The London Plan and Health

October 2011
HUDU Planning for Health
Information Note No. 1
The London Plan and Health

Purpose
The purpose of this Information Note is to highlight the way in which health considerations have been incorporated into the adopted London Plan (July 2011). It provides an easily accessible guide to the key policies on health, and to references within the Plan to health and/or wellbeing.

Introduction
The London Plan was published and came into effect on 22 July 2011. From that date, it replaced the London Plan (consolidated with alterations since 2004) which were published in February 2008. This earlier document now has no formal effect.

The London Plan is an important document for health, health improvement and health infrastructure planning in London and serves a number of purposes:-

- it sets out the spatial development strategy for London, including the framework for where major growth is likely to occur;
- is as an expression of the Mayor’s planning policies, and hence the basis on which he will make decisions on strategic planning applications and proposals that are referred to him under the Mayor of London Order 2008.
- is an integral part of the statutory planning system - Local Development Framework policies in London have to be in general conformity with the Plan and, together with any relevant local plans, are the basis on which local planning authorities must make decisions on planning applications.

The London Healthy Urban Development Unit has worked closely with the London Plan team to ensure that, from a health perspective, the Plan represents the most recent consolidation of good practice - by both linking health and planning policy and by providing a practical, strategic framework of policies which will contribute to ongoing improvements in health infrastructure and the health and wellbeing of Londoners, including helping to reduce health inequalities.

The London Plan and Health
Appendix 1 outlines the contents of London Plan for ease of reference. The Plan itself contains 8 main Chapters and 121 policies in all (Appendix 6 to the Plan contains a summary list of all the policies). Chapter 3 contains the main policies on health and there are nearly 200 references to health or wellbeing throughout the document.
There are several ways in which the Plan can be used to further health objectives:-

(1) The Plan contains an express vision and policies for improving health and reducing health inequalities, in particular the policies in Chapter 3 on London’s people (see Policy 3.2 on Improving Health and Addressing Health Inequalities which is reproduced in Appendix B)

(2) There are policies to protect and enhance social infrastructure (Policy 3.16), and specifically on health and social care facilities (Policy 3.17) - see Appendix B attached for wording.

(3) There are other policies on a variety of topics where the need and/or opportunity to address health impacts and potential benefits are important – for example, the provision of sports facilities (Policy 3.10) and green infrastructure (Policy 2.18), sustainable travel (Chapter 6), the impacts of climate change (Chapter 5) and of noise and pollution (Chapter 7, Policy 7.14) and maximising opportunities – such encouraging that afforded by the Olympics (Policy 2.4); yet other policies contribute indirectly to health improvement – such as Policy 3.1 Ensuring Equal Life Chances for All.

(4) The Plan expressly supports the use of Health Impact Assessments (HIA) to consider the impacts of major development proposals on the health and wellbeing of communities (Policy 3.2).

(5) It provides a clear spatial framework for accommodating and assessing the impacts of population growth and change, in particular, the Mayor’s ten year housing targets for Boroughs (Policy 3.2/ Areas for Table 3.1); and policies on Opportunity Areas, Areas for Intensification and Regeneration Areas, (Policies 2.13 and 14) which highlight the areas where the greatest growth in population and employment is potentially possible – and often desirable in terms of securing local regeneration

(6) It recognises the importance of the health sector itself to the London and national economy (paras 1.18 and 1.24; Policy 2.1)

(7) The Plan is supported by a number of processes and supplementary planning guidance documents which can further support the achievement of health objectives in their wider context eg the accompanying Implementation Plan process, and commitments to produce updated Best Practice Guidance on health and other topics.

When using the Plan, regard should also be had to any Supplementary Planning Guidance that has been issued in draft or final form. There is a rolling programme of planned updates of Supplementary Planning Guidance to further inform the Plan policies – including further guidance on health, housing, shaping neighbourhoods, social infrastructure, planning obligations and Community Infrastructure Levy. In the meantime, a number of documents (such as the Best Practice Guidance on Health Issues in Planning, published in June 2007) have been “saved” in support of the new
The London Plan (July 2011) is an important document in helping to integrate health considerations into planning policy, and which sets the strategic framework for local plans and decisions on individual planning applications. It is likely that amendments to the Plan will be brought forward at an early stage – for example, to bring it in line with the National Planning Policy Framework when the final version is published. This Information Note will be updated once any formal changes to the Plan have been consulted on and adopted.

Conclusions

The London Plan (July 2011) is an important document in helping to integrate health considerations into planning policy, and which sets the strategic framework for local plans and decisions on individual planning applications. It is likely that amendments to the Plan will be brought forward at an early stage – for example, to bring it in line with the National Planning Policy Framework when the final version is published. This Information Note will be updated once any formal changes to the Plan have been consulted on and adopted.

HUDU/October 2011
Appendix A - London Plan Structure

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Appendix B - London Plan Policies on Health and Health Infrastructure

The text of the main policies (3.2, 3.16 and 3.17) on health and health infrastructure in THE London Plan are reproduced below for ease of reference:

CHAPTER 3 LONDON’S PEOPLE

POLICY 3.2 IMPROVING HEALTH AND ADDRESSING HEALTH INEQUALITIES

Strategic
A The Mayor will take account of the potential impact of development proposals on health and health inequalities within London. The Mayor will work in partnership with the NHS in London, boroughs and the voluntary and community sector as appropriate to reduce health inequalities and improve the health of all Londoners, supporting the spatial implications of the Mayor’s Health Inequalities Strategy.

B The Mayor will promote London as a healthy place for all – from homes to neighbourhoods and across the city as a whole – by:
   a coordinating investment in physical improvements in areas of London that are deprived, physically run-down, and not conducive to good health
   b coordinating planning and action on the environment, climate change and public health to maximise benefits and engage a wider range of partners in action
   c promoting a strong and diverse economy providing opportunities for all.

C The impacts of major development proposals on the health and wellbeing of communities should be considered through the use of Health Impact Assessments (HIA).

Planning decisions
D New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

LDF Preparation
E Boroughs should:
a work with key partners to identify and address significant health issues facing their area and monitor policies and interventions for their impact on reducing health inequalities

b promote the effective management of places that are safe, accessible and encourage social cohesion

c integrate planning, transport, housing, environmental and health policies to promote the health and wellbeing of communities

d ensure that the health inequalities impact of development is taken into account in light of the Mayor’s Best Practice Guidance on Health issues in Planning.

SOCIAL INFRASTRUCTURE

POLICY 3.16

Protection and enhancement of social infrastructure

Strategic

A London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population.

Planning decisions

B Development proposals which provide high quality social infrastructure will be supported in light of local and strategic needs assessments. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for reprovision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.

C Facilities should be accessible to all sections of the community (including disabled and older people) and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged.

LDF preparation

D LDFs should provide a framework for collaborative engagement with social infrastructure providers and community organisations:

a for the regular assessment of the need for social infrastructure at the local and sub-regional levels; and

b to secure sites for future provision or reorganisation of provision.

