



The London Plan

ADPH London response, 2 March 2018

About this response

This response is from the Association of Directors of Public Health for London, which represents Directors of Public Health (DsPH) in London's 33 local authorities, and supports them to improve and protect the health of their local populations. ADPH London brings together DsPH and their teams to work together to address issues which can either only be successfully tackled on a pan-London basis and/or which enhance the ability of boroughs to meet their responsibilities locally, for example through delivering efficiencies, sharing of best practice, reducing duplication, and improving coordination of related work.

Further information on ADPH London, including current priorities, is available online here: <http://adph.org.uk/networks/london/>

This response represents the professional collective response of Directors of Public Health in London local government. At a local level, individual boroughs will submit their own responses to the consultation.

ADPH London welcomes the opportunity to comment on the London Plan. Our response does not attempt to provide a comprehensive public health response, but rather pulls together our thoughts on how the strategy can most effectively:

- Improve public health outcomes in London
- Assist councils in developing high value approaches to support their residents' health and wellbeing
- Reduce demand on health and social care services

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Executive summary

This submission will be submitted on or before 2 March 2018 in 2 ways:

- Online via the GLA online consultation platform where we will reference our comments to the relevant policy or paragraph of the document.
- In an email to: LondonPlan@london.gov.uk

The ADPH London welcomes this draft London Plan and in it particular its:

- commitment to 'Health In All Policies'
- emphasis on children and young people
- reference to the social determinants of health, and its ambition to improve Londoner's health and reduce health inequalities.

RESPONSE

Planning London's Future (Good Growth Policies)

ADPH London strongly agrees with Policy GG3 - Creating a healthy city – it plays to a public health aim to embed health in all (local government) policies.

We are pleased that the policy references the wider determinants of health, but want to ensure that best practice and learning is shared in, and across the 32 London Boroughs to encourage the best outcomes for residents.

We ask that the headline statement on this policy be amended as follows: **To improve Londoners' health and reduce health inequalities, those involved in planning and development should identify and review best practice, and must:**

ADPH London wishes to include a statement, aligned to the London Councils London Plan interim response, encouraging boroughs to have 20mph speed limits around schools.

We ask that action GG3 C be amended to: **Use the Healthy Streets Approach to prioritise health in all planning decisions, including the promotion of active travel and physical activity; and the encouragement of a 20 mph speed limit in close proximity to educational settings such as children's centres and schools.**

We note that this amendment might also be added to SB 3.

We welcome the reference to Health Impact Assessments in GG3 D, but also think this requirement could be further strengthened and reinforced by embracing it within a broader 'Integrated impact assessment' process that will ensure consideration of the wider determinants of health. An Integrated Impact Assessment includes: a Sustainability Assessment and Strategic Environmental Assessment; an Equalities Impact Assessment; and a Health Impact Assessment (HIA). The Health Impact Assessment is the only non-



statutory assessment of the 3, and by including it in a broader process it is more likely that outputs will be actioned. There is also scope to include key elements of a HIA in a Sustainability Assessment and Strategic Environmental Assessment.

We recommend the action is amended to: **Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of an Integrated Impact Assessment process. Consideration should also be given to reducing workload and duplication by incorporating key aspects of a HIA into a Sustainability Assessment and Strategic Environmental Assessment.**

We also recommend that narrative be added to GG3 C with reference to impact assessments being timely - HIAs carried out just before the submission of the planning application have very limited practical applications, and run the risk of simply being a 'tick box exercise': **Impact assessments must be undertaken at a very early stage of the master planning, so that any potential issues identified can be addressed.**

Design policies

ADPH London agrees with design policies, with particularly strong support for Policy D3 (Inclusive design - in particular the requirement to include an Inclusive Design Statement in the Design and Access Statement. Amongst other things, inclusive design will ensure that disabled residents will have a safe and dignified escape route in case of emergencies); and Policy D7 Public realm.

We want to reinforce actions in Policy D4 Housing quality and standards by referencing the precise term - 'Minimum space standards for new dwellings', as stated in Policy 3.5 Quality and Design of Housing Developments in the current London Plan.

We recommend that action D4D be amended to: **Housing developments are required to meet the minimum space standards for new dwellings as set out below. These standards apply to all tenures and all residential accommodation that is self-contained.**

Policy D5 is welcome, but we would prefer to see a more ambitious target than the current 10%.

