



A London Plan for Older People 2018

RESPONSE TO
CONSULTATION ON
THE DRAFT NEW
LONDON PLAN

BY
AGE UK LONDON

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EXECUTIVE SUMMARY

Age UK London wishes to propose a range of amendments to the policies set out in the draft New London Plan.

Our evidence for doing so includes feedback from an older people's consultation event titled '**A London Plan for Older People**' on Thursday 8th February 2018 in Brixton. Over 60 people were involved at the event – Participants from across London attended. The aims of the day were twofold: To understand the key issues of the new draft London Plan as they apply to older people, and, to provide constructive comments to secure an age friendly city.

We also carried out a post-event online questionnaire intended to further investigate the views both of the consultation event participants, and of other older people across London.

Older people in London are a distinct but not homogenous group; they vary in terms of ethnic background, wealth and economic wellbeing, tenure, and living conditions. Household size varies, they can live alone, with a partner or extended family, they can be carers for a partner or extended family or be cared for. One of the most important issues defining their outlook and wellbeing is their health. For example, there can be a vast difference in the outlook and needs of a sprightly still healthy 80 year old pensioner and a 60 year old with multiple health conditions, mobility challenges and experiencing social isolation living on Employment and Support Allowance.

SUPPORTING EVIDENCE FOR THE PROPOSED POLICY CHANGES

We have also referred to research evidence, used to support a series of proposed policy changes. The quoted evidence is cross referenced to the policy changes and there are text links, which provide direct connections between the two commentaries. The evidence is extensive and is not set out in this Executive Summary

LONDON PLAN REVIEW & POLICY PROPOSALS

The 8th February consultation, the post event questionnaire and the evidence referred to flow through to proposed changes to the draft London Plan. These are set out below with justifications both in this section and in section 4.

ALL PROPOSED POLICY CHANGES ARE IN RED TEXT.

PROPOSED POLICY AMENDMENTS:

POLICY GG1 BUILDING STRONG AND INCLUSIVE COMMUNITIES

To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities **FOR ALL AGES**, those involved in planning and development must:

A Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, ~~and~~ more equal **AND AGE FRIENDLY** city.

C Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places **AND SPACES** where everyone is welcome, **WHICH ARE WELL MAINTAINED**, which foster a sense of belonging and community ownership, and where communities can develop and flourish.

E Ensure that new, **EXTENDED AND REFURBISHED** buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community ~~requirements-~~ **NEEDS**.

F Support the creation of a **SAFE, SECURE AND WELL MANAGED CITY** where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently and with choice and dignity, avoiding separation, ~~or~~ segregation **AND SOCIAL ISOLATION**.

G: ADD Criterion: SEEK INSPIRATIONAL DESIGN AND VIBRANT PLACEMAKING IN ALL DEVELOPMENT PROPOSALS.

H: Add Criterion: PURSUE THOROUGH AND EFFECTIVE COMMUNITY ENGAGEMENT AT ALL STAGES OF THE PLANNING PROCESS, INCLUDING AT PRE-APPLICATION STAGE, AND DEMONSTRATE TO THE LOCAL PLANNING AUTHORITY THAT A PROACTIVE RESPONSE TO CONSULTATIONS HAS BEEN MADE.

POLICY GG2 MAKING THE BEST USE OF LAND

To create high-density, mixed-use **AND AGE AND DISABILITY FRIENDLY** places that make the best use of land, those involved in planning and development must: (rest of policy).

POLICY GG3 CREATING A HEALTHY CITY

Add criterion

SEEK DEVELOPMENT PROPOSALS THAT PROMOTE MAXIMUM SOCIAL COHESION AND THE MINIMISATION OF SOCIAL ISOLATION. THIS INCLUDES ADDRESSING INTERGENERATIONAL INEQUALITIES BY INSPIRATIONAL DESIGN AND VIBRANT PLACE MAKING.

Also: To add a further criterion here, or elsewhere if more appropriate, to sign London up to the global register of Age Friendly Cities.

POLICY GG4 DELIVERING THE HOMES LONDONERS NEED

A Ensure that more NEW AND CONVERTED homes are delivered, WHICH SHOULD BE AGE AND DISABILITY FRIENDLY.

C Create mixed, ~~and~~ inclusive AND ACCESSIBLE communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

ADD CRITERION:

F. ENGAGE WITH LOCAL PEOPLE AND PROSPECTIVE END USERS AT ALL PLANNING AND DESIGN STAGES, TO ENSURE THAT HOUSING DESIGNS ARE RESPONSIVE TO NEEDS AND INSPIRATIONAL IN TERMS OF DESIGN AND FUTURE USE.

POLICY SD6: TOWN CENTRES

CRITERION F: The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, **AND SAFETY**, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity.

POLICY SD9: TOWN CENTRES & IMPLEMENTATION

Policy SD9 Town centres: Local partnerships, COMMUNITY ENGAGEMENT and implementation

A To develop strong, resilient and adaptable town centres, fulfilling their full potential to accommodate growth and development, strategic and local partnership approaches, community engagement, town centre management, business associations and Business Improvement Districts ~~MUST should~~ be supported, ~~and~~ encouraged AND UNDERTAKEN. Each town centre ~~MUST should~~ have a Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.

2) take a proactive **PARTICIPATORY** and partnership-based approach to bring sites forward for redevelopment, supporting land assembly in collaboration with local stakeholders including, where appropriate, through the compulsory purchase process

POLICY SD10: REGENERATION

2) seek to identify Local Areas for Regeneration taking into account local Circumstances **AND THE NEEDS OF THE LOCAL COMMUNITY.**

ADD CRITERION:

3) RECOGNISE THAT REGENERATION IS BOTH SOCIAL AND PHYSICAL AND IDENTIFY ASPECTS OF SOCIAL CHANGE AND PHYSICAL TRANSFORMATION, FOR EACH DEVELOPMENT PROPOSAL. (ADD TO POLICY JUSTIFICATION: Commentary on the social and physical aspects of regeneration).

POLICY D1: LONDON'S FORM AND CHARACTERISTICS.

PROPOSED POLICY AMENDMENTS:

ADD TO A: THE FORM AND LAYOUT OF A PLACE AND DEVELOPMENT DESIGN SHOULD BE AGE AND DISABLED FRIENDLY.

ADD NEW CRITERION C: COMMUNITY ENGAGEMENT SHALL BE UNDERTAKEN AT ALL STAGES OF THE PLANNING AND DESIGN PROCESS, WHICH SHOULD BE FOCUSED ON LOCAL PEOPLE, THEIR NEEDS AND ASPIRATIONS.

POLICY D2: 'DELIVERING GOOD DESIGN'

PROPOSED POLICY AMENDMENT:

- 1) TO EXPLICITLY MENTION LONDON'S AGEING POPULATION AND DISABILITY FACTORS AS IMPORTANT SOCIO-ECONOMIC DATA TO HAVE REGARD TO.**
- 2) ADD INTO THE POLICY THE NEED FOR COMMUNITY ENGAGEMENT WITH LOCAL PEOPLE AND VOLUNTARY ORGANISATIONS AT ALL STAGES.**

POLICY D3: INCLUSIVE DESIGN

PROPOSED POLICY AMENDMENT:

AGE AND DISABILITY FRIENDLY DESIGN should be mentioned, plus the issue of **'INSPIRATIONAL DESIGN'**.

Add to the front of the policy:

TO DELIVER AN INCLUSIVE AND SOCIALLY COHESIVE ENVIRONMENT THAT ADDRESSES SOCIAL ISOLATION AND INTERGENERATIONAL INEQUALITIES BY INSPIRATIONAL DESIGN AND VIBRANT PLACEMAKING. ALL DEVELOPMENT PROPOSALS WILL BE REQUIRED TO ACHIEVE THE HIGHEST STANDARDS OF ACCESSIBLE, INCLUSIVE AND USER-FRIENDLY DESIGN, ENSURING THEY: (rest of policy as is).

CHANGE the name of the policy to: **POLICY D3: INCLUSIVE ‘& INSPIRATIONAL’ DESIGN.**

POLICY D5: ACCESSIBLE HOUSING

The policy mentions disabled and older people.

PROPOSED POLICY AMENDMENT:

ADD standard for FLAT CONVERSIONS, which might be that all ground floor flat conversions should be wheelchair accessible. And a further 1 in 4 should be disability friendly, including the provision of stair lifts where a full lift cannot be provided.

POLICY D7 PUBLIC REALM

The policy mentions provision of the public realm for people of all ages (see K), which is welcomed.

PROPOSED POLICY AMENDMENTS:

D7(l): TAKE OUT ‘where appropriate’ at the end of the first sentence, as this weakens the policy.

J Explore opportunities for innovative approaches, INVOLVING VIBRANT PLACEMAKING AND INSPIRATIONAL DESIGN, to improve ing the public realm AND INCREASE SOCIAL INTERACTION, such as open street events.

NEW POLICY – RESIDENTIAL CONVERSIONS.

PROPOSED POLICY AMENDMENT:

To word a new policy that will promote residential conversions in accessible locations, which should be age and disabled friendly. The importance of conversions in providing ‘friendly’ housing should not be under-emphasised.

POLICY H1: INCREASING HOUSING SUPPLY

PROPOSED POLICY AMENDMENT:

ADD reference to: To ensure that community engagement is promoted at all housing target consultation stages.

POLICY H2: SMALL SITES

PROPOSED POLICY AMENDMENT:

In H2(E) change 'residential privacy' to 'residential amenity'. This widens the considerations that should be undertaken in assessing small site proposals.

POLICY H6: THRESHOLD APPROACH TO APPLICATIONS

PROPOSED POLICY AMENDMENT:

E. Where an application does not meet the requirements set out in part C it must follow the Viability Tested Route. This requires detailed supporting viability evidence to be submitted in a standardised, EASY TO UNDERSTAND and accessible format as part of the PUBLICLY ACCESSIBLE PLANNING application:

POLICY H7: AFFORDABLE HOUSING TENURE

PROPOSED POLICY AMENDMENT:

A. The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:

- 1) a minimum of ~~30~~ 45 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)**
- 2) a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership**
- 3) ~~40~~ 25 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.**

POLICY H15: OLDER PERSONS HOUSING

Policy H15 Specialist older persons housing

A Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons **AND AGE FRIENDLY DESIGNED** housing taking account of:

B Specialist older persons housing (Use Class C3) provision should deliver:

B3 ADD and the design recommendations of the HAPPI report, HAPPI -Housing our Ageing Population: Panel for Innovation 2009

POLICY S1: DEVELOPING LONDON'S SOCIAL INFRASTRUCTURE

PROPOSED POLICY AMENDMENT:

Policy S1:

A Boroughs, in their Development Plans **AND SUPPLEMENTARY GUIDANCE**, ~~should~~ **MUST** undertake **AND MAINTAIN AN ONGOING** needs assessment of social infrastructure to meet the needs of London's diverse communities, **INCLUDING PEOPLE OF ALL AGES AND THOSE WITH DEMENTIA AND THE GROUPS THAT SUPPORT THEM. THE NEEDS ASSESSMENT SHALL BE SUBJECT TO ONGOING COMMUNITY ENGAGEMENT, INCLUDING LOCAL PEOPLE AND VOLUNTARY ORGANISATIONS.**

B In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans **AND AGE FRIENDLY AUDITS**

E New **SOCIAL INFRASTRUCTURE** facilities should be **SAFELY AND** easily accessible by public transport, cycling and Walking **AND SHOULD BE DESIGNED AS HUB SCHEMES, PROVIDING A RANGE OF INTEGRATED FACILITIES, AS REFERRED TO UNDER POLICY SD6(A)(1).**

F. WHERE POSSIBLE SOCIAL INFRASTRUCTURE FLOOR SPACE SHOULD BE DESIGNED AND MANAGED FOR FLEXIBLE USE, WITH A RANGE OF COMMUNITY USES AT DIFFERENT TIMES, ACCORDING TO THE NEEDS OF THE LOCAL COMMUNITY.

F G. Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:

G H. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, **WHICH SHOULD OCCUR IN CONSULTATION WITH LOCAL VOLUNTARY ORGANISATIONS.**

POLICY S2: HEALTH & SOCIAL CARE FACILITIES

PROPOSED POLICY AMENDMENT:

ADD access to information services for local communities.

POLICY S3: EDUCATION AND CHILDCARE FACILITIES

PROPOSED POLICY AMENDMENT:

- 1) **Add to S3(B)(7): ‘...including disabled AND OLDER people’.**
- 2) **Add ‘further education’ facilities to S3(B).**

POLICY S4: PLAY AND INFORMAL RECREATION

PROPOSED POLICY AMENDMENT:

ADD NEW CRITERION:

C. DEVELOPMENT PROPOSALS SHALL, WHERE POSSIBLE, HAVE REGARD TO THE NEED FOR INFORMAL RECREATION FOR OLDER PEOPLE, (INSERT IN JUSTIFICATION examples of open air gyms and flat walking routes).

POLICY S6: PUBLIC TOILETS

PROPOSED POLICY AMENDMENT:

Age UK London agrees strongly with the objectives of this policy but feel that smaller town centre type developments should make a contribution to toilet provision. This may be by way of an off-site contribution.

Policy S6:

A Development proposals that include **MEDIUM TO** large-scale commercial **AND TOWN CENTRE** developments that are open to the public, such as shops, leisure facilities and large areas of public realm, should provide and secure the future management of free **ON SITE** publicly-accessible toilets. These should be available during opening hours, or 24 hours a day in areas of public realm and should be suitable for a range of users including disabled people and families with young children. **WHERE A NEW TOILET CANNOT BE PROVIDED ON-SITE IT SHALL BE APPROPRIATELY LOCATED IN THE VICINITY OF THE DEVELOPMENT PROPOSAL.**

B Larger developments where users are expected to spend long periods of time or where there is no other local provision, should also provide 'Changing Places' toilets as identified in the British Standard BS8300.

C. WHERE, IN SMALLER COMMERCIAL AND TOWN CENTRE DEVELOPMENTS, A TOILET CANNOT VIABLY BE PROVIDED, THE SCHEME SHALL MAKE AN OFF-SITE FINANCIAL CONTRIBUTION TOWARDS SUCH PROVISION.

D. ALL PUBLIC TOILET PROPOSALS SHALL PROVIDE A PUBLICLY ACCESSIBLE MANAGEMENT PLAN, WHICH SHOULD BE KEPT UP TO DATE AND RELEVANT TO THE NEEDS OF THE LOCAL COMMUNITY.

START PARA 5.6.1. with the words 'WELL MANAGED'...

NEW POLICY ON LIVE/WORK

PROPOSED POLICY AMENDMENT:

NEW POLICY on live/work accommodation, which should mention how this type of development can be disability and age friendly.

POLICY E3: AFFORDABLE WORKSPACE

PROPOSED POLICY AMENDMENT:

ADD age and disability friendly requirements to this policy.

POLICY E7: DEVELOPMENT OF INDUSTRIAL SITES

PROPOSED POLICY AMENDMENT:

ADD NEW D(5): SOCIAL INFRASTRUCTURE IS PROVIDED AS AN INTEGRATED ELEMENT OF THE DEVELOPMENT PROPOSAL.

POLICY T1: STRATEGIC APPROACH TO TRANSPORT

3) SPECIALIST TRANSPORT SERVICES FOR OLDER AND DISABLED PEOPLE (E.G. DIAL-A-RIDE).

POLICY T2: HEALTHY STREETS

PROPOSED POLICY AMENDMENT:

Policy T2:

2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently, and streets are greener and more pleasant.

ADD at the end of the policy:

4) PROVIDE FOR STREET LEGIBILITY INCLUDING STREET AND BUILDING SIGNAGE

POLICY DF1: DELIVERY & PLANNING OBLIGATIONS

PROPOSED POLICY AMENDMENT:

ADD BETWEEN (C) AND (D):

ALL VIABILITY ASSESSMENTS SHALL BE SUBJECT TO COMMUNITY ENGAGEMENT AND SHALL BE PUBLICLY ACCESSIBLE.

AMEND D(2):

2) Recognise the importance of SOCIAL INFRASTRUCTURE, affordable workspace and culture and leisure facilities in delivering good growth.

IN THE 'ENABLING INFRASTRUCTURE' SECTION, ADD IN A SECTION ON 'SOCIAL INFRASTRUCTURE'.

