



## London Sport response to Draft London Plan February 2018

### *Background Information*

London Sport is an independent charity with a vision of helping to make London the most physically active city in the world. Our remit covers a range of strategic responsibilities around the improvement and development of physical activity and grassroots sport in London. While London Sport does not directly deliver grassroots sport, we strongly support any initiatives which enable greater levels of physical activity to take place in the capital to support the health, happiness and prosperity of London's inhabitants.

We are pleased to have the opportunity to respond to the Mayor's Draft London Plan, and would be happy to make ourselves available to further explain any areas of our response.

We are not responding to all areas of this consultation, but have focused on aspects that we feel are particularly pertinent and aligned to London Sport's areas of expertise.

### *Format*

London Sport's responses to specific policy areas outlined in the Draft London Plan are presented against each chapter and referenced policy area. London Sport responses are marked in *italics* and prefaced with "LS:"

### *Contact*

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## General Comments

- i. We strongly support commitments made throughout the Draft London Plan that relate to improving the infrastructure and opportunities for the promotion of physical activity in London.
- ii. We believe that the Draft London Plan would be strengthened by explicit reference to Sport England's Active Design Principles and the associated Active Design Checklist, and recommend that these are incorporated into assessments of planning applications and health impact assessments.
- iii. We would further recommend that where references to 'active travel' incorporate public transport into their definition (c.f. Policy D1 3.1.6 "the design and layout of development should reduce the dominance of cars, and provide permeability to **support active travel** (public transport, walking and cycling), community interaction and economic viability") that this should be removed, so that 'active travel' relates only to walking, cycling or other non-motorised transport methods. We recognise the importance of promoting all methods that reduce preeminence of car travel in London, and believe that promotion of public transport (including its association with active travel to and from points of departure, as evidenced in the Mayor's Transport Strategy draft (sidebar – pp.43) is a positive step, but feel that active travel – as defined – should be explicitly identified as above.

## Chapter 1: Planning London's Future (Good Growth Policies)

- 1.1.5: Early engagement with local people leads to better planning proposals, with Neighbourhood Plans providing a particularly good opportunity for communities to shape growth in their areas. Taking advantage of the knowledge and experience of local people will help to shape London's growth, creating a thriving city that works better for the full diversity of its inhabitants

*LS:*

*We strongly support the co-design principles set out in 1.1.5 and would suggest that these are further strengthened in Policy GG1 C ("Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish"). Specifically, spaces should be designed by and with people, not for people, especially benefiting from input from disabled people*

- GG3 A/B/C/E:
  - A. Ensure the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities
  - B. Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices
  - C. Use the Healthy Streets Approach to prioritise health in all planning decisions
  - E. Plan for improved access to green spaces and the provision of new green infrastructure

*LS:*

*We strongly support policy areas GG3 A/B/C/E, but suggest it is important to acknowledge that physical activity consists of more than just active travel as described in statement 1.3.3 ("The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good planning can help to address all of these issues.") There are a wide variety of ways that Londoners can be physically active, with Chief Medical Officer guidelines reflecting a range of age groups and conditions, all of which are important in challenging the major health problems noted in this section*

- GG5 E:
 

Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning

*LS:*

*We support this policy, and will be responding in more detail on this area through the 'A Smarter London Together: Listening Exercise for a new Smart London Plan' process*



## Chapter 2: Spatial Development Patterns

- SD8 B5:  
In Development Plans, boroughs should: identify sites suitable for higher-density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance of current and future public transport provision including, for example:
  - a) Comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks
  - b) Redevelopment of town centre shopping frontages that are surplus to demand
  - c) Redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing non-residential uses
  - d) Delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development

*LS:*

*We strongly support utilising high-density mixed-use sites that will capitalise on services within walking and cycling distance. We would particularly recommend that in these considerations and when establishing Development Plans, boroughs should take into account the Active Design Principles developed by Sport England and Public Health England*

### Chapter 3: Design

- D2 A: To identify an area’s capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area-based strategies, which covers the following elements:
  1. Socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)
  4. Transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned)
  5. Air quality and noise levels

LS:

*We strongly support these – and other – policies which take into account health and wellbeing, active travel and air quality in identifying areas of growth. These issues all impact on how active people are, as well as the quality of the environment within which they are active, all of which carries considerable implications for population-level health and wellbeing*

- D3 A: to deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:
  1. Can be entered and used safely, easily and with dignity by all
  2. Are convenient and welcome with no disabling barriers, providing independent access without additional undue effort, separation or special treatment
  3. Are designed to incorporate safe and dignified emergency evacuation for all building users. In developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building

D3 B: The Design and Access Statement, submitted as part of planning applications, should include an inclusive design statement

