristics. The Thames Ward Community Project (TWCP) case study (see Appendix 1) highlights the experiences of the Young Citizens Action Group (YCAG) in taking action in relation to the insufficient capacity of their school bus service, which created extremely crowded bus journeys for students.

3.4.6   Open spaces, social and community spaces and heritage

Open and green spaces

Access to open and green spaces is incredibly important for health, wellbeing, and social interaction. The GLA's *Equality, Diversity and Inclusion Evidence Base for London* highlights that 'availability of green space is lower in more deprived areas and areas with a higher proportion of BAME residents, with children in London less likely to visit the natural environment than children elsewhere in England'.[33]

Our Local Plan analysis shows that all plans had policies in place to safeguard existing green and open

Notes

30 See, for example, *Spatial Planning for Health: An Evidence Resource for Planning and Designing Healthier Places*. Public Health England, Jun. 2017. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf

31 *Equality, Diversity and Inclusion Evidence Base for London.* Greater London Authority, May 2018, updated Jun. 2019. https://data.london.gov.uk/dataset/equality—diversity-and-inclusion-evidence-base

32 *Ibid.*

33 *Ibid.*
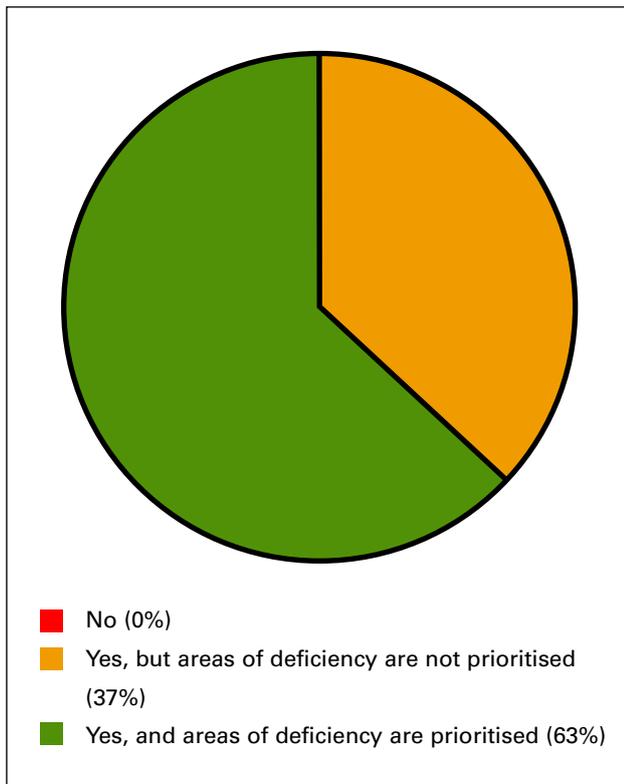
Fig. 9 Indicator: Are there policies in the Local Plan to provide open and green space, and do they prioritise areas of open space deficiency?

spaces from future development, with 54% also having specific policies on improving the accessibility and/or inclusivity of existing spaces so that a larger proportion of the population can use them. All plans had policies in place to provide new open and green spaces, with 63% outlining the need to prioritise areas of open space deficiency to provide access to people who currently have no green space close to their home (see Fig. 9). The emerging new Southwark Local Plan[34] also includes within policy the need for long-term stewardship and maintenance funding for green infrastructure to be put in place.

Community spaces
Community spaces and the spaces that hold social and cultural value can take many forms, and this is not captured well within planning designations. The

Latin Elephant case study (see Appendix 1) highlights the important role that retail space can play as a social and community space for people from specific communities to come together and connect – such as local pubs, illustrated by the Friends of The Joiners Arms case study (see Appendix 1). As highlighted by both case studies, this can be especially important for minority groups. The uniqueness and irreplaceability of community spaces cannot be underestimated.

Our Local Plan analysis shows that 97% of plans had policies in place for the delivery of community spaces, with 29% making specific reference to the importance of community spaces for social inclusion. The example from Kingston upon Thames set out in Box 8 shows how policy can respond to areas of relative deprivation and deficiencies in existing community facilities.

As set out above, communities are people that have formed a group around a shared interest, characteristic, incentive, motivation or identity aspect, or a unique spatial distribution or geography. While it is common for local planning authorities to more commonly define communities spatially with geographical boundaries, the reality is more fluid and complex. Religious buildings, community spaces that are of specific importance to particular ethnic groups, and LGBTQ+ venues are all examples of key social and cultural infrastructure that is often used and enjoyed by people from a wider geography than only those living or working within a local authority boundary.

The Friends of The Joiners Arms case study (see Appendix 1) highlights the importance of community spaces and some of the specific challenges faced by non-geographically defined communities. The case study draws upon research on the trend of the closure of LGBTQ+ night-time spaces across London,[35] and serves as a reminder that planning

Notes
34 *New Southwark Plan: Proposed Submission Version.* London Borough of Southwark, Dec. 2017.
https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan
35 B Campkin and L Marshall: *LGBTQ+ Cultural Infrastructure in London: Night Venues, 2006 – Present.* UCL Urban Laboratory, Jul. 2017. https://www.ucl.ac.uk/urban-lab/research/research-projects/lgbtq-nightlife-spaces-london

> **Box 8**
> **Policy example 8:** Royal Borough of Kingston upon Thames – extract from 'Thematic Policies' section within Kingston's Core Strategy
>
> *Policy CS 16 Protection and Provision of Community Facilities*
>
> *The Council will:*
> *.*
> *.*
> *.*
> *c.   work with partners, including Kingston's Local Strategic Partnership and the community and voluntary sector, to ensure that provision of services and facilities is maintained and enhanced and expanded in areas identified for population growth, in areas of relative deprivation and deficiency areas.*
>
> *Source: Core Strategy: Local Development Framework.* Royal Borough of Kingston upon Thames, Apr. 2012, p.183.
> https://www.kingston.gov.uk/downloads/download/37/core_strategy

decisions across London do not sit in isolation from one another, but may be part of wider trends and so could therefore have a greater cumulative impact.

The Local Plan analysis looked at whether plans had policies in place to protect and retain community spaces, and specifically considered the protection of community spaces that support groups with protected characteristics, for whom such spaces often function as a safe haven or an opportunity to freely socialise which they otherwise might not have. 97% of Local Plans had policies in place to protect and retain community spaces. Of these, however, only one plan, for the London Borough of Camden (see Box 9), specified protection of spaces that support groups with protected characteristics.

The Thames Ward Community Project case study (see Appendix 1) makes reference to the importance of communities being involved in the allocation of how Community Infrastructure Levy (CIL) and Section 106 contributions are spent and the need for community management and ownership of assets. Our Local Plan analysis looked at whether plans had policies in place that required CIL and Section 106

agreements to consider opportunities for community involvement in stewardship, management and ownership of community assets. 91% of plans made no reference to this. Only 9% set out a commitment to community involvement in decision-making on how these funds would be spent, but no plans specified considerations on community involvement in the stewardship, management and/or ownership of community assets – which would give local communities the opportunity to shape and control the future of their community assets and their neighbourhoods.

Heritage
Different communities attribute heritage value to different buildings and places. The Stephen Lawrence Charitable Trust, for example, currently has a project under way funded by Historic England to support work to enrich understanding of the buildings and places that are important to our national history, highlighting the places and histories that are important to people from ethnically diverse backgrounds.[36]

The Local Plan analysis found that 89% of plans had no policy in place requiring involvement of

> **Box 9**
> **Policy example 9:** London Borough of Camden – extract from the 'Community health and wellbeing' section within Camden's Local Plan
>
> ***Policy C2 Community facilities***
>
> *The Council will:*
> *.*
> *.*
> *.*
> *g.* ensure existing community facilities are retained recognising their benefit to the community, **including protected groups**, unless one of the following tests is met:
>   *i.* a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users;
>   *ii.* the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing; [Emphasis added]
>
> *Source: Camden Local Plan.* London Borough of Camden, 2017, p.138.
> https://uat01.nonlive.camden.pfiks.com/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6

communities in heritage designation and protection, whereas 12% had a commitment in policy (percentage sum not 100% owing to rounding), one of which – the London Borough of Havering's – is shown in Box 10.

3.5   Theme 5: Local authority resources, skills and diversity

While local authority capacity and resources were not the main focus of the research, multiple points emerged from the research process relating to local authority resources, skills and diversity being fundamental to the ability to plan for more inclusive outcomes.

3.5.1   Resources and capacity
Many local authority officers and members highlighted that strained resources put pressure on planning processes, and that pressure on funding has in some cases impacted planning teams' ability to hire enough staff – and staff retention was also mentioned as a challenge, with many planners

moving to the private sector. For example, one local authority officer commented that 'we have an absolute recruitment freeze; we are unable to replace any individual who leaves, and the pressure many officers are under makes it more likely than not that they will leave'.

Engaging people effectively requires time, effort, staff, money, skills and information. Capacity issues resulting from the under-resourcing of planning departments were cited on multiple occasions by local authority officers and wider stakeholders as a key barrier to the ability to conduct more in-depth public engagement processes. One councillor noted that his council's planning team know how to do good engagement but did not have the time or the money to approach it in the way that they would have liked to.

One local authority officer observed that 'funding problems make engagement less easy; for example, we no longer have a community development team, [and] have less resource to ensure consultation engagement and involvement is effective'.

Box 10
Policy example 10: **London Borough of Havering – extract from the 'High Quality Places' section within Havering's Local Plan**

Not all of Havering's heritage assets are designated. There are also many non-designated heritage assets that contribute to the character and distinctiveness of the borough's historic environment including historic parks and gardens of local interest and locally important historic buildings. In order to ensure that these elements of the historic environment are conserved in a manner appropriate to their significance, **the Council will work with local communities to promote the identification and maintenance of a list of non-designated heritage assets** *when these meet its agreed criteria.* [Emphasis added]

Source: Havering Local Plan 2016-31. Proposed Submission Version. London Borough of Havering, 2016, p.73.
https://www.havering.gov.uk/download/downloads/id/1909/lbhlp1_-_proposed_submission_local_plan_2016-2031.pdf

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Strained resources were also cited in relation to reinforcing the power imbalance between councils and developers – for example in negotiating viability and Section 106 agreements, as reduced staff capacity can make negotiations more difficult. One local authority officer said that his council needed resources to 'deliver our own projects and to defend our policies'.

3.5.2   Skills and cross-departmental working
Gaps in knowledge, confidence and skills within local planning authorities were highlighted by officers and community groups – including skills in engagement, particularly in effectively engaging with young people as this requires specific skills and different approaches compared with engagement with other groups. As the planning process can be very technical and can seem very inaccessible, officers need the skills and confidence to proactively involve local people and to demonstrate that planning is relevant to their daily lives.

It is also clear that there are significant gaps in the knowledge and confidence of planning officers in relation to carrying out Equality Impact Assessments (EqIAs), and that upskilling of existing planning officers is needed to ensure that they have suitable skills to undertake EqIAs effectively. While planning officers and equality officers in some boroughs seem to work closely together, in others this was not the case. There is also no clear guidance within national Planning Practice Guidance[37] on EqIAs or on how planners should meet the equality duty in the development of Local Plans.

3.5.3   Diversity and awareness
Both planning practitioners and representatives of community organisations underlined the need for the planning sector and wider local authority teams (in particular regeneration and community engagement teams) to be more diverse and to better reflect the communities they are working with and for. This was highlighted both in relation to the need for teams of practitioners to have greater awareness of the specific (spatial) needs and aspirations of different equality groups (and their implications for planning) and in relation to the need for teams involved in public engagement to better reflect the communities they are working to engage with. There are multiple groups, such as BAME in Property, Women in Planning, and Planning Out, that are working to redress this balance.

This structural issue within the planning profession was highlighted as fundamental to how planning

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policy and planning processes adequately consider the needs and aspirations of under-represented groups.

3.6 Theme 6: Addressing the undermining of Local Plan policy

Having ambitious, positive and precise Local Plan policies in place that effectively embed inclusion and equality is a good starting point. However, many findings within the research have highlighted that this will not necessarily result in the positive outcomes that one might expect, as there are multiple processes that consistently undermine Local Plan policy.

In response to the survey question 'What do you consider are the main ways in which planning policy and planning processes can contribute to creating the conditions in which communities are able to flourish?', one planning officer responded 'Trick question. It demands a major change in planning law before planning can perform this role properly.'

3.6.1 Viability

There is a strong reliance on the planning system for the delivery of affordable homes and other key infrastructure through Section 106 agreements. This is problematic, as viability assessments have provided an opportunity for developers to argue that the required contributions towards affordable housing and other key infrastructure, as set out in Local Plans, are not viable.[38]

Comments from local authority officers included:
- 'Viability concerns mean that developers often argue against providing elements which would contribute towards the creation of socially inclusive communities such as affordable housing and affordable workspace*.*'

- 'The resistance of developers and the resources devoted to appealing decisions undermines our ambitions [to reduce inequalities].'
- In relation to the effectiveness of planning tools in working towards reducing inequalities, 'increasingly we are challenged; decisions are appealed, and viability arguments pursued'.

3.6.2 Permitted development rights

Permitted development rights enable developers to convert buildings such as offices and industrial units into housing without having to gain planning permission to do so. This process therefore operates outside the formal planning system, and therefore outside Local Plan policy.

Evidence from across the built environment sector underlines the direct impacts on the health and wellbeing of the occupants of substandard housing units created through the use of permitted rights, and also highlights the wider negative impacts on the wellbeing of communities. Research published in May 2019 on permitted development rights in London shows that:

'- *Of the 15,929 new homes built through permitted development in London since 2013, only 71 were defined as 'affordable' – just 0.4%;*
- *This means that London has missed out on 5,504 affordable homes (based on the current 35% minimum threshold on privately owned land);*
- *Croydon has seen the most residential units delivered through Permitted Development in this time: 2,727 or 17% of the total;*
- *Over half (59%) of London's Permitted Development homes are smaller than the nationally described minimum space standard;*
- *London has lost more than 1.6 million square feet of office space to Permitted Development conversions, equivalent to 6% of London's total office stock.'*[39]

Notes

38 See *Planning for Affordable Housing – the Viability Process*. Parliamentary Briefing. TCPA, Apr. 2019. https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=3083b78a-c8cf-466c-b6fa-fc3fd4543b20

39 T Copley: *Slums of the Future: Permitted Development Conversions in London*. London Assembly Labour. Greater London Authority, May 2019. https://www.london.gov.uk/sites/default/files/slums_of_the_future_-_permitted_development_conversions_in_london_by_tom_copley_am.pdf

Research also shows that 49% of local authorities in England think that homes created through the use of permitted development rights could prove to be dangerous to health and wellbeing, and, further to this, 49% of local authorities in England think that vulnerable people are likely to be disproportionately negatively affected by development delivered in this way.[40] Comments from local authority officers on the impacts of permitted development rights include:

■ 'It is a disaster for housing and also has very badly affected our commercial centre due to loss of office space. In addition, the local charitable sector have been finding themselves without places to operate from.'