A new target should reflect the growing numbers of people likely to be living in London with disabilities in the future, including dementia, the growing ageing community where older people may require accessible housing, and a need to ease the pressure on social care budgets where beds are often 'blocked' by the need for relatively simple home refurbishments.

As stated, we know that London's population will grow older and live longer. We also know that two thirds of people with dementia live in the community in their own homes while one



third live in a care home, so it is important that the London Plan considers dementia across homes and the wider environment and not solely in specialist housing as is currently suggested by referring to dementia only in policy H15 Specialist older persons housing.

Also in this section, ADPH London welcomes the provision of free drinking water fountains: this will contribute to reducing sugary beverage consumption.

Housing Policies

ADPH London agrees with the Housing policy actions to significantly increase the availability and accessibility of affordable housing for Londoners. At the same time, it must be recognised that new higher density and therefore smaller housing may come with inherent problems and risks for the health and wellbeing of residents. We therefore welcome, for example, references (elsewhere in the London Plan) to applying the Healthy Streets approach outlined in the Mayor's Transport Strategy to all areas around new homes, and social infrastructure policies promoting physical activity.

The Mayor has made bold and clear ambitions to reduce air pollution in London. We ask that the Mayor should therefore include in his Housing policy, actions to prevent air pollution generated from construction activities such as the operation of diesel engines, including non-road mobile machinery, and to mitigate noise pollution, as this can contribute to mental ill health, stress levels, hypertension, sleep disturbance and other health issues.

We welcome the policies in H5 to H8 concerning delivering affordable housing, and in particular references to the Affordable Rent Programme and London Living Rent homes as a significant step toward an accessible London housing market.

We will, however, welcome clarification of H5 A 3) 'Affordable housing providers with agreements with the Mayor delivering at least 50% affordable housing across their portfolio'. This sort of statement can easily be misinterpreted, and lead to gentrification in areas of high property value, with risks of separating extended families and support networks for example. We would like to see this amended to **Affordable housing providers with agreements with the Mayor delivering at least 50% affordable housing across** (i.e. delete their portfolio) **each development**.

We know that affordable housing definitions can vary, which places at risk disproportionate numbers of people from BME, older people, disabled and low income groups living in social housing more at risk of homelessness. We also know that genuinely affordable homes are also vital to increasing the likelihood that family units remain within close proximity, which has inherent benefits such as family members supporting each other with childcare and supporting older family members.

We ask the Mayor develops with partners, appropriate definitions for all housing needs, and is more explicit about the links to the objectives in his Health Inequalities Strategy.



In terms of Policy H14 we would like to see a commitment to a proportion of supported and specialised housing being affordable, and recommend an amendment to H14 A: **The delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported, and there should be a commitment to a proportion of this supply being affordable.**

Social infrastructure policies

ADPH London agrees with the social infrastructure policies.

In particular, in S3 B we support actions to locate education and childcare facilities in accessible locations, with good public transport, accessibility and access by walking and cycling; and to locate entrances and playgrounds away from busy roads, with traffic calming at entrances.

We support the proposal in S3 B to link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling. However, we would like to see this action extended to all short trips undertaken by all members of the community.

We recommend that action S3 B 4) be amended to: **link to existing footpath and cycle networks to create healthy routes to community assets including schools, and other education and childcare facilities, play and recreation settings, and community centres, to encourage walking and cycling.**

We would like to see an additional aspiration that all children and young people are able to walk or cycle to school – reducing pollution levels, and increasing levels of physical activity.

This aspiration is in line with the with the Mayor's draft Transport Strategy. We are hopeful this will reinforce the message that facilitating active travel is the responsibility of all planners and developers, and not solely transport planners.

We would like to see an action inserted in S3 B as follows: **Local authorities should set ambitious targets for the proportion of children and young people travelling by walking, cycling, scooting, or public transport for all or part of the journey to new primary and secondary schools. In terms of primary schools the target should be 90% from the adoption of the London Plan.**

We would also like to see a further action inserted in this section: **Use the Healthy Streets Approach to prioritise health in all planning decisions, including the promotion of active travel and physical activity; and the encouragement of a 20 mph speed limit in close proximity to educational settings such as children's centres and schools.**

In Policy S4 Play and informal recreation, the ADPH London would like to stress the importance of opportunities for play and informal recreation, and that children and young



people can access them independently. S4 provides an opportunity for a 'sea change' in provision.