CHAPTER 12: MONITORING

AMEND KPIs

PROPOSED POLICY AMENDMENT:

The KPIs are lacking. Add KPIs on:

- HEALTH AND WELLBEING
- THE PROPORTION OF AFFORDABLE DWELLINGS
- THE PROPORTION OF WHEELCHAIR ACCESSIBLE DWELLINGS
- THE PROPORTION OF AGE FRIENDLY DWELLINGS
- MONITORING OF BUILD QUALITY STANDARDS
- A REDUCING TREND FOR SOCIAL ISOLATION
- THE TREND FOR SOCIAL INFRASTRUCTURE BUILD OUT INC. COMMUNITY SCHEMES, BURIAL SPACE AND PUBLIC TOILETS.
- GREEN INFRASTRUCTURE PROVISION
- EDUCATION: IMPROVING PROVISION TREND.
- THE PROVISION OF AFFORDABLE WORKSPACE

GLOSSARY

PROPOSED AMENDMENTS:

ADD DEFINITION OF **'SOCIAL INFRASTRUCTURE'**

ADD DEFINITION OF **'SOCIAL ISOLATION'**

ADD DEFINITION OF **'AGE AND DISABILITY FRIENDLY CITY'**.

'INCLUSIVE NEIGHBOURHOODS': ADD IN THE IMPORTANCE OF **'SOCIAL INFRASTRUCTURE'** IN PROVIDING OPPORTUNITIES FOR SOCIAL INTERACTION

ADD TO **'COMMUNITY ENGAGEMENT'**:

'....AND CAN INCLUDE FACE TO FACE, ONLINE AND VOLUNTARY SECTOR ENGAGEMENT'.

<<END OF EXECUTIVE SUMMARY>>

1. INTRODUCTION

This response – which we have entitled **‘A London Plan for Older People’** - to the Mayor’s consultation over the Draft New London Plan is produced on behalf of older people, a cohort acknowledged by the Mayor to require special consideration.

We hope to demonstrate that the significance of the changing demographic of the older people cohort has an overwhelming importance for the future of London, evolving from the Plan and moving forward with an all-age response. The Mayor has noted his desire for socially cohesive communities, a crucial element for a successful future mega city; and through our response, we hope to assist the Mayor to refine the Plan’s objectives, to achieve an ‘Age Friendly’ Plan alongside the other commendable aims of the ‘Good Growth’ Policies.

The [numerous amendments proposed](#), are based on extensive consultation and research, with a few key principles pertinent to our support of older people becoming apparent:

- **London faces an ageing population and the physical and social environment should accommodate this**
- **Older people are a valuable resource for London**
- **Community engagement is essential in ensuring developments are fit for purpose and social cohesion is strengthened**
- **A strengthened, community based, social infrastructure is required and the contribution of the voluntary sector must not be overlooked**
- **Quality control of design and design materials is required**
- **Addressing areas that give rise to health and social inequality are essential for the success of the New London Plan.**
- **Solutions for an ageing population require a life- course approach.**

**AGE UK LONDON: Gordon Deuchars Policy and Campaigns Manager
& THEIR CONSULTANTS: Olexandra Stepaniuk, Angela Dobson, Christine Sandford & Peter Kyte
Document Issued: 1st March 2018**

2. ABOUT AGE UK LONDON

Age UK London raises the voice and addresses the needs of older Londoners. We promote and represent the views of older Londoners, campaigning on real issues that make a difference to older people. We work with older people's organisations across London to enhance services and we offer a range of products and services tailor-made for the over 50s (via Age UK London Trading). We are part of the national Age UK network and work in partnership with the national charity Age UK and with London borough Age UKs. We also link to over 500 local older people's groups in all London boroughs, many of them volunteer led. We are currently funded by City Bridge Trust to build the resilience of these local age sector organisations to help them and older people in general to make their voice heard, as part of "The Way Ahead" initiative, of which the GLA is also a member.

3. THE PARTICIPATORY APPROACH TO THESE REPRESENTATIONS

Age UK London organised an older people's consultation event titled '**A London Plan for Older People**' on Thursday 8th February 2018 at 336, 336 Brixton Road, SW9 7AA. **Over 60 people** were involved at the event – Participants from across London attended.

Age UK London carried out an online survey to identify older people's views in more depth – see Appendix 4. It was answered by 31 people linked to older people's groups across London.

The Community Matrix – **SEE APPENDIX 5** – is a spatial planning tool that was used in undertaking the current work, to identify and emphasise different planning-based themes and factors within the very broad subject of community needs and aspirations. The Matrix is focused around the draft London Plan's main objectives and goes on to place the sub-factors (in white squares) within the Plan's main outputs. The main London-wide themes are shown in purple. It proved very useful in encouraging responses to the Plan's issues.

4. SUPPORTING EVIDENCE FOR THE PROPOSED POLICY CHANGES

This section of the report deals with research evidence, used to support a series of proposed policy changes. The quoted evidence is cross referenced to the policy changes (contained in [Section 5](#)), and there are text links, which provide direct connections between the two commentaries.

EVIDENCE TO SUPPORT PROPOSED POLICY AMENDMENT TO GG1:

[LINK TO POLICY CHANGE](#)

- 1. GG1A Demographics** In the UK the projected number of people aged 65 and over is projected to rise from 9.7 million in 2015 to 14.5 million in 2035, an increase of 49%. Those aged 85 and over are projected to rise faster during this period, by over 122% from 1.3 million in 2015 to 2.9 million in 2035 - much of this increase is due to a rise in male life expectancy. It is also expected that the number of people unable to perform one activity of daily living (ADL) will rise by 65% between 2015 and 2035 from around 2.9 million to 4.8 million. Those with more severe disabilities are likely to increase by 74% from 1.15 million in 2015 to 2.0 million in 2035. The GLA's own intelligence unit is aware that there will be over 750,000 Londoners aged over 75 in 2031, an increase of 290,000 from 2015. (*GLA Intelligence Unit, 2016*). Accompanying this increase will be a rise in Londoners experiencing a long-term health condition or disability. Currently, 37% of Londoners over the age of 65 report disability, accounting for 45% of disabled London residents (*Transport for London, 2014*). By 2031 it is estimated that there will be an additional 150,000 people in London reporting 'reduced mobility', that is, some kind of disability, bringing the total to over one million (*Age, disability and everyday mobility in London: An analysis of the correlates of 'non-travel' in travel diary data Philip Corran et al, Journal of Transport and Health 2017 as quoted in the London Councils Transport Environment Committee, 2018*).
- 2. GG1A Older Londoners** Whilst older Londoners aged 50 plus are a smaller proportion of the total London population than in the rest of England, nevertheless, at around 2 million in number, they form 25% of the total population with disproportionate numbers in outer London Boroughs, forming between 32 and 36% in some (*GLA Economics: The Economic Contribution of Older Londoners 2013 p. 8*).
- 3. GG1A Ageing Population – implications for London** At the same time as this unprecedented, yet welcome, longevity, the birth rate throughout the western world is falling. In the UK in 2015 there were four people working to every one retired person, this is projected to become 2 people working for every retired person in 2060. (*Office of National Statistics {ONS} 2012*). This has implications for all aspects of society and raises questions as to how productivity will be maintained and how people in retirement will be financed. London thus needs to invest in places, spaces and institutions that help to develop long term health and maintain or increase productivity, improve social cohesion, in particular intergenerational cohesion, and, at the same time, guard against social issues that promote ill health, such as health inequalities, loneliness isolation and poverty. The World Health Organisation (WHO) notes that, "The City's landscape, buildings, transportations

system and housing contribute to confident mobility, healthy behaviour, social participation and self-determination, or conversely, to fearful isolation, inactivity and social exclusion. (*Global Age Friendly Cities; A Guide World Health Organisation 2007*)

4. **GG1A Older people: a resource.** The WHO further advises that older people require, “supportive and enabling living environments to compensate for physical and social changes associated with ageing and that an age friendly city emphasises enablement rather than disablement”. Before it begins to appear that a special pleading is being made for a particular group, this comment should also be noted: “Healthy older people are a resource for their families, their communities and the economy” (*WHO Brasilia Declaration on Ageing, 2006*). Research has shown the transfer of assets is downwards from older to younger generations for various reasons, and is both direct, in terms of financial support or indirect in such terms as, for example, baby-sitting. This downward flow of resource is predicted to increase (*The British Journal of Sociology 2005 Volume 56 Issue 2 ‘Reciprocity in relationships: socio-economic and health influences on intergenerational exchanges between Third Age parents and their adult children in Great Britain’ Emily Grundy*). “Furthermore, older Londoners are generally more educated... and more ethnically diverse than the rest of the population with 27% from BAME communities including 10% of those over 85%(as opposed to 1% in the rest of the population)”. The current economic contribution of older Londoners (aged 50 Plus) is £53 billion p.a. (*GLA Economics: The Economic Contribution of Older Londoners Alisdair Barratt 2013*).
5. **GG1A Older people fulfilling potential** There is a link between increased education and increased health. According to Sarah Harper et al “ It is highly likely, however, that future generations of older adults will have higher levels of human capital – in terms of education, skills and abilities – and better health profiles, and this will enable them to remain active, productive and contributory for far longer”. (*International Handbook on Ageing and Public Policy 2016*) The Plan appears to understand that dealing with the diversity of needs is a complex matter (NLP 5.1.3) however, fulfilling the productive potential of educated older Londoners also needs to permeate every aspect of the Plan.
6. **GG1A** In conclusion of this section, GG1A, it is recommended that London is signed up to the World Health Organisation’s register of Age Friendly Cities and audited annually towards progress in fulfilling targets, with older people themselves included in the process. It is further recommended that the Plan includes a commitment to incorporate amendments in the light of recommendations arising from impending new research studies. To name just one example, ‘Pathways to Healthy Equitable Cities led by Imperial College and supported by Kings College London was announced in February 2018 by King’s College as, “part of a global consortium of leading universities seeking to answer the fundamental question of how we can design cities to achieve better and more equal health outcomes in six major cities around the world”. Part of the Healthy Lives Healthy Planet to address Urban Health Inequalities and Sustainability this is a major new research Hub funded by the Wellcome Trust.
7. **GG1B** Part of the vision of the Draft New London Plan is to create cohesive communities and the plan recognises that achieving this is very complex. To be successful GG1B needs to be reiterated within more detailed policies.
8. **GG1C** Older people have told us that they will not venture out if they feel unsafe, thus being deprived of opportunistic encounters for social interaction that help to alleviate loneliness. It will

also undermine the value of spaces created for people if those spaces are not well maintained as they will be perceived as undesirable places to visit.

9. **GG1E** We are concerned that the Mayor's New London Plan will be undermined if 'extended' or 'refurbished' property is excluded from the plan.
10. **GG1F (see 8 above)** Include social isolation to tie in with the major government all-party initiative to address social isolation with the appointment of a new ministerial lead on loneliness the MP Tracey Crouch, Minister for Sport and Civil Society who will begin to implement the recommendations of the Jo Cox Commission on Loneliness, including the provision of indicators against which to measure improvements.
11. **GG1G** The Mayor's work with the House Building Programme, Public Realm and High Street Plan is radical. To achieve the desired impact, it is considered that not just good, but inspirational design is required. Older people themselves concur. One attendee at our London Plan consultation on February 8th suggested that Sir Terence Conran be brought in to design hospitals.
12. **GG1H** The ambitious nature of the Plan, including densification and the need to improve or amend the infrastructure needs to engage older people, both to take account of their voice and to ensure that they are not excluded by changes to the built environment that will affect their daily lives. Exclusion in this area could lead to the disempowerment and resultant health inequalities that the draft New London Plan is seeking to address. We endorse the strong recommendation by Professor Anthea Tinker in her report commissioned by the GLA in which she says, "Our major recommendations are that older people should be consulted by a variety of means, to enable their views to be taken into account" (*An Age Friendly City – how far has London come? Anthea Tinker, and Jay Ginn, King's College London" 2015*).

EVIDENCE TO SUPPORT PROPOSED POLICY AMENDMENT TO GG2, ONWARDS:

[LINK TO POLICY CHANGE](#)

13. **GG2 (see also evidence for GG1 above nos. 1, 3 and 6)** Please note also that several international designers consider the interest of cyclists and pedestrians to be conflicting: Dissing and Weitling with their award-winning bicycle snake; "The area around the Fisketorvet Shopping Centre in Copenhagen was characterised by a particular problem - two distinctive groups of users, each with conflicting interests, cyclists and pedestrians." Also, *Converging Grounds: A design 'charrette' on Density in Denmark* hosted by the Van Alen Institute New York looked at multi modal use of streets. Amongst the proposals were different uses and users at different times of day. Older people themselves have told us that they are afraid of cyclists who jump lights when they, pedestrians, are crossing roads and that they are afraid of cyclists on pavements. They asked for a number of measures including increased cycle lanes.
14. **GG3 (see also evidence for GG1)** **[LINK TO POLICY CHANGE](#)**
15. **GG4 (see evidence for GG1)** **[LINK TO POLICY CHANGE](#)** Include conversions in addition to new build otherwise the Mayor's New Plan can be thwarted. Furthermore, by re-iterating the need for age-friendly and disability-friendly construction, a clear, consistent instruction is provided to and reinforces the message for, developers. Good design is seen to be a crucial element, see GG4C, of the Plan and the need to provide for an ageing population has been established, see GG1 nos 1-6 above and GG1F LP.

16. **GG4 Adding** Criterion F strengthens the New London Plan, helps to ensure that new developments are 'Fit for purpose' and contributes to social cohesion.
17. **SD4** Criterion F adding safety (**see 8 above**) Whilst safety is also mentioned in Criterion J entry here reinforces the intention for town centres.
18. **SD9A** [LINK TO POLICY CHANGE](#) Given the key significance of Town Centres in the Mayor's Draft New Plan, replacing SHOULD with MUST strengthens the policy and the use of UNDERTAKEN ensures that plans will be carried through.
19. **SD9** The addition of Community Engagement in the policy will help to achieve the intentions of policy SD6. Community involvement and the participation of the local voluntary sector will ensure that town centres match local needs and aspirations and the insertion of a participatory approach in SD9C 3 will add to community cohesion.
20. **SD10 2** [LINK TO POLICY CHANGE](#) Insertion of 'needs of the local community' ties into Policy S1 and improves the chances of achieving the Mayor's aims for social cohesion.
21. **SD10** Adding Criterion 3 enhances understanding of regeneration and goes some way towards guarding against the loss of social capital when existing communities are disrupted.
22. **D1** (**see notes 1 – 6 re GG1 above**) [LINK TO POLICY CHANGE](#) It is considered that the addition of the amendment to Policy A and the insertion of new criterion C are critical for the appropriate transformation of London and coheres with the mayor's intentions for London to serve the needs of Londoners as well as creating a vibrant city.
23. **D2** [LINK TO POLICY CHANGE](#) Once again, the insertion of the policy amendments signals a consistent requirement to provide for an ageing population and to the fact that community engagement with proposed new developments is essential for the success of the project, where success is taken to mean well designed developments and strengthened communities.
24. **D3** [LINK TO POLICY CHANGE](#) We would like to see 'Inclusive design' renamed as 'Inclusive and Inspirational design'. The new London Plan should not become a charter for mass building that does not take account of the Mayor's desire for locally appropriate solutions. We consider the use of the word 'inspirational' lifts design concepts out of the danger of being mundane and pedestrian to those that could create joy. This is necessary because clever design is required to offset effects of increased densification, and pleasure in the built environment will encourage, rather than discourage, people to go out from their homes into the public realm. This in turn will help to realise the Good Growth Policies in GG1 – 6.
25. **D5** [LINK TO POLICY CHANGE](#) This amendment ensures that conversions are not exempt from the design requirements of the London Plan and that the resultant dwellings add to the variety of choice available to older and/or disabled people. The provisions of stair lifts where possible, means the inclusion of converted properties in the housing stock being available to older and disabled people, again, so providing choice. This also provides a conformity of approach towards new build and conversions.
26. **D7** [LINK TO POLICY CHANGE](#) **Add to F** '...and a variety of uses' after surveillance to reinforce the purpose of the public realm. **Remove** 'where appropriate' from D7(I); this weakens the policy.
27. **D7 H** Strengthen H, perhaps by rewording to stress the importance of greening the public realm. This is because research has demonstrated the value of green space on mental well-being (*Urban Mind: Using Smartphone technology Bio science 10.1.18: research between King's College London*

and landscape architects). In this study, J L Gibbon and Art foundation Nomad Projects used smart phone technology to assess the impact of nature in cities, and found that being outdoors, hearing bird song, seeing the sky and feeling in contact with nature were beneficial and particularly so to those individuals with greater impulsivity who were at risk of mental health issues. It has also been demonstrated that good access to public parks is a buffer against cognitive decline: Mobility Mood and Place (MMP) is a co-produced piece of research between architects, landscape architects, a neuro scientist and 750 older people into understanding the role of the urban environment on brain activity in older adults and is co-authored by Professor Catharine Ward Thompson of University of Edinburgh and director of OPENspace (<http://www.openspace.eca.ac.uk>). MMP builds on evidence that demonstrates how mood and the willingness to be active is influenced by how the environment is experienced.