■ 'We are losing important employment spaces, and are unable to obtain a proportion of affordable or any accessible homes within these developments… We also miss out on the Section 106 obligations and contributions towards social and green infrastructure or the public realm.'

3.6.3 Variation from a plan-led process

The NPPF states that:

'*The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*'[41]

Research has highlighted cases of developments that diverge from Local Plan policy being granted planning permission. The Vital Old Kent Road case study (see Appendix 1), for example, highlights how such decisions can lead to a sense of disempowerment, and can undermine people's trust in planning processes and their ability to genuinely feed into how development will take place.

3.7 Summary of the analysis

The thematic analysis of current practice and policies within Local Plans set out in this Section provides a complex picture of how planning shapes both substantive justice in terms outcomes for people and procedural justice in terms of citizens' access to the decision-making process. Each theme highlights the power of planning decisions to positively shape people's lives, and also the obvious gap between this potential and current practice. As set out in the analysis, there are positive examples of what can be achieved by community activism and enlightened local authorities, but these successes are too often secured *despite* the system and not because of it. They are also often the product of committed individuals, whether members of the community or operating within a local planning authority, rather than a wider systemic approach.

This is, perhaps, unsurprising, since the analysis reveals multiple barriers to outcomes which might address the equalities agenda. This begins with a lack of priority in national policy, and is exacerbated by resource constraints and skill shortages in local government. It is made worse by a development model in which communities are, on the whole, at a significant and sustained disadvantaged in relation to the resources and expertise deployed by the development industry. The challenge of improving practice requires reform in a number of areas, from the effective and positive application of existing requirements such as Equality Impact Assessments, to the wider legal and policy purpose of the planning system. Section 4 sets out how this can be achieved.

Notes

40 *Housing for a Fairer Society: The Role of Councils in Ensuring Stronger Communities.* APSE (Association for Public Service Excellence) and the TCPA, Jul. 2019. https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=0f78e74a-b631-4449-a8eb-ffe967765fd7

41 *National Planning Policy Framework.* CP 48. Ministry of Housing, Communities and Local Government, Feb. 2019. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

Section 4

Recommendations

This report sets out powerful evidence on the need for transformation in the way we plan, to re-focus on an approach that centres around meaningful public participation and genuine consideration of the impacts of planning on different groups in society. In doing so, it is vital that all stakeholders recognise that inclusion and equality are cross-cutting issues that need to be embedded and addressed in all policy areas.

The recommendations set out here offer practical ways in which planning policy and wider planning processes can be better centred around promoting inclusion and equality, with a particular focus on improving outcomes for groups who are especially at risk of disadvantage and social exclusion. The recommendations are designed to address each of the themes in Section 3 and aim to identify immediate actions that can improve planning practice. Taken together, they could transform the way planning operates. But the transformation required to support the equalities agenda also requires fundamental change to the purpose of the planning system.

The Raynsford Review of Planning in England[42] concluded, for a number of reasons, that such a purpose should constitute a new legal duty requiring the planning system to focus on people's health, safety and wellbeing in the context of sustainable development. This report strongly endorses that approach as a key part of wider legal, policy, skills and culture change, and the following recommendations should be read in that context.

Theme 1: The aims and ambitions of planning

Recommendation 1: **Local planning authorities must ensure that Local Plans are ambitious and aspirational in promoting equality and reducing socio-economic exclusion. Local planning authorities must also ensure that corporate strategies and other strategies that relate to inclusion and equality fully recognise the key role that planning plays in achieving these ambitions.**

The research demonstrates that planning has a profound impact on people and communities, and highlights the potential for planning to positively contribute to achieving a more socially and economically just society. Local Plans are a key tool in working to achieve this.

The aims and key objectives of a plan set the ambition and the tone for what as a whole it is trying to achieve, and the values that underpin wider decision-making within local planning authorities. With only 28% of Local Plans having clear and strong top-level objectives related to inclusion or equality, there is clearly a great deal of room for improvement in the levels of ambition being demonstrated.

The key role of planning and of Local Plans in relation to impacts on equality and inclusion must also be clearly communicated beyond planning departments in order to ensure that corporate strategies demonstrate a clear understanding of how planning policies and planning processes contribute to these wider ambitions. This would shift the culture of planning to become more focused on the promotion of equality and inclusion at all levels.

Note

42   *Planning 2020 – Final Report of the Raynsford Review of Planning in England.* TCPA, Nov. 2018.
https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=30864427-d8dc-4b0b-88ed-c6e0f08c0edd

Section 4

Recommendation 2: **Built environment institutions should urgently consider introducing a 'Do no harm' obligation in built environment professional codes of conduct and should strengthen their ambition to actively challenge patterns of inequality and exclusion.**

While planning processes have the power to positively promote equality and socio-economic inclusion, they also have the power, whether directly or indirectly, to cause harm to people and to communities through intensifying, reinforcing and entrenching existing patterns of inequality and exclusion.

Cases where planning processes lead to harmful outcomes raise key ethical questions. The Raynsford Review of Planning[43] has highlighted that planners feeling conflicted about their involvement in development that would be sub-standard and harmful to people's health and wellbeing did not feel that the current RTPI Code of Professional Conduct provides a sufficiently precise ethical standard to enable them to raise concerns and ultimately to make a judgement about their involvement. A 'Do no harm' obligation would support professional planners in delivering outcomes that do not damage people's health, safety and wellbeing.

Recommendation 3: **Built environment institutions (and/or other relevant organisations) should introduce into existing award programmes new categories that recognise excellence in planning for equality and inclusion.**

In raising ambitions and working to embed equality and inclusion within planning policy, it is important for planners and other stakeholders to see what positive examples look like, in terms of both policy and examples of the tangible impacts that policies have.

Introducing new categories that recognise positive examples of planning for equality and inclusion

within existing award programmes would give weight to this agenda, highlight the importance of the equality and inclusion outcomes of planning processes, support the re-focusing of planning on these outcomes, and raise awareness of good practice.

Theme 2: Meaningful public participation in planning processes

Recommendation 4: **Local planning authorities should strengthen their Statements of Community Involvement by including targeted methods to include under-represented groups, improve the inclusivity of public participation processes, ensure that wider public engagement directly feeds into Local Plan development, and ensure that proactive engagement takes place at all stages of the planning system.**

The research found that only 83% of Statements of Community Involvement made specific reference to reaching under-represented groups, of which only 26% included targeted methods of engaging with specific groups. Meanwhile, only one Statement of Community Involvement (out of 35) included a commitment to collaboration, co-creation and/or co-production with communities, and 23% of local planning authorities had in place Statements of Community Involvement that are more than five years old.

Beyond these statistics, the wider research reflects, from the perspectives of multiple community groups and activists, how and why approaches to engagement need to be greatly improved. There is also a fundamental need for planners to better appreciate and value the information shared through public engagement, and to ensure that this information is acted upon by local authorities and genuinely shapes policy development and decision-making.

Note

43 *Planning 2020 – Final Report of the Raynsford Review of Planning in England.* TCPA, Nov. 2018.
https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=30864427-d8dc-4b0b-88ed-c6e0f08c0edd

Recommendation 5: **Local planning authorities should improve the usability and transparency of their websites and planning portals and the accessibility and readability of planning documents, in particular the Local Plan, and they should ensure that hard copies of planning documents are made available to all.**

Local authority websites and planning portals can be unclear and difficult to navigate, and key documents are often difficult to find (or in some cases missing) and written in overly technical language. This lack of transparency feeds the sense of distrust that people can have towards the planning process. Barriers to accessing and interpreting planning information need to be removed. In addition to website improvement, there is a need for planning documents to be available in hard copies in different formats at public spaces such as libraries, for documents to be translated in to multiple languages, and for development plans to be accompanied by strategic and detailed visuals. The poor quality of the majority of local authority websites is a missed opportunity in relation to trying to achieve greater levels of public participation.

Recommendation 6: **The Greater London Authority and local planning authorities should create new mechanisms to make funding available for community-level planning initiatives, professional and mutual/reciprocal support, and advice services for local people, and they should enable community groups to have access to planning officer support at a pre-application stage.**

The research highlights the fundamental imbalance of power and the very real challenges that citizens are facing in trying to engage with and influence planning processes and outcomes. But it also points to the incredible amount of time, effort and energy that community groups and local activists, almost all with limited or no funding, dedicate to influencing planning processes – and the role of groups that provide technical support and expert advice and facilitate mutual and reciprocal learning and community support, again often with minimal funds or on a voluntary basis. Clear and consistent mechanisms for funding community and community support

groups are needed in order to reduce this imbalance of power. Ensuring that community members can access planning officer support at the pre-application stage would also help to reduce the power imbalance.

Moreover, local people have an intricate and detailed understanding of the ways, needs and assets of a local area, and possess skills and knowledge that could enrich the planning process. Making resources available to local people to build and share evidence bases could substantially improve planning outcomes for local communities and local authorities, and could foster mutual learning between people and planning professionals.

Recommendation 7: **Local planning authorities should ensure that their Statements of Community Involvement and Local Plans fully recognise and support neighbourhood planning.**

Neighbourhood planning can provide an important route through which communities can influence planning in their local area. Research undertaken by Neighbourhood Planners.London highlights the disparity in local councils' approaches and attitudes towards neighbourhood planning, with approaches taken in Statements of Community Involvement and Local Plans ranging from some being supportive of this new tier of planning to others failing to implement the legal requirements introduced in the 2017 Neighbourhood Planning Act.

Theme 3: Meaningful consideration of how planning policies impact different groups of people differently

Recommendation 8: **Local planning authorities should ensure that Equality Impact Assessments conducted in developing a Local Plan are not merely tick-box exercises, and that the Equality Impact Assessment process starts early and is embedded within the iterative process of policy development and implementation.**

The purpose of carrying out an Equality Impact Assessment (EqIA) in relation to Local Plan

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development is to inform the development of policy, and in doing so strengthen and maximise the positive impacts of promoting equality and inclusion. It should also, where the need arises, enable the removal of, or highlight the need to mitigate, any potential negative and discriminatory impacts of proposals on specific groups. An EqIA therefore needs to be carried out early on and then at multiple stages in the Local Plan development process in order to ensure that it can genuinely inform policy development and the development of alternative policy options in an iterative way, through consulting with relevant groups to build a strong evidence base.

EqIAs should clearly identify and outline steps to mitigate any potential adverse impacts, consider the cumulative impact of policies and policy implementation, consider that people who have multiple protected characteristics may be uniquely impacted by planning policies, and consider cross-boundary impacts on non-geographically defined communities. The research shows that a much greater emphasis needs to be placed on EqIAs in the Local Plan development process.

Recommendation 9: **Local planning authorities should ensure that Equality Impact Assessments evaluate the impact of policies on socio-economic status in addition to the protected characteristics outlined in the Equality Act 2010.**

The equality duty only specifically relates to the protected characteristics. Importantly, there are multiple other factors and characteristics that can lead to people being particularly at risk of disadvantage and social exclusion (as considered in Section 3.3). For example, socio-economic factors, determined by social class and income level, are notably absent from the protected characteristics but are nevertheless vital considerations as they increase the likelihood of experiencing poverty, deprivation, ill-health, and other related outcomes.

Developing an EqIA methodology provides an opportunity to broaden the scope of equality consideration in order to ensure that socio-economic

status and other factors are built in. This will ensure that local planning authorities are able to more holistically and comprehensively assess the impacts of Local Plan policy on all groups who are particularly at risk of disadvantage and social exclusion.

Some Local Plan EqIAs do systematically assess the impacts of policies on lower-income communities as an integrated part of the process. This approach should be adopted in all Local Plan EqIAs.

Recommendation 10: **Government should publish Planning Practice Guidance on Equality Impact Assessments in relation to Local Plan development.**

Although local planning authorities must consider the implications of their duties under the Equality Act 2010 in developing Local Plans, there is no specific guidance provided at the national level within Planning Practice Guidance on how to approach this.

It is clear that there are significant gaps in the knowledge, skills and confidence of planners in undertaking EqIAs as a part of Local Plan development. It is also clear that the process is not given as much significance within the Local Plan development process as it should be. In publishing Planning Practice Guidance on EqIAs, government would be helping planners to more effectively undertake the EqIA process, and would also be sending a signal about the importance of planning for equality and inclusion.

Recommendation 11: **Local planning authorities should ensure that there is adequate monitoring and evaluation of the impacts of planning policies – and that this information is publicly available. They should also proactively learn from cases where an absence of a strong or specific policy may have contributed to negative outcomes for people.**

Public authorities covered by the general equality duty must ensure that 'decision-makers review policies or decisions if circumstances change (e.g. if

the make-up of service users alters). This is vital as the duty is a continuing one.'[44]

While the EqIA evaluates the expected effects of policies using a strong evidence base, contexts continually change, and there may be unforeseen impacts. It is therefore vital that, once a Local Plan is adopted, the actual impacts of its policies on distinct equality groups are monitored (feeding back into the wider evidence base) and negative impacts are mitigated as required. Wider learning also needs to be captured to inform future policy-making.

Theme 4: Embedding inclusion and equality within thematic policy areas

Recommendation 12: **Local planning authorities should develop ambitious, positive, precise and clearly worded policies which specify detail on reducing inequalities and exclusion and which express the needs and aspirations of local communities. Assessment of the effectiveness of such policy should be a key aspect of local planning authorities' annual monitoring reports.**

The Local Plan analysis demonstrates the disparity in the degree to which Local Plans have embedded equality and inclusion within their policies.

In some cases, existing policies need to be improved by ensuring that they include detail on inclusion and equality – for example by specifying that spaces must be accessible and inclusive, by specifying that areas of deficiency and deprivation (for instance green space) will be prioritised, and by specifying that protected characteristic groups and other groups at risk of being excluded will be specifically considered (through, for instance, protecting community spaces). In other cases where policies are missing, it is a matter of ensuring that Local Plans include policies that have a clear link to

inclusion – for example having clear policies on tenure blindness and clearly prohibiting gated housing developments. The effectiveness of these policies should then be monitored to ensure that they are meaningful and impactful.