We recommend that action S4 B be strengthened to: **Development proposals for schemes that are likely to be used by children and young people should be co-produced by stakeholders, parents and children and young people and should: ...**

We also feel it will be useful to include a definition of a 'playable space' so that Part S4 B 4) of the policy becomes more helpful. We recommend that action S4 B be improved with an additional action: **Development proposals for schemes that are likely to be used by children and young people should: (insert new 1) offer spaces for play that are recognised as 'playable'.**

This might be supplemented with guidance on what constitutes a playable space such as the GLA's Play and Informal Recreation SPG, in para 3.23: 'A playable space is one where children's active play is a legitimate use of the space. Playable space typically includes some design elements that have 'play value': they act as a sign or signal to children and young people that the space is intended for their play. The creation of play value through fixed equipment, informal recreation activities or engaging landscaping features should be a key requirement'.

We also strongly support the concept of intergenerational playgrounds or public spaces that work for all members of the community and encourage interactions between all ages – children playing with parents and grandparents for example. The delivery of high quality spaces will produce better playgrounds, better play, inclusive, stronger communities, and enriching experiences across the generations.

We recommend that action S4 B be strengthened to include an action: **consider the development of intergenerational playgrounds to encourage better play, inclusive, stronger communities, and enriching experiences across the generations.**

Younger children are usually accompanied at playgrounds by their parents/carers, so in addition to considering intergenerational play, play spaces intended for younger children should provide facilities for parents/carers to socially interact whilst supervising their children. We therefore recommend an additional action under action S4 B: **Consider the needs of adults supervising children through the provision of facilities that encourage social interaction, such as seating for example.**

We also wish to encourage the growth of incidental or informal play – which relates to a healthy streets approach, closing streets on a Sunday for 'play streets'¹, for example.

¹ https://www.londonplay.org.uk/content/30290/our_work/recent_work/play_streets/play_streets



Policy E9 Retail, markets and hot food takeaways.

ADPH London strongly agrees with the restriction in E9 C restricting the proximity of fast food takeaways to schools.

We recommend that that action E9 C be strengthened to: **Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified and supported with policies that resist overconcentration of hot food takeaways and that require health impact assessments on proposals for all new hot food takeaways.**

Evidence shows that A5 hot food takeaways are most widely used by relatively vulnerable members of the community, contributing to childhood obesity and escalating the widening of health inequalities. The Mayor has a statutory duty to promote improvements in the health for Londoners, and in line with the 'London Plan topic paper: Hot food takeaways, January 2018', we strongly urge the 400m restriction be maintained as a minimum.

ADPH London recommends that the Mayor clarifies cross border issues where a proposal for a hot food takeaway is within 400m of a school in a neighbouring borough. We would suggest that the Mayor states that when assessing proposals for a new hot food takeaway, the borough has regard for schools located within 400m but located in a neighbouring borough.

The reference to the Healthy Catering Commitment (HCC) also needs strengthening. There are issues with the implementation of the HCC around: loopholes in the classification of businesses, compliance, payment for the accreditation, and the limited resource that Boroughs dedicate to it, in particular in the monitoring of the accreditation once it has been achieved.

We ask the planning inspector to respond on the following issues:

- How can we close loop holes in the Healthy Catering Commitment (HCC) around how businesses classify themselves to avoid HCC accreditation requirements?
- Boroughs have limited resource dedicated to HCC, how will the Mayor support boroughs on this?

Heritage and culture policies

In general in this section, ADPH London would like to see stronger wording to promote good health. We recommend strengthening HC1 B 4) to: **delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to health and social wellbeing.**



We support policies boosting the night time economy, but would like to emphasise the need for the night time economy to have more options that do not involve alcohol such as bowling, dancing, arts and culture. Many policies in this section largely revolve around alcohol, and we ask the Mayor to be mindful that excessive consumption of alcohol is, of course, harmful to health.

We therefore recommend strengthening HC6 B 3) to: **diversify the range of night-time activities, creating more options that do not necessarily involve the consumption of alcohol, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums.**

We are supportive of integrated approaches in HC6 C) to mitigate the negative impact of licenced premises and other services, and ask if it can be emphasised more.

