



The Economic Development Strategy

ADPH London response, 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 Economic Development Strategy. 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 13 March 2018 in an email to economy-strategy@london.gov.uk

The ADPH London welcomes the draft Economic Development Strategy and in particular its:

- commitment to a fairer and more inclusive economy, particularly references to early years settings, and the education of the capital's young people
- intention to creating the conditions for growth
- call to action to work together to achieve the Mayor's vision

Policy areas in the plan.

Chapter 3: Fairer and more inclusive economy.

3.1 World Class Education

The Marmot Review into Health Inequalities (Fair Society, Health Lives, 2010) states that disadvantage starts before birth and accumulates throughout life and recommends giving every child the best start in life to be the highest priority policy objective in tackling health inequalities.

ADPH London, therefore, strongly supports the Mayor's ambition to **'pilot the Healthy Early Years London programme and deliver the Early Years Hubs to tackle the cost of childcare, improve the health, wellbeing and school readiness of children under five, and upskill early years workers – helping to increase the takeup and quality of early years education.**

In terms of the second action – Work with London schools, colleges, providers, businesses, universities and London boroughs to develop a coherent and accessible all-age careers information, advice and guidance offer, **we would like this action to be more explicit in stating its intended outcomes.**

We believe that a collective range of actions can produce a sea change in how we prepare all young Londoners to flourish in the workplace. Future generations entering the workforce will need to be responsive to the fast pace of change that is inevitable as the way in which we work continues to evolve. We want all our young people, whatever their background, to have the opportunity to be socially mobile and reach their potential.

As things stands, we anticipate that many young people from disadvantaged communities may be ill prepared for work. Their parents may be rooted in more traditional ways of working, and we need to open up opportunities for all by offering guidance and support around what new workplaces will look like, and what skills will be required to flourish in them.



This is a chance to address social mobility. We know that, in the main, the private education system is way ahead of the state sector in future gazing for its students - encouraging the use of parental networking for example, to source internships, placements or volunteering opportunities to help guarantee pathways into good employment.

This Strategy provides an opportunity to build confidence amongst all of our young people – providing mentoring for example to help build ambition and aspiration, confidence and resilience, manage stress, and help build the skills required for the world of work.

There are numerous charities and social enterprises in London and the UK, all specialising in addressing inequalities by connecting employers to schools and colleges, and empowering young people with the real-life skills and knowledge they need for work¹. **We would like this type of support to become the norm, and become embedded in everyday education settings.**

We ask that this action be strengthened to reflect this need: Work with London schools, colleges, providers, businesses, universities and London boroughs to develop an innovative range of approaches and interventions, in addition to careers information, advice and guidance, to prepare all young Londoners to flourish in the workplace.

The draft Economic Development Strategy should reflect the ‘London Ambitions Career offer’², in particular the ambition for every young Londoner to have completed at least 100 hours experience of the world of work, in some form, by the time they reach the age of 16. For example, this ambition was strongly supported by the young people who contributed to Islington’s Fair Futures Commission³: “Young people want schools to prioritise work experience. They find it difficult to find work experience opportunities especially if the school doesn’t help them. Some young people feel that having no work experience reduces their chances of securing paid jobs in the future.”

We also recommend that consideration also be given to actions that include supporting children and young people with enrichment activities outside of term-time.

The long school holidays for example, are often the times when many young Londoners fall behind with their education.

We would like to see specific action(s), not necessarily located in this section, or any one particular section of the Strategy, promoting the development of female talent. ‘Bias in the talent pipeline starts before school’⁴, and this Strategy should amplify the

¹ There are numerous examples including <https://careerready.org.uk/schools-colleges>, and <http://wcomc.org/2017Nov30-3>

² <https://lep.london/publication/london-ambitions-careers-offer>

³ http://www.fairfutures.org/app/uploads/2018/02/Fair_Futures_Report_Web_Final.pdf

⁴ <https://www.ft.com/content/a89228e2-76d7-11e7-a3e8-60495fe6ca71>



need to build and supply a pipeline of female talent into London's workforce for generations to come.