LS:

*We welcome the commitments made in these policies, and particularly the commitments to an inclusive design approach and requirements around inclusive design statements as outlined in points 3.3.1 and 3.3.7. In 2017, London Sport published An Active Inclusive Capital – A Strategic Plan of Action for Disability in London committing to actions designed to support deaf and disabled people in London to be as physically active as non-disabled people. These policies are in direct alignment with London Sport’s vision for supporting disabled people across London, and are a welcome commitment to inclusive design.*

- D4 – specifically 3.4.6  
**Private open space** should be practical in terms of its shape and utility, and care should be taken to ensure the space offers good amenity. All dwellings should have level access to one or more of the following forms of private outdoor spaces: a garden, terrace, roof garden, courtyard garden or balcony. The use of roof areas, including podiums and courtyards for additional private or shared amenity or garden space is encouraged.

LS:

*We strongly support the recommendation contained in this policy area around the use of roof areas for additional amenity, and would recommend that this is given broader support in the context of providing space to enable structured and unstructured physical activity and recreation opportunities across London as public realm. In the context of an expanding city environment, roof areas represent a clear opportunity to provide space for participation in both structured and unstructured physical activity, and may help to relieve burden on other facilities and environments.*

- D7 Development Plans and development proposals should:
  - b) Maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds.
  - c) Be based on an understanding of how the public realm in an area functions and creates a sense of place, during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists
  - d) Ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings.
  - i) Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused.
  - j) Explore opportunities for innovative approaches to improving the public realm such as open street events.
  - m) Ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm.

LS:

*We strongly support these – and other – policies that seek to maximise walking and cycling in the public realm, that reduce barriers to active travel, and that minimise car use. On point m, relating to free drinking water, we believe that this is an area that has the potential to remove one significant barrier to participation in physical activity, and believe that the placement of drinking fountains around all London Underground network stations – in central, inner and outer London – would provide a valuable support infrastructure to enable Londoners to live active lives.*

- D13 A: In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
  - 1) Avoiding significant adverse noise impacts on healthy and quality of life

- 2) Reflecting the Agent of Change principle to ensure measures do not add unduly to the costs and administrative burdens on existing noise-generating uses
- 3) Mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development
- 4) Improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
- 5) Separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation
- 6) Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
- 7) Promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver

*LS:*

*Policies to limit noise should not be at the expense of use of outdoor space for either structured sport, informal play, or any other activity on the spectrum of participation in physical activity and sport.*

*Noise management is undeniably an important aspect of planning consideration, but where mitigation is required in reference to outdoor space to enable physical activity to take place, there should in the first instance be consideration as to how noise could be designed out through natural measures that achieve noise-absorption.*

*These factors should also be considered in references to other areas, including lighting.*



## Chapter 4: Housing

- H15: Specialist older persons housing

*LS:*

*As well as commitments outlined in the Draft London Plan, specialist older person's housing should additionally ensure that adequate flexible internal space is available to enable older people to keep active; for instance, space to undertake physical activity classes or other forms of physical activity.*

- H17 A: Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that:
  - 1) At the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood
  - 2) The use of accommodation is secured for students
  - 3) The accommodation is secured for occupation by members of one or more specified higher education institutions
  - 4) At least 35 per cent of the accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance
  - 5) The accommodation provides adequate functional living space and layout

*LS:*

*In addition to the points raised in this policy area, Boroughs should additionally seek to ensure that sport and leisure facilities built as part of purpose built student accommodation are opened up for community usage, especially outside of main academic term time when standard use is likely to be below capacity levels, thus contributing to wider community opportunities to engage in physical activity and sport.*

## Chapter 5: Social Infrastructure

- S1 A: Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities

LS:

*These needs assessments should incorporate a review and understanding of evidence around physical activity behaviours to assist in determining positive interventions that could boost Londoners' physical and mental health and wellbeing through physical activity. It is also important that these reviews go beyond Borough boundaries to take into account the cross-Borough implications of leisure facilities, recognising the transitory nature of people across London.*

- S1 D: Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.

LS:

*We strongly support the opportunity to maximise co-location of activities and services, particularly where links with leisure and physical activity facilities can be maximised. In particular, there are considerable opportunities around the potential use of the NHS Estate to strengthen connections between health and physical activity/leisure infrastructure as part of the London Health and Care Devolution Agreement.*

- S1 F, G:

Development Proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:

- 1) There are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or:
- 2) The loss is part of a wider public service transformation plan which required investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services

Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.