Recommendation 13: **Local planning authorities should build into Local Plan policy opportunities for communities to define the social value of spaces and buildings.**

Understanding the social value of spaces such as markets, green spaces, heritage buildings and community spaces to different groups in society is very important in planning for inclusion and equality. The Local Plan analysis found that consideration of how people will be involved in processes of determining the social value of spaces and buildings was largely absent from the policies that were examined. For example, only four plans committed to community involvement in the identification of local heritage, and only two outlined how communities would be involved in this process.

Recommendation 14: **Local planning authorities should develop Local Plan policy that supports community-led initiatives – for example through policies to support community housing and community stewardship, management and ownership of assets.**

Opportunities for community-led initiatives where communities can play an active role in the design, delivery, stewardship, management and/or ownership of community assets enable people to shape their own environment and are hugely important for equality, inclusion, creating social value, and supporting the sense of pride and belonging that can result.

Policies on community-led initiatives such as community housing[45] were largely absent in Local

Notes

44 *Meeting the Equality Duty in Policy and Decision-Making.* Equality and Human Rights Commission, Oct. 2014.
     https://www.equalityhumanrights.com/sites/default/files/meeting_the_duty_in_policy_and_decision-making.pdf

45 Including housing co-operatives, community land trusts, co-housing, tenant management organisations, self-help housing, community self-build, community development trusts and other forms of community-led housing

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Plans, with only four recognising the existence of community housing approaches and none including these approaches within strategic priorities or specifying support available. In relation to broader community assets such as community spaces and green spaces, a handful of policies mentioned community involvement in determining expenditure from the Community Infrastructure Levy and Section 106 agreements. However, no policies specified opportunities for community involvement in the stewardship, management and/or ownership of spaces delivered through these mechanisms.

Theme 5: **Local authority resources, skills and diversity**

Recommendation 15: **The local planning service must be adequately funded to provide an effective system that can shape outcomes in the public interest and meet the aspirations of local communities.**

The reduction in funding for local authorities directly impacts planning teams and their ability to engage, plan and negotiate effectively, with the consequent risk that planning processes fail to realise opportunities to promote equality and inclusion, leading to substandard or harmful outcomes. These outcomes have real costs in terms of health and social care expenditure. As planning is a public service and has such a significant impact on people's lives, it should be adequately funded out of local and national taxation in order to secure key public benefits.

Adequately funding planning teams would give them the capacity to be more proactive in engaging with people at various stages of the planning process, and would also enable them to be better equipped in negotiating viability processes. This also requires that areas such as public engagement be better prioritised in the allocation of resources.

Recommendation 16: **Local planning authorities should upskill planning officers to ensure that they have the skills, knowledge and confidence to undertake Equality Impact Assessments and to engage in community engagement processes effectively. These skills must also be a mandatory part of the professional qualification of planners and other built environment professionals.**

As noted above, it is clear from the research that there are significant gaps in the knowledge, skills and confidence of planners in undertaking EqIAs as a part of Local Plan development. The research also identified that there is great room for improvement in how planners and related teams approach public participation, particularly in engaging with specific under-represented groups. An integral part of upskilling processes to lead to better planning outcomes will be officer training on the need to truly recognise the value of meaningful public participation and understand the impacts of planning policy on different groups of people.

Recommendation 17: **Local planning authorities should take action to proactively support greater diversity of staff within planning teams and related sectors.**

The research highlights the importance of diversity within the planning profession. This is particularly important in how it impacts the ability of planning teams to plan better for outcomes that support equality and inclusion. Practical steps to increase and support the diversity of planning teams can be taken by, for example, ensuring that equality diversity and inclusion policies are proactive, ensuring that data are collected at various stages of the recruitment process, having diverse recruitment panels, and delivering unconscious-bias training.[46] Local planning authorities should also proactively engage with and support existing diversity networks.[47] Local planning authorities should create the infrastructure to

Notes

46 See *Supporting Diversity*. Handbook. London Mayor. Greater London Authority, undated.
    https://www.london.gov.uk/sites/default/files/supporting_diversity_handbook_web.pdf

47 Such as BAME in Property (see https://www.bameinproperty.com/), Women in Planning (see https://www.womeninplanning.org/), and Planning Out (see https://www.rtpi.org.uk/briefing-room/rtpi-blog/planning-out-%E2%80%93-a-new-network-for-lgbtplus-planners/)

support a diverse planning team and retain staff members by providing ongoing staff support and training.

Theme 6: Addressing the undermining of Local Plan policy

Recommendation 18: **Government should remove centrally imposed barriers to Local Plan policy goals being achieved by further reforming the viability process and by rescinding the central imposition of permitted development rights.**

Even strong Local Plan policy can currently be undermined or bypassed. Despite the changes made to the viability test in the NPPF and Planning Practice Guidance, many challenges remain, including the lack of transparency of viability processes and the imbalance of power and resources of parties in the negotiating process. Greater clarity is also required on the proposed changes to how market values are calculated.

The use of permitted development rights (PDR) creates severely substandard housing in locations that are not designed for residential life. 59% of London's PDR homes are smaller than nationally described minimum space standards. Only 71 homes (0.4%) of the 15,929 new homes built through PDR are defined as 'affordable', meaning that London has missed out on 5,504 affordable homes (based on the current 35% minimum threshold on privately owned land).[48] At the same time the use of PDR has wider negative impacts on communities through the loss of office and industrial space and the loss of Section 106 obligations and contributions towards social and green infrastructure or the public realm.

Recommendation 19: **Government should reinforce the legal status of the Local Plan to support a genuinely plan-led system, providing certainty for local communities and the development sector on how and when development will take place. Policy in Local Plans should be expressed accessibly and precisely, in language that communicates the key outcomes for communities.**

Planning decisions that deviate from adopted Local Plan policy risk undermining the status of the plan and creating or reinforcing the sense of distrust that can be felt by communities towards the planning process. Stronger Local Plans developed with full participation can help to rebuild trust and reduce speculation in land markets.

Recommendation 20: **Government should institute a limited community right of appeal.**

It is recommended that government institute a limited community right of appeal that could be used by community groups to appeal if decisions are being made that are seriously in conflict with policy in the approved Local Plan. Linked to Recommendation 19, instituting a community right of appeal would reinforce the status of the plan and would support a genuinely plan-led system by ensuring that communities can hold local planning authorities to account. The implementation of this recommendation would be based on the model recommended in the Raynsford Review of Planning,[49] in which the right is strictly limited to major decisions which depart from Local Plan policy.

Notes

48   T Copley: *Slums of the Future: Permitted Development Conversions in London.* London Assembly Labour. Greater London Authority, May 2019. https://www.london.gov.uk/sites/default/files/slums_of_the_future_-_permitted_development_conversions_in_london_by_tom_copley_am.pdf

49   *Planning 2020 – Final Report of the Raynsford Review of Planning in England.* TCPA, Nov. 2018. https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=30864427-d8dc-4b0b-88ed-c6e0f08c0edd

Concluding thoughts

As outlined in this report, the planning system has very real impacts on people's lives, and the need for planners to much better understand the nature and magnitude of these impacts on different groups in society is therefore central to planning for inclusion and equality.

The profound impacts that planning policy and planning decision-making can have are often underestimated – both in terms of the transformational potential of the planning system to be used as a positive tool in the promotion of inclusion and equality, and, conversely, in relation to the very real risk of doing harm through reinforcing poverty and exclusion that planning can pose.

This report calls for a refocusing of the planning system to place social justice at its core. It is clear from the research that the transformation required for the planning system to better promote equality and inclusion will need to be through a combination of both practical shifts in planning practice and fundamental shifts in power.

Appendix 1

Case studies

Case Study 1
Friends of The Joiners Arms
Tower Hamlets

Ewan Munro/flickr

A1.1 Introduction – Friends of The Joiners Arms

The Friends of The Joiners Arms (FOTJA) is a LGBTQ+ community campaign group in Tower Hamlets, which aims to save The Joiners Arms on Hackney Road and evolve it into the first community-run LGBTQ+

pub in London.[a1] The Joiners Arms was shut down in early 2015 after the property owner ended its licence, despite the pub's financial stability and continued importance to the (East) London queer communities since the late David Pollard opened the pub in 1997. Many of London's LGBTQ+ inhabitants have enjoyed The Joiners Arms to meet, dance and build a community under the motto of 'Life, Love and Liberty'.[a2]

In 2017 the FOTJA campaign convinced the London Borough of Tower Hamlets Planning Committee to create a condition in the planning permission for the site development that required the developer to include a LGBTQ+-run pub in the scheme, the first time the provision of a lost LGBTQ+ venue was enshrined into a planning obligation, setting an important precedent for other community groups.[a3]

A1.2 Introduction – Hackney Road

Hackney Road, the former location of The Joiners Arms, runs through London's East End, which has undergone extensive regeneration over the past decades: six-storey office and apartment buildings rise across from the closed pub, situated between the largely redeveloped Old Street and Kingsland Street junction and new development at Cambridge Heath. The Joiners Arms is part of the block of buildings at 114-150 Hackney Road for which a mixed-use redevelopment proposal was submitted after The Joiners Arms' closure.

Notes

a1 LGBTQ+ is an acronym for lesbian, gay, bisexual, transgender, queer people and related communities. The legal agreement between Tower Hamlets Council and the applicant uses 'LGBT+ operator'

a2 Further information on the campaign is available on the website of the Friends of The Joiners Arms, at www.thejoinersliveson.wordpress.com

a3 Minutes of Meeting of Development Committee, 11 Oct. 2017, Agenda item 114 -150 Hackney Road. London Borough of Tower Hamlets. https://democracy.towerhamlets.gov.uk/mgAi.aspx?ID=81660

Appendix 1

A1.3 Challenges – issues of inclusion and equalities

Disappearance of LGBTQ+ community infrastructure

Planning officers conducted an Equality Analysis on how the closure of The Joiners Arms impacted groups with protected characteristics: the report considered the negative impacts on the LGBTQ+ community (protected under the 'gender reassignment' and 'sexual orientation' characteristics of the Equality Act 2010) to be acceptable given the scheme's other benefits.[a4] These assessments of individual cases do not consider the cumulative impact of planning decisions on community infrastructure within and across borough boundaries: 58% of London's LGBTQ+ venues have closed between 2006 and 2016, with an even greater number of closures in Tower Hamlets (seven out of ten venues). These nightlife spaces are important to the diverse communities of the city, enriching their surrounding neighbourhoods and London's night-time economy and culture.[a5] Planning partly contributed to the disappearance of LGBTQ+ spaces: approval for development directly influenced at least a fifth of these closures.[a6]

Section 106 agreements

Although the legal agreement between Tower Hamlets Council and the developer states that a new venue should be run for 25 years by a 'LGBT+ operator' (a major victory for the FOTJA campaign), there is no guarantee that FOTJA will have first right of refusal once the scheme is completed. The Joiners Arms offered a space for people of all walks of life, and a different LGBTQ+ operator might run a space that is less inclusive. The legal agreement also provides no support to FOTJA (or other community-led initiatives) to develop a business plan and prepare to bid for the lease. However, planning obligations can create opportunities for community

groups, and communities need additional resources to seize them.

Temporary community spaces and meanwhile use

The Joiners Arms has been closed for almost five years, while works on site have yet to start. Although the FOTJA campaign continues to organise performance shows and day-time events in support of the LGBTQ+ community across Central and East London, often in collaboration with other groups, the absence of a temporary space to bridge the long period of redevelopment is a challenge. The timelines of development schemes do not align with community life: a five-year period of preparation, standard to developers, is a long haul for communities.

A1.4 Engagement with planning policies and processes

Asset of community value

FOTJA's first attempt to stop the demolition of The Joiners Arms was through gaining formal recognition of the value of the pub to the local community: FOTJA applied successfully to the local authority to grant The Joiners Arms Asset of Community Value (ACV) status in February 2015. As stated in the 2011 Localism Act, an asset is of community value if its main use contributes to the social wellbeing or social interest (which includes cultural, recreational and sporting interests) of the local community and will continue to do so in the future.

Advocacy and campaigning

After winning ACV status, FOTJA continued to put pressure on Tower Hamlets Council and advocate for further protection of the pub. At Development Committee meetings FOTJA spoke in objection to the proposal to express concern about the development's impact on the viability of a new

Notes

a4   *Equality Analysis (EA)*. For Planning Ref PA-17-00250, Hackney Road Nos 114-150. London Borough of Tower Hamlets.
     https://democracy.towerhamlets.gov.uk/documents/s113672/FINAL2Oct17%20Equality%20Analysis%20-
     %20Hackney%20Road%20Nos%20114-150%20Planning%20Ref%20PA-17-00250_.pdf

a5   B Campkin and L Marshall: *LGBTQ+ Cultural Infrastructure in London: Night Venues, 2006-Present*. UCL Urban Laboratory, Jul. 2017.
     https://www.ucl.ac.uk/urban-lab/sites/urban-lab/files/LGBTQ_cultural_infrastructure_in_London_nightlife_venues_2006_to_the_present.pdf

a6   *ibid*.

LGBTQ+ venue, owing to its design, the costs of bringing the new unit into use, excessive rent levels, and the operating hours. In agreement, the committee deferred the planning permission. Consequently, Tower Hamlets planning officers organised a roundtable meeting between the applicant for the scheme, FOTJA and the Culture at Risk Officer from the Greater London Authority. Following this meeting, the applicant submitted a series of amendments to the scheme to increase the size of the new pub by 22%, with enhanced sound-proofing; altered the heads of terms of the legal agreement to contribute £130,000 to fit-out costs; and increased the lease length to 25 years for a future LGBT+ operator.[a7] Tower Hamlets Council extended the opening hours of the new venue for a 12-month trial period.

The Development Committee, approving of the amended legal agreement, granted planning permission in October 2017.

Setting up a community benefit society
In preparation for its bid on the lease of new pub, FOTJA registered as a Community Benefit Society (CBS) in May 2018, a legal structure that half of the community pubs in England use.[a8] As a CBS, FOTJA will aim to benefit the wider community beyond the pub's clientele, and can raise funds for the pub by issuing 'community shares'.[a9] A pub operating as a CBS can also apply for funding and business support from organisations such as the Plunkett Foundation and Locality.