Where appropriate, boroughs are encouraged to develop collaborative cross-boundary approaches in the provision and delivery of social infrastructure.
E Boroughs should ensure that adequate social infrastructure provision is made to support new developments. If the current use of a facility is no longer needed, boroughs should take reasonable steps to identify alternative community uses for which needs have been identified.

Adequate provision for social infrastructure is particularly important in areas of major new development and regeneration and should be addressed in opportunity area planning frameworks and other relevant area action plans.

F The Mayor will work with boroughs, relevant social infrastructure providers and the voluntary and community sector as appropriate to extend proposed supplementary guidance on social infrastructure requirements, especially at the sub-regional and Londonwide levels.

POLICY 3.17 HEALTH AND SOCIAL CARE FACILITIES

Strategic

A The Mayor will support the provision of high quality health and social care appropriate for a growing and changing population, particularly in areas of underprovision or where there are particular needs.

Planning decisions

B Development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Where local health services are being changed, the Mayor will expect to see replacement services operational before the facilities they replace are closed, unless there is adequate justification for the change.

C Relevant development proposals should take into account the Mayor’s Best Practice Guidance on Health Issues in Planning.

LDF preparation

D In LDFs boroughs should identify and address significant health and social care issues facing their area for example by utilising findings from joint strategic needs assessments.

E Boroughs should work with the NHS, social care services and community organisations to:

a regularly assess the need for health and social care facilities at the local and sub-regional levels; and

b secure sites and buildings for or to contribute to future provision.

F Boroughs should promote the continued role and enhancement of London as a national and international centre of medical excellence and specialised facilities.
Notes:

(1) Para 3.92 of the Plan states that this Policy “complements Policies 3.16 on social infrastructure and 3.2 on improving health and tackling health inequalities. Boroughs should refer to all three policies when planning for health and social care facilities.”

(2) In addition to Policies 3.16 and 3.17, Policy 3.7 Large residential developments states that:

A Proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility.

B Those on sites of over five hectares or capable of accommodating more than 500 dwellings should be progressed through an appropriately plan-led process to co-ordinate, where necessary, provision of social, environmental and other infrastructure and to create neighbourhoods with a distinctive character, sense of local pride and civic identity in line with Chapter 7. The planning of these areas should take place with the engagement of local communities and other stakeholders.
Appendix C - London Plan - Health and/or Wellbeing References

NOTES

(1) References to health include variations such as healthy, healthier, healthcare and ill-health but exclude use in non-health contexts – such as Town Centre health checks, or healthy economy. There are 185 such references, over half of which are in Chapter 3 of the Plan on London’s People, which also contains the main policies on health and health infrastructure – SEE Appendix B. References to well-being include the alternative spellings of well being and wellbeing (11 refs in total).

(2) There will be other references which have health connotations - such as references to active lifestyles, reductions in pollution etc - but which do not include a direct reference to health and/or wellbeing. Policies and references always need to be read in their full context.

LONDON PLAN STRUCTURE

Contents – 2 refs

Overview and Introduction

Page 10, The London Plan is, 2nd bullet point

- the document that brings together the geographic and locational (although not site specific) aspects of the Mayor’s other strategies – including those dealing with:

...........

- a range of social issues such as children and young people, health inequalities and food

Page 10, The London Plan is, 0.5

0.5 The Mayor has also had regard to the principle that there should be equality of opportunity for all people, and to:

- reducing health inequality and promoting Londoners’ health

Page 13, Integrated Impact Assessment 0.18

0.18 The IIA also included a Health Impact Assessment (HIA) and an Equalities Impact Assessment (EqIA) to meet the Mayor’s duties under the Greater London Authority Act 1999 (as amended) and equal opportunities legislation – see paragraphs 0.4-5. Finally, the IIA covered relevant aspects of a Community Safety Impact Assessment (CSIA) to ensure that the statutory requirements of
the Crime and Disorder Act 1998, and the newly enacted Police and Justice Act 2006 are also met.

CHAPTER ONE CONTEXT AND STRATEGY Growing and Ever Changing Economy

Page 21, 1.18

1.18 The world economy experienced dramatic changes between 2007–9, with a credit crunch, bank failures and a severe downturn in the real economy, and with increases in business failures and unemployment. However, it does seem increasingly clear that in so far as these have impacted on London, they do not signal the kind of fundamental long-term economic change here seen, for example, in the 1980s. The London Plan has to look beyond what is happening today. It does seem likely that globalisation, supported by mass production, technological innovation, reducing transport and communication costs and countries across the world continuing to open their markets to international trade, will support resumed economic growth. The world economy will be yet more integrated by 2031 and larger, with China, India and other currently ‘emerging’ markets having greater economic weight and providing wider markets for products and services. Closer to home, a growing London population is likely in itself to support an expanding economy, with growing demand for leisure and personal services, health and education.

Page 23, 1.24

1.24 What changes might we see to the kind of economy London has over this period? Projections prepared for this Plan suggest that the total number of jobs in London could increase from 4.68 million in 2007 to 5.45 million by 2031 – growth of 16.6 per cent or an additional 776,000 jobs over the period as a whole. Manufacturing is projected to continue to decline, from 224,000 jobs in 2007 to 89,000 by 2031, while business and financial services could grow from 1.56 million in 2007 to 1.98 million in 2031, representing 38 per cent of the new jobs (excluding sectors with falling employment such as manufacturing) projected between now and 2031. Jobs in ‘other services’ (leisure and personal services) are projected to grow by 360,000 (about a third of projected new jobs), and those in hotels and restaurants are set to grow by 235,000 (about a fifth of new jobs). Other sectors where growth might be expected include health and education, which could see around 54,000 more jobs and retail (36,000 new jobs). We can also expect changes to the way London works, as firms adjust to the imperatives of climate change and make more use of information and communications technology. Figure 1.5 shows these projections in the context of change since 1971.

Fig 1.5 Employment Projections – Key has ref to Health & Education
Persistent Problems of Poverty and Disadvantage

Page 23, 1.27

1.27 As a result, London is an increasingly polarised city. On the one hand, it has seen a major growth in earnings, with significant rises both in the number of those earning high salaries, and in the amount they earn. This leaves those on low incomes or without employment further and further behind. This polarisation is associated with a range of social problems of ill-health, substance abuse and crime.

Page 25, 1.29

1.29 Deprivation tends to be geographically concentrated (see Map 1.3). Looking at the factors that are brought together in the Government’s Index of Multiple Deprivation (which covers aspects like employment, housing, health, education and access to services), it becomes clear that there are particular concentrations of disadvantage, especially in inner north-east London, running from Tower Hamlets northwards through Hackney to Haringey and eastern Enfield, eastwards to Newham and Waltham Forest and on both sides of the Thames to Barking and Dagenham and the southern part of Havering and from Lambeth and Southwark eastwards to Bexley. There is another cluster in west London, around Park Royal. This pattern is fairly consistent across the various components of the Index, although some show a rather more dispersed pattern (that for housing, for example). This suggests the importance of geographically targeted approaches to development and regeneration, focussing investment and action on places with the highest need.