3.2 Opportunity for All Londoners

We strongly support the actions in this section, in particular actions to help long-term unemployed people to (re) enter work, thereby helping to address the dangers of widening the inequalities gap.

In addition, we request that consideration be given to creating the conditions that encourage all Londoners to access a 'second chance' to return to education - a chance to retrieve their education if they 'failed in the school system' the first time around. **We therefore ask for a further action to be added: Develop a range of approaches and interventions to attract Londoners back into education programmes to enable them to gain the skills to flourish in the future.**

We also request that comments made in 3.1 and 3.2 be cross referenced with comments made below in 4.4.

3.3 A lower cost of living

ADPH London agrees with actions to help to increase the supply of housing including affordable homes and help make private renting more affordable. 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 Economic Development Strategy) 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 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.

Most journeys undertaken in London are under 5 miles. We consider that most people, especially those in the workforce, could easily do this by prioritising walking, cycling and public transport use, if suitable access was universally available.

We welcome policies set out in the draft *London Plan* 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 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 that 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.

The cost and accessibility of transport ('transport poverty') can be a barrier to employment, learning, and socialisation. We therefore welcome the action **to improve the accessibility and affordability of the cost of transport, and provide a better experience for disabled and older people.**

We also welcome the action to **help to support access to more affordable and accessible childcare.**

We would like to see specific action(s), not necessarily located in this section of the Strategy promoting the development of female talent, incorporating a range of issues such as:

- A focus on supporting maternity – breastfeeding opportunities in the workplace for example, and support to maintain and grow career progression potential - in programmes around 'returning talent' for example⁵.
- Flexible working conditions.
- Addressing differences in pay.
- Encouraging paternity leave, and commissioning or reviewing research into understanding why take up is low.

3.4 Fairer pay and employment practices

ADPH London welcomes the actions on **fairer pay and employment practices**, as they are important contributors to reducing inequalities and improving mental health.

We would like to see an additional action around promoting healthier and happier workplaces. We feel there is possible scope for confusion and duplication concerning the Good Work Standard for London, and the London Healthy Workplace Charter. We would like consideration to be given to a clear narrative about the relationship between the two, acknowledging and building on the success and reach of the Charter and ensuring employers address crucial issues like: recruitment and staff retention, sickness absence and employee productivity'⁶.

We recommend an amendment to the action 1: Recognise and celebrate businesses that promote high standards in employment, procurement, and interventions to improve the health and wellbeing of employees through the new Good Work Standard for London (and Healthy Workplace Charter).

⁵ There are numerous examples in London including <https://www.workingmums.co.uk/school-students-senior-leaders-building-pipeline-female-talent/>

⁶ <https://www.london.gov.uk/what-we-do/health/healthy-workplace-charter?source=vanityurl>



3.5 Better health and less poverty

ADPH London strongly welcomes all actions to achieve better health and reduce poverty.

We responded to the Mayor's *Health Inequalities Strategy* in November 2017: 'We, along with the National Association of Directors of Public Health, welcome the support and profile that the Mayor's office has brought to tackling health inequalities and we strongly support the vision for 'a healthier, fairer city, where nobody's health suffers because of who they are or where they live'⁷.

We have some concern that the Strategy in this section is strong on narrative, but weak on implementation intent – we would like to see references that change the supporting narrative to have a stronger emphasis on action, for example, from: Addressing food poverty by developing food poverty action plans and good retail plans to: Addressing food poverty by implementing food poverty action plans and good retail plans

We want the Strategy to commit to taking concerted action to address child poverty as the evidence is mounting that gains in the past are slipping⁸.

We want the Strategy to raise and sustainably address the issue of Holiday Hunger, for example. There is evidence to suggest that up to 500,000 children in London may be at risk of going without food in the Easter and summer school holidays⁹.

We also consider that the actions should make explicit reference to the issue of childhood obesity. We recommend an additional action based on our collaboration with the Mayor: Set up a Child Obesity Taskforce for London to tackle 'the childhood obesity epidemic ... as a crucial part of ensuring that all young Londoners are able to flourish and lead happy, healthy lives'.