28. **D7** Expand/explore opportunities for innovative approaches in J, to give clearer direction by inserting the words, ‘involving vibrant placemaking and inspirational design.’ Include increasing social engagement in the policy so that, again, there can be no doubt about the purpose of the public realm to designers and developers. This is to maximise opportunities to improve the public realm and realise the vision of the New London Plan.
29. **H1** [LINK TO POLICY CHANGE](#) Add a proposed new policy to H1 Increasing Housing Supply to incorporate residential conversions in accessible locations which should be age and disability friendly. Not to do so is to exclude a valuable resource, and the importance of refurbished dwellings as age friendly and disability friendly homes should not be under-emphasised.
30. **H1** [LINK TO POLICY CHANGE](#) **Add H1 (B) d** Ensure that community engagement is promoted at all stages. There is evidence that lack of engagement and consultation will interfere with the Mayor’s wish for an inclusive city: “When urban development is driven by market led imperatives and does not involve older people in the planning process this can lead to their social exclusion” (*Handler 2014 cited by A Tinker and J Ginn ‘How far has London come as an Age Friendly City?’*).
31. **H2 E** [LINK TO POLICY CHANGE](#) Proposed amendment speaks for itself.
32. **H6 E** [LINK TO POLICY CHANGE](#) Proposed amendment speaks for itself.
33. **H7 A1 and 3.** [LINK TO POLICY CHANGE](#) The proposed amendments suggest a more appropriate split between low cost social housing and other affordable housing products; they are based on the following evidence:

- (i) “To alleviate London’s current housing crisis, where demand outstrips supply, more affordable social housing is urgently required. We recommend that available public land be transferred to LAs and HAs (Housing Associations) at low prices and LA borrowing limits eased enabling them to build new social housing and to refurbish existing stock to a decent standard.

To retain these valuable assets for future generations, we recommend LAs and HAs should be able to choose not to sell.

For a sustainable housing policy that ensures sufficient decent affordable homes for all Londoners in future, housing demand must be stabilised by discouraging overseas buyers from using ‘Buy to Leave’ and ‘Buy-to-Let’. We recommend disincentives to using London housing need as an investment for capital gain and policies at national and regional level to distribute employment opportunities more evenly across the UK”

(Professor Anthea Tinker and Professor Jay Ginn, 'How Far has London Come as an Age Friendly City?').

(ii) From our consultation conference on 8.2.18

"£170k a year is the average income in Kensington and Chelsea. The average income in our Housing Association is £12k a year and my friends would never be able to afford a so-called 'affordable rent'. Many older people have low fixed incomes, just above benefit levels or at benefit levels. Our incomes won't go up as rents go up. This has to be taken into account" see Appendix 2.

(iii) This was a top priority for people extensively consulted by Age UK London, with reference to the Mayor's Draft London Housing Strategy and submitted in December 2017.

(iv) It is our view that inadequate housing perpetuates poverty and ill health. It contributes to social unrest, and to a lack of social cohesiveness. In an ageing society, inter-generational reciprocity, one of the planks of the UK pension system, continues to be crucial. Investing in the young, therefore, starting with decent low-cost social rented homes that give rise to settled communities is deemed to be essential. The proposed variations in the split in 1 and 3 in our view better reflect the need for low cost social rented housing whilst observing the Mayor's desire to assist those Londoners with middle incomes.

34. H15 [LINK TO POLICY CHANGE](#) In relation to H15, older people themselves have told us that not all want to live in specialist housing; some want to live in the general community. In our view, the title should change to Specialist and Non-specialist older persons' housing. "Our group is interested in the development of multi-generational community led housing. Kensington and Chelsea have very little housing. They offer older people bungalows by the seaside or housing in clusters of older people. But we want to live in mixed age communities." And again, "Co-housing provides opportunity to remain independent and able to participate in wider community. Avoids loneliness." These are the words of participants in the Consultation Conference 8.2.18.

Where specialist housing is built however, incorporation of the HAPPI design recommendations should be applied. These were endorsed by the report of the All Party Parliamentary Group on Housing and Care for Older People (HAPPI 2 Housing our Ageing Population: Plan for Implementation 2012. Chair Richard Best; Secretary Jeremy Porteus) and have already been adopted by some London Boroughs. Adoption of these will ensure the production of well-designed 'age' as well as 'community' friendly housing.

35. H15 Amendments to sections A and B H15 follow on from 34 and are self-explanatory.

36. S1A [LINK TO POLICY CHANGE](#) We believe this policy intends to improve and increase London's Social Infrastructure. We consider that the proposed amendments strengthen the intention of the policy by the inclusion of SPG and by expanding the description of London's diverse communities. The replacement of SHOULD by MUST gives the policy the weight it deserves. The inclusion of

ongoing community engagement is essential if local plans are to be effective in achieving the aims of the Plan.

37. **S1B** The inclusion of the words ‘Age Friendly Audits’ will assist the Mayor to achieve the aims and intentions of GG1.
38. **S1E** Professor Anthea Tinker and Professor Jay Ginn recommend that L.As recognise the importance of community centres, libraries, and the services of the voluntary sector. Professor Tinker’s report recommends hub schemes in every borough where a range of impartial information and advice be available on the whole variety of issues of importance to older people. This is considered to be an essential facility to enable older people to achieve the advice they need to maintain their lives as citizens (Professor Anthea Tinker and Professor Jay Ginn, ‘How Far has London Come as an Age Friendly City?’).
39. **S1F** This amendment adds a further strand to enhance the intention of the policy and keep in line with other principles of flexible use of developments.
40. **S1F** now becomes **S1G**.
41. **S1G** becomes **S1H** to which should be added the condition to consult with local voluntary organisations in order to consistently ensure that stakeholder participation helps to contribute to locally effective solutions.
42. **S2** [LINK TO POLICY CHANGE](#) Health advice service for local communities would complement other information and advice services (see S1E above) and together provide an essential strand of social infrastructure. Health advice services could be co-located with other social infrastructure buildings or with purpose built sheltered housing.
43. **S3** [LINK TO POLICY CHANGE](#) should include a reference to further education, training and re-training. Professor Tinker recommended that the GLA worked with the then Age and Employment Network to persuade employers that re-training older workers is a sound investment. Whilst Equal opportunities policies have become more widespread, practices have not and older workers are less likely to receive training than other workers, (but those that do are satisfied with the training offered) (*Older Workers and the Workplace DWP Feb 2017*) Professor Tinker also refers to the fact that older people will continue to require carers but that care workers are in need of improved training, if older people are to maintain quality of life. (*Professor Anthea Tinker and Professor Jay Ginn, ‘How Far has London Come as an Age Friendly City?’*).
44. **S3B7** Add ‘and Older ‘after disabled **please refer to GG1A 4**.
45. **S4** [LINK TO POLICY CHANGE](#) Add new Criterion C. According to research (*‘The relationship between outdoor activity and health in older adults using GPS’ J Kerr et al 2012 International Journal of Environmental Research and Public Health Research 2012 Dec; 9(12): 4615–4625*), being outdoors and being active were both related to greater self-reported physical functioning, less fear of falling and fewer depressive symptoms. This research also suggests that currently “limitations in physical functioning, fear of falling and neighbourhood design may prevent older adults from being active outdoors so safe environments to support such activity will be crucial.” The London Plan, insistent on producing Healthy Streets and promoting activity, should therefore incorporate external recreational activity for older adults including, for example, facilities such as outdoor gyms for older people, routes for flat walking and by supporting free exercise activity in parks.

46. **S6 [LINK TO POLICY CHANGE](#)** Age UK London strongly welcomes this policy, which was carefully considered at a conference held to consult on aspects of the NLP. We welcome the Mayor's recognition that lack of toilet provision prevents many older people from going out and the diminution of quality of life that ensues. What perhaps may not be as well understood, is the extent of the critical importance of public toilets to older people. In addition to the proposed amendments, people desired a grid map of public toilets, determining the walking distance between them and also to have them available at every underground station and at every bus terminus. Older people wanted reassurance that public W.C.s would be well maintained and be permanent. Concern was expressed that public W.C.s were closed down and not reopened in centres if they were found to be in need of repair.
47. **E1 [LINK TO POLICY CHANGE](#)** It is considered that live/work units provide a flexible work opportunity for the Capital and that these should now incorporate age and disability friendly design features in order to be socially inclusive.
48. **E3 [LINK TO POLICY CHANGE](#)** We consider affordable workspace to be of significance to older people. To begin with, older people require support from voluntary agencies and it is likely that this need will increase so, especially in an environment of increasing market rates, it is crucial that rental costs for charities and voluntary organisations are reduced as their presence and continued existence will directly impact positively on the quality of life for older people. Secondly, given the scenario described in GG1 points 1-6 above, it is also likely that newly retired people will begin to diversify into new self-employed roles and therefore, the availability of low cost work space will be an advantage for them. And finally, given the scenario described in notes GG1 1- 6 all work spaces should now be designed to be disability and age friendly.
49. **E7 [LINK TO POLICY CHANGE](#)** Adding a new D5 will provide consistency with the rest of the London Plan which places substantial emphasis on social infrastructure, states social cohesion to be one of its aims in GG1 and seeks to reduce travel to essential services. T1, T2 For the sake of absolute clarity, housing without social infrastructure cannot create a community.
50. **T1 [LINK TO POLICY CHANGE](#)** As you can imagine public transport is of great importance to Older Londoners, who are still quoting the same longstanding issues of short crossing times at pedestrian lights, buses not pulling up to the kerb and setting off before older people are seated. There have been improvements at many crossings; these need to continue. The other issues mentioned may appear to be minor, however they cause discomfort and can cause injury, often unreported.

At our conference on 8.2.18 older people in Camden reported overcrowding on buses which made it difficult for wheel chair users to access. People also reported that they wished to have direct routes to major areas such as CAZ especially Oxford Street. Of great importance was the creation of direct routes to and from hospitals especially where car parking was restricted.

A survey of Age UK London members demonstrated broad support for T1 but noted that frail elderly people would be excluded if they did not feel confident and if there was insufficient investment to create sufficient user-friendly, accessible transport to meet increased demands. It was noted this would benefit all travellers. The considerably increased length of journey time was noted together with the discomfort of carrying heavy bags of shopping.

One member disagreed entirely and felt that disabled and older people with mobility restrictions or impairments who could not walk or cycle and may not feel safe using public transport were completely ignored. The fact that there are those who cannot walk or cycle was corroborated by others. Another recommended the provision of small run around buses with a drop-on drop-off facility outside of traditional bus stops but noted that this would only work with fewer cars. Another respondent agreed with the strategy because they “would have given up driving by then”. It is felt that the insertion of A3, provided that the specialist transport services were adequately resourced, will help to mitigate the adverse comments for T1.

51. **T2** [LINK TO POLICY CHANGE](#) 59% of respondents to a question on healthy streets and pedestrianisation of Oxford Street mentioned there would be problems with accessibility for older people and disabled people if there were not sufficient parking places or drop off points in Oxford Street itself, or other pedestrianised shopping areas. One person mentioned the possibility of the hire of buggies for older people. The point about inability to walk, or to walk long distances, as mentioned in 50 above is reiterated here. As well as substantially increasing the numbers of Blue Badge parking spaces, another improvement would be to review the rules for Blue Badge eligibility as some people experience restricted mobility that compromises their ability to get about, yet do not qualify for a Blue Badge. Long distances between drop off points and access to public buildings also creates exclusion for older disabled people and makes life very difficult for them and their carers. Please note also point **13** above which comments on the conflicting interest of cyclists and pedestrians and requires appropriate planning to take account of these. Finally, the addition of No. 4 to T2D provides a new requirement that is essential for older people if they are to navigate journeys with ease and which is currently often missing in London streets. The value of clean air was noted by one respondent and clean air was also mentioned in ‘Wishes for London’ expressed at the beginning of the conference on 8.2.18.
52. **DF1** [LINK TO POLICY CHANGE](#) This proposed policy amendment to be inserted between (C) and (D) pursues, and is consistent with, the principle of collaboration with stakeholders. The amendment of D2 also provides a consistent approach to the Mayor’s intention regarding social infrastructure which is essential in delivering good growth.
53. **KPIs** [LINK TO POLICY CHANGE](#) We consider that the strength of the Mayor’s intention in his six Good Growth Policies is not reflected in the KPIs which then severely limits the Mayor’s ability to achieve Good Growth. We feel that the areas we propose better reflect the expressed aims of the Mayor for a successful city and should therefore be included.
54. **Glossary** [LINK TO POLICY CHANGE](#) We believe that the glossary will benefit from the inclusion of the proposed definitions.

5. LONDON PLAN REVIEW & POLICY PROPOSALS

The 8th February consultation, the post event questionnaire and the evidence referred to flow through to proposed changes to the draft London Plan. These are set out below with justifications both in this section and in section 4.

CHAPTER 1 PLANNING LONDON'S FUTURE (GOOD GROWTH POLICIES)

The LP starts by focusing on **'Good Growth'** for London's communities. The policies provide a foundation and a vision for sustainable growth in the future. The introduction to the good growth policies identifies problems such as the limited growth in affordable housing and issues such as car dependency and other environmental problems. The **'new approach'** taken (Para 1.07) includes aiming for the improvements to health and quality of life for all Londoners.

The Plan is informed by the six Good Growth policies.

POLICY GG1 BUILDING STRONG AND INCLUSIVE COMMUNITIES

Policy **GG1** Includes:

'It [London] is home to an ageing population, with more and more people facing the barriers that already prevent many from participating fully in their communities'. (Para. 1.1.3.)

The policy commendably mentions at **CG1(B)** the need to encourage and strengthen communities, including issues of active participation and social integration, as well as addressing social isolation. The issue of **'creating places where everyone is welcome' (CG1(C))** is also included. **CG1(F)** also refers to older people, disabled people and younger people too, thus referring to intergenerational issues and the recognition that an age friendly city is for all ages, not just older people.

A number of amendments to **GG1** are proposed, to refer to Age Friendly issues, maintenance issues, safety and security and to the idea of **'inspirational design'**. The need to address social isolation is also brought into the GG policies.

ALL PROPOSED POLICY CHANGES ARE IN RED TEXT.

PROPOSED POLICY AMENDMENTS:

Policy GG1:

To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities **FOR ALL AGES**, those involved in planning and development must:

A Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, ~~and~~ more equal **AND AGE FRIENDLY** city.

B Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.

C Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places **AND SPACES** where everyone is welcome, **WHICH ARE WELL MAINTAINED**, which foster a sense of belonging and community ownership, and where communities can develop and flourish.

D Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.

E Ensure that new, **EXTENDED AND REFURBISHED** buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community ~~requirements-~~ **NEEDS**.

F Support the creation of a **SAFE, SECURE AND WELL MANAGED CITY** where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation, ~~or~~ segregation **AND SOCIAL ISOLATION**.

G: ADD Criterion: **SEEK INSPIRATIONAL DESIGN AND VIBRANT PLACEMAKING IN ALL DEVELOPMENT PROPOSALS.**

H: Add Criterion: **PURSUE THOROUGH AND EFFECTIVE COMMUNITY ENGAGEMENT AT ALL STAGES OF THE PLANNING PROCESS, INCLUDING AT PRE-APPLICATION STAGE, AND DEMONSTRATE TO THE LOCAL PLANNING AUTHORITY THAT A PROACTIVE RESPONSE TO CONSULTATIONS HAS BEEN MADE.**

ADD TO JUSTIFICATION: To emphasise social opportunities in the policy justification, plus inclusivity and accessibility for all and the need to address social and health inequalities across the generations. This is a core policy that needs to mention these issues, because London in common with the rest of the UK , Europe and the developed world faces an ageing population, for which preparation is required now, given the lead time required to change the built environment. It is also critical that the policy references on issues such as social isolation follow through to the more detailed policies and that the diversity and complexity of the needs of older Londoners is reflected by these.