Ensuring the Infrastructure to Support Growth

Page 27, 1.40

1.40 In addition to this ‘hard’ infrastructure, a growing and increasingly diverse population will create demand for more social infrastructure, ranging from schools, colleges and universities, theatres, museums and libraries through health facilities to spaces for local groups and places of worship. A green infrastructure of green and other open spaces also has a crucial part to play in ensuring good health and a high quality of life – as well as helping to address the challenges of climate change.

A New Focus on Quality of Life

Page 28, 1.44, 2nd and 4th bullet points

- tackling London’s persistent problems of deprivation and exclusion – and in particular the unacceptable health inequalities that exist in one of the wealthiest cities in the world - in order to ensure equal life chances for all
- making sure all Londoners can have access to good quality and healthy food
Conclusion: Planning for Growth

Page 31, 1.49

1.49 In looking at how these challenges are to be met, it is important to remember that the private sector dominates London’s economy, accounting for 70 per cent of economic activity. Achieving all the environmental, economic and social objectives outlined in this Plan relies upon modernisation and improvement of the capital’s stock of buildings and public realm, and this in turn means encouraging private investment and development. The approach taken in this Plan is to welcome and support growth and development, but to ensure that it contributes to London’s sustained and sustainable development. Economic success; making the kind of step change needed in environmental issues; and improving the health, wealth and quality of life of Londoners are all inextricably linked. It is impossible over the long term to succeed in any one in isolation.

Strategy: The Mayor’s Vision and Objectives

Page 32, Ensuring London is: 1. 4

1. A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes.

4. A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London’s built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environments and waterways, realising their potential for improving Londoners’ health, welfare and development.

Quality of Life

Page 33, 1.57, 2nd bullet point

- ensuring equal life chances for all (3.1), improving and addressing health inequalities (3.2), ensuring an adequate supply of good quality homes for all Londoners (3.3–3.15) and sufficient social infrastructure (3.16–3.19) in Chapter Three (London’s People)
CHAPTER TWO LONDON’S PLACES

Introduction

Page 38 2.1, first bullet point

- A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and helps tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes.

- A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy and consuming fewer resources and using them more effectively.

Looking beyond London

Page 39, Policy 2.1 London in its global, European and United Kingdom context, A, a

Strategic

A The Mayor and the GLA Group will, and all other strategic agencies should, ensure:

a that London retains and extends its global role as a sustainable centre for business, innovation, creativity, health, education and research, culture and art and as a place to live, visit and enjoy; and

Page 39, Para 2.7

2.7 London is a world city with a role in the global economy rivalled only by New York. As such, it fulfils functions and attracts investment that other cities in the United Kingdom – and in Europe – do not. It has a distinctive role to play in the spatial development of the country and continent as part of a polycentric network of cities and urban areas, and the Mayor recognises the importance of ensuring London does this in ways that promote sustainable success at European, national and city region levels. He recognises the importance of this to the continued prosperity and well-being of London and its people.

Page 41, Policy 2.2 London and the wider metropolitan area, D, a

a appropriate resources, particularly for transport (including ports and logistics) and other infrastructure (including open space, health, education and other services) are made available to secure the optimum development of the growth areas and corridors as a whole and those parts which lie within London
Realising the Benefits of 2012

Page 44, Policy 2.4 The 2012 Games and their legacy, B

B The Mayor’s priorities for the Olympic Park and the surrounding areas will be set out in his Olympic Legacy Supplementary Planning Guidance (OLSPG), which will set out the Mayor’s long term vision for the Olympic Park and surrounding area; clarify and emphasise the need for a planned approach to regeneration and change; embed exemplary design and environmental quality including attention to the response to climate change and provision of exemplary energy, water conservation and waste management; and help meet existing and new housing needs – particularly for families. It will also consider social, community and cultural infrastructure requirements; set out how the areas around the Olympic Park can benefit from, be accessible from and be fully integrated with, emerging legacy proposals; and promote the further managed release of appropriate industrial sites for mixed use development while still retaining key industrial land, particularly within established strategic industrial locations. Legacy development within and surrounding the Olympic Park and management of the Legacy venues and parklands should focus on the development of the area for accessible and affordable sport and recreation and maximising opportunities for all to increase physical activity and reduce health inequalities.

Page 44, Policy 2.4 The 2012 Games and their legacy, C, h

C take the opportunities presented by the 2012 Olympic and Paralympic Games and their Legacy to increase participation in sport and physical activity among all sections of London’s population and to address health inequalities.

Page 45, 2.19

2.19 The Mayor and Government have jointly established the Olympic Park Legacy Company to lead the delivery and management of the Olympic Park after the Games. It will maximise the opportunities provided by the Games’ physical legacy of world-class sports facilities, the media and broadcast centre, new housing and many hectares of new green space. In particular, the legacy Olympic Park development should be designed and built so as to guarantee its economic, social, health and environmental sustainability and physical accessibility for generations after 2012. It should form an integral and integrated part of the regenerated wider Lee Valley to meet the needs of the area’s current and future communities. The Olympic Park Legacy Company will submit a planning application for the Legacy Communities Scheme (LCS) to secure the delivery of a 25 year vision for the Olympic Park to help contribute to the achievement of these ambitions, and work with the Lee Valley Regional Park Authority, local authorities, and other partners in delivering the agreed scheme. The Mayor is also preparing Olympic Legacy Supplementary Planning
Guidance which will provide a detailed planning policy framework for the area covered by the LCS and its environs.

**Outer London**

*Page 46, 2.25*

2.25 Outer London (see Map 2.2) encompasses a large and hugely diverse area of the capital, ranging from the leafy residential suburbs of ‘Metroland’ to industrial suburbs like Dagenham. Its town centres and neighbourhoods play a vital role in the life and prosperity of the capital. It is where 60 per cent of Londoners live and over 40 per cent of London’s jobs are located. In general it is greener, and its people healthier and wealthier and enjoy a higher quality of life, than in more central areas – but it also has significant pockets of deprivation and exclusion. This part of London is likely to experience considerable population growth over the period to 2031.

**Inner London**

*Page 52, Policy 2.9 Inner London, A*

A The Mayor will, and boroughs and other stakeholders should, work to realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, and improving quality of life and health for those living, working, studying or visiting there.