3.6 Inclusive and safe communities

ADPH London strongly agrees with the actions in Inclusive and safe communities. These actions make a significant contribution towards reducing inequalities, and tackling mental health and loneliness issues.

Our response to the *London Plan* addresses issues which we wish to emphasise in this Strategy, including:

Planning: To improve Londoners' health and reduce health inequalities, those involved in planning and development should identify and review best practice, and must ensure that the wider determinants of health are addressed in an integrated and co-ordinated way,

⁷ ADPH London response to the Mayors Health Inequalities Strategy, November 2017

⁸ Presentation by Child Poverty Action Group, 1 March 2018:

<https://www.local.gov.uk/sites/default/files/documents/PP2%20Child%20poverty%20in%20the%20UK%20-%20Alison%20Garnham.pdf>

⁹ <http://www.mayorsfundforlondon.org.uk/news/call-mps-tackle-holiday-hunger/>



taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.

20mph speed limits around schools: 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.

Assessing the potential impacts of development proposals on the health and wellbeing of communities: 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.

Minimum space standards: Housing developments are required to meet the minimum space standards for new dwellings.

Providing suitable housing and genuine choice for London’s diverse population: In terms of the target of 10 per cent of new build dwellings to meet Building Regulation requirement M4 (3) ‘wheelchair user dwellings’; The ADPH London wants 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, 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.

Chapter 4: Creating the conditions for growth

4.1 Space for business and work

ADPH London notes the intentions to increase office space to support London’s economic growth, but also urges the Strategy to set out a clear vision outlining future ways of working. We suspect that the future of work will not always be office based. **The Strategy should, therefore, seek to accommodate a flexible approach to how Londoners may work, and plan for different sorts of ‘going to work’ settings.**

New ways of working associated with digital provision may increase incidences of loneliness for Londoners for example, and we request that this sort of negative impact on health be considered in actions going forwards.

ADPH London agrees with narrative to maintain vibrant and healthy high streets, and the action to **Work with communities to create vibrant local economies outside central London, including successful town centres, high streets and industrial areas.**

However, the narrative in the Strategy falls short in giving examples of the characteristics of businesses that will comprise vibrant and healthy high streets.



We recommend referencing key recent publications such as ‘High Streets for all’¹⁰, and Health on the high street’¹¹ – which sets out a clear vision: ‘A healthy high street can provide the public with healthy choices, support community cohesion and social interaction, promote access to health services and do much to support individual wellbeing’.

We welcome mention of the ‘healthy catering commitments from food outlets, and encouraging new healthy food businesses’. However, in order to avoid excessive proliferation, **we encourage the Mayor to support policies on overconcentration of uses. We would strongly encourage the Mayor to lobby for mandatory “scores on the doors” to be displayed in all food outlets in order to ensure good food hygiene practices.**

We are also mindful of the growth of clusters of a broad range of gambling outlets in many of London’s High Streets targeting some of our most vulnerable communities. Many contain Fixed Odds betting terminals that are ‘often described as the crack cocaine of gambling, because of the speed with which large sums can be staked, and lost’¹².

Whilst we acknowledge the ability of many people to gamble responsibly, it is likely that a significant percentage of Londoners will be, or be at risk of being problem gamblers. **We request consideration of an action to encourage London boroughs containing some of London’s most vulnerable residents to take collective action to attempt to limit the numbers of gambling outlets in our high streets.**

We also welcome mention of street markets in the supporting text. Markets that offer affordable fruit and vegetables in our most disadvantaged communities are to be encouraged. Markets also offer opportunities for local people to start a small business with low capital requirements. Markets also offer an environment that can facilitate social interaction. **We therefore recommend an amendment to action 2: Work with communities to create vibrant local economies outside central London, including successful town centres, high streets, market spaces, and industrial areas.**

Finally, we suggest adding in the narrative and the summary of actions: promote the social value act as a way of businesses engaging with local communities.

4.2. Transport

The 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.