Awareness and precedent
Tower Hamlets Planning Committee recently refused planning permission for a scheme that would have led to the closure of gay bar The Backstreet in Mile

End – a decision upheld by the Planning Inspectorate after appeal, who stated that the protection of an important LGBTQ+ club had not been guaranteed.[a10]

A1.5 Conclusion – valuable lessons

- Commercial and not-for-profit community spaces, which include pubs and late-licence venues, are vital components of the infrastructure that communities use to come together in a space that is safe, affirming and liberating. The importance of spaces like The Joiners Arms to the LGBTQ+ community cannot be overstated.
- To protect the future of spaces of value to (local) communities, the rights for communities enshrined in Asset of Community Value (ACV) status could be expanded to include the right of first refusal, since, under the Community Right to Bid, the property owner is under no obligation to sell or let the property to the bidding community organisation.
- Although the FOTJA campaign shows how planning obligations can be used to deliver community infrastructure for specific communities of interest, such a legal agreement requires careful drafting to be enforceable and legally compliant, and might not provide all the support that communities need. The current use class system does not allow for a planning permission to require a venue for a LGBTQ+ use, and therefore cannot provide an alternative to this being stipulated in planning obligations. More importantly, community groups can only benefit from the venue guaranteed in a planning obligation once the development has been completed – meanwhile or temporary spaces can be a solution here.

Notes
a7 *114-150 Hackney Road.* Development Committee Report PA/17/00250. London Borough of Tower Hamlets, 17 Oct. 2017.
https://democracy.towerhamlets.gov.uk/documents/s113671/114-150%20Hackney%20Road%20Deferral%20Committee%20Report%20PA-17-250FINAL2OCT17.pdf
a8 *Community Pubs: A Better Form of Business 2018.* Plunkett Foundation, 2018. https://plunkett.co.uk/wp-content/uploads/Better-Business-2018-Pubs.pdf
a9 For further information, see *How to Set up a Community Pub.* Plunkett Foundation, Jan. 2019. https://plunkett.co.uk/wp-content/uploads/Plunkett_How-to-set-up_Pub_final.pdf
a10 M Donnelly: 'Concern over future of LGBT nightclub prompts inspector to block 12-story London scheme'. *Planning*, 14 Aug. 2019.
https://www.planningresource.co.uk/article/1593843/concern-future-lgbt-nightclub-prompts-inspector-block-12-storey-london-scheme

Case Study 2
Grand Union Alliance
Old Oak and Park Royal

A2.1 Introduction – Grand Union Alliance

The Grand Union Alliance (GUA) is a network of resident and community groups, voluntary organisations, individuals and small businesses from in and around the Old Oak and Park Royal area. The GUA is focused on influencing large-scale development plans in Old Oak and Park Royal and 'wants to see plans developed that will sustain existing communities and enhance what local people currently value in their neighbourhoods'.[a11] The name of the network refers to the Grand Union Canal, which runs through the Old Oak and Park Royal area.

The GUA was established in 2014 through London Tenants Federation (LTF) grant funding from the Trust for London. This funding provided support from LTF workers, Just Space (an informal alliance of around 80 community groups, campaigns and concerned independent organisations) and University College London academics and students. From 2016 to 2018, grant funding to support the network has been

provided through an Economic and Social Research Council grant as part of an international research project titled 'Governing the Future City'.[a12]

A2.2 Introduction – Old Oak and Park Royal

Old Oak and Park Royal is the UK's largest regeneration project, with a development area straddling three London boroughs: Ealing, Brent, and Hammersmith and Fulham. The Old Oak and Park Royal Development Corporation (OPDC), which was launched in 2015 by the Mayor of London, covers two Opportunity Areas and is the local planning authority and regeneration agency for the 650 hectare site.[a13] OPDC plans to use investment in Crossrail and the High Speed 2 railway as a catalyst for redeveloping the area. Development plans include the generation of 65,000 jobs and 25,500 new homes across Old Oak and Park Royal, and public space being enhanced and protected.[a14]

A2.3 Introduction – issues of inclusion and equalities

Scale and nature of the proposed development
Old Oak and Park Royal has been described as 'Canary Wharf in the West'.[a15] The sheer magnitude of the development and the significant annual changes to the draft Local Plan have placed great demands on the GUA. This called for thorough, sustained, technical analysis, possible only with academic support and expert planning advice.

Inclusion
Despite part-time support-worker funding, it has proved difficult to reach out and engage more of

Notes
a11 See the Grand Union Alliance website, at https://grandunionalliance.wixsite.com/grandunionalliance
a12 See UCL's 'Governing the Future City' website, at https://www.geog.ucl.ac.uk/research/governing-the-future-city
a13 See the Old Oak and Park Royal Development Corporation website, at https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc
a14 See the Greater London Authority's 'OPDC Vision and Mission' webpage, at https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/about-opdc/opdc-vision-and-mission
a15 See, for example, J Prynn: 'Old Oak Common: £10 billion plan for 'Canary Wharf of West' to be reviewed by City Hall'. *Evening Standard*, 23 Jun. 2016. https://www.standard.co.uk/news/london/old-oak-common-10-billion-plan-for-canary-wharf-of-west-to-be-reviewed-by-city-hall-a3278981.html

those who do not usually engage in planning, to 'balance' those already adept at engagement, despite efforts to make the planning process more intelligible and relevant in the face of transitory populations and the competing preoccupations of 'everyday life'.

Meaningful impact of consultation

GUA members are conscious that striving to ensure that the OPDC's prescribed procedures of consultation are operationally effective and that the opportunities they present are effectively used by the community is in itself not enough. There has to be meaningful impact as a consequence of community involvement, such that the community's desired outcomes – evolved through collaborative dialogue with plan-makers, developers and decision-takers – demonstrably influence plans and implementation.

A2.4 Engagement with planning policies and processes

Strengthening local voices
Since being established in 2014, the GUA has worked to inform and increase public awareness of development plans for the OPDC area. In bringing together over time around 70 groups and networks, the GUA 'does not aim to supersede existing local groups or networks, but rather to facilitate their coming together in order to share and grow across borough boundaries'. The GUA says that 'by strengthening a diverse range of local voices through meetings, events and briefings, it aims to ensure that locals are well informed, fully consulted and engaged in the decision-making about development plans for this part of London'.[a16] GUA members have also sought to strengthen their voice in the OPDC

area through neighbourhood planning: Harlesden Neighbourhood Forum, whose boundaries overlap with the OPDC area, had its Neighbourhood Plan adopted in May 2019; and the Old Oak Neighbourhood Forum was designated in February 2018. GUA members have also developed a community-based vision for the OPDC area.[a17]

Setting 'Ground Rules' – OPDC Statement of Community Involvement
In response to the OPDC consultation on its draft Statement of Community Involvement (SCI) in autumn 2015, GUA members proposed a set of 12 'Ground Rules'[a18] to guide how the OPDC and developers involve and engage with the local community. The 'Ground Rules' were structured under 12 headings:

- inclusive invitation;
- authorisation;
- continuity, collaboration and co-production;
- independent advice;
- early involvement;
- presenting options;
- choosing between options;
- consensus;
- transparency and confidentiality;
- feedback on the outcome of community involvement;
- responsibility; and
- measuring, monitoring and evaluating the effectiveness of community involvement.

The GUA secured a substantial degree of success with 10 of the 12 proposed 'Ground Rules' being adopted in full or in part within the OPDC's Statement of Community Involvement (SCI).[a19] GUA analysis shows which elements of the 'Ground Rules' had been included in the SCI and which had not.[a20] Most notably, the areas that were not adopted included:

Notes
a16 *Grand Union Alliance Report January 2017 – March 2018*
a17 *Community-Based Vision and Objectives.* Grand Union Alliance (undated).
https://docs.wixstatic.com/ugd/4e0a01_c1b57dfeb646429c9f9f2e054d9c9c5b.pdf
a18 *Responses to ODPC and Mayoral Consultations.* Grand Union Alliance (undated). 'OPDC Statement of Community Involvement' section. https://grandunionalliance.wixsite.com/grandunionalliance/responses-to-consultations
a19 *Statement of Community Involvement.* Old Oak and Park Royal Development Corporation, Feb. 2017.
https://www.london.gov.uk/sites/default/files/opdc-statementofcommunityinvolvement-042017.pdf
a20 *Analysis of the GUA Influence on the Statement of Community Involvement (Jan 2016).* Grand Union Alliance (undated).
https://docs.wixstatic.com/ugd/4e0a01_7866e2273de94387bacb14869f9d5e4b.pdf

endorsing collaborative or co-production with the community; involvement at the formative stage;[a21] encouraging community-based options and expecting development options; providing guidance on effectively responding to planning applications (the GUA, in error, had asked for guidance on objecting); and clearly setting out the differing responsibilities of OPDC and the boroughs.

The 'Ground Rules' approach taken by the GUA provides an example of a model response which could be adapted and replicated in other areas: a member of the GUA has since put forward the 'Ground Rules' as a potential model to Brent and Barnet councils. It has been suggested, linked to the proposition for a 'Social Compact with Londoners' put forth at the Just Space City Hall Conference in February 2016,[a22] that the 'Ground Rules' could form the basis of a potential Mayoral SCI,[a23] which could be used as a best practice example for London local planning authorities in the development of their SCIs.

Influencing the OPDC's developing planning policy

The GUA organised multiple meetings, conferences and a charrette,[a24] and submitted detailed 'consensus' responses to the Greater London Authority's Opportunity Area Planning Framework and the three drafts of the OPDC Local Plan produced between 2015 and 2018, and presented to the Examination in Public in 2019. GUA members sought an affordable and inclusive new community, benefiting, connecting and integrating with the surrounding area through lifetime neighbourhoods, exemplary design and sustainability, enhanced green spaces, and social infrastructure.

Points raised in the submissions were initially influential and overall did lead to specific changes on certain detailed aspects of non-strategic policy. However, over time, as the plan was redrafted, the original moderating of development to meet the 'sensitive edges' of existing communities and heritage assets was lost. The OPDC's masterplans, on which many of the changes were based, had not been consulted on, and the land available for development had been significantly reduced while the development targets remained substantially the same.[a25] Issues around contradictions between policy and proposals and the uncertainty of key infrastructure, particularly transport, are manifest.

GUA members were also strongly involved in the Examination in Public of the draft London Plan in 2019.

A2.5 Conclusion – valuable lessons

■ The 'Ground Rules' advanced by GUA members, and the success gained in their partial adoption within the OPDC SCI, demonstrate that well reasoned community-originated proposals[a26] can have traction and credibility, particularly if such best practice is widely and freely shared.
■ It is vital that there are sustained resources for community groups to organise effectively, especially when cultivating and nurturing the involvement of more marginalised communities.
■ Planning authorities and developers must engage in a deliberate and concerted dialogue with communities from the very start of plan-making and development proposals, rather than simply holding formal consultations every so often.

Notes

a21 The 'Gunning Principles' on what makes for a fair consultation, endorsed by the Supreme Court on 29 Oct. 2014 (see http://www.bailii.org/uk/cases/UKSC/2014/56.html), specifically hold that 'consultation must be at a time when proposals are still at a formative stage'

a22 See Just Space's 'Londoners demand a social compact' webpage, at https://justspace.org.uk/2016/02/06/londoners-demand-a-social-compact/

a23 Unlike for local authorities in London, there is no legal requirement for the Greater London Authority to have an SCI

a24 *Old Oak and Park Royal Charrette Record of Activities.* JTP, Mar. 2016. http://media.wix.com/ugd/4e0a01_b231d103eed54ae898c7e47a7bbb740c.pdf

a25 See, for example, J Prynn: 'Blow to Old Oak Common plan as 6,000 homes have to be cut'. *Evening Standard*, 19 Sept. 2019. https://www.standard.co.uk/news/london/blow-to-old-oak-common-plan-as-6000-homes-have-to-be-cut-a4241071.html

a26 The 'Ground Rules' were inspired by David Farnsworth and the Bristol Network of community groups that negotiated with Bristol City Council. The GUA acknowledges its debt to them

Case Study 3
Hackney Quest
Hackney

What local young people value, the problems they face, and what they want to change
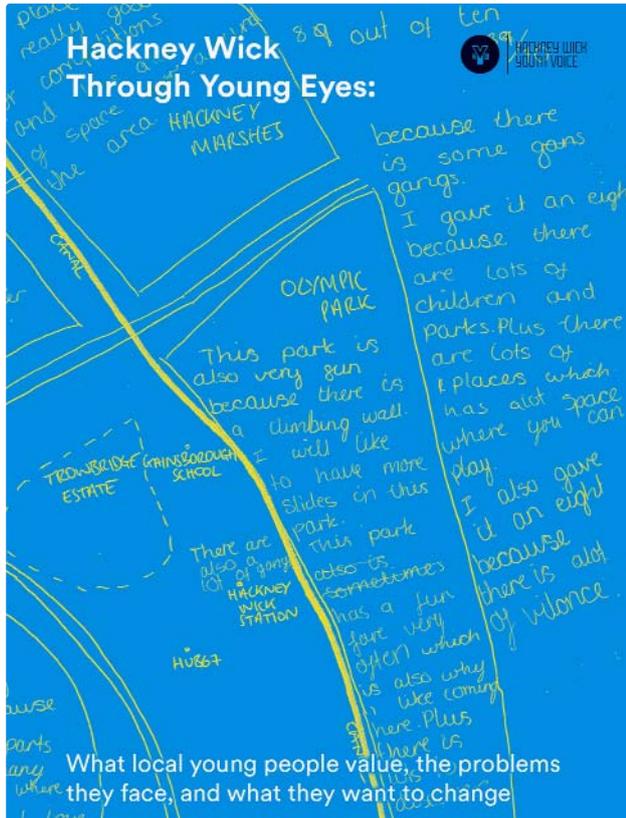
A3.1   Introduction – Hackney Quest

Hackney Quest is a charity based in the Hackney Wick Ward in Hackney. Hackney Quest was founded in 1988 and has a strong focus on working with young people in the local area, and on developing the potential of young people, families and the community.[a27] In 2017, with funding from Wick Award[a28] through the National Lottery's 'Big Local' scheme, as part of the Hackney Wick Youth Voice project Hackney Quest undertook a six-month, large-scale research project, engaging with young people in the area to explore what they value, the problems they face, and what they want to change. The project report, *Hackney Wick Through Young Eyes*,[a29] was published in February 2018.

A3.2 Introduction – Hackney Wick Ward, Hackney

Hackney Wick Ward is situated in the south east of the London Borough of Hackney. It has experienced large-scale rapid change in the last couple of decades, most notably in relation to regeneration and development linked to the 2012 London Olympics, and also in relation to wider regeneration taking place in the ward and surrounding areas. Hackney Wick Ward contains part of the Queen Elizabeth Olympic Park, and part of the ward sits within the London Legacy Development Corporation (LLDC) boundary. Hackney Council published an Area Action Plan for Hackney Wick in 2012 which covers the part of Hackney Wick Ward that lies within the LLDC boundary.