*Page 53, 2.41*

2.41 Policies in this Plan may need to be adapted or implemented in ways that suit local circumstances and the character of inner London’s wide range of places. In housing terms, the particular polarisation of the market in some parts means that there is an especial need not just to increase overall housing output but to ensure that this is affordable, especially to families (Policy 3.8). Social exclusion is a key issue and it is essential that new provision creates more mixed and balanced communities (Policy 3.9) and neighbourhoods (Policy 7.1), especially through estate renewal (Policy 3.14). Where relevant these policies can be supported by the neighbourhood renewal processes outlined in the London Housing Strategy and by the priority for investment highlighted by regeneration areas (Policy 2.14) which underscores the importance the Mayor attaches to community engagement in the regeneration process and the role of adequate social infrastructure, especially tackling health and educational inequalities (policies 3.1, 3.2, 3.16–3.19). While the density of housing varies widely across inner London, generally higher levels of public transport accessibility can open up scope for higher density development, but it is essential that this is constructed to the highest standard and makes a positive contribution to
quality of life here (policies 3.4–3.5) and to place shaping, strong lifetime
neighbourhoods, local character and quality of the urban realm (policies 7.1-
7.7)

The Central Activities Zone

Page 56, Policy 2.11 Central Activities Zone – Strategic Functions, A, g

g ensure development complements and supports the clusters of other
strategically important, specialised CAZ uses including legal, health, academic,
state and ‘special’ uses while also recognising the ‘mixed’ nature of much of the
CAZ

Map 2.3 The CAZ diagram – key includes Mixed uses with strong health services
character

Opportunity Areas and Intensification Areas

Page 61, Policy 2.14 Areas for Regeneration, LDF preparation, B

B Boroughs should identify areas for regeneration and set out integrated spatial
policies that bring together regeneration, development and transport proposals
with improvements in learning and skills, health, safety, access, employment,
environment and housing, in locally-based plans, strategies and policy
instruments such as LDFs and community strategies. These plans should resist
loss of housing, including affordable housing, in individual regeneration areas
unless it is replaced by better quality accommodation, providing at least an
equivalent floorspace.

Town Centres

Page 66, 2.74

2.74 The current role of town centres should be tested through regular town centre
‘health checks’. This process should ensure that the network is sufficiently
flexible to accommodate change in the role of centres and their relationships to
one another. Centres can be reclassified and, where appropriate, new centres
designated, in the light of these through subsequent reviews or alterations to
this plan and DPDs. Changes to the upper tiers in the network (Major and
above) should be co-ordinated first through this Plan.

Page 66, 2.75

2.75 Appendix 2 provides strategic guidance on policy directions for individual town
centres, including their potential for growth. It has been informed by the latest
Londonwide retail need study, town centre health checks, the 2009 office
policy review and collaborative work with the boroughs and Outer London
Commission. Potential future changes to the categorisations of centres within
the network (subject to implementation and planning approvals), together with
the roles of other centres in the regeneration process, are set out in Appendix 2. Boroughs should identify and promote the complementary offers of the other smaller centres in the network including neighbourhood centres and local shopping parades. These play a key role in meeting ‘walk to’, everyday needs and are often the kernel of local ‘Lifetime’ neighbourhoods.

**Strategic network of green infrastructure**

*Page 70, policy 2.18, A Green Infrastructure: The Network of Open and Green Spaces*

A The Mayor will work with all relevant strategic partners to protect, promote, expand and manage the extent and quality of, and access to, London’s network of green infrastructure. This multifunctional network will secure benefits including, but not limited to: biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being.

*Page 72 para 2.88*

2.88 Green infrastructure performs many of the following functions, including:

- protection and enhancement of biodiversity, including mitigation of new development
- making a positive contribution to tackling climate change by adapting to and mitigating its impact
- improving water resources, flood mitigation and reduced flood risk through sustainable urban drainage systems
- increasing recreational opportunities, access to and enjoyment of open space and the Blue Ribbon Network to promote healthy living
- creating a sense of place and opportunities for greater appreciation of the landscape and cultural heritage
- promoting walking and cycling
- as a place for local food production, in line with the Mayor’s Capital Growth strategy
- as a place for outdoor education and children’s play.
CHAPTER THREE LONDON’S PEOPLE

Page 76, para 3.1, 1st bullet point

- A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes.

Page 76, para 3.1, 3rd bullet point

- A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London’s built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environments and waterways, realising their potential for improving Londoners’ health, welfare and development.

Page 76, para 3.1, 2nd para

This chapter brings together policies to enable the planning system to help deliver equal life chances for all by reducing health inequalities, supporting social infrastructure provision such as health, education and sports facilities,.............

Ensuring Equal Life Chances for All

Page 78, 3.7

3.7 In assessing local communities’ needs in the way referred to in Policy 3.1D, particular regard should be had to the policies elsewhere in the Plan about establishing particular needs, including polices 3.2 (health and health inequalities), 3.8 (housing choice), 3.9 (mixed and balanced communities), 3.16 (social infrastructure), 3.17 (health and social care), 3.18 (education), 3.19 (sports facilities), 4.12 (improving opportunities for all), 7.1 (London’s neighbourhoods and communities), 7.2 (inclusive environments) and 7.18 (local open space).

Improving Health and Addressing Health Inequalities

Page 78-79, Policy 3.2 Improving health and addressing health inequalities – 3.11 extracts
POLICY 3.2 IMPROVING HEALTH AND ADDRESSING HEALTH INEQUALITIES

Strategic

A The Mayor will take account of the potential impact of development proposals on health and health inequalities within London. The Mayor will work in partnership with the NHS in London, boroughs and the voluntary and community sector as appropriate to reduce health inequalities and improve the health of all Londoners, supporting the spatial implications of the Mayor’s Health Inequalities Strategy.

B The Mayor will promote London as a healthy place for all – from homes to neighbourhoods and across the city as a whole – by:

a coordinating investment in physical improvements in areas of London that are deprived, physically run-down, and not conducive to good health

b coordinating planning and action on the environment, climate change and public health to maximise benefits and engage a wider range of partners in action

c promoting a strong and diverse economy providing opportunities for all.

C The impacts of major development proposals on the health and wellbeing of communities should be considered through the use of Health Impact Assessments (HIA).

Planning decisions

D New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

LDF Preparation

E Boroughs should:

a work with key partners to identify and address significant health issues facing their area and monitor policies and interventions for their impact on reducing health inequalities

b promote the effective management of places that are safe, accessible and encourage social cohesion

c integrate planning, transport, housing, environmental and health policies to promote the health and wellbeing of communities

d ensure that the health inequalities impact of development is taken into account in light of the Mayor’s Best Practice Guidance on Health issues in Planning.

3.8 The living environment has a fundamental impact on the health of a population, whether positive or negative. Good housing, employment and a
good start in life can all help to reduce health inequalities at the local level, while poor environmental quality, housing conditions or pollution can exacerbate them. Targeted interventions to protect and promote health should help address health inequalities. The London Plan will help deliver Objective 5: Healthy Places of the Mayor’s Health Inequalities Strategy to ensure new homes and neighbourhoods are planned and designed to promote health and reduce health inequalities.

3.9 The planning system can play a key role in promoting health and reducing health inequalities. Health inequalities are distributed across different population groups, are often geographically concentrated and closely aligned to poverty and deprivation (see Map 1.3 - Index of Deprivation). In the light of the proposed major restructuring of the NHS, it is envisaged that boroughs will have an enhanced role in improving public health in their area and that ‘health and wellbeing boards’ will be established to lead on joint strategic needs assessments to inform joined up commissioning plans across the NHS, social care and public health.

