

My comments

Page	Section	Comment
Chapter 1 Planning London's Future (Good Growth Policies)	1.0.1	<p>When those responsible are making decisions it is important that they bear children and young people in mind. They are often not taken into account.</p>
Policy GG1 Building strong and inclusive communities	GG1	<p>We strongly support the Mayor's approach of building strong and inclusive communities.</p> <p>People are generally suspicious of young people and steps should be taken to make sure they are included and also able to spend time and move around in comfort and safety. We suggest adding the following wording in bold:</p> <p>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 allow children and young people freedom of association and peaceful assembly, which foster a sense of belonging and community ownership, and where communities can develop and flourish.</p> <p>F. This is one of a number of places where we suggest adding 'children and young people as follows: disabled people, older people, children and young people and families with young children</p>

<p><u>Policy GG2</u> <u>Making the best use of land</u></p>	<p>NVA</p>	<p>A. There can be no surplus public land. The selling of public land into private hands is depriving future generations of land for housing and social infrastructure. It is a limited resource and the funding shortfall needs a more long term solution and a new funding model can and should be developed, in particular dealing with the notion of land values. This is necessary to avoid the inequality which arises from moving value away from the common good for private gain.</p> <p>B. It is important to maintain a balance between intensification and the protection of children's play spaces. These are not specifically playgrounds, but include spaces where children play.</p>
<p><u>Policy GG3</u> <u>Creating a healthy city</u></p>	<p><u>GG3</u></p>	<p>We welcome the approach of creating a healthy city, especially emphasising good food and restricting unhealthy options as in G. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.</p>
<p><u>Policy SD6</u> <u>Town centres</u></p>	<p>NVA</p>	<p>We propose adding the following wording in bold:</p> <p>H: The delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners, children and young people and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, informal play, seating and public toilets.</p> <p>Children like to stop and play in informal spaces and this should be highlighted and included in the delivery of inclusive town centres.</p>

<p><u>Policy D3 Inclusive design</u></p>	<p><u>D3</u></p>	<p>Often there are barriers to the free movement of children which are not recognised. The use of fobs as keys to door between the interior and exterior of housing blocks is one of them as young children are generally not able to use them without adult supervision. We suggest adding the wording in bold:</p> <p>D3 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:</p> <p>A. 1. can be entered and used safely, easily and with dignity by all, including avoiding the use of technology such as fobs which will prevent young children having free access between interior and exterior space without adult assistance or supervision.</p>
<p><u>Policy D4 Housing quality and standards</u></p>	<p><u>D4</u></p>	<p>B. New homes should have adequately-sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes. Particular account should be taken of the needs of children, disabled and older people.</p> <p>Our comment: We welcome the consideration of meeting the needs of children to have adequately sized rooms and efficient room layouts. This should also include the possibility of private space for children; is there a place where a child can play inside? Can they build a Lego model? Is there somewhere to do homework?</p> <p>Designing homes to encourage and support parents to talk, sing and play more with their children, for example, places to talk in the layout of a flat or room for chair where a mother cooks to allow her children to talk to her present opportunities for conversation between parents and children in the early years improves language skills. (See Save the Children and National Literacy Trust Project 'Wonder Words' https://blogs.savethechildren.org.uk/2017/10/innovating-low-income-families/)</p>