POLICY GG2 MAKING THE BEST USE OF LAND

The LP states:

‘1.2.4 Making the best use of land means directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking and cycling networks. Integrating land use and transport in this way is essential not only to achieving the Mayor’s target for 80 per cent of all journeys to be made by walking, cycling and public transport, but also to creating vibrant and active places and ensuring a compact and well-functioning city’.

PROPOSED POLICY AMENDMENT:

Add into policy the requirement to achieve age and disabled friendly developments, that take walkability and mobility into account.

Policy GG2:

To create high-density, mixed-use **AND AGE AND DISABILITY FRIENDLY** places that make the best use of land, those involved in planning and development must: (rest of policy).

POLICY GG3 CREATING A HEALTHY CITY

PROPOSED POLICY AMENDMENT: To add a criterion that broadens definitions of social cohesion and isolation and links these to design and placemaking, stating:

SEEK DEVELOPMENT PROPOSALS THAT PROMOTE MAXIMUM SOCIAL COHESION AND THE MINIMISATION OF SOCIAL ISOLATION. THIS INCLUDES ADDRESSING INTERGENERATIONAL INEQUALITIES BY INSPIRATIONAL DESIGN AND VIBRANT PLACE MAKING.

Also: To add a further criterion here, or elsewhere if more appropriate, to sign London up to the global register of Age Friendly Cities, or include such a commitment within the policy justification.

POLICY GG4 DELIVERING THE HOMES LONDONERS NEED

The policy needs to mention age friendly design, accessibility and the need for community engagement.

PROPOSED POLICY AMENDMENTS:

Policy GG4:

To create a housing market that works better for all Londoners, those involved in planning and development must:

A Ensure that more **NEW AND CONVERTED** homes are delivered, **WHICH SHOULD BE AGE AND DISABILITY FRIENDLY.**

B Support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.

C Create mixed, **and** inclusive **AND ACCESSIBLE** communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

D Identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.

E Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

ADD CRITERION:

F. ENGAGE WITH LOCAL PEOPLE AND PROSPECTIVE END USERS AT ALL PLANNING AND DESIGN STAGES, TO ENSURE THAT HOUSING DESIGNS ARE RESPONSIVE TO NEEDS AND INSPIRATIONAL IN TERMS OF DESIGN AND FUTURE USE.

CHAPTER 2 SPATIAL DEVELOPMENT PATTERNS

POLICY SD6: TOWN CENTRES

...recognises that:

London's varied town centres and their vitality and viability should be promoted and enhanced as:

1) strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development.

Community and amenity groups are mentioned as stakeholders in the 'town centre first' process.

PROPOSED POLICY AMENDMENT:

CRITERION F: The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, **AND SAFETY**, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity.

ADD TO POLICY JUSTIFICATION: Community participation and the involvement of the voluntary sector needs to be mentioned in the policy justification.

POLICY SD9: TOWN CENTRES & IMPLEMENTATION

Community engagement should be made a stronger requirement in policy SD9.

PROPOSED POLICY AMENDMENTS:

Policy SD9 Town centres: Local partnerships, COMMUNITY ENGAGEMENT and implementation

A To develop strong, resilient and adaptable town centres, fulfilling their full potential to accommodate growth and development, strategic and local partnership approaches, community engagement, town centre management, business associations and Business Improvement Districts **MUST ~~should~~** be supported, **and** encouraged **AND UNDERTAKEN**. Each town centre **MUST ~~should~~** have a Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.

B Regular town centre health checks should be undertaken to inform strategic and local policy and implementation.

C Boroughs should:

1) introduce targeted Article 4 Directions where appropriate and justified to remove permitted development rights for office, light industrial and retail to residential in order to sustain town centre vitality and viability and to maintain flexibility for more comprehensive approaches to town centre housing and mixed-use intensification. When considering office to residential Article 4 Directions in town centres, boroughs are encouraged to take into account guidelines in Annex 1 and Policy E1 Offices as well as local circumstances.

2) take a proactive **PARTICIPATORY** and partnership-based approach to bring sites forward for redevelopment, supporting land assembly in collaboration with local stakeholders including, where appropriate, through the compulsory purchase process

3) consider the range of mechanisms to deliver housing intensification, mixed-use development and ongoing asset management such as town centre investment models and the contribution of specialist forms of housing investment.

POLICY SD10: REGENERATION

PROPOSED POLICY AMENDMENTS:

Policy SD10:

A Boroughs should:

1) identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans based on a thorough understanding of the demographics of communities and their needs

2) seek to identify Local Areas for Regeneration taking into account local Circumstances **AND THE NEEDS OF THE LOCAL COMMUNITY.**

ADD CRITERION:

3) RECOGNISE THAT REGENERATION IS BOTH SOCIAL AND PHYSICAL AND IDENTIFY ASPECTS OF SOCIAL CHANGE AND PHYSICAL TRANSFORMATION, FOR EACH DEVELOPMENT PROPOSAL. (ADD TO POLICY JUSTIFICATION: Commentary on the social and physical aspects of regeneration).

CHAPTER 3 DESIGN

POLICY D1: LONDON'S FORM AND CHARACTERISTICS.

PROPOSED POLICY AMENDMENTS:

ADD TO A: THE FORM AND LAYOUT OF A PLACE AND DEVELOPMENT DESIGN SHOULD BE AGE AND DISABLED FRIENDLY.

ADD NEW CRITERION C: COMMUNITY ENGAGEMENT SHALL BE UNDERTAKEN AT ALL STAGES OF THE PLANNING AND DESIGN PROCESS, WHICH SHOULD BE FOCUSED ON LOCAL PEOPLE, THEIR NEEDS AND ASPIRATIONS.

POLICY D2: 'DELIVERING GOOD DESIGN'

is split into the following sections:

- Initial evaluation
- Determining capacity for growth
- Design analysis and visualisation
- Design quality and development certainty
- Design scrutiny
- Maintaining design quality

PROPOSED POLICY AMENDMENT:

- 3) TO EXPLICITLY MENTION LONDON'S AGEING POPULATION AND DISABILITY FACTORS AS IMPORTANT SOCIO-ECONOMIC DATA TO HAVE REGARD TO.**
- 4) ADD INTO THE POLICY THE NEED FOR COMMUNITY ENGAGEMENT WITH LOCAL PEOPLE AND VOLUNTARY ORGANISATIONS AT ALL STAGES.**

POLICY D3: INCLUSIVE DESIGN

PROPOSED POLICY AMENDMENT:

AGE AND DISABILITY FRIENDLY DESIGN should be mentioned, plus the issue of '**INSPIRATIONAL DESIGN**'.

Add to the front of the policy:

TO DELIVER AN INCLUSIVE AND SOCIALLY COHESIVE ENVIRONMENT THAT ADDRESSES SOCIAL ISOLATION AND INTERGENERATIONAL INEQUALITIES BY INSPIRATIONAL DESIGN AND VIBRANT PLACEMAKING. ALL DEVELOPMENT PROPOSALS WILL BE REQUIRED TO ACHIEVE THE HIGHEST STANDARDS OF ACCESSIBLE, INCLUSIVE AND USER-FRIENDLY DESIGN, ENSURING THEY: (rest of policy as is).

ADD to policy justification, something about social isolation and intergenerational inequalities, and what we mean by 'inspirational design' and 'vibrant placemaking'. This addition is meant as a follow through from the Good Growth policies (see our amendment to GG1).

CHANGE the name of the policy to: **POLICY D3: INCLUSIVE '& INSPIRATIONAL' DESIGN.**

POLICY D5: ACCESSIBLE HOUSING

The policy mentions disabled and older people.

PROPOSED POLICY AMENDMENT:

ADD standard for FLAT CONVERSIONS, which might be that all ground floor flat conversions should be wheelchair accessible. And a further 1 in 4 should be disability friendly, including the provision of stair lifts where a full lift cannot be provided.

POLICY D7 PUBLIC REALM

The policy mentions provision of the public realm for people of all ages (see K), which is welcomed.

PROPOSED POLICY AMENDMENTS:

D7(l): TAKE OUT 'where appropriate' at the end of the first sentence, as this weakens the policy.

J Explore opportunities for innovative approaches, **INVOLVING VIBRANT PLACEMAKING AND INSPIRATIONAL DESIGN**, to improve the public realm **AND INCREASE SOCIAL INTERACTION**, such as open street events.

This change follows through from our proposed amendments to the GG policies.

CHAPTER 4 HOUSING

NEW POLICY – RESIDENTIAL CONVERSIONS.

PROPOSED POLICY AMENDMENT:

To word a new policy that will promote residential conversions in accessible locations, which should be age and disabled friendly. The importance of conversions in providing 'friendly' housing should not be under-emphasised.

POLICY H1: INCREASING HOUSING SUPPLY

PROPOSED POLICY AMENDMENT:

ADD reference to: To ensure that community engagement is promoted at all housing target consultation stages.

POLICY H2: SMALL SITES

PROPOSED POLICY AMENDMENT:

In H2(E) change 'residential privacy' to 'residential amenity'. This widens the considerations that should be undertaken in assessing small site proposals.

POLICY H6: THRESHOLD APPROACH TO APPLICATIONS

PROPOSED POLICY AMENDMENT:

E. Where an application does not meet the requirements set out in part C it must follow the **Viability Tested Route**. This requires detailed supporting viability evidence to be submitted in a standardised, **EASY TO UNDERSTAND** and accessible format as part of the **PUBLICLY ACCESSIBLE PLANNING** application:

POLICY H7: AFFORDABLE HOUSING TENURE

PROPOSED POLICY AMENDMENT:

A. The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:

1) a minimum of ~~30~~ 45 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)

2) a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership

3) ~~40~~ 25 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.

These minimums will be reviewed in 2021, and if necessary, updated through Supplementary Planning Guidance.

B Only schemes delivering the threshold level of affordable housing with a tenure split that meets the requirements set out in part A can follow the Fast Track Route for viability.

POLICY H15: OLDER PERSONS HOUSING

Policy H15 Specialist older persons housing

- A Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of:
- 1) local and strategic housing needs information and the indicative benchmarks set out in Table 4.4
 - 2) the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, access to social infrastructure, health care and public transport facilities
 - 3) the increasing need for accommodation suitable for people with dementia.
- B Specialist older persons housing (Use Class C3) provision should deliver:
- 1) affordable housing in accordance with [Policy H5 Delivering affordable housing](#), and [Policy H6 Threshold approach to applications](#)
 - 2) accessible housing in accordance with [Policy D5 Accessible housing](#)
 - 3) the highest standards of accessible and inclusive design in accordance with [Policy D3 Inclusive design](#)
 - 4) suitable levels of safe storage and charging facilities for residents' mobility scooters
 - 5) pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs) minibuses and ambulances.
- C Sheltered accommodation and extra care accommodation is considered as being in Use Class C3. Residential nursing care accommodation (including end of life/ hospice care and dementia care home accommodation) is considered as being in Use Class C2.

PROPOSED POLICY AMENDMENT:

Policy H15 might be extended to refer to standard housing (not only to specialist housing) that could be adapted to changing age needs. Mention age friendly housing. The following policy justification needs to be better integrated into the main body of **policy H15**:

Boroughs and applicants should recognise the important role that new, non-specialist residential developments play in providing suitable and attractive accommodation options older Londoners, particularly developments in or close to town centres, near to relevant facilities and in areas well-served by public transport (Para. 4.15.2.).

Policy H15 Specialist older persons housing

A Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons **AND AGE FRIENDLY** housing taking account of:

B Specialist older persons housing (Use Class C3) provision should deliver:

CHAPTER 5 - SOCIAL INFRASTRUCTURE

POLICY S1: DEVELOPING LONDON'S SOCIAL INFRASTRUCTURE

PROPOSED POLICY AMENDMENT:

Policy S1:

A Boroughs, in their Development Plans **AND SUPPLEMENTARY GUIDANCE**, ~~should~~ **MUST** undertake **AND MAINTAIN AN ONGOING** needs assessment of social infrastructure to meet the needs of London's diverse communities, **INCLUDING PEOPLE OF ALL AGES AND THOSE WITH DEMENTIA AND THE GROUPS THAT SUPPORT THEM. THE NEEDS ASSESSMENT SHALL BE SUBJECT TO ONGOING COMMUNITY ENGAGEMENT, INCLUDING LOCAL PEOPLE AND VOLUNTARY ORGANISATIONS.**

B In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans **AND AGE FRIENDLY AUDITS.**

C Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.

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

E New **SOCIAL INFRASTRUCTURE** facilities should be **SAFELY AND** easily accessible by public transport, cycling and Walking **AND SHOULD BE DESIGNED AS HUB SCHEMES, PROVIDING A RANGE OF INTEGRATED FACILITIES, AS REFERRED TO UNDER POLICY SD6(A)(1).**

F. WHERE POSSIBLE SOCIAL INFRASTRUCTURE FLOOR SPACE SHOULD BE DESIGNED AND MANAGED FOR FLEXIBLE USE, WITH A RANGE OF COMMUNITY USES AT DIFFERENT TIMES, ACCORDING TO THE NEEDS OF THE LOCAL COMMUNITY.

F G. Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:

1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or;

2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services.

G H. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, **WHICH SHOULD OCCUR IN CONSULTATION WITH LOCAL VOLUNTARY ORGANISATIONS.**

POLICY S2: HEALTH & SOCIAL CARE FACILITIES

PROPOSED POLICY AMENDMENT:

ADD access to information services for local communities.

POLICY S3: EDUCATION AND CHILDCARE FACILITIES

PROPOSED POLICY AMENDMENT:

- 5) **Add to S3(B)(7): '...including disabled AND OLDER people'.**
- 6) **Add 'further education' facilities to S3(B).**

POLICY S4: PLAY AND INFORMAL RECREATION

PROPOSED POLICY AMENDMENT:

ADD NEW CRITERION:

C. DEVELOPMENT PROPOSALS SHALL, WHERE POSSIBLE, HAVE REGARD TO THE NEED FOR INFORMAL RECREATION FOR OLDER PEOPLE, (INSERT IN JUSTIFICATION examples of open air gyms and flat walking routes).

POLICY S6: PUBLIC TOILETS

PROPOSED POLICY AMENDMENT:

Age UK London agrees strongly with the objectives of this policy but feel that smaller town centre type developments should make a contribution to toilet provision. This may be by way of an off-site contribution.

Policy S6:

A Development proposals that include **MEDIUM TO** large-scale commercial **AND TOWN CENTRE** developments that are open to the public, such as shops, leisure facilities and large areas of public realm, should provide and secure the future management of free **ON SITE** publicly-accessible toilets. These should be available during opening hours, or 24 hours a day in areas of public realm, and should be suitable for a range of users including disabled people and families with young children. **WHERE A NEW TOILET CANNOT BE PROVIDED ON-SITE IT SHALL BE APPROPRIATELY LOCATED IN THE VICINITY OF THE DEVELOPMENT PROPOSAL.**

B Larger developments where users are expected to spend long periods of time or where there is no other local provision, should also provide 'Changing Places' toilets as identified in the British Standard BS8300.

C. WHERE, IN SMALLER COMMERCIAL AND TOWN CENTRE DEVELOPMENTS, A TOILET CANNOT VIABLY BE PROVIDED, THE SCHEME SHALL MAKE AN OFF-SITE FINANCIAL CONTRIBUTION TOWARDS SUCH PROVISION.

D. ALL PUBLIC TOILET PROPOSALS SHALL PROVIDE A PUBLICLY ACCESSIBLE MANAGEMENT PLAN, WHICH SHOULD BE KEPT UP TO DATE AND RELEVANT TO THE NEEDS OF THE LOCAL COMMUNITY.

START PARA 5.6.1. with the words 'WELL MANAGED'...

CHAPTER 6: ECONOMY

NEW POLICY ON LIVE/WORK

PROPOSED POLICY AMENDMENT:

NEW POLICY on live/work accommodation, which should mention how this type of development can be disability and age friendly.

POLICY E3: AFFORDABLE WORKSPACE

PROPOSED POLICY AMENDMENT:

ADD age and disability friendly requirements to this policy.

POLICY E7: DEVELOPMENT OF INDUSTRIAL SITES

PROPOSED POLICY AMENDMENT:

ADD NEW D(5): SOCIAL INFRASTRUCTURE IS PROVIDED AS AN INTEGRATED ELEMENT OF THE DEVELOPMENT PROPOSAL.

CHAPTER 10: TRANSPORT

POLICY T1: STRATEGIC APPROACH TO TRANSPORT

PROPOSED POLICY AMENDMENT:

Policy T1:

A Development Plans and development proposals should support:

1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041

2) the proposed transport schemes set out in Table 10.1.