3.10 The development and regeneration of areas for regeneration (Policy 2.14) and many of the designated opportunity and intensification areas (Policy 2.13) provide the greatest opportunity to improve health and reduce health inequalities. The policies in this Plan seek to address the main health issues facing the capital, including mental health, obesity, cardio-vascular and respiratory diseases by seeking to ensure new developments are designed, constructed and managed in ways that improve health and reduce health inequalities. New development should be supported by necessary health and social infrastructure and planning obligations should be secured to ensure delivery of new facilities and services (policies 3.16, 3.17 and 8.2). This Plan also aims to create opportunities for employment and economic development; improve access to green and open spaces and leisure facilities (including using the planning system to secure new provision); support safe and sustainable transport systems (including walking and cycling); reduce road traffic casualties; improve air quality; reducing noise, increase access to healthy foods; create
places for children to play; and ensure there is a good array of local services. The Mayor has prepared best practice guidance (BPG) for boroughs and others on promoting public health. This includes guidance on a range of tools, including health impact assessments, available to help assess the impact of a development. This BPG will be updated to reflect the new policy and changes to the NHS in London and will include a methodology for undertaking HIAs.

3.12 The voluntary and community sector has an essential role in tackling health inequalities at the local level, particularly in promoting and supporting community involvement.

**Housing**

*Page 80, para 3.14*

3.14 With a growing population and more households, delivering more homes for Londoners meeting a range of needs, of high design quality and supported by the social infrastructure essential to a good quality of life will be a particular priority over the period covered by the Plan. This section of the Plan brings together policies on housing requirements and supply (including affordable housing), design and quality. It also covers social infrastructure, such as health, education and sports.

**Housing Supply**

*Page 89, para 3.40*

3.40 In a densely urbanised city like London, safe and stimulating play facilities are essential for a child’s welfare and future development, as well as preventing health problems such as obesity. However, many children still do not have adequate access to such facilities and some existing provision can be unsuitable. LDFs should address this by providing policies on play provision, including the need for high quality design. Through the development of play strategies, boroughs should ensure the integration of play provision into overall open space strategies. Particular consideration should be given to consultation with children and young people in the design of new provision to understand their changing needs. Appropriate provision should be included for different age groups, including consideration of communal space, roof gardens, indoor space for young children and youth facilities for young people. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Wherever possible, playspace should include grassed or wooded areas. School playing fields also provide an important contribution to high quality play spaces (Policy 3.18).

*Page 90, para 3.43, bullet point 3*

- social infrastructure provision (see Policies 3.16–3.19) with particular attention being paid to access to health, education and other essential
services, appropriately phased and coordinated with provision in neighbouring areas so that the development is attractive from the outset as well as being fully sustainable when completed, and takes account of Lifetime Neighbourhood criteria and inclusive design principles (Policies 7.1 and 7.2)

Page 93, para 3.5

3.51 In view of the scale of the projected growth in London’s older population and the housing affordability issues it raises, this Plan supports boroughs in seeking application of the principles of its affordable housing policies (policies 3.10-3.13) to the range of developments – including those falling within Use Class C2 – which cater specifically for older people. These principles include taking account of site circumstances, development viability, needs assessments and availability of development capacity and relevant public subsidy; the need to encourage rather than restrain residential development and to promote mixed and balanced communities and circumstances where ‘off-site’ contributions, ‘contingent obligations’ or other phasing measures may be appropriate. The way in which these principles can be applied most effectively will vary with local circumstances and will require close integration between planning and other borough strategies to meet social needs. Such an integrated approach will also be required to address the needs of other groups which may require accommodation-based, supported care services such as hostels, refuges and foyers, as well as housing needs connected with particular types of occupation e.g. health workers, police, hotel staff.

Social Infrastructure

Page 103, para 3.86

3.86 Social infrastructure covers a wide range of facilities such as health provision, nurseries, schools, colleges and universities, community, cultural (Policy 4.6), play, recreation and sports facilities, places of worship, fire stations, policing and other criminal justice or community safety facilities and many other uses and activities which contribute to making an area more than just a place to live. At a more local level, other facilities may need to be provided, including informal recreation facilities (Policy 3.6), public toilets, drinking water fountains and seating (Policy 7.5). The whole range of social infrastructure has a major role to play in supporting London’s expected growth, particularly in places where significant new housing is proposed, such as opportunity and intensification areas (Policy 2.13) making residential areas more attractive and turning them into sustainable neighbourhoods and communities. It is therefore essential to plan for high quality social infrastructure alongside development particularly in major new development and regeneration areas.
3.88 Boroughs and local strategic partnerships have a key role in bringing together the different parts of the public, private, community and voluntary sectors to tackle priority issues including health, education, lifelong learning, community safety, housing and transport infrastructure, and access to social, leisure and cultural activities through community strategies, local strategies and agreements and other policy tools. In doing so, they may wish to develop, where appropriate, collaborative approaches to the provision and delivery of social infrastructure, and apply the following methodology:

POLICY 3.17 HEALTH AND SOCIAL CARE FACILITIES

Strategic
A The Mayor will support the provision of high quality health and social care appropriate for a growing and changing population, particularly in areas of underprovision or where there are particular needs.

Planning decisions
B Development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Where local health services are being changed, the Mayor will expect to see replacement services operational before the facilities they replace are closed, unless there is adequate justification for the change.

C Relevant development proposals should take into account the Mayor’s Best Practice Guidance on Health Issues in Planning.

LDF preparation
D In LDFs boroughs should identify and address significant health and social care issues facing their area for example by utilising findings from joint strategic needs assessments.

E Boroughs should work with the NHS, social care services and community organisations to:
   a regularly assess the need for health and social care facilities at the local and sub-regional levels; and
   b secure sites and buildings for or to contribute to future provision.

F Boroughs should promote the continued role and enhancement of London as a national and international centre of medical excellence and specialised facilities.
This Policy complements Policies 3.16 on social infrastructure and 3.2 on improving health and tackling health inequalities. Boroughs should refer to all three policies when planning for health and social care facilities.

London’s health service is vital to maintaining and improving Londoners’ quality of life. Its influence goes far beyond the primary role it plays in delivering health care. It is one of the capital’s major employers, employing over 140,000 people in London (excluding contract workers) and over 4,000 in each borough. London’s relatively high housing prices make it hard for frontline staff to afford accommodation in the areas where they work. Policy 3.8 addresses this housing issue.

The NHS in England is undergoing a major restructuring. The NHS White Paper Equity and Excellence: Liberating the NHS and the public health White Paper Healthy Lives, Healthy People: Our Strategy for Public Health in England set out the Government’s long-term vision for the future of the NHS and public health in England. The vision builds on the core values and principles of the NHS - a comprehensive service, available to all, free at the point of use, based on need and, not on ability to pay. It is expected that boroughs will be responsible for promoting joined up commissioning of local NHS services, social care and health improvement. The Health and Social Care Bill, which was published in January 2011, contains provisions for strengthening commissioning of NHS services, increasing democratic accountability and public voice, liberating provision of NHS services, strengthening public health services and reforming health and care arm’s-length bodies. In response to the public health White Paper, it is proposed to create a statutory London Health Improvement Board (LHIB) that will take on the development of the London Health Inequalities Strategy and have regard to the health and well being strategies of each borough. The Board will play an important role in identifying city-wide health needs and will decide which priority health issues would be delivered most effectively at the pan-London level. It will act as a focal point for discussions about how to improve health and reduce health inequalities across London as a whole. The London Plan will be updated to reflect any implications for health improvement and health infrastructure planning.