Census data show that Hackney Wick Ward has a high proportion of young people, with over a third of residents in the ward being 25 or under.[a30] It has high levels of deprivation, with the 2019 Index of Multiple Deprivation scoring most of the ward in the most deprived 10% or 20% of areas in England.[a31]

A3.3 Challenges – issues of inclusion and inequalities

Affordability, belonging and disempowerment
Hackney Wick Through Young Eyes outlines what young people value most in Hackney Wick, highlighting the importance of parks and play facilities, youth centres and community projects, neighbours and community feeling, and other local assets, including

Notes

a27 See the Hackney Quest website, at http://www.hackneyquest.org.uk/
a28 See the Wick Award website, at https://wickaward.co.uk/
a29 *Hackney Wick Through Young Eyes: What Local Young People Value, the Problems they Face, and What they Want to Change.* Hackney Wick Youth Voice. Hackney Quest, Jan. 2018. http://www.hackneyquest.org.uk/images/HWTYE.pdf
a30 *Hackney Wick Ward Profile.* London Borough of Hackney, Nov. 2015. https://drive.google.com/file/d/1YSnKV-f5ZyE-a9Lqit5vIpOAGR_eHUAx/view
a31 See the 2019 Index of Multiple Deprivation for England Explorer, at http://dclgapps.communities.gov.uk/imd/iod_index.html

Appendix 1

the hospital, libraries, stations, and shops. The report also outlines the problems faced by young people in the ward, including problems relating to crime, safety and violence, gangs, housing, deprivation and the local environment, a lack of things to do, and a lack of work opportunities.

While it notes that 'a number of those involved in our research spoke positively about how the area seems to have improved and to have been regenerated, particularly because it can help tackle misconceptions and stereotypes about the area', the research found that negative comments about change in the area were more common than positive ones.

In relation to negative experiences of change in the local area, the report highlights three related issues: affordability, belonging, and disempowerment. It says that 'some young people feel they're being left out by what's happening in the area, or at least that they're not benefiting from it'. The report highlights the challenges being experienced by young people in relation to housing conditions, housing affordability and the affordability of goods and services, and also argues that if change in the area is to benefit local people it needs to include substantial employment opportunities for young people.

The report also notes that 'some young people were very aware that they may not be able to afford to stay in the area', and highlights the link between affordability and belonging, arguing that 'when you're struggling to afford the area you've grown up in, it can undermine your sense of belonging'. The report goes on to say that 'when combined, problems with affordability and belonging can lead to a profound sense of disempowerment, and to a feeling that people in the area are not being listened to or thought about'.

Engagement in planning and regeneration processes

As noted above, young people make up a large proportion of residents in Hackney Wick Ward, with over a third of residents in the ward being 25 or under.[a32] The *Hackney Wick Through Young Eyes* report suggests that 'through all the change, there is a risk that local young people feel that things are happening *to* them, rather than *for* them – more could be done to ensure that they are involved and their needs are considered'. This can link to a strong sense of disempowerment. The report highlights the need for openness and honesty in engaging with young people, stating that 'young people need to know the changes which are definitely happening, so that they feel informed, and they need to know which changes they can have a say in, so that they feel involved'.

A3.4 Engagement with planning policies and processes

***Hackney Wick Through Young Eyes* report**
Hackney Wick Through Young Eyes was launched by Hackney Quest in Hackney Town Hall in February 2018, and Hackney Council issued a formal response to the recommendations in the report outlining how it links to council initiatives, and stating that 'we have used the *Hackney Wick Through Young Eyes* report to further strengthen the principles which underpin our new strategy around access to opportunities, equality and inclusion and belonging'.[a33]

Following the launch of the report, members of Hackney Quest were invited to a series of meetings with council staff from different teams. On reflecting on the report, a Hackney Quest staff member stated that he felt that undertaking the research has built confidence and has provided Hackney Quest with a stronger platform from which to engage with the council, developers and other stakeholders on planning and development issues; and that building relationships with council officers working in regeneration and other council teams has put Hackney Quest in a better position to be able to influence change in the area.

Notes
a32 *Hackney Wick Ward Profile.* London Borough of Hackney, Nov. 2015. https://drive.google.com/file/d/1YSnKV-f5ZyE-a9Lqit5vIpOAGR_eHUAx/view
a33 *Council Response to Hackney Wick Through Young Eyes Report*. London Borough of Hackney, 2018

Six follow-on projects

Following on from the publication of *Hackney Wick Through Young Eyes*, Hackney Quest has identified six ideas for practical follow-up projects that seek to address some of the issues raised in the report. These project ideas include a kitemark for local businesses offering opportunities to young people, a youth-led community build project (which is currently under construction), and facilitating increased youth voice through schools.

Championing the need to meaningfully engage young people

Hackney Quest continues to champion the need for change in the area to have tangible positive impacts for local young people. There are multiple large-scale developments currently being planned linked to Queen Elizabeth Olympic Park, and Hackney Quest has met with many developers as part of their community consultation processes.

A3.5 Conclusion – valuable lessons

- The process of producing the *Hackney Wick Through Young Eyes* report, and the impacts that it has had, demonstrate the importance of community-led research in galvanising awareness, strengthening a platform for engagement and relationship-building with different stakeholders, and contributing in-depth documentation of lived experiences to form part of evidence bases.
- Hackney Quest's experience of engaging with young people on issues of change in their local area demonstrates the importance and potential for ongoing engagement with schools as a structured way to involve young people and their parents.
- Hackney Quest's experience highlights that engaging effectively with young people on issues relating to planning and change requires different approaches from those commonly used in consultation processes, and requires those involved to have specific skills and experience.

Notes

a34 See the Latin Elephant website, at https://latinelephant.org/

a35 *Planning Application 16/AP/4458*. Southwark Council, Oct. 2016. https://www.southwark.gov.uk/regeneration/elephant-and-castle?chapter=4

Case Study 4
Latin Elephant
Southwark

A4.1 Introduction – Latin Elephant

Latin Elephant[a34] is a charity that promotes the inclusion of migrant and ethnic groups by increasing their representation and engagement in regeneration projects across London. It currently focuses on working with the traders of Elephant and Castle Shopping Centre in the London Borough of Southwark – a hub of around 150 Latin American, migrant and ethnically diverse businesses spread across the shopping centre and surrounding railway arches and serving the Latin American community (Census 2011 data show that 8.9% of the borough's population is of Latin American background) and other communities in the area. Latin Elephant supports the traders in their engagement with the redevelopment plans for Elephant and Castle (which include the planned demolition of the shopping centre and the relocation of the traders), for which an application was submitted in 2016.[a35]

In March 2019 it was announced that the redevelopment scheme for the shopping centre would be subject to a judicial review, which local campaigning groups, including the 35% Campaign, initiated with support from the Public Interest Law

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Centre and Southwark Law Centre. The proposals and subsequent review have left the future of the traders uncertain.

A4.2 Introduction – Elephant and Castle, Southwark

The Elephant and Castle Shopping Centre opened in 1965 as one of the first American-style indoor shopping malls in the UK, offering more than 100 shops in a three-story building and having immediate access to railway and tube stations. Home to a cluster of Latin American businesses for three decades, the shopping centre has been recognised as an important Latin Quarter in London, as business owners and staff members are of ethnically diverse backgrounds and cater to a diverse clientele, many of whom have migrated from Latin America or are of a second-generation Latin American background.

Elephant and Castle has been undergoing an intensive regeneration programme for almost a decade, notably the highly controversial Elephant Park scheme on the site of the former Heygate Estate and the planned new town centre at the site of the Elephant and Castle Shopping Centre, with another 24 projects either under way or in the pipeline in the Elephant and Castle Opportunity Area.[a36]

The replacement of the shopping centre could result in the (temporary) relocation of the current traders, as some traders have been offered five- to ten-year leases in Perronet House and Elephant One. The scheme has met with opposition from local communities, resident associations and campaigning groups owing to perceptions of a lack of genuine affordable housing, an inadequate business relocation strategy, and wider concerns over gentrification.

A4.3 Challenges – issues of inclusion and inequalities

Equality Impact Assessment
Latin Elephant advocates for the consideration of the needs of minority ethnic groups affected by the regeneration proposals. It has challenged the Equality Impact Assessment (EqIA) of the proposed scheme as not all trading businesses had been considered, and only a small portion of the Latin American population had made representations in the evidence gathering (just 3% of the Latin American community had been included).[a37] More importantly, an assessment of the full implications of the scheme on groups with protected characteristics requires the consideration of each current use of the shopping centre: a separate EqIA of the centre's Bingo Hall found that 90% of the bingo visitors were aged over 45 and visited the hall at least once a week, and that 62% identified as Black/African/Caribbean/Black British.[a38] The full impact of the scheme on local communities remains unknown.

Provision of (affordable) workspace
One of the key challenges Latin Elephant encountered was the difference in expectations of property developers and managers on how to operate the retail offer within mixed-use development, as there seems to be some confusion over the differences between affordable workspace and affordable retail space.

Local business
The relocation strategy for traders in the shopping centre has been set out in a Section 106 agreement between Southwark Council and the property developer. Using a legal agreement to ensure that local traders can continue to do business is a complex matter, as, according to the current definition of local independent businesses, not all existing businesses

Notes
a36 See the Elephant and Castle Partnership website, at https://www.elephantandcastle.org.uk/
a37 *Equality Analysis of the Elephant and Castle Shopping Centre Redevelopment: Final Report.* AECOM Infrastructure & Environment UK, for Southwark Council, Jun. 2016. https://www.southwark.gov.uk/assets/attach/2949/160623_Elephant_and_Castle_Shopping_Centre_Redevelopment_Equality_Analysis___Final_Report.pdf
a38 *Elephant and Castle Shopping Centre Redevelopment – Bingo Hall Survey Results: Final Report.* AECOM Infrastructure & Environment UK, for Southwark Council, Feb. 2017. https://www.southwark.gov.uk/assets/attach/2950/170410_Elephant_and_Castle_Shopping_Centre_Bingo_Equality_Analysis___Final_Report.pdf

will qualify for financial compensation and relocation: sub-tenants renting properties under multiple occupation are not fully eligible. Through diligent fieldwork Latin Elephant discovered that an inadequate number of relocation units had been made available for traders, estimating that over 40 businesses have not been offered a relocation unit, while traders have not always been prioritised in the allocation of the completed affordable retail space in the neighbouring Elephant Park development.[a39] Enforcement and implementation of legal agreements requires continuous scrutiny from the local community, in a resource-intensive process that further erodes trust in planning process and creates uncertainty for local businesses.

A4.4 Engagement with planning policies and processes

Workshops for local businesses
To raise awareness among traders in the shopping centre, Latin Elephant held workshops to brief traders on forthcoming development and to organise businesses to respond to planning proposals. To bring local businesses together and explain the importance of planning, Latin Elephant provided tailored information: the initial workshops focused on its Migrant & Ethnic Business Readiness Programme, comprising four micro-business support guides, covering commercial leases, employers' duties, building an online presence, and models for business planning.[a40] Latin Elephant now offers assistance to people from all across South London. The 2018 workshops focused on traders and community members and included topics such as employment rights, settlement schemes, and urban planning. The continuous presence of Latin Elephant and the offer of free support have been important in forming a bond of trust with the traders. In collaboration with the retailers Latin Elephant developed an alternative vision for the Latin Boulevard (or Calle Latina), which focuses on (retaining) local business and heritage, the provision of community infrastructure, and local craftmanship and food.[a41]

Evidence-based advocacy
Latin Elephant has mapped all the different businesses (and uses) in the shopping centre, and is now mapping other Latin American business clusters across London to benefit all businesses and retailers.[a42] The mapping has allowed Latin Elephant to substantiate demands and quantify objections to the local authority and developer, and to monitor the implementation of legal agreements.

Through mapping Latin Elephant built a database with information on use classes, rent levels and trader locations, which it has used in its advocacy and social media campaign. Based on such evidence Latin Elephant has negotiated substantial improvements for the traders, which have included a relocation fund, rent reduction for traders in two of the three relocation sites (Castle Square and Perronet), more units for relocation, and improvements to Castle Square (and it continues to campaign for more).

Latin Elephant also conducted a socio-economic value study of Elephant and Castle in collaboration with Loughborough University and the London School of Economics and has published *The Case for London's Latin Quarter: Retention, Growth and Sustainability.*[a43]

Notes
a39 See Latin Elephant's Interactive Map of the Elephant and Castle Area, at https://latinelephant.org/map/
a40 The guides are available from Latin Elephant's 'Migrant & Ethnic Business Readiness Guides' webpage, at https://latinelephant.org/migrant-ethnic-business-readiness-guides/
a41 *Latin Quarter and Elephant & Castle Community Vision*. Latin Elephant, Feb. 2015. https://latinelephant.org/wp-content/uploads/2015/02/EC-Community-Vision.pdf
a42 See Latin Elephant's Interactive Map of the Elephant and Castle Area, at https://latinelephant.org/map/
a43 J King, S Hall, P Román-Velázquez, A Fernandez, J Mallins, S Peluffo-Soneyra and N Perez: *Socio-Economic Value at the Elephant and Castle*. Latin Elephant, Loughborough University and the London School of Economics and Political Science, Aug. 2018 (revised Aug. 2019). https://repository.lboro.ac.uk/articles/Socio-economic_value_at_the_Elephant_and_Castle/9464105; and P Román-Velázquez and N Hill: *The Case for London's Latin Quarter: Retention, Growth and Sustainability*. Latin Elephant, Mar. 2016. https://latinelephant.org/wp-content/uploads/2015/03/The-Case-for-Londons-Latin-Quarter-WEB-FINAL.pdf

The charity model

As a registered charity Latin Elephant is a recognised stakeholder with a level of legitimacy to make evidence-based claims, which has provided more press coverage in its advocacy. Charity status has increased transparency and enabled partnerships to be formed with universities. While other activist campaigns have taken a more outspoken stance, as a registered charity Latin Elephant gained substantial concessions for the traders, which demonstrates that community advocacy can take various forms that potentially amplify one another.

A4.5 Conclusion – valuable lessons

■ Mapping local assets and recording detailed information is necessary to ensure that planning agreements consider all the businesses affected by new development, and to ensure that legal agreements are properly documented. A strong evidence base has been at the core of Latin Elephant's advocacy and successes in improving outcomes for retailers.