<p><u>Policy D4 Housing quality and standards</u></p>	<p><u>3.4.7</u></p>	<p>3.4.7 Communal play space for children and young people should be provided in developments with an estimated occupancy of ten children or more in accordance with the requirement of Policy S4 Play and informal recreation. Add: Streets should allow for children and young people to move around their local neighbourhood safely and independently. Roof spaces and podiums should not be classed as playable spaces due to poor accessibility and no natural surveillance. Provide active ground floors as part of reasons to walk around, which supports children to have those next steps from home, learning informally from doing so.</p> <p>It is important to bear in mind that children need to move around freely and to not create barriers to that movement.</p>
<p><u>Policy D4 Housing quality and standards</u></p>	<p><u>3.4.9</u></p>	<p>3.4.9 - in order to make this more achievable and provide a positive way of creating a more socially inclusive London, add: Development should help create a more socially inclusive London, by creating local networks of streets that are safe and easy to get around whilst travelling actively.</p>
<p><u>Policy D4 Housing quality and standards</u></p>	<p><u>3.4.11</u></p>	<p>3.4.11 ... the built form, massing and height of the development is appropriate for the surrounding context and intended users. Add here: Residential uses and family sized units should be located on lower storeys, no higher than the 4th floor.</p> <p>The nearer families are to the ground floor, the more able children are to access the street and gain access to the out door space to play and move around. Above about 4 storeys, children become isolated and less able to go and and play, often leading to depression and obesity.</p>

<p><u>Policy D5</u> <u>Accessible</u> <u>housing</u></p>	<p><u>D5</u></p>	<p>A. add ‘children and young people as follows:</p> <p>disabled people, older people, children and young people and families with young children</p>
<p><u>Policy D6</u> <u>Optimising</u> <u>housing</u> <u>density</u></p>	<p><u>D6</u></p>	<p>We would like you to add the words in bold:</p> <p>A. Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:</p> <ol style="list-style-type: none"> 1 the site context 2 its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL) 3 the capacity of surrounding infrastructure, including social infrastructure, especially for children and young people <p>B. 3. Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure, including social infrastructure, especially for children and young people and the recommended 10 sq. m. play space (Policy S4 Play and informal recreation B.2.) and public transport services and that the development is phased accordingly.</p> <p>People tend to think of infrastructure in terms of buildings and it is important to take children and young people into account.</p>

<p><u>Policy D6</u> <u>Optimising</u> <u>housing</u> <u>density</u></p>	<p><u>3.6.9</u></p>	<p>3.6.9.</p> <p>Note - Tall buildings are not always the best way to achieve high density. For example, the density of Kensington and Chelsea Mansions is greater than in a tall building and more suitable for families with children. The costs involved in building and the running, including service charges, of a tall building are greater than lower rise buildings and in private developments the have limited use for families especially on low incomes.</p>
<p><u>Policy D7</u> <u>Public realm</u></p>	<p><u>D7</u></p>	<p>F. Add the wording in bold: Ensure buildings are of a design that activates and defines the public realm, provides natural surveillance, including good visual contact with the homes of children and takes into account children's need to get to and from their homes to outdoor space easily and safely.</p> <p>We strongly support the inclusion of natural surveillance. It is especially important that parents and children have direct visual contact between the home and outdoor space. Both feel more secure and children are more confident to play outdoors.</p>
<p><u>Policy D7</u> <u>Public realm</u></p>	<p><u>D7</u></p>	<p>We support the creation of inclusiveness, including young people in the public realm. Targeting teenagers and young people as being responsible for anti social behaviour is not acceptable. The use of the use of the 'Mosquito' which emits high frequency sound to discourage youths hanging out in built up areas should be banned. It is also uncomfortable for young children and can have adverse affects on their health.</p>

<p><u>Policy D8 Tall buildings</u></p>	<p><u>D8</u></p>	<p>C. 2. Functional impact Add a point 'h':</p> <p>h. Build family sized units on the lower floors, ensuring they are not higher than the 4th floor, to allow children and young people easy access to the outside spaces. Roof spaces and podiums should not be classed as playable spaces due to poor accessibility and no natural surveillance.</p> <p>Children and families need to have easy access to the ground and outdoor space with good visual contact between their homes and outdoor space. High level flats, roof spaces and podiums do not allow this. See for example this study:</p> <p>www.tandfonline.com/doi/full/10.1080/08111146.2012.663729?scroll=top&needAccess=true</p>
<p><u>Policy H2 Small sites</u></p>	<p><u>H2</u></p>	<p>It is necessary to protect children and young people's play areas from development in order to support the reduction of obesity, antisocial behaviour and knife crime as well as their general health and wellbeing. Play areas including adventure playgrounds and playing fields are disappearing and children and young people are acutely aware of this. We recommend adding the following in bold:</p> <p>C. Boroughs should increase planning certainty on small sites by:</p> <ul style="list-style-type: none"> 1 identifying and allocating appropriate small sites, excluding the sites of existing children and young people's play areas, for residential development, 2 listing these sites on their brownfield registers 3 granting permission in principle on specific sites or preparing local development orders.