7) **SPECIALIST TRANSPORT SERVICES FOR OLDER AND DISABLED PEOPLE (E.G. DIAL-A-RIDE).**

B All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

POLICY T2: HEALTHY STREETS

PROPOSED POLICY AMENDMENT:

Policy T2:

ADD at the end of the policy:

3) **PROVIDE FOR STREET LEGIBILITY INCLUDING STREET AND BUILDING SIGNAGE**

Chapter 11: FUNDING THE LONDON PLAN

POLICY DF1: DELIVERY & PLANNING OBLIGATIONS

PROPOSED POLICY AMENDMENT:

ADD BETWEEN (C) AND (D):

ALL VIABILITY ASSESSMENTS SHALL BE SUBJECT TO COMMUNITY ENGAGEMENT AND SHALL BE PUBLICLY ACCESSIBLE.

AMEND D(2):

2) Recognise the importance of SOCIAL INFRASTRUCTURE, affordable workspace and culture and leisure facilities in delivering good growth.

IN THE 'ENABLING INFRASTRUCTURE ' SECTION, ADD IN A SECTION ON 'SOCIAL INFRASTRUCTURE'.

CHAPTER 12: MONITORING

AMEND KPIS

PROPOSED POLICY AMENDMENT:

The KPIs are lacking. Add KPIs on:

- **HEALTH AND WELLBEING**
- **THE PROPORTION OF AFFORDABLE DWELLINGS**
- **THE PROPORTION OF WHEELCHAIR ACCESSIBLE DWELLINGS**
- **THE PROPORTION OF AGE FRIENDLY DWELLINGS**
- **MONITORING OF BUILD QUALITY STANDARDS**
- **A REDUCING TREND FOR SOCIAL ISOLATION**
- **THE TREND FOR SOCIAL INFRASTRUCTURE BUILD OUT INC. COMMUNITY SCHEMES, BURIAL SPACE AND PUBLIC TOILETS.**
- **GREEN INFRASTRUCTURE PROVISION**
- **EDUCATION: IMPROVING PROVISION TREND.**
- **THE PROVISION OF AFFORDABLE WORKSPACE**

GLOSSARY

PROPOSED AMENDMENTS:

ADD DEFINITION OF **'SOCIAL INFRASTRUCTURE'**

ADD DEFINITION OF **'SOCIAL ISOLATION'**

ADD DEFINITION OF **'AGE AND DISABILITY FRIENDLY CITY'**.

'INCLUSIVE NEIGHBOURHOODS': ADD IN THE IMPORTANCE OF **'SOCIAL INFRASTRUCTURE'** IN PROVIDING OPPORTUNITIES FOR SOCIAL INTERACTION

ADD TO **'COMMUNITY ENGAGEMENT'**:

'...AND CAN INCLUDE FACE TO FACE, ONLINE AND VOLUNTARY SECTOR ENGAGEMENT'.

6. CONCLUSION

Age UK London has approached the draft new London plan on behalf of older Londoners and in the light of the fact that London, in common with the rest of the developed world, faces an ageing population.

Ageing is a natural process which, if we are lucky, will happen to each of us. However, for us to age well and remain active citizens (which is what London requires from us and this requirement will increase as numbers of older people grow) we will need the built environment and attendant services to accommodate and even compensate for the lack of functional capacity that our bodies will undergo.

An ageing population on the other hand, is not to do with ageing of bodies as such, but with the falling birth rate. As we approach a future when older people will outnumber the young, we need to face the fact that cities must adapt to enable older people to navigate the physical, social and economic environment with ease. The challenge is to create this with inspirational design, vibrant place-making and user-friendly dwellings, neighbourhoods and workplaces. Such an approach will serve to reduce social isolation, segregation and increase social interaction and cohesion. London will become more inclusive and accessible, providing a welcoming and usable environment.

Age UK London has prepared this response in collaboration with older people, who have generally welcomed and added to the vision set out in the Good Growth Policies. They have drilled down in detail to ensure that the policies are amended in such a way as to complement the vision and assist it to be realised. Sometimes small-word changes to a policy go a long way towards making big changes for the community.

Older Londoners are interested in London, in good, inspirational age-friendly design; in transport that meets their needs and addresses frailty. They are interested in a social infrastructure that will enable cohesive communities to flourish and individuals to be supported. As a result, they are interested in the young, and in intergenerational collaboration, not in exclusivity, and a public realm that is for all. They are interested in sufficient homes of sufficient quality to meet housing need both for themselves and for all Londoners. Most importantly, older Londoners need a degree of planning and development control. They desire to be consulted over developments that happen in their neighbourhoods and to have their views taken into account.

The numerous amendments that have been proposed, 54 in all, are consistent with these aspirations, and with those stated in the draft New London Plan. In the same way, the proposed expansion of KPIs is offered to ensure that the stated aims of the Good Growth Policies in the London Plan can be realised.

There also remains a need to develop our Community Matrix, which, by representing the complexity of strands leading to the good growth and other policies of the plan in a visually easily accessible manner, can be used as a tool to further engage older people in civic affairs.

In conclusion we are strongly supportive of the vision of the draft new London Plan which goes a long way towards making a city for all ages. But great development plans can always be improved further, and it is

hoped that weight will be put on our proposed amendments, produced with and on behalf of older people to ensure that the new London Plan will be truly in the interests of the community.

AGE UK LONDON: Gordon Deuchars Policy and Campaigns Manager

& its CONSULTANTS: Olexandra Stepaniuk, Angela Dobson, Christine Sandford & Peter Kyte

Document Issued: 1st March 2018

Appendix 1 – Consultation Event, 8 February

The aims of the day were twofold:

- 1 To understand the key issues of the new draft London Plan as they apply to older people**
- 2 To provide constructive comments to secure an age friendly London**

The consultation event was split into 4 sections:

- 1. Hopes and dreams for London - a warm up activity (SEE APPENDIX 2)**
- 2. Presentations:**
 - **An Outline of elements of The London Plan by officers at the GLA Darren Richards & Rachel Smalley:**
 - Questions and answers (SEE APPENDIX 3)**
 - **Why do we need an Age Friendly City? Talk by Olexandra Stepaniuk**
 - **How to respond to the London Plan – individually and as groups**
- 3 Participants then split into 4 smaller groups to allow the maximum amount of involvement. Engagement centred on:**
 - **Policy GG1 Building Strong and Inclusive Communities**
 - **Policy S1 Developing London’s social infrastructure**
 - **Policy S6 Public Toilets**
- 4 Participants subsequently self selected into 3 groups, to discuss the following three policy areas, again aimed at maximising individual involvement:**
 - **SD6 Town Centres**
 - **H1 & H15 Housing & Specialist Older Peoples Housing**
 - **T1 & T2 Transport and Healthy Streets**

There was also a POST EVENT QUESTIONNAIRE. This is assessed under section ?? of this report.

HOPES & DREAMS

Participants were asked at the beginning of the event to outline their hopes and dreams for London, on a post it note and stick on a blank Community Matrix. This task was an ice breaker which helped understand the aspirations of participants and to see if the broad themes of the London Plan were reflected in ordinary Londoners’ concerns and desires. See **APPENDIX 1** for the full feedback from this section.

To summarise the key themes that arose:

GOOD GROWTH

- Older people' incorporate a huge spectrum of outlook and perspectives, to some extent dependent on health and health conditions, relative mobility and economic wellbeing, not just age.

A HEALTHY CITY

- Huge support for a healthy city and reductions in pollution
- Isolation of older people at home impacts on mental health and well being, and recognition of the positive role of public housing in countering these issues.

DESIGN

- High quality design for older people.
- Include WHO Age Friendly checklist
- Integrate public toilets in designs for town centres, using walking distance radius from key transport and shopping hubs.
- Pavement safety important in terms of materials but also who is allowed on pavements (pedestrians / cyclists conflict of interest on pavement); fear of shared use.
- Dementia friendly design needed.

ECONOMY

- Concern about public funding constraints and impact on support for older people, as well as younger public sector workers.

TRANSPORT

- Much support and gratitude for the freedom pass
- Transport especially buses should be increased to local hospitals, otherwise have to increase parking at hospitals.
- Overcrowding on public transport is a disincentive to use.

HOUSING

- Desperate need for **affordable housing** for all generations
- Public housing needed as a means to meet the needs of real Londoners not luxury homes
- Opportunities for other solutions, such as co-housing.

SOCIAL INFRASTRUCTURE

- Vital role that friendly neighbourhoods play in adding enhancing people's lives
- The need for both capital funding for community facilities as well as operational funding
- More community facilities needed.

TOWN CENTRE REGENERATION

- Importance of benches to open up the public realm (especially if hilly).
- Desire for community spaces in regeneration schemes.

RESPECT & SOCIAL INCLUSION

- Need for active participation and engagement in decision-making.
- Important need for social inclusion for all ages /communities.

GLA QUESTION & ANSWER SESSION

Two officers from the GLA, Darren Richards and Rachel Smalley, gave a presentation in which they outlined the broad themes of the London Plan.

During the questioning of officers, some of the issues that emerged were not within the scope of the London Plan, however pertinent background themes emerged. These are referred to in **APPENDIX 4**.

GROUP DISCUSSIONS: THE CONSULTATION RESPONSES

POLICY GG1 – BUILDING STRONG & INCLUSIVE COMMUNITIES

- Overall this policy was perceived as positive and inspirational *'in principal brilliant'*. But:
- Need monitoring to see if goals achieved
- What is measured, monitored and reported?
- Suggested use of local people to audit the movement towards strong and inclusive communities
- Co-production of the process
- Some words quite subjective 'ease', 'confidently', 'good'
- **GG1A:** Intergenerational as well as age specific,
- **GG1B:** Ongoing maintenance perceived to be the key to creating usable spaces not just the production of spaces themselves.
- Fear of falling leads to social isolation, pavement quality important, separation of cyclists and pedestrians.
- Endorsed reduction in street clutter/ furniture to aid the blind and short sighted
- Strong desire to keep cyclists and pedestrians separate
- Build in Age Friendly resilience with dementia friendly planning
- 'B' new build developments should have diversified uses on the ground floor such as community spaces / micro business space not just mini supermarkets

- Current economic trends countering the general aims of this policy e.g. Banks closing reducing potency/vibrancy of smaller once vibrant town centres, shifting activity to larger less local centres . Closure of some chains, boarded up shops. Closure of community centres, without funding for ongoing activities. Importance of the charity sector in delivering services and activities for older people. *'I agree with all points but quality services and amenities require revenue funding – which is disappearing'*
- Desire that communities of all ages should not be separate all the time
- **GG1C:** endorse having places for people to meet
- Gardening groups using spaces outside
- Due to the weather need not only benches but areas with a roof to ensure keep dry and safe
- Dog only areas, people only areas
- Currently streets are dominated by cars, which can block the spaces for people
- Concern that public space is being privatised in new developments
- **GG1E:** have a prominent name (and importantly number) on every building to enhance legibility
- Good lighting to enhance safety
- safe and supervised spaces
- Stairwells can attract undesirables
- Flats with Concierge / manager safer
- Safety to include adequate policing of the streets to encourage people to safely spend time in public places
- **GG1F:** Use the planning system to ensure that new fitness centres accommodate people with wheelchairs and disabled people
- Other issues that emerged:
- Unwieldy nature of fire doors
- Desire for non-combustible building materials

S1 – DEVELOPING LONDON'S SOCIAL INFRASTRUCTURE

- **S1A:** Act upon assessments do not just play lip service to them
- Policies developed at the local level with high level co-production
- Ensure that consultation process on what infrastructure to keep and develop is co-production and cross generational
- Consider not just needs but current assets
- Make it easier to engage
- Diverse range of activities to interest all ages and cultural groups
- Each town should have centres/ day centres for socialising, encourage older people to attend rather than sit at home alone.
- Provision of community centres supported and funded with one body for the whole of London

- **S1B:** Encourage an age friendly environmental audit as part of the process
- **S1E:** Accessibility by car for those with limited mobility, blue badge. Ensure that the drive for a healthy London does not isolate older people with mobility issues.
- **S1F:** Time limited loss of social infrastructure, developments take so long may never live to see the infrastructure built
- Infrastructure should include Police stations as part of area resilience
- Consider changing routes to enhance the accessibility of existing places
- Meeting rooms in development plans suitable for a diverse range of activities
- Small businesses and traders that meet local needs and build social capital should be considered
- Provide exercise equipment for adults in public areas and parks, play areas for adults to help them exercise and socialise
- Review old by laws with local communities re public spaces, open spaces and parks

S6 Public Toilets

- Participants **strongly endorsed** these policies and in fact wanted them enhanced in existing developments / social assets - basic facilities such as toilets if not available increase social isolation and can keep older people indoors due to potential embarrassment and worry about being *'caught short'*, *'existing places need toilets urgently to prevent social isolation'*
- **S6A:** Some concern about 24- hour facilities which would need investment with caretakers or monitoring to avoid vandalism, drug use.
- Radar systems need to be extended
- All supermarkets should have public toilets
- All eating places should have accessible and open WC's / washing facilities
- Not limited to large developments (access so important) should be given greater priority
- Greater specifics required regards toilet numbers required
- Should demand that transport hubs provide toilets and ensure they are open to the public
- Footfall rather than type of building important
- Toilets open in parks when parks are open
- French pissourre / public urinals to cut down people/men weeing in the open / up buildings
- **S6B:** Changing places toilets excellent idea; suggestion to include changing beds
- **General :**
- Ensure good management and maintenance.
- Need to be safe and secure.
- Toilets so rare at the moment that need a map for WCs like the station
- Include gender neutral toilets
- Need to have a specific requirement for toilets within set distance from town centre

- Unsure how realistic free toilet facilities might be, important that they are maintained and clean
'The stench around some public toilets is so repugnant that it is very unhealthy to enter them to relieve oneself, so good maintenance and cleanliness of the toilets is as important as their provision'

SD6 TOWN CENTRES

- There can be an inherent conflict between the night time economy and local residents e.g. Camden residents who might feel they unfairly pay for facilities and servicing of non residents using the night time economy
- Town Centres under threat as they are drained of local facilities (e.g. banks)
- General support for high streets, shopping and community hubs
- Support for area to sit and chat(nice oasis of calm)
- Important that spaces should be safe and well managed
- **SD6A:** Provision of toilets important
- **SD6D:** Desire not to be segregated on age grounds, would like housing to include families
- Challenge of empty shops
- 'Meanwhile' uses important in ensuring vibrancy is not lost
- Encourage more independent outlets and not just the chains
- **SD6E:** Concern that changing business premises to housing is short sighted
- Employment opportunities reduced
- **SD6F:** Concern over who is funding maintenance the local residents who pay council tax or night time economy users form across borders
- Safety a concern
- Seating good as long as it does not encourage street drinking
- The types of shops as important not just betting shops and fast food take aways building in variety builds in vitality
- Encourage shutter art to avoid the dead atmosphere of closed shutters
- **SD6H:** The quality of pavements should not be underestimated; reduce the fear of falling and resultant social isolation
- Dementia friendly design (pay attention to colours , pictograms and signage)
- Including community infrastructure in the town centre including all ages enhances community cohesion
- **SD6 I & J:** Utilise the ground floor for Police stations, council offices one stop shops
- Incorporate a London Square where there is space to do so
- Include a stage, bandstand, performance space.

H1 & H15 HOUSING & SPECIALIST OLDER PEOPLES HOUSING

- **‘Housing is the priority, everyone needs a home that they can afford which is different from the GLA definition of affordable’**
- Affordable housing targets endorsed with a request that they were made more ambitious the lack of affordable housing affects Londoners of all ages
- Redefinition of affordable 35% of median income is what we should be aiming to assist
- Do we have figures for the income of OAPs in London avoid the mistake of Paris which is socially segregated with wealthy people in the centre and low income people outside in a ring

- Concerned for the level of density and desire to see ‘sky’
- Next generation post austerity will be poorer so we have to ensure sufficient low cost housing
- Deep seated concern of many regeneration projects that old community members are being ‘moved out’. This is to the benefit of developers and wealthy investors and not local communities.