■ To engage people in planning, it is vital to meet them where they are and communicate how planning is relevant. Latin Elephant involved traders in planning by offering free business support and explaining the relevance of planning to their daily lives. Resident and business engagement in planning requires a proactive stance and continuous support far exceeding the requirements of the statutory consultation process.

Case Study 5
Thames Ward Community Project
Barking and Dagenham

A5.1 Introduction – Thames Ward Community Project

Thames Ward Community Project (TWCP) aims to be a catalyst for sustainable community-led change in Thames Ward in the London Borough of Barking and Dagenham (LBBD).[a44] The project was established in 2017 with a grant from the National Lottery. TWCP was formed as a response to the perceived threat of development marginalising and impoverishing communities. It was set up to work in partnership, using a community organiser approach, to deliver key community empowerment outcomes, resulting in the creation of a Community Development Trust.

The project aims to bring together schools, community groups and residents from across Thames Ward to develop initiatives that will:
■ improve the local environment;
■ achieve better health outcomes and quality of life for residents;
■ increase resident skills and job opportunities; and
■ ensure that they have a strong voice and can influence change in the area over the next decade.

Note
a44 See the Thames Ward Community Project website, at https://twcp.org.uk/

A5.2 Introduction – Thames Ward, London Borough of Barking and Dagenham

Thames Ward sits within the London Riverside Opportunity Area, which stretches along the Thames in East London from Barking town centre to the eastern edge of the London Borough of Havering. The London Riverside Opportunity Area Planning Framework (2015) notes that in this part of London 'changes in industrial practices have resulted in extensive areas of brownfield land and relatively deprived communities, with low levels of development activity'.[a45]

The large-scale Barking Riverside development, which has been dubbed 'Barcelona on Thames' and is earmarked to include 10,800 homes and 65,600 square metres of commercial space, sits within Thames Ward on the site of the former Barking Power Station. Barking Riverside is a partnership between the Mayor of London and L&Q which was formed in March 2016.

There are three main geographical areas within Thames Ward: Barking Riverside, Thames View, and Scrattons Farm. Thames Ward has high levels of deprivation, with the 2019 Index of Multiple Deprivation scoring parts of the ward in the most deprived 10% of areas in England.[a46] Sandwiched between the A13 to the north, the River Thames to the south, and the River Roding to the west, Thames Ward is quite island-like and relatively isolated from surrounding areas.

A5.3 Challenges – issues of inclusion and inequalities

Establishing and sustaining a community-led response

In 2018 LBBD published a new Corporate Plan, *No-one Left Behind*,[a47] which outlines the council's ambition to deliver growth that is inclusive and benefits all residents. While there are council- and developer-led community engagement and consultation processes taking place in Thames Ward, TWCP is a response to the risk of very real divisions (physical, economic and social) which may be exacerbated without a community-led response that brings people together across the entire area. Engaging and mobilising residents consistently has proven challenging for a number of reasons; while there are many small community groups in the area and active resident associations, Thames Ward has a relatively weak base level of local civil society to build upon.

Navigating the complexity of planning documents, processes and stakeholder accountabilities

TWCP has described the challenges it faced in trying to engage with and influence planning processes in the ward as 'immense'. One of the challenges outlined by TWCP is the sheer scale of the Barking Riverside development. The technical complexity that a development of this scale brings (for example the complexity and length of technical planning documents such as Section 106 agreements, which feel impenetrable and difficult to make sense of) has added to the imbalance of power felt by TWCP and residents. Another challenge has been in navigating the complexity of the different stakeholders involved in the development, with responsibilities and accountabilities being split between multiple stakeholders, including LBBD's Inclusive Growth team, LBBD's regeneration company BeFirst, and Barking Riverside Ltd.

Barking Riverside Community Development Community Interest Company (BR CIC)

The Barking Riverside CIC was incorporated in 2012 and provides a potentially very positive mechanism through which community assets developed as part of the Barking Riverside development will be owned

Notes

a45 *London Riverside: Opportunity Area Planning Framework*. Greater London Authority, Sept. 2015.
   https://www.london.gov.uk/sites/default/files/1_introduction_reduced.pdf
a46 See the 2019 Index of Multiple Deprivation for England Explorer, at http://dclgapps.communities.gov.uk/imd/iod_index.html
a47 *No-one Left Behind*. Corporate Plan 2018/2022. London Borough of Barking and Dagenham, Mar. 2018.
   https://www.lbbd.gov.uk/sites/default/files/attachments/No-One-Left-Behind-Corporate-Plan-2018.pdf

and managed in the future. Through working with ASF-UK (Architecture Sans Frontières – UK), TWCP has found that the initial Section 106 agreement for Barking Riverside set out that the BR CIC would have a shadow Board that would be replaced by a fully representative Board in the second phase. The shadow Board consists of four directors – two appointed by Barking Riverside Ltd and two appointed by LBBD. It has been stated that ideally five independent persons would also be appointed. To date, however, there are no residents on the Board. The BR CIC is currently in the process of reviewing the requirements for the composition of the Board – which TWCP and other groups fear will result in the requirement for resident parity being removed.

More broadly, TWCP's experience has been that there is very limited transparency to the CIC activities, with meetings taking place behind closed doors, meeting agendas and minutes not being shared, and local people unable to observe or participate. As a result of TWCP lobbying, the developer has committed to review the CIC and will appoint an independent Chair to refresh current arrangements.

Practical challenges of long development timelines

There are multiple practical challenges related to large-scale, long-term development processes. Given the physical isolation of the Thames Ward, road closures and congestion caused by ongoing construction works have had a magnified impact on residents, creating severe disruption and accessibility issues.

A5.4 Engagement with planning policies and processes

TWCP is attempting to ensure a sustained resident-led response, and is trying to do a lot with minimal funding. It has been engaging and partnering with organisations such as ASF-UK, Citizens UK, Just Space and Just Map in order to have access to technical and expert support and advice.

Thames Ward Growth Summits

TWCP has begun to hold six-monthly Growth Summits, three having been held to date. The summits bring together residents, key local institutions such as staff and students from Riverside School, LBBD officers and councillors, representatives of Barking Riverside Ltd, and other stakeholders, providing a platform for collectively discussing change in Thames Ward.

Young Citizen Action Group (YCAG)

TWCP and Citizens UK have supported the establishment of a Young Citizen Action Group (YCAG) at Riverside School (which was built as part of the Barking Riverside development). Through YCAG, young people carry out listening campaigns and identify issues to engage on. One of the key issues that YCAG has taken action on so far is the insufficient capacity of the bus service to and from Riverside School, creating extremely crowded bus journeys for students. YCAG has engaged with Transport for London and Barking Riverside Ltd on this issue, and a Growth Summit also provided an important platform for sharing the concerns and ideas of young people involved in YCAG.

Resident Planning Forum and the Resident Charter

LBBD used to run a resident planning forum in Thames Ward, but this was wound up several years ago. TWCP has been working with ASF-UK to re-start a Resident Planning Forum (as a thematic 'Citizen Action Group') with a specific focus on planning, to provide an open platform for residents to come together, learn together, and take action together. Currently, many residents engage with planning processes at the point at which it is too late to influence things – essentially when they see cranes going up and construction on site beginning. The Resident Planning Forum will aim to support residents in proactively engaging in planning processes at an earlier point.

One of the main focuses of the Resident Planning Forum will be to develop a Resident Charter. The plan is to develop the charter by holding 2,000 conversations with local residents, resulting in a

document outlining residents' priorities and a set of key asks for the ward as a whole and for the different areas within it. The Resident Planning Forum will then work to try to make sure these asks are delivered.

A5.5 Conclusion – valuable lessons

■ Gaining an understanding of planning processes that is sufficiently in-depth to enable people to effectively hold developers, local authorities and other key stakeholders to account can take a significant amount of time, and often requires technical and expert support and advice. The nature of large-scale developments can further add to the complexity faced by communities, exacerbating the imbalance of power experienced.

■ Developing a sustained community-led response by engaging with local residents in a context in which there is a relatively low baseline of local civil society can take more time than in situations where strong community structures are already in place. Ensuring that there are community-led representative structures in place as early as possible is vitally important. Funding is needed to support community groups in taking a proactive role in planning.

■ Creating platforms – such as the Growth Summits – to provide a forum for stakeholders to come together is incredibly valuable.

Case Study 6
Tonic Living
Pan-London

A6.1 Introduction – Tonic Living

Tonic Living is a Community Interest Company (CIC) with the objective of creating and running vibrant and inclusive, LGBT+-affirming urban retirement communities in which people can share common experiences, find mutual support, and enjoy their later life.[a48] Tonic was founded in 2014 to work with LGBT+ communities and was set up as a community-led not-for-profit organisation. Tonic primarily focuses on London, which is home to the largest LGBT+[a49] population in the United Kingdom – and is experiencing a housing crisis that severely restricts the choices of older people in affordable accessible housing. Outside of London, Tonic is working in partnership with the LGBT Foundation in Manchester to build an LGBT+-affirmative retirement community on a site that Manchester City Council has acquired for the scheme.

Notes

a48 See the Tonic Living website, at https://www.tonicliving.org.uk/

a49 LGBT+ is an acronym for lesbian, gay, bisexual, transgender and related communities. Not all members of these communities use or recognise themselves in the term 'queer', as some, and in particular those of older generations, associate it with stigma and shame, while many younger members of the communities use 'queer' and consider it to be reclaimed from its previously derogatory use

A6.2 Challenges – issues of inclusion and inequalities

Communities of interest
A significant challenge for those wanting to build safe and inclusive housing options for older LGBT+ people is the relative invisibility of such communities to planning authorities, many of whom still think of a community as a group of residents who live nearby and feel attached to their immediate environment. It took the Older Women's Co-Housing in High Barnet[a50] almost two decades to be recognised as a community and establish an exemplar for how communities form around shared interests and needs, setting an important precedent for organisations like Tonic. Fortunately, community living and co-housing policy and funding options have started to recognise communities of interest: since 2018 the Homes England's Community Housing Fund supports 'all sections of our communities, whether defined by geography, need or interest'.[a51]

Age and sexual orientation – older LGBT+ people
The size of the communities Tonic supports is not to be underestimated: over 1 million people aged over 50 in the UK identify as lesbian, gay or bisexual.[a52] Many of them fear the prospect of needing health and social care services because of worries over prejudice from care professions or fellow residents. In 2011 more than 61% of LGB people felt concerned that statutory and voluntary health and care services would not meet their needs.[a53] A later survey carried out by Stonewall found that up to 25% of NHS patient-facing staff heard colleagues making homophobic, biphobic or transphobic remarks.[a54] Older LGBT+ people are often more reliant on external health and social care services, because lesbian, gay and bisexual people over the age of 55 more often live alone and have no children and are therefore less likely to have informal care. Access to appropriate and safe care close to home is therefore vital.

Ageing population
The development of specialised housing and care provision for a diverse ageing population is a key challenge for planners. Within 20 years the number of people aged 65 and above in the UK will have increased by more than 40%.[a55] Community-led housing has an important role in the future delivery of inclusive and accessible age-friendly housing, which recent planning guidance acknowledges.[a56] Nevertheless, Tonic has encountered local authorities that have difficulties in understanding the needs of communities of interest and the importance of common interest and mutual support for wellbeing. Planning teams often have difficulty in planning for older people's housing because schemes require communal social spaces which impact on standard approaches to determining schemes' financial viability. Retirement housing schemes often either contain affordable housing or market housing, creating a divide based on tenure, while the few mixed-tenure schemes usually need to be very large in scale, which is challenging for inner city locations.

Housing provision
Everyone needs a home that remains affordable and is accessible as they age, and home is particularly valued by the older LGBT+ generation who found safety and support in their private spaces from a hostile wider world. The challenge for planning is to create varied housing options: some would choose

Notes

a50 See the Older Women's Co-Housing website, at http://www.owch.org.uk/

a51 *Community Housing Fund: Prospectus*. Homes England, Jul. 2018. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/772919/CHF_prospectus_-_FINAL_updated_16.1.19.pdf

a52 S Knocker: *Perspectives on Ageing: Lesbians, Gay Men and Bisexuals*. Joseph Rowntree Foundation, Feb. 2012. https://www.jrf.org.uk/report/perspectives-ageing-lesbians-gay-men-and-bisexuals

a53 *Lesbian, Gay and Bisexual People in Later Life*. Stonewall, 2011. https://www.stonewall.org.uk/system/files/LGB_people_in_Later_Life__2011_.pdf

a54 *Unhealthy Attitudes: The Treatment of LGBT People within Health and Social Services.* Stonewall, 2015. https://www.stonewall.org.uk/system/files/unhealthy_attitudes.pdf

a55 *The State of Ageing in 2019: Adding Life to our Years*. Centre for Ageing Better, Mar. 2019. https://www.ageing-better.org.uk/sites/default/files/2019-04/The-State-of-Ageing-in-2019.pdf

a56 'Housing for older and disabled people'. *Planning Practice Guidance*. Ministry of Housing, Communities and Local Government. Revision date Jun. 2019. https://www.gov.uk/guidance/housing-for-older-and-disabled-people

to live in housing specific for LGBT+ people, whereas others prefer an integrated housing arrangement with housing and care providers who have a good understanding of their (LGBT+) needs.[a57] Despite the good intentions of some housing and care providers, there are still no specialist schemes developed for older LGBT+ people. Tonic seeks to fill this gap.

A6.3 Engagement with planning policies and processes

Community Interest Company

Tonic uses the Community Interest Company (CIC) model, an approach that over 17,000 communities have used since its introduction in the Companies Act 2004.[a58] Tonic works collaboratively with a Community Panel that consists of people interested in Tonic's work who might wish to become a future resident of a LGBT+ retirement community. The panel reports directly to the Board of Directors to co-create the specification and design of future housing schemes and direct how schemes can meet the communities' needs and aspirations. Their input ensures that Tonic's housing schemes will suit their future residents.

Working with boroughs – Section 106 agreements and funding

Tonic is working with the Greater London Authority (GLA), investors, developers, borough councils and/or registered housing providers to acquire properties and sites for schemes. The GLA acts as an important facilitator for initiatives such as this, because of its political support to the LGBT+ community and its grants and loan fund, which is less restricted than commercial loans to support housing innovation.[a59] Tonic is also looking into the acquisition of specific developments through a Section 106 agreement between a council and property developer. The challenge here is whether public authorities fully understand and accept communities of interest.

Collaboration with registered providers

Having recently become part of the Build London Partnership (an L& Q initiative to develop housing projects with partner organisations), Tonic is exploring several retirement community site opportunities across London. To make LGBT+ retirement schemes financially viable, it is also investigating the incremental acquisition of properties within (extra-care) housing schemes in partnership with a registered provider, as opposed to building a development itself. Tonic will lead on enabling the creation of an LGBT+-affirming community, including training staff and care teams to give appropriate care to LGBT+ older people.