We recommend strengthening HC7 A2) to: **support considered proposals for new public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development where appropriate.**

And adding: **Proposals for new public houses should be considered on their own merit, and approval should be contingent on an assessment of the cumulative impact of licenced properties.**

Green infrastructure and natural environment policies.

ADPH London strongly agrees with policies in the section – they are strong and positive.

The environmental determinants of health are well recognised and the environments in which people live, work, play, learn and grow have the potential to strongly promote health and reduce inequalities. The design and function of the urban environment, through improvements in access to green and open space and controlling exposure to air pollution, has a significant role in establishing the health and wellbeing of both current and future populations.

We believe that London can be a city that promotes the health and wellbeing of all through creating an environment in which everyone can flourish. To ensure its potential is realised, a health and equity approach, guided by evidence is required. We therefore welcome the Green infrastructure and natural environment policies.

Creating a greener London has the potential to have significant other beneficial impacts on the health of our population. An appealing and accessible environment can create a positive experience for all Londoners, increasing the likelihood of individuals wanting to be outside, to be active and to enjoy parks, open spaces and everyday life. The more positive an experience that Londoners have of their city the more likely people are to go out to enjoy, explore and benefit from it and to connect with others. The numerous benefits on both the mood and mental wellbeing of our population and the cumulative benefits this would have for



the city as a whole means we strongly support this aim and the strategies in place to this end.

A more accessible, healthy and enjoyable environment supports positive and healthy child development by providing opportunities for children to play, be active and explore in areas that would previously have been prohibited.

Overall, there are numerous benefits to making the city more environmentally friendly, including helping to alleviate health inequalities across the capital. This, in turn, will positively impact on the most prevalent health conditions in our city, improving mental health, reducing obesity rates, improving air quality and increasing physical activity.

To ensure that the policies are implemented and that meaningful impacts on health outcomes and inequalities are achieved, we strongly recommend that the Mayor:

1. Provides ongoing support to boroughs and local communities to implement the policies and identify the interventions that will have the greatest impact at local level.
2. Ensures equity and fairness remain at the centre of all policy initiatives.
3. Establishes a widely disseminated and clear communication strategy to share his vision with all Londoners, articulating the benefits to their lives, their health and how they experience and interact with their city.
4. Implements a thorough evaluation and development process to demonstrate impact and identify areas for improvement.

Sustainable infrastructure policies

ADPH London strongly agrees with policies in the section – they are strong and positive.

Exposure to harmful levels of air pollution contributes to a considerably poorer quality of life, increased use of primary and secondary health services, and excess premature deaths in our city, with long-term exposure responsible for thousands of early deaths each year. Poor air quality disproportionately impacts those living in the most deprived areas. Poor air quality also discourages people from walking and cycling around the city at a time when rates of physical inactivity, sedentary behaviour and obesity are at very high levels. To address these health-related issues, strong leadership and a strategic approach which acts on all the different levers available are required. In this, we strongly support the Mayor in his efforts to improve London's air quality.

To ensure that the policies are implemented and that meaningful impacts on health outcomes and inequalities are achieved, we strongly recommend that the Mayor:

1. Provides ongoing support to boroughs and local communities to implement the strategy and identify the interventions that will have the greatest impact at local level.
2. Establishes clear channels of accountability and governance for achieving the strategy's goals, indicators and time-scales for implementation.



3. Ensures equity and fairness remain at the centre of all strategy initiatives.
4. Implements a thorough evaluation and development process to demonstrate impact and identify areas for improvement.

Finally, in this section, we wish to emphasise the importance of waterways as multifunctional assets, particularly in terms of health and wellbeing.

We recommend an addition, taken from supporting text, to Policy SI14 Waterways – strategic role (and to support Policy SI16) to add a new C: **Continue to develop London’s waterways as (delete are) multifunctional assets. They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage sites, landscapes, views, cultural and community activities; and drainage, flood and water management functions. As such, they provide environmental, economic and health and wellbeing benefits for Londoners.**

Transport policies

ADPH London agrees with policies in the section, and in particular the Healthy Streets approach that is key for physical activity and tackling health inequalities.

We are particularly supportive of reducing car dominance, ownership and use, and consider this fundamental to delivering Healthy Streets.

