

London Healthier Places (LHP) Network Response to the draft London Plan

Policy	Summary of LHP discussion and comments
GG3 Creating a healthy city	<p>This policy emphasises the health impacts of the built environment, wider determinants of health and health inequalities. The LHP Network supports this policy, in particular the proposed Healthy Streets Approach</p> <p>The use of Health Impact Assessments can identify where major developments impact on health and health inequalities and recommend mitigation. HIAs should cover the construction phase as well as the masterplan and focus on both physical and mental health.</p> <p>The LHP Network would like to see strengthened London-wide HIAs guidance to ensure consistency.</p>
Policy D1 London's forms and characteristics	<p>The LHP Network supports this policy which promotes:</p> <ul style="list-style-type: none"> - Safe and secure environments, by designing out crime - Conveniently located green and open spaces for social interaction, play and physical activity, including urban greening - Design and measures to encourage active travel - Measures to mitigate and design out noise and air pollution
Policy D3 Inclusive Design	<p>The LHP Network supports this policy which will improve the accessibility of buildings, creating a more inclusive environment and welcome the requirement of an Inclusive Design Statement as part of the Design and Access Statement.</p>
Policy D4 Housing quality and standards	<p>The LHP Network endorses the principle that all developments should be tenure blind. The quality and design and minimum space standards should not be based on tenure. The minimum space standards are in line with the Government's technical housing standards (March 2015).</p> <p>The LHP Network supports that residential development should maximise the provision of dual aspect dwellings and avoid the provision of single aspect dwellings. Furthermore, aspects and design should take into account noise from roads and exposure to poor air quality arising from busy traffic.</p> <p>The LHP Network supports:</p> <ul style="list-style-type: none"> • The requirement of at least 5m of private outdoor space per 1-2 person dwelling (and an extra 1sqm for each additional occupant) • The requirement to provide externally accessible storage space for cycles, deliveries and other bulky items.

Policy D5 Accessible housing	The LHP Network endorses the requirement that at least 10% of new build dwelling to meet Building Regulation requirement M4(3) “wheelchair user dwellings”. We support the decision to secure these types of dwellings through planning conditions, so that compliance to this requirement could be checked and enforced.
Policy D7 Public Realm	<p>The LHP Network strongly support the requirement to maximise the contributions of the public realm to encourage active travel and discourage car usage. The Healthy Streets indicators will help to assess the quality of the public realm associated with a new development.</p> <p>The LHP Network welcomes the provision of free drinking water fountains: this will help reduce single-use plastic bottles and will support public health initiatives to reduce fizzy drinks consumption.</p> <p>The LHP Network also welcomes the provision of seating, shade and shelter as this will encourage use of outdoor space.</p>
Policy H5 Delivery of affordable housing	Affordable, good quality housing is a major influence on health and wellbeing and the LHP Network welcomes the Mayor’s commitment to deliver affordable new homes. The LHP Network believes that a good mix of housing (ie affordability, tenure, size) in any neighbourhood makes for a more balanced community that will benefit everyone living there.
Policy H10 Redevelopment of existing housing and estate regeneration	The LHP Network strongly supports that regeneration (of both residential and /or mixed use developments) should not result in a loss of affordable housing or affordable retail space.
Policy H13 Build to Rent	The LHP Network acknowledges that there are positive contributions that Build to Rent schemes can give to the housing market, especially if subject to the same fast track affordability criteria of Build to sale property (35% AH). It is however essential that the same high quality of design and minimum standards of space described in Policy D4 should apply to Build to rent developments and that security of tenancy, affordability and access for all communities to this type of housing is ensured.
Policy H18 Large-scale purpose-built shared living	The LHP Network recognises that large scale purpose built shared living may have a role in meeting housing need. However, we would like to emphasize that these developments must be of excellent quality and design and be well resourced, managed and maintained.
Policy S1 Developing London’s social infrastructure	The LHP Network strongly supports the policy on social infrastructure and welcomes the requirement to undertake a

	<p>local needs assessment of social infrastructure, including health provision, education, community, play, youth, recreation, sports, faith and emergency facilities and green infrastructure. The assessment should take into account the needs of both current and future local residents. Where appropriate, a proportion of the 'social infrastructure' should be made available to charities and other registered Third Sector organisations at a discounted rate.</p>
Policy S2 Health and social care facilities	<p>The LHP Network strongly supports the policy for closer working and collaboration between Councils, the CCG and other NHS and community organisations to better identify local needs and provision for health, social and community facilities .</p>
Policy S3 Education and childcare facilities	<p>The LHP Network especially welcomes the requirement for school entrances and play grounds to be located away from busy roads and the implementation of local traffic calming measures; the introduction of "healthy" routes to schools to encourage walking and cycling and the high quality of design required for new schools, including space for both indoor and outdoor learning space (including space for food growing). The LHP Network recommends that the London Plan Monitoring includes targets for the proportion of children who walk/cycle or get public transport to school.</p> <p>We propose that Policy S3 part B4 be changed to "link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively (walk/cycle/travel by Public Transport) to school".</p> <p>The LHP Network would like to see stronger promotion of opportunities to share school facilities (in particular sports facilities) with the wider community.</p>
Policy S4 Play and informal recreation	<p>The LHP Network strongly endorses that play areas and their access, should be designed and located to support and promote safe play, safe access and allow local children to be independently mobile.</p>
Policy S5 Sports and recreation facilities	<p>The LHP Network strongly supports the provision of good quality sports and recreational facilities that are well maintained. Alongside this, the LHP Network strongly supports the promotion and enhancement of daily outdoor recreational activities and supports the development, maintenance and promotion of integrated walking and cycling routes for London – both for active travel as well as recreation.</p>
Policy S6 Public Toilets	<p>Public Toilets are essential facilities, especially for older</p>

