

James Scantlebury

From: David <[REDACTED]>
Sent: 04 September 2024 09:16
To: Local Plan
Subject: Consultation response
Attachments: Local Plan Consultation Response - DM.docx

Please find attached my response to issues raised in the Local Plan consultation.
Best wishes,
Dave

David Mann

Chair
Bonny Downs Community Association

<https://bonnydowns.org/>

[REDACTED]

"Working together to change lives and transform our community"

BDCA was founded on 3rd September 1998 and is a registered company limited by guarantee number [3625785](#). We are a registered charity number [1071625](#). Registered office: The Well Community Centre, [REDACTED]

Please be aware that I do not usually work on Fridays. If you require an urgent response, please call our main office on [REDACTED]

James Scantlebury

From: David <[REDACTED]>
Sent: 10 October 2024 13:28
To: Local Plan
Subject: Re: Consultation response

Thanks

I'm happy for it to be classed as a Bonny Downs Community Association response as I consulted with other BDCA members.

Best wishes

Dave

David Mann

Chair

Bonny Downs Community Association

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[REDACTED]

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On 10 Oct 2024, at 13:14, Local Plan <LocalPlan@newham.gov.uk> wrote:

Hi David,

We're processing responses to the Local Plan consultation – I've noticed that your representation states "*All of these comments are my personal views - not necessarily the organisations I represent.*"

However, you signed off your email as Chair [of] Bonny Downs Community Association, and it was sent from the bonnydowns.org email address.

Can you clarify if your representation should be considered a personal response, or one from the Bonny Downs Community Association.

Best regards,

James Scantlebury | he/him
Senior Planner | Planning Policy

London Borough of Newham
Newham Dockside | 1000 Dockside Road | London E16 2QU

<image001.jpg>

Read more about our Building a Fairer Newham plan [here](#) and watch [here](#).

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Local Plan response

Social infrastructure

In addition to the four listed categories.....

- Social infrastructure we have a statutory duty to provide: schools; some early years provision.
- Social infrastructure with a nationally set target: playing pitches; built sport and recreation facilities; health facilities.
- Council delivered social infrastructure: youth zones; libraries; some community halls, galleries, museums and theatres.
- Community/charity/market-led: wider youth provision; faith facilities; private built sport and recreation facilities; some early years provision; public houses; some community halls, galleries, museums and theatres.

.....I would like to add a fifth - **Council and Community PARTNERSHIPS**

Especially in the current financial climate and in line with LBN's Community Wealth-building agenda, we need to maximise and multiply the resources of the council and third-sector groups. services are always stronger when they are delivered WITH and BY local people, rather than TO or FOR them.

LBN needs to recognise and assist community organisations in delivering services that it cannot afford and that can be delivered most effectively by local people at grassroots-roots level.

The People Powered Places grants were a good step in this direction but it's not primarily cash that community initiatives need.

Buildings and places are key to delivering sustainable social value and impact.

The **Social Value and Health Impact** Assessment is helpful in focussing community groups on desired outcomes but it needs to be reconfigured to encourage, rather than stifle growth.

Rental discounts for Community facilities are currently capped at 80% of a notional 'market rent.'

This is both morally and pragmatically wrong.

Even a 20% contribution of a notional 'market rent' is in effect a Charity Tax.

Charitably raised funds that could be spent on providing community services and developing charities' infrastructure are being diverted to LBN for no direct benefit to the communities they serve.

For instance, a community centre with a full management and maintenance lease, providing services the council would like to deliver but can't afford, could pay more than half a million pounds over the course of a 30-year lease. As an aging Chair of a local charity, I could never agree to burden future generations of volunteers with such a commitment.

In terms of the council's budget these amounts are insignificant but they would be crippling for local charities. Payments would have to come out of unrestricted reserves that are the life-blood for sustainability and development of services.

To pay a rent of even £10k per year would cost charities much more to raise. Fundraisers would need to be employed in an increasingly difficult climate where grants to maintain vital services are getting harder and harder to obtain.

Should charities relinquish use of council community buildings a lost opportunity cost should be factored into the Social Value assessment.

Capital investment in council buildings by charity tenants dramatically increases the social and financial value of these assets. There would be a significant increase in cost to the council if these relationships end - even if it's just providing security for empty buildings. That's not to mention the terrible loss of community delivered social value.

As the LBN v Flanders Community Centre court case in 2016 proved, applying 'market-rent' calculations to designated community buildings is

fundamentally flawed. If cash is king, buildings should either be let out at 'market-rates,' sold off - or they should be positively supported as vital community wealth-building hubs.

100% Social Value rent relief would mean charities could use their assets to attain and maintain delivery Quality Marks. Financially penalising charities for not having such marks is self-defeating. When money is tight this is the first sort of investment to be cut.

On the other hand, genuine, intentional partnerships between LBN and community groups, could maximise resources and multiply impact. Agreed Social Value targets would ensure groups using council facilities are delivering vital and excellent services and help these groups to develop positive impact and sustainability. I would love to work in closer collaboration with LBN on this Community Wealth-building agenda.

Specific example:

NEWway/BDCA - 35 Vicarage Lane E6

This derelict ex-council call centre was used to accommodate homeless guests as part of the SWEP protocol last winter.