The health and wellbeing of people living, working and visiting London is influenced and shaped by how they move about the city and their safety and experiences while doing so. The relationship between transport and health is well recognised. The interplay between health, wellbeing, air quality, levels of physical activity, access to services, isolation, and safety represent a clear example of this relationship. These represent some of the largest public health issues negatively impacting on the lives of Londoners and are influenced, and exacerbated, by the transport system.

The positive impacts of a well-designed transport system that is accessible to all is a public health opportunity not to be missed.

The Healthy Streets Approach represents a significant opportunity to improve public health across London by prioritising walking, cycling and public transport use and establishing a shift away from a car dominant transport system. This approach represents a substantial movement towards a health focused transport system and is one that will undoubtedly have a positive impact on the health of Londoners.

We believe that the Transport Policy can be strengthened through further consideration being given to:

Health Inequalities: Making changes to the street environment and transport system has significant potential for reducing health inequalities in London. Positive and negative impacts



of transport are distributed unequally, with the greatest burden of harm from the transport system falling on the most deprived in our city. Compounding this, the benefits of our current transport system, such as access to services, schools and employment opportunities are also unevenly experienced, further exacerbating social inequalities. We ask the Mayor to ensure that this transport policy benefits every one of all ages, abilities and background – particularly those that need it the most to ensure the maximum health benefits are recognised.

Health Messaging: Londoners spend a considerable amount of time in the public transport system and this policy represents a significant opportunity to consider how this time can be maximised to promote health behaviours through positive advertisement. We ask the Mayor to consider the potential the transport system has to create a health-promoting environment, by minimising advertising of unhealthy food and at risk behaviours and instead focusing on the promotion of health behaviours and messages. This is currently the case in Amsterdam, where from January 2018, the City has banned advertising of unhealthy products aimed at young people in all 58 subway stations².

We recommend an addition to T2, add new E: **TfL should create a health promoting environment by removing all advertising of HFSS foods and drinks (products that are high in fat, salt or sugar), and alcohol.**

Suicide Prevention: The transport environment, in particular the underground network, is a significant location for suicide and attempted suicide. We are aware of suicide prevention infrastructure on new underground and rail lines and would ask the Mayor to consider a stronger focus on suicide prevention through this policy.

ADPH London recommends an addition to policy T1: Strategic approach to transport as follows: T1 C: **All development plans and development proposals should incorporate suicide prevention measures.**

To ensure that the Policy becomes a reality and that meaningful impacts for improving health outcomes are achieved, we strongly recommend that the Mayor:

1. Provides ongoing support to boroughs and local communities to implement the Policy and identify the interventions that will have the greatest impact at local level.
2. Establishes clear channels of accountability and governance for achieving the strategies goals, indicators and time-scales for implementation.
3. Ensures equity and fairness remain at the centre of all strategy initiatives.
4. Calls upon a multi-sector approach to implement and embed the Policy and the Healthy Streets agenda. Partnership working across all sectors, from health, planning and development to education and business, and through the established borough led Healthy Places Network, is vital to maximise the impact of the Policy.

² See, <http://www.dutchnews.nl/news/archives/2017/09/amsterdam-bans-metro-ads-featuring-unhealthy-food-for-kids/>



5. Implements a thorough evaluation and development process to demonstrate impact and identify areas for improvement and encourage boroughs to do so at a local level.
6. Establishes a widely disseminated and clear communication strategy to share his vision with all Londoners, articulating the benefits to their lives, their health and how they experience and interact with their city.

We encourage the Mayor to do all he can to lobby central government and other city-leaders to adopt the Healthy Streets Approach and share learning across the nation so that everyone in the UK can benefit from breathing clean air, being active and enjoying the places where they live, work, play and grow.

In T5, we support increases in cycle parking but would emphasise the need to increase the amount of cycle parking dramatically especially in central London. We suggest an amendment to T5 A 2): **Significantly increase** (delete securing) **the provision of** (delete appropriate) **levels of cycle parking, especially in central London, which should be fit for purpose, secure and well-located.**

We also wish to see a reference to increasing levels of park and ride options in outer London. We suggest an addition to T6 new J: **Consider increasing levels of park and ride options in outer London.**

Policy M1 Monitoring

ADPH welcomes the set of measures that are proposed. We would, however, like to see an additional KPI set for active travel alongside the 'Positive trend in provision of cycle parking': **Set and measure a target of all Londoners doing two ten minute periods of active travel a day by 2041.**

END