	<p>residents/visitors, families with young children and people with disabilities. Not knowing whether a public toilet will be available if needed may discourage some people from leaving their properties and move on foot/cycle. The LHP Network strongly supports this policy, including the proposed “changing places” toilets. Toilets should be fully accessible, safe, well lit and maintained.</p>
<p>Policy E3 Affordable workspace</p>	<p>A proportion of affordable (below market rate) business/retail space should be a requirement for all new commercial developments. This is particularly important for third sector organisations and or small and medium businesses and in the context of local regeneration processes.</p> <p>New development should not result in loss of affordable space. Should this be inevitable, businesses should receive help with their re-location strategies.</p>
<p>Policy E9 Retail, Markets and hot food takeaways</p>	<p>The LHP Network strongly supports part C of Policy E9 on hot food takeaways. Tackling obesity is one of the key health priorities for London, that has the highest childhood obesity rates nationally.</p> <p>Being overweight or obese in childhood and adolescence has considerable consequences for physical and psychological health and academic achievement. Some obesity-related conditions can develop during childhood. Type 2 diabetes (a condition that normally develops in adulthood) in overweight children has increased, as have asthma and other respiratory problems, along with some musculoskeletal disorders. Furthermore, the emotional and psychological effects of being overweight include discrimination and teasing by peers; low self-esteem, anxiety and depression, potentially impacting educational performance and wellbeing. Obese children may also suffer disturbed sleep and fatigue, impacting quality of life.</p> <p>The obesogenic environment in which London children live, learn and play influence their behaviour and decisions. Over the course of the last decade, many national and international studies have shown moderate to strong associations between density and location of fast food and takeaway outlets and take away consumption and excess weight. A cross-sectional study in England found a positive association between the density of unhealthy food outlets in a given neighbourhood, including fast food, and the prevalence of overweight and obesity in children¹</p>

¹ Cetateanu A., Jones A., Understanding the relationship between food environment, deprivation and childhood overweight and obesity: evidence from a cross sectional England-wide study, 2014

	The LHP Network strongly supports the 400m exclusion zone around both primary and secondary schools, and the requirement for new hot food takeaways to comply with the Healthier Catering Commitment standards. Appropriate measures to prevent over-concentration of A5 uses should also be implemented.
Policy E11 Skills and opportunities for all	Good employment is a protective factor for both physical and mental health. This policy is supported and will require development proposals to seek to support employment, skills development, apprenticeships and other education opportunities for all. Training should be inclusive and of a high quality.
Policy HC6 Supporting the night-time economy	<p>While the LHP Network recognises the many benefits of a night time economy, we strongly urge that careful consideration be given to developing a full range of opportunities that are not associated with alcohol and that for the parts of London where there are already cumulative impacts of high concentrations of licensed premises, their impact on anti-social behaviour, noise pollution and health and wellbeing must be taken into account in any further night time economy developments. Consideration should also be given to the impact of evening and late night work on families and on sleep patterns.</p> <p>We strongly support Policy HC6 Part B) 1, 2, 3, 4 and 5</p>
Policy HC7 Protecting public houses	<p>When well managed and maintained, pubs can be an asset to the local community. Where appropriate, pubs should be retained and, as such, the LHP Network supports Policy HC7 part A 1.</p> <p>Part A 2, however should be amended to: “ Proposals for new public houses (and bars) should be contingent to an assessment of the cumulative impact of licensed premises in any neighbourhood. The merits and any potential negative impacts on health and wellbeing and other social impacts should be considered on a case by case basis”.</p>
Policy G1 Green Infrastructure	The LHP Network strongly supports this policy. Green spaces are linked to reduction of stress and anxiety and improved mental wellbeing, self-esteem and social connections, especially in the long-term.
Policy G4 Local green and open space	This policy requires Boroughs to undertake a needs assessment of local green and open space to inform policy. The assessment should take into account not only “quantity”, but “quality” too.
Policy G5 Urban greening	This policy is supported by the LHP Network.
Policy G8 Food growing	The LHP Network supports the protection of existing allotments

	and believes that provision of space for community gardening, including food growing is positive. There is good evidence that growing and gardening are beneficial to health and wellbeing, promoting physical activity and social interaction. Studies have also demonstrated that participation in food growing can influence healthier eating especially for children and families.
Policy S11 Improving Air Quality	This policy is especially welcomed. This is particularly important in areas that already have poor air quality or in the vicinity of sensitive receptors such as schools/health care facilities. The LHP Network additionally proposes that developments over a certain size consider incorporating internal and external air quality monitoring devices in their design.
Policy T1 Strategic approach to transport	This policy supports the Mayor's target of 80% of all trips in London to be made by foot, cycle or public transport. The LHP Network strongly endorses all policies that make active travel easier, safer and sustainable.
Policy T2 Healthy Streets	The LHP Network strongly supports the TfL Healthy Streets approach and the proposal that all development plans should promote and demonstrate its application.
Policy T4 Assessing and mitigating transport impacts	The LHP Network supports this policy.
Policy T5 Cycling	Development plans and proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle. This includes supporting the delivery of London-wide networks of cycle routes as well as securing the provision of appropriate levels of appropriate cycle parking. The LHP Network fully endorses this policy.
Policy T6 Car parking	The LHP Network strongly supports car-free developments in places that are well connected by public transport. This policy is essential to deliver the Healthy Streets Approach



London Healthier Places

London Healthier Places is a public health network for London boroughs working with town planning, licensing, trading standards & environmental health to promote healthier town centres & high streets.