<p><u>Policy H7</u> <u>Affordable</u> <u>housing tenure</u></p>	<p><u>Table</u> <u>4.3</u></p>	<p>Table 4.3. 2017 SHMA findings The assumptions behind the proportion of 1 bedroom to 3 or 4 plus bedroom units gives a bias towards single bedroom units. More larger units are needed in order to provide housing suitable for families and children to meet a predicted increase in children in London (see SHMA, fig. 26)</p> <p>This is important to support the aim of inclusive communities in which families are accommodated.</p>
<p><u>Policy H16</u> <u>Gypsy and</u> <u>Traveller</u> <u>accommodation</u></p>	<p><u>4.16.10</u></p>	<p>4.16.10 Where new pitches are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, children and young people and families with young children.</p>
<p><u>Policy S3</u> <u>Education and</u> <u>childcare</u> <u>facilities</u></p>	<p><u>S3</u></p>	<p>B. 4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, (omit - to encourage walking and cycling) to enable all children to travel actively (walk, cycle, travel by public transport) to school.</p> <p>We strongly support children's active travel to and from school by creating healthy routes. We recommend the wording in bold to make it a stronger requirement and enable rather than encourage.</p> <p>B. 10. ensure that there is not a net loss of facilities, unless it can be demonstrated, following a dialogue with the users, that there is no ongoing or future demand.</p> <p>It is important to involve those people using the facilities in the decision over whether there is an ongoing or future demand, especially where possible including children and young people in the discussion. They have a knowledge which is fundamental to the decision making process.</p>

<p><u>Policy S3</u> <u>Education and</u> <u>childcare</u> <u>facilities</u></p>	<p><u>5.3.12</u></p>	<p>For reasons given in my comments to B 10, the agreement of stakeholders is important for the success of the implementation of decisions. Therefore we propose adding the wording in bold:</p> <p>5. 3. 12. School and college facilities - in particular sports, play, training and meeting facilities - should be capable of use by the wider community outside their main operating hours. They can provide venues for a range of community activities, including nurseries, children’s centres, cultural, youth and sports activities. Designing schools and colleges with this shared use in mind, and ensuring they are safe for a range of uses, also allows for more adaptability around changing work and lifestyle patterns, and extended childcare and holiday provision. <i>Sharing of facilities such as sports pitches and multi-use games areas and locating schools next to parks and open spaces can also further encourage the shared use of space, where space on a school or college site is demonstrably limited following a negotiation with stakeholders to establish what they need.</i> Education and childcare facilities could also be co-located with other uses such as housing and mixed-use developments at higher densities.</p>
<p><u>Policy S4 Play</u> <u>and informal</u> <u>recreation</u></p>	<p><u>S4</u></p>	<p>We strongly support the inclusion of the policies in S4. We propose the following additions:</p> <p>A 3 particular consideration should be given to the views of children and young people in the design of new provision and in proposed changes to existing provision to understand their needs.</p> <p>B.2.b. Add: Roof and podium spaces are not acceptable due to poor accessibility and no natural surveillance</p> <p>B. 5. should maintain existing play provision, unless after meaningful dialogue with the user group, it can be replaced by a similar or improved play provision or demonstrated that there is no ongoing or future demand.</p> <p>This is in keeping with the need to protect existing play provision from development and involve young people in decisions which affect them.</p>