Demographic trends and national and local policy approaches will partly determine the scale of health care need in particular locations. New or improved health and social care facilities may be needed as part of large scale commercial and housing developments to address additional demands and should be assessed in accordance with the criteria in paragraph 3.90 and Policy 8.2 on planning obligations. Boroughs may wish to apply the suggested methodology under Policy 3.16 when assessing the needs for health care facilities. The needs of older Londoners particularly, in respect of residential and nursing home provision, also need to be considered (see Policy 3.8).

London forms the hub of health-related research and development in the south east of England and is where 25 per cent of UK doctors are trained. It is thus a centre for clinical, training and research excellence. The networks, research and
facilities that support London’s role as a centre of medical excellence and specialist facilities, and their enhancements, will be supported.

3.97 Many policies included within this Plan have a part to play in promoting good health and seeking to address inequalities in health.

Page 109, para 3.110

3.110 Sports and recreation facilities are important parts of the social infrastructure, providing a range of social and health benefits for communities and neighbourhoods. Backed by the Mayor’s Sports Legacy Plan, these will be given increasing prominence by and after the 2012 Games. London aspires to contribute 150,000 towards Sport England’s target of getting 1 million people doing more sport by 2012.

CHAPTER FOUR LONDON’S ECONOMY

Page 114, 4.1, 1st bullet point

- A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes; and

Economic Sectors and Work Spaces

Page 130, para 4.48

4.48 Larger centres are appropriate locations for accommodating much of the growth in comparison goods retail expenditure and floorspace because they are the most accessible by public transport and have greater capacity to provide choice and competition. While provision to meet need for convenience goods can be made in larger centres, smaller centres, especially district, neighbourhood and more local centres, are particularly suitable for accommodating growth in convenience floorspace, providing the new shops are of appropriate scale. This is because they form a denser network and are particularly accessible by walking and cycling as well as public transport. The availability of accessible local shops and related uses meeting local needs for goods and services (including post offices and public houses) is also important in securing ‘lifetime neighbourhoods’ (see Policy 7.1) – places that are welcoming, accessible and inviting to everyone regardless of age, health or disability and which provide local facilities available to all.
New and Emerging Economic Sectors

Page 132, para 4.54

4.54 The Mayor strongly supports measures to secure and develop London’s leading role as a centre of higher and further education of national and international importance. These are important economic sectors in their own right with a key part to play in developing London’s world city offer, as well as having considerable potential for greater synergies in fostering innovation in the private, and other parts of the public sector such as the National Health Service. Policy 2.11 underpins the Mayor’s commitment to addressing their accommodation needs in the distinct circumstances of central London, and more generally through Policies 3.2, 3.17 and 3.18. He will support a broadly based forum of academic and other stakeholders to address these and other requirements.

CHAPTER 5 LONDON’S RESPONSE TO CLIMATE CHANGE

Page 138, para 5.4

5.4 Even if all greenhouse gas emissions stopped now, it is projected that the world would still need to adapt to at least a century of irreversible climate change. London is already feeling the effects. It is particularly vulnerable to flooding, overheating and drought conditions which can lead to water supply shortfalls. Climate change will increase the probability and severity of these effects through rising sea levels, heavier winter rainfall, higher tidal surges, hotter summers and less summer rainfall. The effects of climate change could seriously harm Londoners’ quality of life, particularly the health and social and economic welfare of vulnerable people.

Climate Change Mitigation

Page 144, para 5.24

5.24 The principles underlying sustainable design and construction reflect a number of policies in this Plan. In particular they seek to improve the environmental performance of buildings, including consideration of climate change mitigation and adaptation. Policy 5.3 is intended to ensure that buildings minimize carbon dioxide emissions; are efficient in resource use; protect the environment; recognise the uniqueness of locations; are healthy and adaptable; and make the most of natural systems including, for example, the use of passive solar design or local ecosystems. It should be considered alongside policies dealing with architecture and design in Chapter 7.
Climate Change Adaptation

Page 153, para 5.51

5.51 London experienced a heatwave in 2003 that killed at least 600 people and its impact was exacerbated by the urban heat island effect. Cooling the urban environment through the use of green infrastructure, as part of a package of measures to combat climate change, will have important health and social benefits. It is particularly important to address the urban heat island effect in central London. Further work will be undertaken to establish a methodology by which major developments can be assessed for the contribution that they will need to make to increasing green infrastructure in the Central Activities Zone. Research undertaken in Manchester has shown that increasing urban green space by 10 per cent can help to cool high density areas of the city by around three to four degrees centigrade. Urban greening also contributes to achieving a network of green multifunctional infrastructure across London with the consequent range of benefits that this can bring (see Policy 2.18).

Page 157, para 5.60

5.60 Water supplies are essential to any sustainable city and to the health and welfare of its people. London’s consumption of water already outstrips available supplies in dry years and ensuing a sustainable and secure water supply has to be an urgent priority. Some steps have already been taken. Investment in recent years to reduce leakage from Victorian mains supply pipes has had an effect (although Thames Water still has a significantly higher leakage rate than the rest of the country). An additional source of supply, the desalination plant at Beckton, has been operational since 2010. These two measures have eased the pressure on water resources in London.

Waste

Page 168, para 5.86

5.86 Waste processing facilities, including materials recycling facilities and depots, inert waste recycling plants, composting facilities, waste treatment and energy recovery facilities, and reprocessing of recyclables, should be well designed. They need not be bad neighbours and could be a source of new products and new jobs. They should be developed and designed in consultation with local communities, taking account of health and safety within the facility, the site and adjoining neighbourhoods. Energy recovery should be carried out through advanced conversion techniques, ie gasification, pyrolysis or anaerobic digestion, or any combination of these. Developments for manufacturing related to recycled waste, deriving fuel from waste and recovering value from residual waste should be supported. Where movement of waste is required, priority should be given to facilities for movement by river or rail. Opportunities to provide combined heat and power and combined cooling, heat and power should be taken wherever possible (see Policies 5.5, 5.6 and 5.8).
Developments adjacent to waste management sites should be designed to minimise the potential for disturbance and conflicts of use.

Page 169, para 5.89

5.89 In 2007 around 300,000 tonnes of hazardous waste was produced in London – 35 per cent from construction, excavation and demolition waste (containing asbestos and contaminated soil), 21 per cent from oil and oil/water mix waste, and 44 per cent as waste from chemical and other industrial processes. Changes to the definition of hazardous waste mean that the amount of such waste produced will grow in the short and medium term, and London will need more and better hazardous waste treatment facilities to cope with this.