Advocacy and policy influence

To raise the profile of the needs and wishes of older LGBT+ communities and shape policies accordingly, Tonic joined the London Housing Panel, which gives the voluntary and community sector a platform to inform the London Mayor's housing policies. Tonic has also given evidence to the health and social care and LGBT communities inquiry conducted by the House of Commons Women and Equalities Committee, directly engaging with national policy-making.

A6.4 Conclusion – valuable lessons

- To create safe homes for all, planning teams and housing providers need to consider how equalities groups overlap and create unique requirements for inclusive and accessible housing. Better recognition of communities of interest in planning is a vital first step.
- Building inclusive and accessible housing can be community led: at every stage of development, from site selection to design, the community is involved in the decision. Tonic's work with older LGBT+ communities exemplifies the pioneering work that CICs can do, creating a wealth of knowledge that planning authorities can benefit from when planning for a diverse ageing population.

Notes

a57 *Building Safe Choices. LGBT Housing Futures: a Feasibility Study.* Stonewall Housing, Jun. 2016. https://stonewallhousing.org/wp-content/uploads/2018/09/BuildingSafeChoices_full.pdf

a58 For information on CICs and other legal structures for community organisations, see *Choosing a Legal Structure: A Toolkit for Community Organisations.* Locality (undated). https://locality.org.uk/wp-content/uploads/2018/03/Choosing-a-legal-structure-toolkit.pdf

a59 *London Community Housing Fund.* Greater London Authority, Jan. 2019. https://www.london.gov.uk/sites/default/files/london_chf_prospectus_0.pdf

Case Study 7
Vital Old Kent Road and Southwark Law Centre
Southwark

A7.1 Introduction – Vital Old Kent Road and Southwark Law Centre

Vital Old Kent Road (Vital OKR) is an association of businesses based around the Old Kent Road in the London Borough of Southwark. It was established in 2016 to connect businesses in response to development proposals for the area and provide a platform for local enterprise to voice concerns on development plans and influence the course of regeneration.[a60]

Vital OKR advocates for a policy of zero net loss of industrial accommodation, to protect and strengthen the area's unique and particularly vulnerable industrial economy. Vital OKR works with Southwark Law Centre (SLC), which provides legal support through its Planning Voice programme.

The project began in 2017 as local groups reported a need for advice and expertise to engage with major redevelopment plans in the northern part of the borough. In collaboration with local community activists and resident groups, SLC aims to secure the meaningful involvement of local people, with a focus on more economically and socially disadvantaged communities currently uninvolved in the planning process.

A7.2 Introduction – Old Kent Road

The Old Kent Road, a major thoroughfare in South East London, is home to a vibrant economy of around 1,000 businesses that provide close to 10,000 jobs, with a strong presence of light industry and manufacturing. The area's diverse local business profile includes the construction sector, the logistics and production industry, printing and publishing, the food and brewery sector, creative industries, courier businesses, and vehicle mechanics.[a61]

As part of the Old Kent Road Opportunity Area (OKROA), the area is undergoing extensive redevelopment: planning proposals include 20,000 new homes and three London Underground stations as part of the Bakerloo Line extension into the area.

While the London Borough of Southwark is currently developing an Area Action Plan[a62] to guide development in the area and a new Southwark Plan[a63] is still at submission stage, development is well under way: Southwark's Planning Committee and the Greater London Authority (GLA) have approved planning applications for schemes at Malt Street (1,300 homes) and Ruby Street (1,152 homes), while construction has started at Crimscott Street (406 homes), mostly on former industrial sites.[a64]

Notes

a60 See the Vital OKR website, at https://www.vitalokr.com/

a61 *The Old Kent Road Audit Book: Investigating the Economy of the Old Kent Road Opportunity Area.* CASS Cities, 2017. https://static1.squarespace.com/static/59bbe4992994ca1b4f8b771c/t/59c4231351a5846209810887/1506026387536/Cass+Cities+Audit+2016-2017.pdf

a62 *Old Kent Road Area Action Plan/Opportunity Area Framework Consultation. Further Preferred Option Version 2017.* Southwark Council, Dec. 2017. https://www.southwark.gov.uk/assets/attach/5961/Southwark-OKR-APP_16.01.18.pdf

a63 *New Southwark Plan: Proposed Submission 2017.* Southwark Council, Dec. 2017. https://www.southwark.gov.uk/assets/attach/5811/NSP-PSV-FINAL.pdf

a64 See Southwark Council's Old Kent Road Planning Applications Map, at https://oldkentroad.org.uk/map/

A7.3   Challenges – issues of inclusion and inequalities

Release of strategic industrial land

The rapid release of industrial land threatens the businesses in the area. To protect London's industry, the GLA oversees development on industrial sites across London and defines benchmarks for release based on local demand.

Closely monitoring approved and incoming planning applications, Vital OKR found that the proposed and current release of industrial land in the borough had already exceeded the GLA benchmarks set until 2041.[a65] Vital OKR has been unable to locate the council's monitoring framework for industrial land release (a requirement under GLA Land for Industry and Transport Supplementary Planning Guidance policy SPG3(vi)), which has led Vital OKR to have to examine individual planning applications to uncover the loss of industrial land – a time-consuming process. Vital OKR estimates that the draft OKR Area Action Plan will result in the release of around 4.2 million square feet of industrial accommodation, which would displace 330 businesses. Vital OKR has also estimated that the draft Southwark Local Plan will only retain 3.3 million square feet of industrial land in the OKROA (including mixed residential and industrial land) – less than half of the current industrial footprint.[a66]

Development plan – approval of applications

Although the draft Area Action Plan and the draft New Southwark Plan have not yet been adopted, Vital OKR found that planning applications are being approved based on the future plans while in conflict with the existing development plan. As opportunities for public participation in planning focus on plan-making, an important safeguard for democratic

involvement is weakened – this has made the planning process appear to be undemocratic and unfair.

Engagement of local businesses – access to information

To build its evidence base, object to planning proposals with support from Southwark Law Centre, and voice the concerns of local enterprise, Vital OKR has relied on the council's planning portal to access information. Vital OKR has experienced real challenges in accessing information on the portal and obtaining planning application information (the first obstacle being that the case status is often listed as 'unknown', with no case-worker mentioned). Complaints raised with planning officers remain unanswered.

A7.4 Engagement with planning policies and processes

Building an evidence base

Vital OKR continues to build an evidence base to monitor the release of industrial land, and the loss of accommodation, in the area. This has involved detailed scrutiny of incoming planning applications, the proposed release of industrial land in the development plan, and planning guidance set out by the GLA. The evidence has informed Vital OKR's objections to planning applications and its ability to provide evidence at planning committee meetings. With support from students at London Metropolitan University, Vital OKR conducted a detailed audit of the local economy, which has led to an update of the incomplete employment study conducted by the GLA and Southwark Council.[a67] Through its audit Vital OKR built a strong network of local businesses and a list of local contacts with whom to share information

Notes

a65 *Land for Industry and Transport. Supplementary Planning Guidance.* Greater London Authority, Sept. 2012. https://www.london.gov.uk/file/5275/download?token=2kudYJzP; and *London Industrial Land Demand. Final Report.* CAG Consultants, for Greater London Authority, Oct. 2017. https://www.london.gov.uk/sites/default/files/ilds_revised_final_report_october_2017.pdf

a66 Figures can be provided by Vital OKR upon request

a67 *Old Kent Road Employment Study.* London Borough of Southwark and the Greater London Authority, Mar. 2016. https://www.southwark.gov.uk/assets/attach/1896/2.2.6-Old-Kent-Road_Employment-Study-2016_low_res.pdf; and *The Old Kent Road Audit Book: Investigating the Economy of the Old Kent Road Opportunity Area.* CASS Cities, 2017. https://static1.squarespace.com/static/59bbe4992994ca1b4f8b771c/t/59c4231351a5846209810887/1506026387536/Cass+Cities+Audit+2016-2017.pdf

regarding incoming planning applications and opportunities for involvement in plan-making.

Public inquiry – Burgess Business Park
Vital OKR also gave evidence on the release of industrial land in a full public inquiry into the planning appeal for a development proposal for 499 residential units at Burgess Business Park, another major industrial employment site in the borough, a short walk away from the Old Kent Road area. Vital OKR was supported in this by Southwark Law Centre, which obtained interested party status at a major planning application appeal. The appeal will ultimately be decided by the Secretary of State.

Southwark Law Centre – Planning Voice
An advisory group of people with expertise on planning and local knowledge guides SLC's Planning Voice programme. The project's caseworker provides training sessions on planning and individual support to local people, including legal advice and the drafting of representations and templates for the New Southwark Plan consultation. SLC has also set up a panel of pro bono experts to assist with judicial reviews and more complicated legal cases. Essential to its work is that SLC collaborates with existing residents groups to hold workshops and engage local people in participating in consultations, and add capacity to existing initiatives.

A7.5 Conclusion – valuable lessons

- Legal support from professionals is a key resource for citizens seeking to influence planning outcomes in their area, as it lowers the barriers to challenging planning applications and giving evidence in consultations on Local Plans. This support should be combined with resources for community engagement and organisation, to make participation in the planning system more inclusive, as citizens first need to know about their rights and the means and resources available to exercise them.
- The approval of planning applications based on an unadopted development plan compromises the ability of citizens to influence planning outcomes

and erodes their trust in the planning system. Planning decisions should be guided by a plan-led system in which the adopted Local Plan determines the decision-making of the planning committee, thus providing greater certainty to local communities.

- The collection of evidence and consultation with local businesses and residents should take place before a new development plan is proposed. This includes investigations to identify all the businesses that could be affected by the proposed development plan and their specific demand for industrial land, accommodation and infrastructure (and wider sectoral demand), and requires the maintenance of a robust, accurate and up-to-date database of local businesses in an area of industrial land and other workspace earmarked for redevelopment.

Appendix 2

Local Plan analysis – methodology

The research reported here analysed the Local Development Plan documents of London's 35 local planning authorities.[a68] Table A1 (on the following page) provides a list of the policy documents that were analysed for each planning authority, and includes the date of adoption or submission for each Local Plan (note that the status of a Local Plan is subject to change, and in each case the status noted in the table is that of the Local Plan at the time of writing). We opted to select the most recent version of the Local Plan that included detailed strategic policies; and therefore in cases where new Local Plans were under development and a full draft version of new Local Plan existed this version was used in the analysis, rather than the potentially out-of-date adopted Local Plan.

Each Local Plan was analysed according to three sets of indicators:

■ The first set analysed the aims and ambitions of a Local Plan in relation to reducing inequalities and achieving equality in the Borough through the planning system.
■ The second analysed the plan-making process for the Local Plan.
■ The third analysed thematic policies that contribute to creating fair and socially just conditions for different communities.

Appendix 3 includes a list of all the indicators against which Local Plan policies were assessed.

For the first set of indicators we analysed the 'Vision' and 'Objectives' (or equivalent) at the beginning of the Local Plan. We applied the second set of indicators to documents that were part of the evidence base of the Local Plan, which included the Equality Impact Assessment or Integrated Impact Assessment (or equivalent), the Health Impact Assessment (as part of the Integrated Impact Assessment), the Statement of Community Involvement, and the consultation report(s). For the analysis of the thematic (policy) indicators, we focused on the strategic and detailed policies within policy boxes in the Local Plan, and did not include policies limited to a specific geographic area, the justifications provided for a policy, site allocations or Supplementary Planning Documents, unless they were explicitly referred to in the Local Plan.

For the majority of the criteria we defined three benchmarks to distinguish between policies that fully met or went beyond the indicator, partially complied with the indicator, or did not consider the indicator. We separately identified policies that stood out in terms of their ambition and comprehensiveness in considering equalities and inclusion.

The indicators were tested out at the end of 2018 and in January 2019, and the analysis was conducted using the revised criteria in the spring of 2019 and updated over the subsequent summer period.

Note

a68 Throughout this report we use the term 'Local Plan' to refer to Local Development Plan documents, including both older Local Development Frameworks and more recent Local Plans

Table A1

London Local Development Plan documents included in the analysis

Local Planning Authority	Documents	Date	Comments
London Borough of Barking and Dagenham	Core Strategy and Borough Wide Development Policies	2010 and 2011	Reviewing Local Plan
London Borough of Barnet	Core Strategy and Development Management Policies	2012	Reviewing Local Plan
London Borough of Bexley	Core Strategy	2012	Reviewing Local Plan
London Borough of Brent	Core Strategy and Development Management Policies	2010 and 2016	Reviewing Local Plan
London Borough of Bromley	Local Plan	2019	
London Borough of Camden	Local Plan	2017	
City of London Corporation	Draft Local Plan	2018	Consulted January 2019 on the draft
London Borough of Croydon	Local Plan	2018	
London Borough of Ealing	Development (Core) Strategy and Development Management Policies	2012 and 2013	
London Borough of Enfield	Core Strategy and Development Management Policies	2010 and 2014	Issues and Options of new Local Plan published in 2018
Royal Borough of Greenwich	Core Strategy	2014	
London Borough of Hackney	Proposed Submission Local Plan	2018	Under examination
London Borough of Hammersmith and Fulham	Local Plan	2018	
London Borough of Haringey	Core Strategy and Development Management Policies	2013 (updated in 2017) and 2017	
London Borough of Harrow	Core Strategy and Development Management Policies	2012 and 2013	
London Borough of Havering	Proposed Submission Local Plan	2018	Under examination
London Borough of Hillingdon	Strategic Policies and Development Management Policies	2012	Strategic Policies scheduled to be reviewed in 2019
London Borough of Hounslow	Local Plan	2015	
London Borough of Islington	Proposed Submission Local Plan	2019	Reviewing Local Plan
Royal Borough of Kensington and Chelsea	Local Plan	2019	

Table A1
London Local Development Plan documents included in the analysis

Local Planning Authority	Documents	Date	Comment
Royal Borough of Kingston upon Thames	Core Strategy and Development Management Policies	2012	Reviewing Local Plan
London Borough of Lambeth	Local Plan	2015	
London Borough of Lewisham	Core Strategy and Development Management Policies	2011	Reviewing Local Plan
London Borough of Merton	Draft Local Plan	2018	
London Borough of Newham	Local Plan	2018	
London Borough of Redbridge	Local Plan	2018	
London Borough of Richmond Upon Thames	Local Plan	2018	
Old Oak and Park Royal Development Corporation	Local Plan – Second Revised Draft	2018	
London Borough of Southwark	Proposed Submission Local Plan	2017	
London Borough of Sutton	Local Plan	2018	
London Borough of Tower Hamlets	Proposed Submission Local Plan	2018	Under examination
London Borough of Waltham Forest	Draft Local Plan	2019	
London Borough of Wandsworth	Core Strategy and Development Management Policies	2016	
City of Westminster	Draft City Plan	2019	
London Legacy Development Corporation	Local Plan – Illustrative Revised	2019	Under examination

Appendix 3

Local Plan analysis – summary table

The table on the following pages (69-75) sets out the results of an analysis of London's 35 Local Plans (across 32 London Boroughs, the City of London, and the two Mayoral Development Corporations – the London Legacy Development Corporation and the Old Oak and Park Royal Development Corporation).