SPECIALIST HOUSING

- Desire to retain guest bedrooms (for family staying or visiting / or for a live in carer)
- Desire for mixed housing young and old together
- Not everyone wants to live in sheltered housing
- *‘I don’t want to live in an institution where I have no say how it is run’*
- Need for more communal facilities
- Needs to be bottom up not top down organised, not just one ideal model
- Older people need to be involved in drafting local plans
- The emphasis must be on community facilities
- The sale of council housing should never have been allowed
- How do we allow people to stay where they are and improve the facilities this is easier and cheaper than new build
- Great concern about housing used as an investment and sold abroad and not occupied
- Desire for choice and a range of options
- Some older people want co-housing communities insert this in specialist housing
- Concern about limited lifespan of new houses, many people want to stay in their homes for life
- Endorse the idea that buildings should be thermally insulated and water usage economic
- Pensioners object to being asked to swap a family home for a bedsit or IBR

TRANSPORT – T1

- More older people in the future
- More Dial a ride facilities required
- Public transport how far can you expect people to walk? Quarter of a mile?
- Not everyone can walk cycle or use buses (ensure inclusion of those with mobility problems)
- Dial a ride needs to improve the booking system, journey allocation should be regional
- Situation varies between inner and outer London, plan perceived as more suited to inner London

OUTER LONDON

- Perception that the strategy ignores outer London boroughs and accessibility between these boroughs
- Need more public transport in outer London, cannot just discourage cars without providing replacement public transport.
- Greater connections between suburbs and outer towns
- Information at bus stops a vital resource
- Increase accessible tube stations and bus stops
- Ensure that cycling walking and public transport work together
- Outer London car dominated cycle safety an issue
- Need public transport to all hospitals as a priority

CYCLING SAFETY

- Older people might cycle more if they could go slower (not aggressive)
- Need for better cycle lane design
- No to floating bus stops perceived as a problem by pedestrians
- Stop buses at raised pavements
- Cyclists and pedestrians should have separate space. Cyclists use of pavements can be very intimidating to older people and discourage use of space that is shared

T2 HEALTHY STREETS

- Pedestrians Priority
- Conundrum how to get access for all
- Local mobility schemes
- Exceptions for buses and / or
- Buses near facilities
- We need a healthy environment
- Seating & Greenery both positive
- Coffee shops needed where you can hang out

STREET CLUTTER

- Non slip surfaces
- Contrasting colours
- Access for V1 people
- Trees
- Bins (reduce street litter)
- Toilets
- Maintenance
- Control delivery times
- Radar scheme
- Bus stops closer together (better queuing system)

POST EVENT QUESTIONNAIRE

After the engagement event a questionnaire was developed in order to test the strength of the respondent's support for some of the Mayor's policies in the London Plan. At the time of going to press 31 people had responded. The questionnaire and response can be seen in **APPENDIX 4**.

In summary:

- The Mayor wishes to build 66,000 new homes pa, of which 50% must be affordable:
- 81% of respondents agreed with the Mayor's target on affordable housing (66% agree, 15 % strongly agree).
- Indeed, there was wide support for the target on affordable housing to be increased further (81%)
- In terms of how this target would be achieved there was less unanimity:
 - 51% of respondents agreed with intensifying developing the outer London Boroughs
 - 46% disagreed with removing restrictions on density
 - Tall buildings split respondents views across the board
 - 40% of respondents agreed with building on small infill sites
- There was agreement that good design could offset the effects of intensification (48% Agree and 13% strongly agree)
- Strong support (71% Agree and 19% Agree Strongly) for the emphasis on rejuvenating high streets and town centres and stopping out of centre retail developments
- Strong support for placing sheltered housing in town centres (61% Agree and 39% Strongly Agree)
- Strong support for placing care homes in town centres (65% Agree and 32% Strongly Agree)
- Investment in social infrastructure strongly supported (58% Agree and 35% Strongly Agree)
- Strong support for identifying older people as a group with distinct needs (39% Agree and 35% strongly Agree). Age friendly design addressing dementia and mobility needs.
- Strong Agreement that the plan includes a written commitment to becoming an Age Friendly City (52% Strongly Agreeing and 42% Agree)
- Strong Agreement for a shift to walking cycling or public transport for 80% of journeys (52% strongly agree, 29% Agree). With the proviso that Public transport become more age friendly.

- When asked if you or the people you represent would be able to manage in a city where 80% of journeys by walking cycling or public transport 48% agreed 16% strongly agreed, although recognition that the policy could make the frail elderly even more isolated.

'Not all would be able access public transport. Also, if use of it increases there would need to be more accessible buses and trains etc to meet the demand. The frail elderly may be left more isolated if not confident on crowded trains/buses'

- Public Realm designed to be safe, accessible with free drinking water fountains and free public toilets strong levels of agreement (53% strongly agree, 43% agree).
- A question on increasing neighbourliness stimulated a broad response with respondents looking for a modern replacement for traditional pubs and market places that had increased neighbourliness in the past. The role of community centres and voluntary groups were valued as a means to increase connections through joint activities such as gardening, cafes etc.
- Accessibility issues were anticipated by 58% of respondents on the issue of Pedestrianisation. Pedestrianisation has to be ameliorated by:
 - Parking for those with disabilities in side streets
 - Mobility buses
 - Increase in benches
 - Well managed pavements

'a lot of pedestrian areas are reasonably accessible for cars to get disabled people near enough'

'local buses use these streets to remove them would render the streets less accessible'

‘HOPES AND DREAMS FOR LONDON’

We asked participants on entering ‘A London Plan for Older People’ event on 8th February 2018 to write their spontaneous ‘*hopes and dreams for London*’ and put them on a blank Community Matrix. This is what they wished for:

| DESIGN | GOOD GROWTH | ECONOMY |
|--|--|--|
| <p>Maximum walking distance radius to a toilet for public use.</p> <p>Ensure the WHO Age friendly checklist is incorporated into infrastructure.</p> <p>Pavement safety, wide and even Fear of Falling leads to social isolation</p> <p>Will the London Plan change with a different Mayor?</p> <p>Think about Energy Ask Conran to design for Oldies instead of hospital design</p> | <p>Healthy friendly and good growth city</p> <p>Not all ‘old’ people are frail disabled or without intelligence and working brains. An increasingly aged society will be more active and volatile.</p> | <p>Good Public sector jobs, decent pay – to provide support for the elderly (councils desperate – Northampton).</p> <p>More funding for day services</p> |

| A HEALTHY CITY | TRANSPORT & ACCESSIBILITY | HOMES |
|--|--|--|
| A healthy city | Keep the freedom pass | Affordable homes designed for a lifetimes living in. |
| Cut pollution. | Excellent freedom pass | Housing policy that works for all generations. |
| Pollution. | Improvement in transport services i.e. Dial a ride. | Homes we can all afford. |
| Cut pollution. | Increase cycle routes which feel safe for older people. | Rent reduction for over 60's. |
| Air pollution. | Parking facilities especially in hospitals where there is no direct bus routes. | Homes |
| Cut pollution, restore public health budgets, government should support local councils. | Do not cut buses (e.g. C11 serves 2 major hospitals RF & Whittington) if overloaded problems for elderly & disabled. | Affordable housing for everyone. |
| Outreach for older people stuck at home | Heavily used by elderly | Really affordable housing – suitable provision for elderly and disabled. |
| Mental health /social isolation | Direct transport routes from areas covered by local | Housing – need public housing meeting real needs of Londoners, NOT luxury homes built by Persimmon. Bovis etc. |
| Long term expenditure on community housing is cheaper in the long term as older people will be healthier & less of a cost to NHS and social houses | | |

| | | |
|--|---|--|
| <p>Stop building bicycle lanes cause pollution, are not policed pay nothing, and still ride on the pavements/jump lights seriously look at school buses.</p> <p>Priority for active travel on roads</p> <p>Stop penalising pedestrians on busy road crossings.</p> <p>Ensure new developments don't just pay lip service for cycling.</p> <p>All GLA/mayor funded large schemes should be evaluated after at least 2 years / 5 years</p> | <p>hospitals especially when parking is limited.</p> <p>Solar bins</p> <p>Safe routes for cycling & walking including lighting.</p> <p>Transport that isn't over crowded</p> <p>Public toilets in tube and train stations</p> <p>The emphasis should be on easy access to all services needed to be human.</p> <p>Does the whole of the plan think of people with Dementia</p> <p>Most shops do not have wheelchair accessibility</p> <p>Transport is the big issue in Merton (Dial a ride).</p> <p>Bikes a menace in London – 2 x this year knocked down. Do</p> | <p>Co- housing provides opportunity to remain independent and able to participate in wider community. Avoids loneliness.</p> |
|--|---|--|

| | | |
|--|--|---|
| | they have a right to pavement road and cycle lanes when it suits them? | |
| SOCIAL INFRASTRUCTURE | TOWN CENTRES & REGENERATION | RESPECT & SOCIAL INCLUSION |
| <p>Friendly neighbourhoods</p> <p>More interaction</p> <p>Talk to neighbours</p> <p>Equal participation in TV re old characters who are active / intelligent</p> <p>Better community provision – support groups struggling.</p> <p>Accessible community facilities.</p> <p>Merton is promoting Dementia friendly Borough.</p> <p>London Plan should include training to transport staff on</p> | <p>Benches for sitting up hilly areas rest needed.</p> <p>Crossing times count down. Make older people part of regeneration not separated from it.</p> <p>Better design of care homes to create spaces for reasonable craft / teaching / more.</p> <p>Some day centres in Beckenham.</p> <p>More centres for older people or coffee mornings (in Sydenham SE26, SE23, SE22 area please).</p> | <p>Older people included as active participants.</p> <p>Don't forget me all get old.</p> <p>Social inclusion for all irrespective of age.</p> <p>Social inclusion.</p> <p>Help each other.</p> <p>Loneliness – inclusion in media & cultural attitude - respect.</p> <p>Communities only exist in villages in the country.</p> <p>Multi-culturalism has killed the community.</p> |

| | | |
|--------------------------------------|--|--|
| Dementia, Autism, and Mental Health. | Why local pensioner state pensions is around £140 - £160/ week. But refugee gets £200/ week. | |
|--------------------------------------|--|--|

APPENDIX 3

**Q & A SESSION WITH GLA
8th FEBRUARY 2018**

LONDON PLAN CONSULTATION 8th FEB 2018

Q AND A SESSION

Q1. Speaker from Grenfell Group

Our group is interested in the development of multi generational community led housing. Kensington and Chelsea have very little housing. They offer older people bungalows by the seaside or housing in clusters of older people. But we want to live in mixed age communities.

£170k a year is the average income in Kensington and Chelsea. The average income in our Housing Association is £12k a year I and my friends would never be able to afford a so-called “affordable rent”. Many older people have low fixed incomes, just above benefit levels or at benefit levels. Our incomes won’t go up as rents go up. This has to be taken into account

A1. The London Plan does not set rents, although the Mayor is encouraging Local Authorities to provide housing at London Affordable Rent and London Living Rent levels.

Supplementary comment

K and C and Hammersmith have very little social housing. People on low incomes living in high income areas are going to be in trouble.

Q2: Transport

Elderly people rely on buses. The local bus service in Camden and Islington has been reduced. The buses are now so full that it is impossible for wheelchair users to get on. The bus service is very heavily used and I am concerned about continued cuts to the bus service.

A2 The London Plan’s target is for 80% of all trips to be made by walking/ cycling or by public transport There is a strong link between transport and development. Many LAs expect developers to contribute to the bus service. There is no plan by the Mayor to reduce the bus services.

Q3 C. W.: On Process

We welcome consultation. “Positive Aging” has held three events (about the London Plan) and sent in comments to the GLA and had no response. We want a response. How can we communication between our events and the GLA? There is a lot in the LP about the frail elderly. What about the fit elderly? What about people in their 50s and 60 s who are doing part time work or voluntary work? There is no mention of the Silver Economy.

Also, please note that “Positive Aging” is holding an event on 22nd February on “ Digital Inclusion for the Elderly”.

A3 All submissions will be considered by the independent panel. We do not respond to every submission individually.

Supplementary question

Will there be a feed -back meeting?

Ans. No. The panel will hold an Examination in Public of all the comments and submissions. It will then produce a report recommending changes to the plan, for the Mayor's consideration, which the Mayor can decide to accept or reject.

Q4 C. V. from The Aylesbury Estate.

The regeneration of the Aylesbury estate is a disaster for the residents. They are knocking down the properties and moving us out of homes where we have lived all our lives (myself for 46 years) and moving us we don't know where, to places at double the rent we currently pay. We had it so good in the 60s. Now we don't know where we are going.

A4 The policy on Estate Regeneration says that when residents are moved, they must be offered "like for like" : properties with similar rent levels and similar tenure. The Mayor does not redevelop estates. Local Authorities do. But if the Mayor is partly funding the regeneration he can influence what is done.

Q5 Resident from Lewisham

I don't see any robust data such as a detailed examination of transport usage by age, competency *and* mobility. All the data I have seen has been very crude. It is not enough to say "the over 65s" or "the over 85s" use transport in such and such a way. You have to look at their cognitive and physical abilities as well. What state are the 70 yr olds that the plan mentions, in? The whole Transport section seems to be built on unsubstantiated projections. If you have data, show us where it is.

A5 Talk to Transport for London

Q6 M. B.

This Plan is all about new build. There is nothing requiring WCs to be installed or replaced in *current* shopping centres.

A6 That is true. The plan only relates to new build where planning applications have to be submitted for new developments. However it is possible to go to original planning permission for existing development to see if there are conditions that can be enforced.

Q7 E C Age UK London

How will the feed -back that we are giving be used? How are older people represented in the Inspectorate, and in the staffing of the Mayor's office.

(note taker's comment: do they mean the independent panel holding the Examination in Public mentioned on page 8 of the Plan

A7 The ages of the staff in the Mayor's office are not relevant. The Inspectorate is independent of both the Mayor and the Government.

In terms of preparing the Plan, we started with the original vision groups. We tried to get these groups to be representative of the communities in London. We also drew on the experience of specialist groups.

Q8 N. P from Barnet

What about developments which are half way through? In Barnet they said that no new high rises would be built. Now there are loads of very high high- rises going up. The developers get planning permission based on one set of proposals. Then in phase two they change things: they say they cannot include as much affordable housing as they originally said. And they get away with it!

A8 The Mayor expects developers to provide 35% affordable housing. The London Plan applies to *new* applications and plans. Properties being built *now* are not bound by the London Plan. This is the first time we have Fire Safety in the London Plan.

Q9 L B from Kensington and Chelsea.

I thought this event was about older people. Is it just about buildings?

A9 It applies to anything which requires a planning application.

Supplementary question

Loneliness and isolation are problems for older people. They feel unappreciated: that they are being put out with the dustbins. Are there any plans for cultural change for older people? The Council is great at sending carers to the home to care for our physical needs. But we need support in the home to use IT.

Ans. The plan just deals with land use, but it does protect cultural buildings.

Supplementary question

Is there a vision for older people?

Ans. There is the Mayor's Health Strategy and the Mayor's Cultural Strategy.

Supplementary Comment

We need an Older Persons' Strategy. We, older people with Age UK London, could write it.

Q10 London is over populated. We are in a mess now. Stations are overcrowded. We need an age-friendly city. Do we really need more growth? Maybe the population will reduce if Europeans do not continue to come after Brexit.

A10 The Plan is to manage the growing population. London is very attractive and will always attract new people. The Strategic Housing Market Assessment has identified a need for 66k additional homes a year. The Plan is about how we meet that need.

Q11 Speaker from the Mental Health Foundation

My question is about the consultation process. This room feels like “ us and them”. Can there be any co-production of policies?

A11 We are following a statutory process. At the beginning we did have events with stakeholders. We spent 18 months producing the plan and we involved the stakeholders in it. But it is up to the Mayor what goes in the plan.

Q12 It seems to me that there is a mismatch in the room:

You are here for a London Plan for land.

We are here for a London Plan for older people.