Without sustained action there remains the risk of a major shortfall in our capacity to treat and dispose of hazardous waste safely. This could lead to storage problems, illegal disposal (including fly tipping) and rising public concern about health and environmental impacts. There is therefore a need to continue to identify hazardous waste capacity for London. The main requirement is for sites for regional facilities to be identified. Boroughs will need to work together and with neighbouring authorities to consider the necessary regional/local facilities.

Aggregates, Contaminated Land and Hazardous Substances

Page 171, Policy 5.21 Contaminated Land, A

Strategic

A The Mayor supports the remediation of contaminated sites and will work with strategic partners to ensure that the development of brownfield land does not result in significant harm to human health or the environment, and to bring contaminated land to beneficial use.

5.95 In a city where space is increasingly at a premium, it is essential that wherever practicable, brownfield sites – including those affected by contamination – should be recycled into new uses. This also provides an opportunity to deal with any threats to health and the environment posed by contamination. Any land that is affected by contamination, whether or not identified under the regulations, may require measures to prevent contamination being activated or spread when building takes place.

Page 171, Policy 5.22 Hazardous Substances and Installations, B, a

Planning decisions

B When assessing developments near hazardous installations:

a site specific circumstances and proposed mitigation measures should be taken into account when applying the Health and Safety Executive’s
Planning Advice Developments near Hazardous Installations (PADHI)\textsuperscript{32} methodology

\textit{Page 172, Policy 5.22 Hazardous Substances and Installations, C, b}

\textbf{LDF Preparation}

\textit{C} In preparing LDFs, boroughs should:

\textit{b} consult and give due weight to advice from the Health and Safety Executive to ensure that land use allocations take account of proximity to major hazards

5.96 The EU Directive on the prevention of major accidents involving hazardous substances requires land use policies to take prevention and minimisation of consequences into account, and this is reflected in PPS12. Where appropriate, advice should be sought from the Health and Safety Executive. Development decisions should take account of CLG Circular 04/00 Planning Controls for Hazardous Substances.

\textbf{endnotes}

\textsuperscript{32} PADHI – HSE’s Planning Land Use Methodology. Health and Safety Executive, September 2009

\textbf{CHAPTER 6 LONDON’S TRANSPORT}

\textbf{Connecting London}

\textit{Page 196, para 6.33}

6.33 The Mayor is committed to seeing a revolution in cycling in London. The quality and safety of London’s street environment should be improved to make the experience of cycling more pleasant and an increasingly viable alternative to the private car. By providing safe and attractive routes that are easy to navigate people may be encouraged to cycle more, which will have health benefits for them and also help tackle climate change. Cycle Super Highways will do this by developing 12 routes into central London.

\textit{Page 197, para 6.37}

6.37 The Mayor is also committed to a substantial increase in walking in London. To this end, the quality and safety of London’s pedestrian environment should be improved to make the experience of walking more pleasant and an increasingly viable alternative to the private car (see also policies on inclusive environments (7.2) and the public realm (7.5)). By providing safe and attractive routes that are easy to navigate, such as the seven strategic walking routes, people will be encouraged to walk more, which will have safety, economic and health benefits for them and also help tackle climate change and support the viability of town centres. ‘Legible London’ is a pedestrian wayfinding system, developed by
Transport for London (TfL), to support walking journeys around the capital. By providing clear, comprehensive and consistent information the system gives pedestrians the confidence to attempt more journeys on foot. The system uses map-based information, presented in a range of formats including on-street signs. The signs have been designed to enhance the urban realm and sit comfortably in a range of London settings. The Mayor is keen to promote street trees, and proposals for public realm improvements should include additional planting, while avoiding removing trees to further decluttering.

Page 199, para 6.39

6.39 Smoothing traffic flow is the Mayor’s broad approach to managing road congestion, improving traffic journey time, reliability and predictability. There is an urgent need to smooth traffic flow and reduce congestion and traffic levels, as these have detrimental impacts on health, climate change and the economy. Improved public transport, better management of the road network, smarter travel initiatives and support for a shift to walking and cycling, in accordance with the policies in this Plan and the Mayor’s Transport Strategy, will help mitigate the congestion impacts of population and economic growth. This approach will ensure more reliable journey times on the road network than would otherwise be the case and help reduce emissions of carbon dioxide and air pollutants. If these measures prove unsuccessful the principle road-user charging as a demand management tool may need to be examined, but the Mayor has made clear his view that he does not envisage doing so during his term of office.

Page 207, table 6.3

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<td><strong>Health</strong> facilities/clinics</td>
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CHAPTER SEVEN LONDON’S LIVING PLACES AND SPACES

Page 210, para 7.1, bullet point 2

- A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London’s built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environment and waterways, realising its potential for improving Londoners’ health, welfare and development.

Air and Noise Pollution

Page 210, policy 7.1 – Building London’s Neighbourhoods and Communities, C

Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people’s sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people’s lives, and should meet the principles of lifetime neighbourhoods.

Page 211, para 7.4

7.4 People should be able to live and work in a safe, healthy, supportive and inclusive neighbourhood with which they are proud to identify1. They should have easy access to services and facilities that are relevant to them and should be able to navigate their way easily around their neighbourhood through high quality spaces, while having good access to the wider city. They should have access to a network of open and green spaces that meets their recreational needs and a natural and built environment that reinforces a strong, unique local history and character.

Place Shaping

Page 215, para 7.16

7.16 The quality of the public realm has a significant influence on quality of life because it affects people’s sense of place, security and belonging, as well as having an influence on a range of health and social factors. For this reason, public and private open spaces, and the buildings that frame those spaces, should contribute to the highest standards of comfort, security and ease of movement possible. Open spaces include both green and civic spaces, both of which contribute to the provision of a high quality public realm (see Policy 7.18). Legibility and signposting can also make an important contribution to whether people feel comfortable in a place, and are able to understand it and
navigate their way around. On going maintenance of this infrastructure should be a key consideration in the design of places.

**Air and Noise Pollution**

*Page 229, policy 7.14 – Improving Air Quality, A*

The Mayor recognises the importance of tackling air pollution and improving air quality to London’s development and the health and well-being of its people. He will work with strategic partners to ensure that the spatial, climate change, transport and design policies of this plan support implementation of his Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.

*Page 229, para 7.47*

Poor air quality is a public health issue that is linked to the development of chronic diseases and can increase the risk of respiratory illness. Action is needed to improve air quality in London and the Mayor is committed to working towards meeting the EU limit values of fine particulate matter ($\text{PM}_{10}$) by 2011 and nitrogen dioxide ($\text{NO}_2$) by 2015. The Mayor’s Air Quality Strategy sets out policies and proposals to address the full range of these air quality issues reducing emissions from transport, reducing emissions from homes, business and industry and increasing awareness of air quality issues. For example the Low Emission Zone (LEZ) will continue to deliver health benefits by reducing emissions from the oldest heavy diesel engined vehicles. The Strategy also includes proposals to extend the LEZ to heavier vans and mini buses from 2012 and to introduce a new standard for nitrogen oxides ($\text{NO}_x$) in 2015. Other transport policies to contribute to achieving these limit values address:

**Protecting London’s Open and Natural Environment**

*Page 232, para 7.55*

PPG 2: Green Belts gives clear policy guidance on the functions the Green Belt performs, its key characteristics, acceptable uses and how its boundaries should be altered, if necessary. Green Belt has an important role to play as part of London’s multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and improve overall quality of life. Positive management of the Green Belt is a key to improving its quality and hence its positive benefits for Londoners.