For the majority of the criteria we defined three benchmarks to distinguish between:
■   policies that fully met or went beyond the indicator (highlighted green in the table);
■ partially complied with the indicator (highlighted amber); or
■ did not consider the indicator (highlighted red).

We separately identified policies that stood out in terms of their ambition and comprehensiveness in considering equalities and inclusion.

Indicator

Thresholds

Score
(Number of local planning authorities)

Indicator	Thresholds			Score				
	Red	Amber	Green	Red	Amber	Green	Doc^{mnt} not available	Total
AIMS AND AMBITIONS								
Ambition: Does the Local Plan make reference to social justice, social inclusion, poverty reduction, and/or addressing social and economic inequalities as key objectives of the plan?	No reference to these terms	Yes, some reference made	Yes, clear and strong wording as key objectives	11 (31%)	16 (46%)	8 (23%)		35
Identification of inequalities: Does the Local Plan specify which inequalities it will seek to address?	No assessment of current inequalities	A few inequalities to be addressed specified	Yes, inequalities to be addressed clearly identified	15 (43%)	13 (37%)	7 (20%)		35
PLAN-MAKING PROCESS								
Impact assessment:								
Equality Impact Assessment (EqIA): Has an EqIA been carried out as part of the Local Plan?	Document not available and no reference made	Yes, referenced but difficult to locate	Yes	7 (20%)	4 (11%)	24 (69%)		35
Issues addressed: Are any negative impacts identified in the EqIA, and are measures to mitigate them included?	No	Yes, identified – no mitigation proposed	Yes, identified and mitigation clearly outlined	13 (37%)	5 (14%)	7 (20%)	10 (29%)	35
Socio-economic status: Does the EqIA assess policies according to their impact on socio-economic status/low-income groups?	No	Partial – included in indicators/ considered for a few policies	Yes	13 (37%)	6 (17%)	6 (17%)	10 (29%)	35
Health Impact Assessment (HIA): Has an HIA been carried out as part of the Local Plan?	No	Yes, but does not consider health inequalities	Yes, and considers health inequalities	14 (40%)	1 (3%)	19 (54%)	1 (3%)	35

Percentage totals may not sum to exactly 100% owing to rounding

Indicator	Thresholds			Score (Number of local planning authorities)				
	Red	Amber	Green	Red	Amber	Green	Doc^mmt not available	Total
PLAN-MAKING PROCESS								
Public participation:								
Statement of Community Involvement (SCI): Is there a published, up-to-date SCI in place?	No	Yes, but older than five years	Yes, and adopted no more than five years ago	0 (0%)	8 (23%)	27 (77%)		35
Under-representation: Does the SCI make specific reference to reaching under-represented/ disengaged groups?	No	Yes, mentions methods of reaching out	Yes, and includes targeted methods of reaching specific groups	6 (17%)	20 (57%)	9 (26%)		35
Collaboration with communities: Does the SCI include a commitment to collaborate/ co-create/co-produce, etc. in planning with communities?	No	Yes, but weak phrasing	Yes	31 (89%)	3 (9%)	1 (3%)		35
Consultation statement: Is a consultation statement/report accessible on the council's website, outlining what consultation has taken place for the Local Plan?	No (not accessible)	Yes, but not covering all stages of consultation	Yes, covers all stages of consultations	12 (34%)	11 (31%)	10 (29%)	2 (6%) (consult'n ongoing)	35
THEMATIC POLICY INDICATORS WITHIN LOCAL PLANS – MECHANISMS TO REDUCE SOCIAL AND ECONOMIC INEQUALITIES								
Housing development:								
Minimum percentage of affordable housing: Are policies outlining the percentage of affordable housing required from new housing developments strong and ambitious?	<35%	35%	>35%	0 (0%)	13 (37%)	22 (63%)		35

Percentage totals may not sum to exactly 100% owing to rounding

Indicator	Thresholds			Score (Number of local planning authorities)				
	Red	Amber	Green	Red	Amber	Green	Doc^mnt not available	Total

THEMATIC POLICY INDICATORS WITHIN LOCAL PLANS – MECHANISMS TO REDUCE SOCIAL AND ECONOMIC INEQUALITIES

Housing development (cont.):

Indicator	Red (threshold)	Amber (threshold)	Green (threshold)	Red	Amber	Green	Doc^mnt not available	Total
Required tenure split of affordable housing: Does housing policy specify a minimum percentage of social rental tenure requirement within the wider 'affordable housing' category?	No target for affordable rent	Target for affordable rent but not for social rent	Yes, target for social rent	2 (6%)	23 (66%)	10 (29%)		35
Retainment of affordable housing: Does housing policy require the like-for-like re-provision of affordable housing to ensure no net loss of affordable housing tenures?	No requirement for re-provision of affordable housing	Yes, but not requiring like-for-like re-provision	Yes, requires like-for-like re-provision	20 (57%)	10 (29%)	5 (14%)		35
Tenure blindness: Does housing policy require 'tenure blindness' of affordable housing units?	No	Yes, but weak phrasing	Yes	21 (60%)	3 (9%)	11 (31%)		35
Gated development: Does housing policy prohibit gated developments?	No	Yes, but weak phrasing	Yes	25 (71%)	2 (6%)	8 (23%)		35
Wheelchair-accessibility of homes: Does policy consider (wheelchair-) accessibility of housing and Lifetime Homes, and require more than the 90% M4(2) and 10% M4(3) split required under the London Plan?	No	Yes, 90% M4(2) and 10% M4(3) as per London Plan	Yes, higher percentages required	2 (6%)	33 (94%)	0 (0%)		35

Percentage totals may not sum to exactly 100% owing to rounding

THEMATIC POLICY INDICATORS WITHIN LOCAL PLANS – MECHANISMS TO REDUCE SOCIAL AND ECONOMIC INEQUALITIES

Housing development (cont.):

Indicator	Thresholds			Score (Number of local planning authorities)				
	Red	Amber	Green	Red	Amber	Green	Doc^mnt not available	Total
Quality of housing: Do housing policies include well defined standards for design and quality?	No	Yes, but the commitment is not well defined	Yes, and includes well defined standards	1 (3%)	10 (29%)	24 (69%)		35
Sites for Gypsies and Travellers: Is there consideration of sites for Gypsy and Travellers based on assessed demand?	No	Yes, but policies do not refer to demand or protect existing sites	Yes, and policies allocate new sites and protect existing sites	2 (6%)	11 (31%)	22 (63%)		35
Play space: Do policies require the delivery of play space, and do they refer to the need for accessible/inclusive play space?	No	Yes, but no mention of inclusivity/ accessibility	Yes, and mention of inclusivity/ accessibility	0 (0%)	16 (46%)	19 (54%)		35
Amenity space: Are there policies to ensure that new housing developments will include communal amenity space, and do they include requirements for inclusive/accessible design?	No	Yes, but no mention of inclusivity/ accessibility	Yes, and mention of inclusivity/ accessibility	2 (6%)	17 (49%)	16 (46%)		35
Community housing: Are there policies supporting co-operatives, community land trusts, co-housing, tenant management organisations, self-help housing, community self-build, community development trusts, and other forms of community-led housing?	No	Yes, recognition of existence of these approaches	Yes, strategic priority and support available	31 (89%)	4 (11%)	0 (0%)		35

Percentage totals may not sum to exactly 100% owing to rounding

Indicator	Thresholds			Score (Number of local planning authorities)				
	Red	Amber	Green	Red	Amber	Green	Doc^mnt not available	Total
THEMATIC POLICY INDICATORS WITHIN LOCAL PLANS – MECHANISMS TO REDUCE SOCIAL AND ECONOMIC INEQUALITIES								
High streets and markets:								
High streets: Are there policies to protect high streets and local shops?	No	Yes, but within designated town centres only	Yes, protecting high streets inside and outside of town centres	6 (17%)	13 (37%)	16 (46%)		35
Local markets: Are there policies to support local markets, recognising their social value?	No	Yes, but without recognition of social value	Yes, with recognition of social value	20 (57%)	15 (43%)	0 (0%)		35
Employment and workspace:								
Employment space: Do policies protect against the loss of employment space, in particular Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs)?	No	Yes, but no adequate protection of industrial use classes	Yes, and protection for industrial land use classes	2 (6%)	18 (51%)	15 (43%)		35
Affordable workspace: Do policies require an amount/percentage of affordable workspace from commercial and mixed development?	No	Yes, but no threshold defined	Yes, clear targets defined	12 (34%)	19 (54%)	4 (11%)		35
Local employment: Are there requirements for developers to form agreements on local employment and apprenticeships?	No	Yes, but no threshold defined	Yes, clear targets defined	5 (14%)	17 (49%)	13 (37%)		35

Percentage totals may not sum to exactly 100% owing to rounding

Indicator	Thresholds			Score (Number of local planning authorities)				
	Red	Amber	Green	Red	Amber	Green	Doc'mnt not available	Total

THEMATIC POLICY INDICATORS WITHIN LOCAL PLANS – MECHANISMS TO REDUCE SOCIAL AND ECONOMIC INEQUALITIES

Health:

Indicator	Red	Amber	Green	Red	Amber	Green	Doc'mnt not available	Total
Health infrastructure: Do policies consider health inequalities when determining the future provision of healthcare services?	No		Yes	21 (60%)		14 (40%)		35
Evidence and health: Do policies require an HIA to be included in planning applications?	No		Yes	17 (49%)		18 (51%)		35

Transport and mobility:

Indicator	Red	Amber	Green	Red	Amber	Green	Doc'mnt not available	Total
Transport infrastructure: Does the plan include policies on the provision of inclusive and accessible transportation options?	No	Yes, but the needs of groups with protected characteristics not considered	Yes, and the needs of groups with protected characteristics are considered	1 (3%)	22 (63%)	12 (34%)		35
Pedestrians and cycling: Are policies in place to improve walking and cycling in the area which consider the needs of groups with protected characteristics?	No	Yes, but the needs of groups with protected characteristics not considered	Yes, and the needs of groups with protected characteristics are considered	0 (0%)	18 (51%)	17 (49%)		35

Open spaces, community spaces and heritage:

Indicator	Red	Amber	Green	Red	Amber	Green	Doc'mnt not available	Total
Protecting existing green and open space: Are there policies safeguarding, and improving the accessibility of, existing green and open spaces from future development?	No	Yes, but not on improving accessibility/ inclusivity	Yes, including improving accessibility/ inclusivity	0 (0%)	16 (46%)	19 (54%)		35

Percentage totals may not sum to exactly 100% owing to rounding

THEMATIC POLICY INDICATORS WITHIN LOCAL PLANS – MECHANISMS TO REDUCE SOCIAL AND ECONOMIC INEQUALITIES

Open spaces, community spaces and heritage (*cont.*):

Indicator	Thresholds			Score (Number of local planning authorities)				
	Red	Amber	Green	Red	Amber	Green	Doc^{mnt} not available	Total
Green and open space: Are there policies to provide open and green space, and do they prioritise areas of open space deficiency?	No	Yes, but areas of deficiency not prioritised	Yes, and deficiencies addressed	0 (0%)	13 (37%)	22 (63%)		35
New community spaces: Does the plan include a policy for the delivery of community spaces which considers the importance for social inclusion/cohesion?	No	Yes, but social inclusion not considered	Yes, and social inclusion considered	1 (3%)	24 (69%)	10 (29%)		35
Protection of community spaces: Are there policies in place to protect and retain community spaces which support groups with protected characteristics?	No	Yes, general protection of community facilities	Yes, specifying groups	1 (3%)	33 (94%)	1 (3%)		35
CIL and S106: Do policies on CIL and S106 agreements consider opportunities for community involvement in determining expenditure and opportunities for stewardship, management and ownership of assets?	No	Yes, community involvement in determining expenditure	Yes, providing opportunities for community stewardship, management and ownership	32 (91%)	3 (9%)	0 (0%)		35
Protecting heritage: Are policies in place to involve communities in heritage designation and protection?	No	Yes, commitment to involve stated	Yes, strategy of involvement listed	31 (89%)	2 (6%)	2 (6%)		35

Percentage totals may not sum to exactly 100% owing to rounding

Appendix 4

Glossary

BAME

Acronym – black, Asian and minority ethnic.

Community

People that have formed a group around a shared interest, characteristic, incentive, motivation or identity aspect, or a unique spatial distribution or geography.

Equality Impact Assessment (EqIA)

A process designed to evaluate the nature and the magnitude of impacts that policies, projects or schemes will have on different groups of people.

LGBTQ+

Acronym – lesbian, gay, bisexual, transgender, queer people and related communities.

Local Plan

Sets out local planning policies and identifies how land will be used, determining what will be built where. Adopted Local Plans provide the framework for development across England.

Mayoral Development Corporation

Governance structure set up to manage a designated Mayoral development area. There are two Mayoral Development Corporations in London – the London Legacy Development Corporation, and the Old Oak and Park Royal Development Corporation.

Opportunity Areas

A designation used for areas that are London's major sources of brownfield land with significant capacity for development.

Protected characteristics

The Equality Act 2010 identifies personal characteristics that might lead people to experience discrimination and inequality, called the 'protected characteristics'. These are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Statement of Community Involvement (SCI)

A document that each local planning authorities is required to update every five years, outlining their policies regarding the methods and scope of public consultation and engagement.

The Town and Country Planning Association is an independent charity working to improve the art and science of town and country planning. The TCPA puts social justice and the environment at the heart of policy debate and inspires government, industry and campaigners to take a fresh perspective on major issues, including planning policy, housing, regeneration, and climate change. Its objectives are to:

- secure a decent, well designed home for everyone, in a human-scale environment combining the best features of town and country;
- empower people and communities to influence decisions that affect them; and
- improve the planning system in accordance with the principles of sustainable development.

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