Once the need for this provision ended in March, BDCA/NEWway were offered a two-year meanwhile lease on the building. We invested more than £10,000 cash and hundreds of volunteer hours in bringing the building back into use. It is currently housing services including our Family Hub, supporting families without recourse to public funds, food bank, food club and debt advice centre. We also offered to make spaces available for SWEP this winter, linked in with support from NEWway, based in the Bobby Moore Pavilion on Flanders Field.

LBN is actually saving money, without the need for security costs. But we were asked to pay an annual rental to LBN initially of £21,750 pa. This was later reduced to c£10.5k.

Had I have known that a rental charge was envisaged, I would never have agreed to negotiations starting with LBN. The building would still be derelict, costing LBN money and depriving our community of much needed services.

Green & Water spaces

Flanders Field.

Another example of good and vital partnership working is Flanders Field, East Ham.

This nine-acre playing field had been left to overgrow until a group of local residents took matters into our own hands and started to cut down the 4ft high grass with petrol strimmers.

For the last 25 years this place has been managed by BDCA and more than £2 million has been raised to replace the pavilion, burned down by arsonists, provide a multi-use games area (MUGA) and relay part of the grass playing surface.

We have installed the only two grass cricket squares on LB Newham land and developed Newham Cricket Club that after 15 years has just been accepted as a full member of the elite Essex Hamro league.

The maintenance and running costs of Flanders Field are subsidised by income we generate through the Well Community Centre in Vicarage Lane E6 and helped with a contribution of around £25kpa from LBN towards filling the gap between income and expenditure. This small contribution from LBN helps make running Flanders Field viable and provides incredible social value.

We would like to agree a long-term lease in order to secure significant capital funding however this is currently impossible. Although running Flanders Field as a multi-use facility for our whole community is a financial LIABILITY (not a financial asset), we were still asked to pay £11kpa rent, without any commitment from LBN of on-going funding. LBN is liable to replace the current worn-out MUGA surface, and to replace the containerised pavilion in 10-year's time at the end of its life expectancy. Does the council want to continue to work in partnership with the voluntary sector to keep Flanders Field in use as a broad community asset, share on-going revenue costs and work together to secure necessary capital investment? The alternatives would be to scrap the restrictive covenants and sell the land off or choose to let the facility overgrow again. Either way the borough would be deprived of a vital sporting and leisure provision.

Cricket

Demand for the two grass cricket squares at Flanders Field is massively over-capacity and we desperately need more grass squares in the

borough. However they are expensive to maintain and income from local people doesn't cover the maintenance costs. A massive number of volunteer hours (including my own) make maintenance possible and Flanders Field is now renowned as one of the best wickets in the Essex league.

It would be wonderful to re-provide cricket squares on development like East Ham Gasworks, alongside income generating facilities like indoor cricket nets. Newham Cricket Club players currently travel to Chingford to use indoor practice facilities. Again a partnership between LBN, the developer and the voluntary sector would spread the costs and multiply the benefits.

Newham City Farm

Newham City Farm is another example where a LBN/Voluntary sector partnership could reap immediate rewards. The farm previously cost the council huge amounts of money but its closure has created a toxic environment in the community. If this energy was harnessed into positive action, in a way I would be committed to championing, I believe that we could re-open and run the farm without any cost to LBN. In partnership with Oasis Trust, which runs two profitable city farms, we have produced a two-year meanwhile plan that would explore whether this long-term dream is achievable. LBN's contribution would be a peppercorn rent. At Eko Pathways SEMH School, E6 we currently send pupils to Oasis' Waterloo City Farm for therapeutic education sessions. Local businesses including UEL and Buhler are also interested in supporting this project. This sort of partnership could be lauded by LBN as a great positive partnership initiative.

NEWway

I welcome the flexibility on centralising service delivery to 'town centres.' On the whole, delivering services from easily assessable locations makes sense. But in some cases the sense of belonging and offer of community support is best provided in mainly residential communities. We hope this will be true of the approved plans to redevelop Bonny Downs Church, E6 as a co-housing project in partnership with NEWway and BDCA. Our aim is to provide move-on accommodation for people experiencing homelessness, with the wraparound care and support they will need to become independent in the longer term.

As a community we are also exploring purchasing properties to provide further move-on accommodation. The difficulty is the current block on establishing HMOs. This is understandable when these are designed purely to maximise income with poor management leading to anti-social behaviour and disruption to communities.

However, with careful management and monitoring, bona fide charities such as NEWway should be able to buy and manage homes where three or four guests can be supported into independent living and permanent work. The current Article 4 restrictions means investing in property is capped to just two people per home, which makes this plan financially unviable. The finances also rely on Enhanced Housing Benefit rates- in turn increasing the Council burden and excluding the tenant from gainful employment- as the rent is tied to support and does not encourage paid work. By increasing tenant numbers in suitable homes and using Universal Credit (and salary) for the rent, the support to tenants can be provided in existing community projects, such as Bonny Downs and NEWway. Investors are interested in this model, and talks are already in progress. This model makes the support sustainable using community assets, it is person centred rather than financially-driven and removes the reliance on Housing Benefit costs.

Again, this joint LBN/voluntary sector approach could really help many individuals flourish in independent living and reduce benefit and support costs.

All of these comments are my personal views - not necessarily the organisations I represent.

They include, as follows:

Chair, Bonny Downs Community Association

Chair, Newham Cricket Club

Chair, Eko Pathways School governing body

Joint-Minister, Bonny Downs Church

Volunteer, NEWway project

It's a privilege to work together with LBN to make our wonderful borough even better.

Dave Mann