¹⁰ https://files.lsecities.net/files/2017/10/high_streets_for_all_report_web_final.pdf

¹¹ <https://www.rsph.org.uk/uploads/assets/uploaded/b6f04bb8-013a-45d6-9bf3d7e201a59a5b.pdf>

¹² <https://www.theguardian.com/society/2016/jun/06/gambling-secret-addiction-ruins-lives>



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, and 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:

Explicitly mentioning the Mayors Transport Strategy in the summary of actions.

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.**

We also want the Strategy to raise and address the issue of transport poverty. We fully support the aspiration to ‘make public transport the first choice’, but are mindful that the expense of public transport may undermine positive attempts at social mobility. We therefore request that innovative, sustainable solutions be explored.

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 stations¹³.

We recommend an additional action: 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.

4.3 Infrastructure

ADPH London agrees with the actions: **Protect and enhance London's Natural Capital - its green spaces, air, water and other natural resources to ensure London is a healthy, green and liveable city; and - Promote the concept of green infrastructure and natural capital accounting.**

4.4 Innovation and skills

ADPH London agrees with the actions including the **'Use the Adult Education Budget', the 'provision and takeup of high quality (including higher level) apprenticeships', and 'Use the Skills for Londoners Capital Fund to improve the quality of facilities for learning.**

We request that comments made in 3.1 and 3.2 also be considered in this section of our consultation response, particularly in references to the development of female talent.

We also want the Strategy to be more explicit regarding promoting digital inclusion to prevent health Inequalities. We recommend an amendment to the action: Use the Adult Education Budget, once devolved, to tailor skills provision, including digital inclusion, to meet the needs of businesses and learners, and to support progression into work.

4.5 Enterprise and entrepreneurship

ADPH London strongly agrees with the action in the supporting text: **The Mayor will continue to make the case to government for the full devolution both of business rates revenues and also the local administration of the tax ...**

We consider that, if managed well, there is the potential for London to share the benefits of an increase in wealth across the London economy helping to **address inequality in the capital.**

We therefore, recommend that this supporting text be added to the summary of actions as follows: The Mayor will continue to make the case to government for the

¹³ See, <http://www.dutchnews.nl/news/archives/2017/09/amsterdam-bans-metro-ads-featuring-unhealthy-food-for-kids/>



full devolution both of business rates revenues and also the local administration of the tax.

Chapter 5: Supporting London's sectors

5.1 Advanced urban services

ADPH London recognises the significant potential of digital innovation to boost the role of public health across the capital.

We, therefore, strongly agree with the action: **Support investment in urban demonstrators to showcase digital technologies across the city, and work with London boroughs and investors to bring these to market for the benefit of Londoners.**

5.2 Cultural and creative industries

ADPH London welcomes the social and mental health benefits that may flow from the encouragement of cultural and creative industries.

However, in terms of action 8. **Promote the night time economy in line with the vision for London as a 24-hour city:** We support policies boosting the night time economy, but wish 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.

In our draft response to the *London Plan*, we have stated: we ask the Mayor to be mindful that excessive consumption of alcohol is, of course, harmful to health. We have consequently recommended to strengthen HC6 B 3) of the *London Plan* 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.**

5.3 Financial and business services

ADPH London agrees with the action to: **Lobby on behalf of the sector for a Brexit deal which sustains mutual market access for UK and EU financial services companies.**

5.4 Life sciences

ADPH London agrees with all actions in life sciences and notes **that the broad health workforce in London makes a significant contribution to the capital's economy.**

5.5 Low carbon and environmental goods and services

ADPH London welcomes all actions, particularly concerning environmental ambitions that include toxic air, noise pollution, the loss of green spaces and the adverse effects of climate change. We are hopeful that action 2: **Support businesses and households to become**



more resource efficient, will make a contribution to **reducing fuel poverty levels in the capital**.

Chapter 6. Working together to achieve the Mayor's vision

ADPH London strongly welcomes the strengthening of partnerships. We also strongly welcome **the formation of policy specific groups such as the Mayor's London Food Board and the Child Obesity Taskforce for London**.

And finally, we support '**Making the case for devolution**'. We consider that this is **a real opportunity for London to re-balance its significant inequalities**.

END.