*Page 232, para 7.56*

The policy guidance of PPG 2 on Green Belts applies equally to Metropolitan Open Land (MOL). MOL has an important role to play as part of London’s multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are
likely to help human health, biodiversity and quality of life. Development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate. Appropriate development should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL. Green chains are important to London’s open space network, recreation and biodiversity. They consist of footpaths and the open spaces that they link, which are accessible to the public. The open spaces and links within a Green Chain should be designated as MOL due to their Londonwide importance.

Page 233, para 7.57

7.57 As part of London’s multifunctional green infrastructure, local open spaces are key to many issues, such as health and biodiversity. Needs assessments can be part of existing borough strategies on issues such as allotments, play, trees and playing pitches and the preparation of an open space strategy will need to bring together the outputs of these borough strategies. The categorisation of open space in Table 7.2 provides a benchmark for boroughs to assess their own provision for the different categories of open space found throughout London. These standards can be used to highlight areas of open space deficiency and to facilitate cross-borough planning and management of open space. The London Parks and Green Spaces Forum can provide a useful mechanism to support this co-ordination. Cross-borough boundary planning is particularly relevant for the larger metropolitan and regional parks and for facilities such as playing pitches, where a sub-regional approach to planning is recommended.

Page 236, para 7.61

7.61 Development proposals should begin by understanding their wider context and viewing promotion of nature conservation as integral to the scheme not as an ‘add-on’. The indirect impacts of development (eg noise, shading, lighting etc) need to be considered alongside direct impacts (eg habitat loss). New development should improve existing or create new habitats or use design (green roofs, living walls) to enhance biodiversity and provide for its on-going management. Most wildlife habitats are difficult to recreate, accordingly the replacement or relocation of species and habitats should only be a last resort. Access to nature can be an important contributor to people’s health and the Mayor wants to see better access to both existing and new wildlife habitats and has identified priorities to redress areas of deficiency.
CHAPTER 8 IMPLEMENTATION MONITORING AND REVIEW

Planning Obligations and the Community Infrastructure Levy

Page 256, Policy 8.2, E

E Importance should also be given to tackling climate change, learning and skills, health facilities and services, childcare provisions and the provision of small shops.

Page 257, para 8.13

8.13 Other important priority uses for s106 funding that apply generally across London are measures to mitigate and adapt to climate change, the improvement of learning and skills, improved health care, child care facilities and small shops.

Monitoring

Page 259, table 8.1 Key performance indicators

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<th>Target</th>
<th>Relevant Plan Objectives*</th>
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<td>Reduction in the difference in life expectancy between those living in the most and least deprived areas of London (shown separately for men and women)</td>
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ANNEXES

Annex 1 Opportunity and intensification areas

Page 273, nr 32 White City

32 White City

Area (Ha): 110

Indicative employment capacity: 10,000

Minimum new homes: 5,000

OAPF progress: 2

An area undergoing substantial change within which completion of strategically significant new retail provision at Westfield has raised the status of Shepherd’s Bush to a Metropolitan town centre. The BBC is consolidating its activities within the area and this will create opportunities for further development, building upon the area’s strengths in creative, media and entertainment business. It is proposed to extend the Opportunity Area to include Shepherd’s Bush town centre and the White City Estate. There is potential for mixed density housing and a focal point for office development at and around the tube stations at White City and Wood Lane with other commercial, leisure, open space, education and retail uses of appropriate scale to support the local community. This will be facilitated by de-designation of the historic strategic industrial location complemented by provision for waste and other industrial functions in the Park Royal Opportunity Area. The scope to improve connectivity with the wider area should be explored and development should be related to improvements in public transport capacity. Housing-led intensification should support local regeneration, enable estate renewal and seek a mixed and balanced community. There may be scope to enhance education and research capabilities in the area linked in particular to healthcare and bio-technology. Development should promote the vitality of the town centre, particularly in the Shepherd’s Bush market area, and complement the viability of other west and central London centres. An Opportunity Area Planning Framework is being prepared by the GLA and the London Borough of Hammersmith & Fulham which will set out further strategic principles including the appropriate scale, location and mix of uses taking into account studies of the creative industries, development and transport capacity.

Annex 5 Glossary

Page 301

Community Strategies These are practical tools for promoting or improving the economic, social and environmental wellbeing of the area of jurisdiction of a local authority. Such strategies are prepared allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities.
**Green infrastructure** The multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs). It includes the Blue Ribbon Network but excludes the hard-surfaced public realm. This network lies within the urban environment and the urban fringe, connecting to the surrounding countryside. It provides multiple benefits for people and wildlife including: flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole. See also Urban Greening.

**Health inequalities** are defined by the UK Government as ‘inequalities in respect of life expectancy or general state of health which are wholly or partly a result of differences in respect of general health determinants.’

**Lifetime Homes** Ordinary homes designed to provide accessible and convenient homes for a large segment of the population from families with young children to frail older people and those with temporary or permanent physical or sensory impairments. Lifetime Homes have 16 design features that ensure that the home will be flexible enough to meet the existing and changing needs of most households, and can be easily adapted to meet the needs of future occupants. The 16 criteria are set out and explained in www.lifetimehomes.org.uk and are included in the health and wellbeing category of the Code for Sustainable Homes. They have been built upon and extended in the British Standards Institution Draft for Development (DD 266:2007) ‘Design of accessible housing – Lifetime Homes – Code of practice’.

**Lifetime Neighbourhoods** A lifetime neighbourhood is designed to be welcoming, accessible and inviting for everyone, regardless of age, health or disability, is sustainable in terms of climate change, transport services, housing, public services, civic space and amenities making it possible for people to enjoy a fulfilling life and take part in the economic, civic and social life of the community. This can be achieved by extending the inclusive design principles embedded in the Lifetime Home standards to the neighbourhood level.

**Polyclinics** Combine GP and routine hospital care with a range of wellbeing and support services such as benefits support and housing advice.

**Social exclusion** A term for what can happen when people or areas suffer from a combination of linked problems, such as unemployment, poor skills, low incomes, poor housing, high crime environments, bad health and family breakdown.

**Social inclusion** The position from where someone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers for
people or for areas that experience a combination of linked problems such as unemployment, poor skills, low incomes, poor housing, high crime environments, bad health and family breakdown.

**Social infrastructure** Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people’s play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.

**Annex 6 (Index of Policies) – 3 refs**

**Savings** – 1 ref