LS:

*The retention or redevelopment of social infrastructure as it relates to physical activity and sport provision should consider in the broadest sense the facilities and developments that could enable physical activity opportunities to be implemented into individual communities.*

*Here again, shared use and co-location of facilities as outlined in 5.1.8 could play a significant role in enhancing connections between social prescription and physical activity provision.*

- S3 B: Development proposals for education and childcare facilities should:

- 5) Maximise the extended or multiple use of education facilities for community or recreational use, through appropriate design measures

- 10) Ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand

*LS:*

*We strongly support the statement which encourages schools to open up their facilities, which could provide many more opportunities for both informal and formal recreation, and a range of physical activities, as well as formal sport.*

*We also strongly support policies (specifically S3 B 2-4) which make it easier for children and young people to travel to and from school, and which locate play areas away from higher-polluted busy roads.*

- S4: Play and informal recreation

*LS:*

*We support the commitments and the spirit of policies outlined around play and informal recreation, and welcome reinforcement of the role of play and informal recreation strategies. We would recommend that these are required to be embedded within core Borough strategies to emphasise the importance of their role for communities across London.*

*We further believe that there are wider inter-generational opportunities around promotion of play and informal recreation within strategic development, that could benefit the whole of the population. Formal, structured physical activity and sport plays an important role in the lives of adult Londoners, but there are gaps in provision (at both supply and demand side) that could be fulfilled by adult informal recreation. Incidental play space (as references in S4 B 4) can play an important role in facilitating physical activity habits among people of all generations, and therefore we would recommend that these policy areas are strengthened with inclusion of audits around inter-generational informal recreation spaces.*

*We would also propose an additional policy line, that challenges the use of 'negative signage for recreation' – specifically 'No Ball Games' signs and associated signage. The social and cultural implications of such signage can lead to a substantial, negative impact on engagement with physical activity and sport.*

- S5: Sports and recreation facilities

*LS:*

*We strongly support all policies in this section, however we believe it could be improved by making clear a requirement for a robust assessment of need around sports and recreation facilities based on in-depth community consultation and gap analysis. Sport England has developed methodology for indoor and built facilities (Assessing Needs and Opportunities) which is widely-adopted elsewhere in the country.*

*Sports and recreation facilities can also play an important role in meeting borough health infrastructure needs as evidenced in health infrastructure assessments. We believe this section should carry explicit reference to this, in order to highlight the broader societal implications of adequate facility provision.*



## Chapter 8: Green Infrastructure and Natural Environment

- G1 B: Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation

*LS:*

*We strongly support this recommendation and the integration of sport and recreation objectives, particularly as they pertain to the retention and maintenance of green environments conducive to or contributing to the necessary facilities mix for physical activity and sport*

- G4: Local green and open space

*LS:*

*We support the policy recommending that Boroughs should produce Green Infrastructure Strategies, and that these build on existing strategies including Playing Pitch Strategies. We believe that for these to play an effective role, it is important that they are regularly reviewed and updated in a similar manner to Playing Pitch Strategies, and would suggest a review period not longer than 3 years.*



## Chapter 9: Sustainable Infrastructure

- SI1: Improving air quality

*LS:*

*All policies that aim to improve air quality in London have our full support. Poor air quality is known to disproportionately affect those experiencing health inequalities, children and young people, and those with long-term conditions; all groups typically less likely to be physically active. Policies which improve the environment for people from these groups to be active in are exceptionally welcome.*



## Chapter 10: Transport

- T1: Strategic approach to transport

*LS:*

*We support these points fully, and would point to broader recommendations made in response to the Mayor's Transport Strategy consultation. In short, we particularly and specifically endorse the role of the Healthy Streets Approach outlined in detail in Policy T2 Healthy Streets.*

- T5: Cycling

*LS:*

*We support all measures aimed at improving cycling infrastructure and network, but would specifically suggest that recommendations are included that would see provision strengthened for storage and parking for adapted bikes for disabled people.*



## Chapter 12: Monitoring

- Environment KPI: Protection of Green Belt and Metropolitan Open Land

*LS:*

*We believe these are positive KPIs, but would like to see further clarity or definition around what represents 'harm' in the context of the Green Belt, especially as this would help to protect against any negative impact on development affecting the provision of open space for physical activity and sport.*

- Culture Infrastructure KPI: No net loss of culture venues and facilities (based on a rolling average)

*LS:*

*This KPI will be sufficient only if Boroughs have complete, up-to-date and robust needs assessments so applications and decisions around development are based on clear current and future pictures of supply and demand for culture venues and facilities.*

- Health KPI: Londoners engaging in active travel

*LS:*

*We strongly support a KPI measure around Londoners engaging in active travel, but believe cycle parking is too limited as a measure of both physical activity and health. We would like to see included a measure around Londoners' participation in 2x10 minutes of active travel as measured in the travel Demand Survey, and connected to Sport England's Active Lives Survey.*