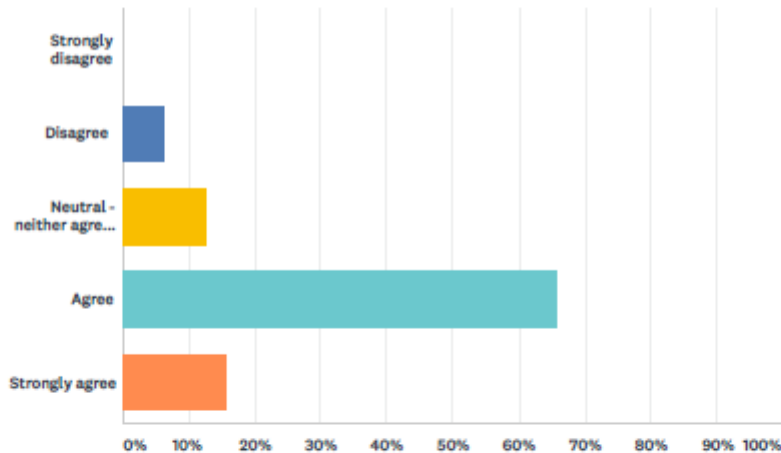
A12 We will look at how specific policies can be improved

APPENDIX 4

POST EVENT QUESTIONNAIRE – A LONDON PLAN FOR OLDER PEOPLE

Q1 The Mayor wishes to build 66,000 new homes per year for the next ten years. Of these, 50% must be affordable, (affordable is defined below *) 4,000 are sheltered homes for older people and 10% of the total must be suitable for wheelchair users. All new homes should be designed to meet the changing needs of Londoners as they age. Do you agree with the proposals? * Affordable has three categories % in brackets indicates their proportion of the total -social rented – lowest rent (30%) - affordable no more than 80% of market rents (40%) - intermediate i.e. shared ownership and low- cost homes for sale and intermediate rent, higher than low cost but lower than 'affordable' ineligible for housing benefit (30%)

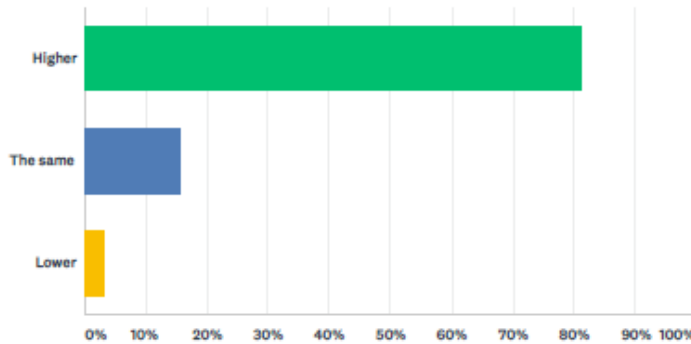
Answered: 32 Skipped: 0



| ANSWER CHOICES | RESPONSES | |
|--------------------------------------|-----------|-----------|
| Strongly disagree | 0.00% | 0 |
| Disagree | 6.25% | 2 |
| Neutral - neither agree nor disagree | 12.50% | 4 |
| Agree | 65.63% | 21 |
| Strongly agree | 15.63% | 5 |
| TOTAL | | 32 |

Q2 Do you think that the proportion of affordable housing should be:

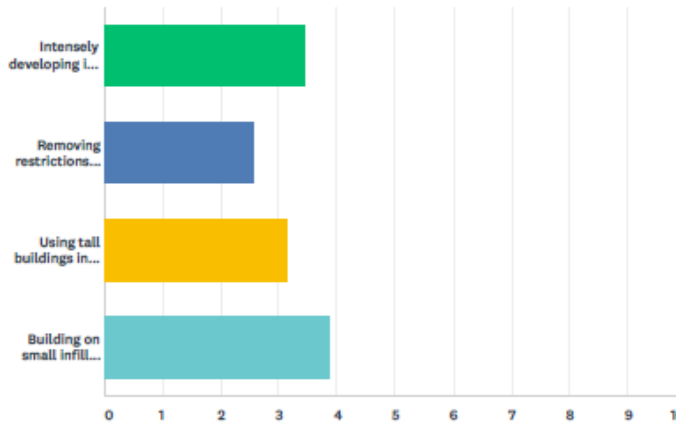
Answered: 32 Skipped: 0



| ANSWER CHOICES | RESPONSES |
|----------------|-----------|
| Higher | 81.25% 26 |
| The same | 15.63% 5 |
| Lower | 3.13% 1 |
| TOTAL | 32 |

Q3 The Mayor hopes to achieve these numbers by various means - what do you think of each?

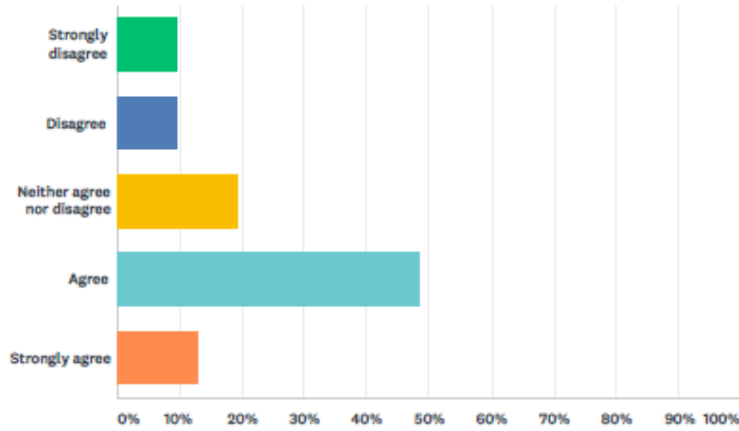
Answered: 31 Skipped: 1



| | STRONGLY DISAGREE | DISAGREE | NEUTRAL | AGREE | STRONGLY AGREE | TOTAL | WEIGHTED AVERAGE |
|---|-------------------|--------------|-------------|--------------|----------------|-------|------------------|
| Intensely developing in the suburbs (the Outer London boroughs) | 3.23% 1 | 12.90% 4 | 25.81% 8 | 51.61% 16 | 6.45% 2 | 31 | 3.45 |
| Removing restrictions on density | 16.67% 5 | 46.67% 14 | 10.00% 3 | 16.67% 5 | 10.00% 3 | 30 | 2.57 |
| Using tall buildings in certain circumstances | 9.68% 3 | 19.35% 6 | 29.03% 9 | 29.03% 9 | 12.90% 4 | 31 | 3.16 |
| Building on small infill sites | 0.00% 0 | 6.67% 2 | 26.67% 8 | 40.00% 12 | 26.67% 8 | 30 | 3.87 |

Q4 The Mayor believes that good design will offset the effects of intensification

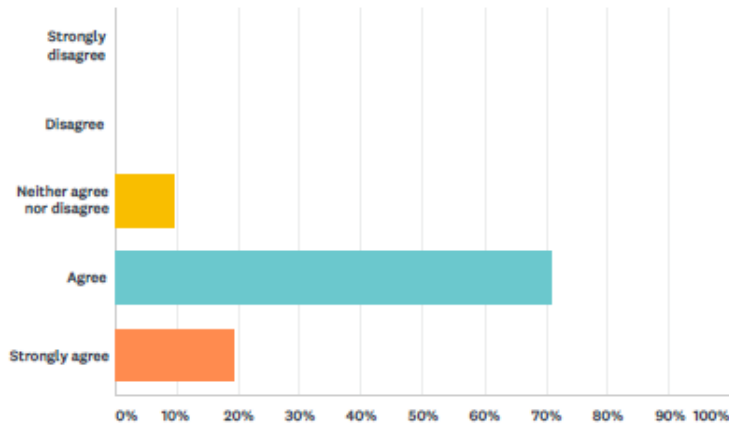
Answered: 31 Skipped: 1



| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|-----------|
| Strongly disagree | 9.68% | 3 |
| Disagree | 9.68% | 3 |
| Neither agree nor disagree | 19.35% | 6 |
| Agree | 48.39% | 15 |
| Strongly agree | 12.90% | 4 |
| TOTAL | | 31 |

Q5 The Mayor wishes to rejuvenate High Streets and Town Centres, placing a stop on out of centre retail developments.

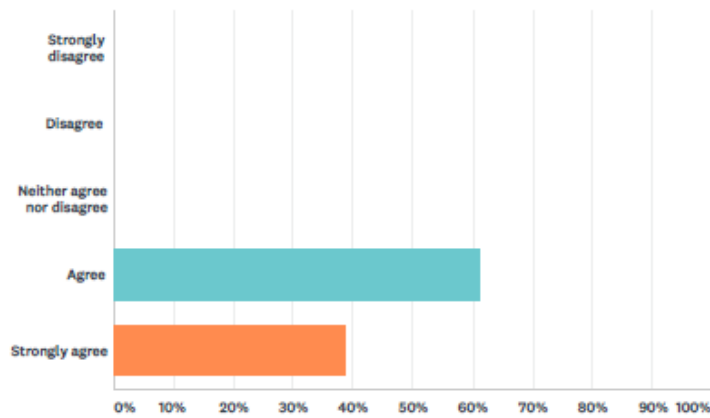
Answered: 31 Skipped: 1



| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|-----------|
| Strongly disagree | 0.00% | 0 |
| Disagree | 0.00% | 0 |
| Neither agree nor disagree | 9.68% | 3 |
| Agree | 70.97% | 22 |
| Strongly agree | 19.35% | 6 |
| TOTAL | | 31 |

Q6 The Mayor wishes to build sheltered housing in town centres, insulated against noise near to shops, services, health facilities, recreation and public transport

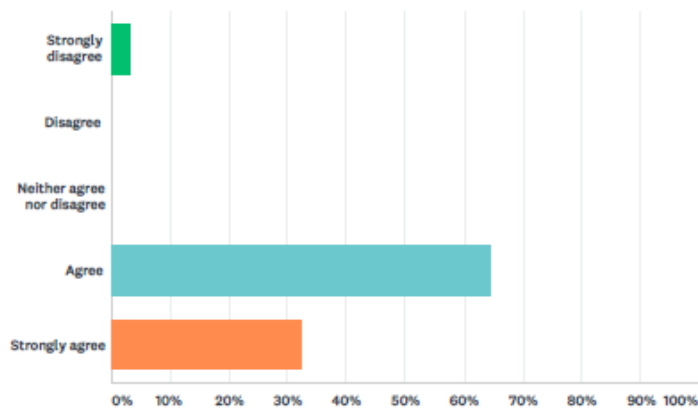
Answered: 31 Skipped: 1



| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|-----------|
| Strongly disagree | 0.00% | 0 |
| Disagree | 0.00% | 0 |
| Neither agree nor disagree | 0.00% | 0 |
| Agree | 61.29% | 19 |
| Strongly agree | 38.71% | 12 |
| TOTAL | | 31 |

Q7 The Mayor wishes to build care homes in town centres near to shops health and other facilities and public transport (insulated against noise)

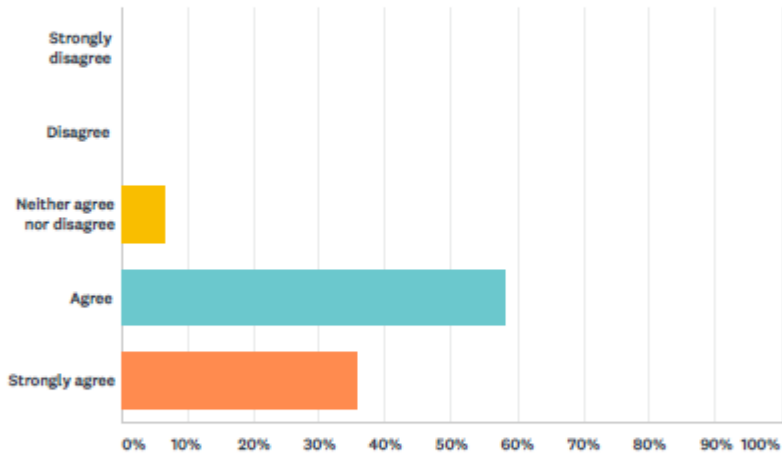
Answered: 31 Skipped: 1



| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|-----------|
| Strongly disagree | 3.23% | 1 |
| Disagree | 0.00% | 0 |
| Neither agree nor disagree | 0.00% | 0 |
| Agree | 64.52% | 20 |
| Strongly agree | 32.26% | 10 |
| TOTAL | | 31 |

Q8 Investment in Social Infrastructure*. The mayor wishes to build 'strong and inclusive communities.' To do this he wishes to give priority to those developments that make the best use of land and those that provide high quality social infrastructure. The plan states that Social Infrastructure covers a range of structure and facilities that meet local and strategic needs and cover health provision, education, community, play, youth, recreation, sports faith and emergency facilities

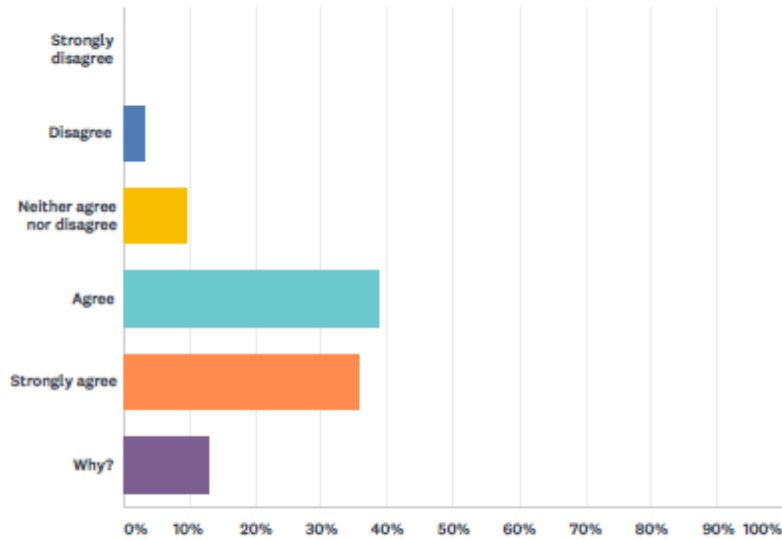
Answered: 31 Skipped: 1



| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|-----------|
| Strongly disagree | 0.00% | 0 |
| Disagree | 0.00% | 0 |
| Neither agree nor disagree | 6.45% | 2 |
| Agree | 58.06% | 18 |
| Strongly agree | 35.48% | 11 |
| TOTAL | | 31 |

Q9 In the Draft New London Plan within the description of social infrastructure, older people are not identified as a group with distinct needs. Should older people be included as having distinct needs in this section?

Answered: 31 Skipped: 1

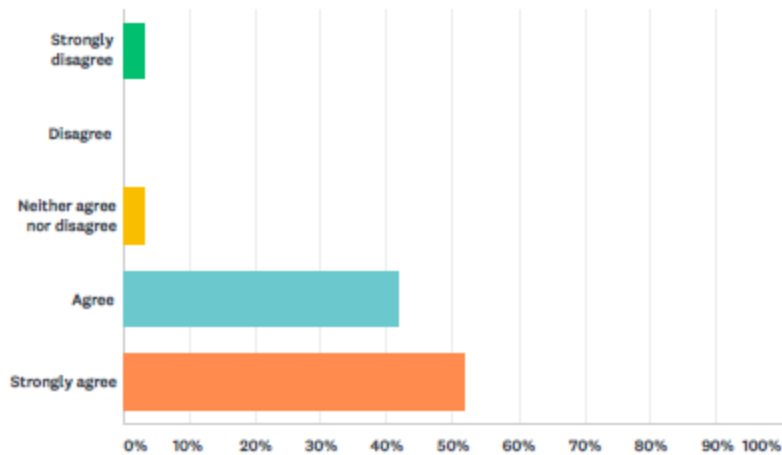


| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|-----------|
| Strongly disagree | 0.00% | 0 |
| Disagree | 3.23% | 1 |
| Neither agree nor disagree | 9.68% | 3 |
| Agree | 38.71% | 12 |
| Strongly agree | 35.48% | 11 |
| Why? | 12.90% | 4 |
| TOTAL | | 31 |

| # | WHY? | DATE |
|---|---|--------------------|
| 1 | All ages may have distinct needs. How needs are responded to and the resources to do so is the issue. | 2/23/2018 9:43 AM |
| 2 | Older people with mobility issues need assistance and proximity to health and care services, as well as accessible housing and support | 2/21/2018 12:41 PM |
| 3 | Age friendly design is good design. Must also take account of growing numbers of people with dementia, people with disabilities living longer apart from any moral imperative | 2/20/2018 10:34 AM |
| 4 | We are all equal. | 2/19/2018 5:31 PM |

Q10 Should the plan include a written commitment to becoming an Age Friendly City?"to be sustainable cities must provide the structure and services to support their residents' wellbeing and productivity. Older people, in particular, require supportive and enabling living environments to compensate for physical and social changes associated with ageing." Global Age-friendly Cities: A Guide World Health Organisation 2007

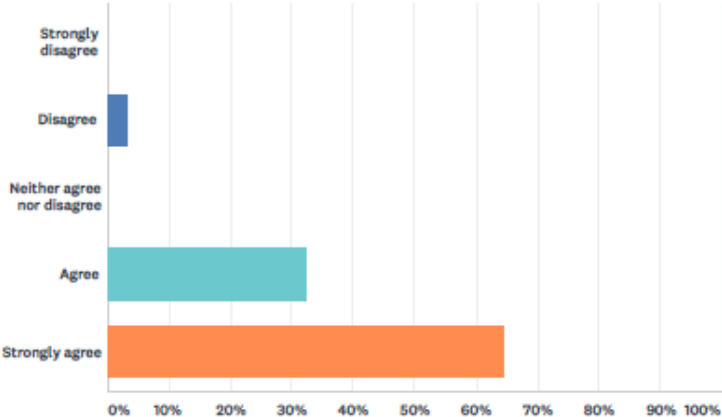
Answered: 31 Skipped: 1



| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|-----------|
| Strongly disagree | 3.23% | 1 |
| Disagree | 0.00% | 0 |
| Neither agree nor disagree | 3.23% | 1 |
| Agree | 41.94% | 13 |
| Strongly agree | 51.61% | 16 |
| TOTAL | | 31 |

Q11 1 Consultation and Engagement Should the draft new London Plan contain a policy on community engagement to enable older people and others to have a voice in developments that concern them?