<p><u>Policy S4 Play and informal recreation</u></p>	<p><u>5.4.6</u></p>	<p>We strongly recommend that children and young people are included in an age appropriate way in making decisions over matters which affect them. Children and young people are the most able to communicate what they are looking for in play and other social infrastructure and any decision should take their views into account. This is also included in the UN Convention on the Rights of the Child Articles 12 and 13.</p> <p>We suggest the following wording in bold:</p> <p>Off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated, following meaningful dialogue with the users, including children and young people, that it addresses the needs of the development whilst continuing to meet the needs of existing residents. ...</p>
<p><u>Policy S6 Public toilets</u></p>	<p><u>S6</u></p>	<p>Add to point A:</p> <p>users including disabled people, children and young people and families with young children.</p>
<p><u>Policy E9 Retail, markets and hot food takeaways</u></p>	<p><u>E9</u></p>	<p>We strongly support part C and D. London has the highest level of childhood overweight and obesity. We welcome this contribution to the Mayor's campaign to reduce obesity.</p>

<p><u>Policy HC7</u> <u>Protecting</u> <u>public houses</u></p>	<p><u>HC7</u></p>	<p>Protecting the heritage of existing public houses which have cultural value is important. It is less clear whether new proposals come under this category. This needs to be approached with care as new public houses would be part of a new culture with possible negative impacts especially for the wellbeing of children and young people.</p> <p>1. 2) support proposals for new public houses (and other similar drinking establishments) should be considered in a balanced way taking into account efforts to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development and the statement of licensing policy for the local area, to ensure that proposals deliver benefits to the community and avoid negative impacts.</p> <p>Other cultural infrastructure buildings including community centres, youth clubs, play areas and free play infrastructure serve a similar role, supporting the existing community culture and heritage and should also be included. Preventing the disappearance of a community's cultural centres is as important to the local community culture over generations as protecting public houses.</p>
<p><u>Policy T1</u> <u>Strategic</u> <u>approach to</u> <u>transport</u></p>	<p><u>T1</u></p>	<p>We strongly support the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041.</p>

<p><u>Policy T2</u> <u>Healthy streets</u></p>	<p><u>T2</u></p>	<p>We strongly support the Mayor's healthy streets approach.</p> <p>We propose two minor additions in bold.</p> <p>B. 2. identify opportunities to improve the balance of space given to people to dwell, play, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant.</p> <p>Children often make use of informal places for play and it should be included in people's space.</p> <p>D. 2. reduce the dominance of motor vehicles on London's streets whether stationary or moving.</p> <p>To clarify this refers to motor vehicles and not other forms which could include bicycles.</p>
<p><u>Policy T6 Car</u> <u>parking</u></p>	<p><u>T6</u></p>	<p>We strongly support this policy especially B - Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').</p> <p>One of the biggest obstacles to creating healthy streets and a child friendly city is the dominance of the car.</p>

<p><u>Policy DF1 Delivery of the Plan and Planning Obligations</u></p>	<p><u>DF1</u></p>	<p>When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and <i>decision-makers should firstly apply priority to affordable housing and necessary public transport improvements</i>, and following this:</p> <ol style="list-style-type: none"> 1 Recognise the role large sites can play in delivering necessary health and education infrastructure; and 2 Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth. <p>The priority is being given to housing and transport, creating a the dependence on income from S 106 and CiS money from developers to deliver these policies. This usually results in the developers not including appropriate facilities and spaces for children and young people. There will have to be strong safeguards to prevent this, including a way of taking account of the wishes and suggestions of those people, adults as well as children and young people affected. In spite of the present financial constraints, the funding of children and young people’s social infrastructure is fundamental to the delivery of the Mayor’s policies on healthy streets, good growth and inclusive design, not to mention the health of future generations.</p>
<p><u>Chapter 12 Monitoring</u></p>	<p><u>12.1.1</u></p>	<p>Children and young people should be included as an indicator. They have been called an 'indicator species' because the wellbeing of children results in the wellbeing of the whole community. This can be measured by health outcomes in the form of lower obesity and diabetes levels, improved mental health with fewer incidents of self harm and suicide and a decrease of knife crime.</p>