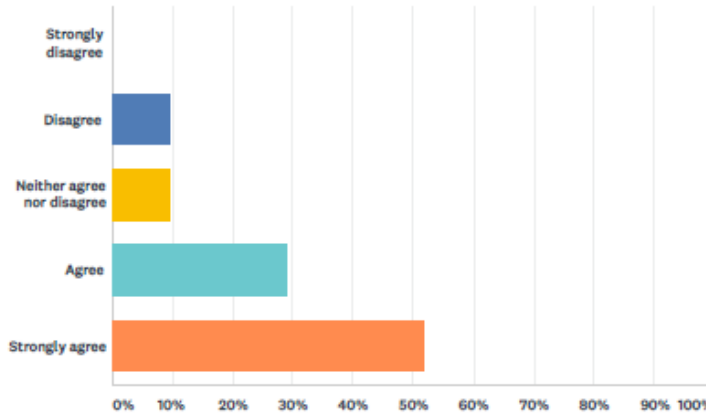
Answered: 31 Skipped: 1



| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|-----------|
| Strongly disagree | 0.00% | 0 |
| Disagree | 3.23% | 1 |
| Neither agree nor disagree | 0.00% | 0 |
| Agree | 32.26% | 10 |
| Strongly agree | 64.52% | 20 |
| TOTAL | | 31 |

Q12 Transport The Mayor wishes 80% of journeys to be by walking, cycling or public transport by 2041

Answered: 31 Skipped: 1

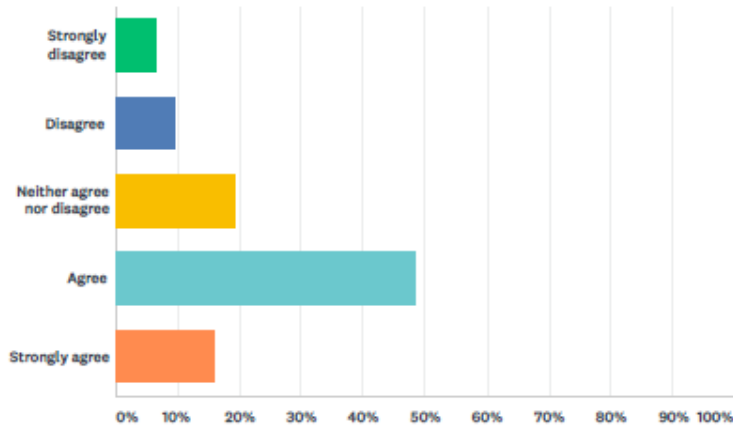


| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|----|
| Strongly disagree | 0.00% | 0 |
| Disagree | 9.68% | 3 |
| Neither agree nor disagree | 9.68% | 3 |
| Agree | 29.03% | 9 |
| Strongly agree | 51.61% | 16 |
| TOTAL | | 31 |

| # | DO YOU HAVE ANY COMMENTS? | DATE |
|----|--|--------------------|
| 1 | As long as good provision is made for all groups not so mobile. ie drop off points at stations should be planned. | 2/23/2018 9:54 AM |
| 2 | As an 80-year old I am in support anything which betters our lot, particularly where London Underground and Overground as well as National rail are concerned. However, us older citizens must always remember there are other age groups who have their own needs. | 2/23/2018 9:52 AM |
| 3 | Accessible and affordable and safe | 2/23/2018 9:43 AM |
| 4 | Walking should be actively encouraged | 2/22/2018 8:25 PM |
| 5 | Improved public transport is a benefit to all and reduces the need for car transport | 2/21/2018 12:41 PM |
| 6 | People with mobility issues (minor or major) Families and weather conditions; shopping etc | 2/20/2018 10:02 PM |
| 7 | Private car-use needs discouraging - London is choking to death and it takes ages to move along the roads, even on a bus. Financial penalties the only way + perhaps alternate day car use by reg plate - as long as disabled people are exempted. | 2/20/2018 5:34 PM |
| 8 | 80% is a too high figure. Should be reasonable as older people and disable groups might find this too much for them. | 2/20/2018 4:52 PM |
| 9 | no | 2/20/2018 1:40 PM |
| 10 | this can only happen if public transport is accessible and affordable. Must keep Freedom Pass | 2/20/2018 10:34 AM |
| 11 | until you get bikes off the pavements and bus drivers to pull into the curb, any more bikes on the road will be just more dangerous than it is now | 2/19/2018 6:25 PM |
| 12 | No more pandering to bicycles unless they start paying. | 2/19/2018 5:31 PM |
| 13 | For the 20% who have a disability and must use a vehicle, there must be user friendly provision, e.g. parking, access etc. | 2/19/2018 5:25 PM |
| 14 | 1)private cars usage encourage the drivers to become criminals e.g. mobile phone use, speeding, dangerous, angry behaviour 2)poison the air we breathe and cause adverse climate change 3)huge cost to NHS, police, road maintenance 4)thousands of UK deaths annually (over 40million globally since cars invented) | 2/19/2018 3:49 PM |

Q13 Would you or the people you represent be able to manage in a city where 80% of journeys will be by walking cycling or public transport?

Answered: 31 Skipped: 1

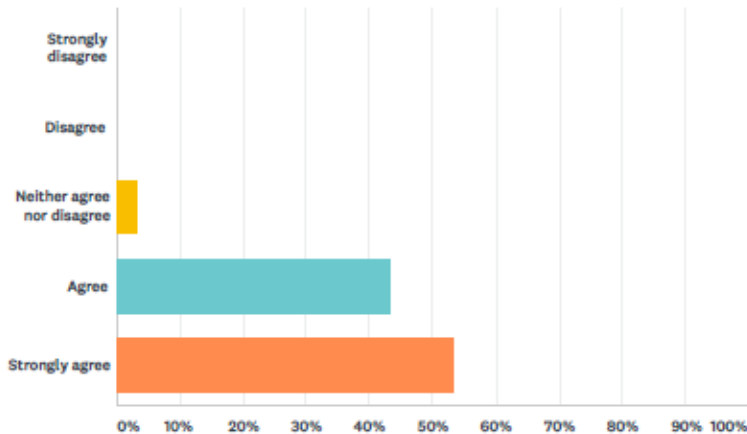


| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|----|
| Strongly disagree | 6.45% | 2 |
| Disagree | 9.68% | 3 |
| Neither agree nor disagree | 19.35% | 6 |
| Agree | 48.39% | 15 |
| Strongly agree | 16.13% | 5 |
| TOTAL | | 31 |

| # | WHY? | DATE |
|----|--|--------------------|
| 1 | Fairer for older people, so long as public transport is properly financed | 2/25/2018 7:51 AM |
| 2 | Not all would be able to access public transport. Also if use of it increases there would need to be more accessible buses and trains etc to meet the demand. The frail elderly may be left more isolated if not confident on crowded trains/buses | 2/23/2018 9:54 AM |
| 3 | I am still able to walk up to 3 or 4 miles, which I often need to do when a bus fails to arrive. I no longer drive a car or motorcycle so am already walking and depending on public transport. A journey takes two or three times the time and if loaded with shopping bags public transport is not the easiest way home. | 2/23/2018 9:52 AM |
| 4 | 80% target will rely on the range of public transport available being accessible to folk with mobility issues. | 2/23/2018 9:43 AM |
| 5 | Where I live there is adequate public transport, especially into London - but it does depend where one is journeying to | 2/22/2018 9:50 PM |
| 6 | it's good that walking and use of public transport should be encouraged | 2/22/2018 8:25 PM |
| 7 | I/we already do | 2/21/2018 12:41 PM |
| 8 | Walking, cycling & public transport is what I mostly do now. There is a need for more small runaround buses that could, perhaps, be asked to stop/ collect anywhere - only possible if private car use is restricted | 2/20/2018 5:34 PM |
| 9 | Again older and disable groups have been ignored. Most of them are not able to walk or cycle and some do not feel safe travelling by public transport. | 2/20/2018 4:52 PM |
| 10 | Lees Trafick | 2/20/2018 1:40 PM |
| 11 | Yes but only if additional factors such as places to sit and rest, better provision of public toilets, clearer signage | 2/20/2018 10:34 AM |
| 12 | see ANSWER TO Q 12 | 2/19/2018 6:25 PM |
| 13 | Have a Freedom Pass and can still walk. | 2/19/2018 5:31 PM |
| 14 | For reasons above. Will manage only if there is adequate provision of user friendly accessible facilities for disabled and elderly people | 2/19/2018 5:25 PM |
| 15 | Because giving up driving by then | 2/19/2018 5:05 PM |
| 16 | mobility problems associated with ageing so walking and cycling may be difficult and public transport would need to be adapted for their needs. However this would assist disabled people and those with children so potentially a win for all if investment was sufficient | 2/19/2018 3:49 PM |
| 17 | I don't know enough about these people | 2/19/2018 3:34 PM |

Q14 PUBLIC REALMpublicly accessible space between buildings including alleys, streets, squares, open squares and some internal or elevated spaces.....The Mayor wants a public realm that is designed to be safe, accessible, inclusive attractive and well connected, easy to understand and maintain with free drinking water fountains and with free public toilets.**

Answered: 30 Skipped: 2



| ANSWER CHOICES | RESPONSES | |
|----------------------------|-----------|-----------|
| Strongly disagree | 0.00% | 0 |
| Disagree | 0.00% | 0 |
| Neither agree nor disagree | 3.33% | 1 |
| Agree | 43.33% | 13 |
| Strongly agree | 53.33% | 16 |
| TOTAL | | 30 |

| # | DO YOU HAVE ANY COMMENTS? | DATE |
|----|---|--------------------|
| 1 | Wonderful idea but this is quite an alien concept to most Britons - we have had the facilities in the past and they have invariably been subject to damage to the point of destruction. | 2/23/2018 9:52 AM |
| 2 | Access to safe, clean public toilets is crucial. | 2/23/2018 9:43 AM |
| 3 | This would allow everybody regardless of age to go out and move around freely. | 2/23/2018 12:08 AM |
| 4 | places where people can meet are vital in community building | 2/21/2018 12:41 PM |
| 5 | Far more sitting places needed for older people on the street, tube stations, bus stops etc - plus education of the young to refrain from monopolising them. | 2/20/2018 5:34 PM |
| 6 | Disagree with free public toilets as these may be abused. | 2/20/2018 4:52 PM |
| 7 | especially the toilets! | 2/20/2018 10:34 AM |
| 8 | The drinking fountains are vital. We had them in years gone by | 2/19/2018 5:05 PM |
| 9 | Both the fountains and toilets would have to be maintained at a very high level an local authorities are cash poor now. Where will the money come from? | 2/19/2018 3:49 PM |
| 10 | Sounds good | 2/19/2018 3:34 PM |

Q15 How, in your opinion, can neighbourliness be encouraged in the public realm?

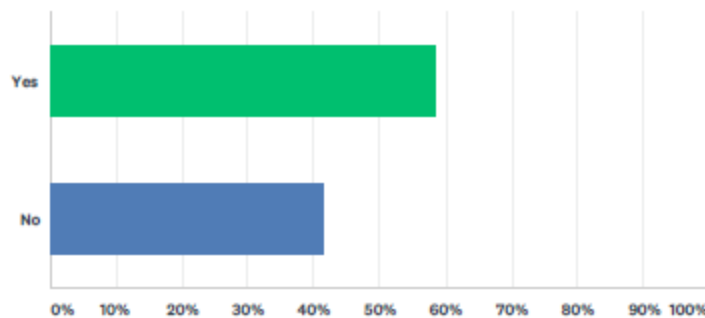
Answered: 28 Skipped: 4

| # | RESPONSES | DATE |
|----|--|--------------------|
| 1 | Make life fairer | 2/25/2018 7:51 AM |
| 2 | Encourage residents' and interest groups. Good planning. Do not destroy or blight areas which have a strong community feeling by imposing large structures especially very tall tower blocks. | 2/23/2018 9:54 AM |
| 3 | Difficult to say, different generations have different attitudes. In our block, 43-73 Codrington Hill, during much of the past 45 years we have had a very good community spirit. However, some of our older neighbours have passed on or moved on, and the younger generation which has moved in in their place doesn't seem to have the same spirit of neighbourliness. In time, all these houses will be occupied by a younger generation, who will, no doubt, develop their own bond of neighbourliness. | 2/23/2018 9:52 AM |
| 4 | Evolving a modern replacement for the traditional market places and pubs. Something you do not have to 'join'. | 2/23/2018 9:43 AM |
| 5 | more access to front gardens, or equivalent spaces. | 2/23/2018 12:08 AM |
| 6 | Ensuring that there is a balance between private and communal space; presence of cafes, pubs etc where people can meet | 2/22/2018 9:50 PM |
| 7 | Provide opportunities for people to engage in public enterprises ie gardening in public parks , allotments, arts and leisure with mentors or enablers , champions. | 2/22/2018 8:31 PM |
| 8 | Community centres with coffee and lunch etc at reasonable cost. Might it be possible to have community centres where the old and young can meet and talk together? | 2/22/2018 8:25 PM |
| 9 | MAKE SURVEYS | 2/22/2018 8:26 AM |
| 10 | events, seating, pleasant cared for areas - but ensuring they ARE cared for and not left to become a mess - which has the adverse effect | 2/21/2018 12:41 PM |
| 11 | By having housing near to younger people | 2/21/2018 8:31 AM |
| 12 | Street Parties Community coming together for events arranged via LA and residents | 2/20/2018 10:02 PM |
| 13 | Identifying smaller areas to be considered as a neighbourhood, at a scale where people can get to know or at least recognise each other. The Nextdoor internet network is helping. How about one day a month 'call on a neighbour you don't know' event? | 2/20/2018 5:34 PM |
| 14 | Shared activity- e.g. communal gardening,discussion on topics of common interest,learning and celebration | 2/20/2018 5:27 PM |
| 15 | Encourage them to be kind and polite to one another. respect others no matter what their colour creed, race or religion may be. | 2/20/2018 4:52 PM |
| 16 | Having discussions and letting the public be aware | 2/20/2018 1:40 PM |
| 17 | Community and public spaces, build up local shopping areas and not big malls or out of town facilities. Support for community organisations and for volunteering | 2/20/2018 10:34 AM |
| 18 | Y making all areas feel safe. This is different from making all areas safe impossible unless we have security at every corner | 2/19/2018 6:36 PM |
| 19 | good seating and good lighting | 2/19/2018 6:25 PM |
| 20 | With great difficulty. | 2/19/2018 5:31 PM |
| 21 | Good permanent management, to encourage use fairly and to ensure safety and security. Not a free for all. | 2/19/2018 5:25 PM |
| 22 | local shops | 2/19/2018 5:05 PM |

| | | |
|----|---|-------------------|
| 23 | play streets, seating on streets open space for collective activities that will be properly supervised to avoid being havens of anti-social behaviour. Commitment to use of space for community activities. | 2/19/2018 4:55 PM |
| 24 | Start with children as early as possible and have effective sanctions on unsocial behaviour | 2/19/2018 3:49 PM |
| 25 | campaigning in media | 2/19/2018 3:49 PM |
| 26 | Better housing design, enabling more neighbourliness | 2/19/2018 3:35 PM |
| 27 | By arranging informal social meetings | 2/19/2018 3:34 PM |
| 28 | Community centres -mutlgeneration use, safe public places | 2/19/2018 3:21 PM |

Q16 Pedestrianisation and Healthy Streets To reduce air pollution and increase more active travel the Mayor seeks to encourage pedestrianisation by making certain streets entirely free of traffic, including buses. Oxford Street is one example . Would this create accessibility issues for you or people you represent?

Answered: 29 Skipped: 3



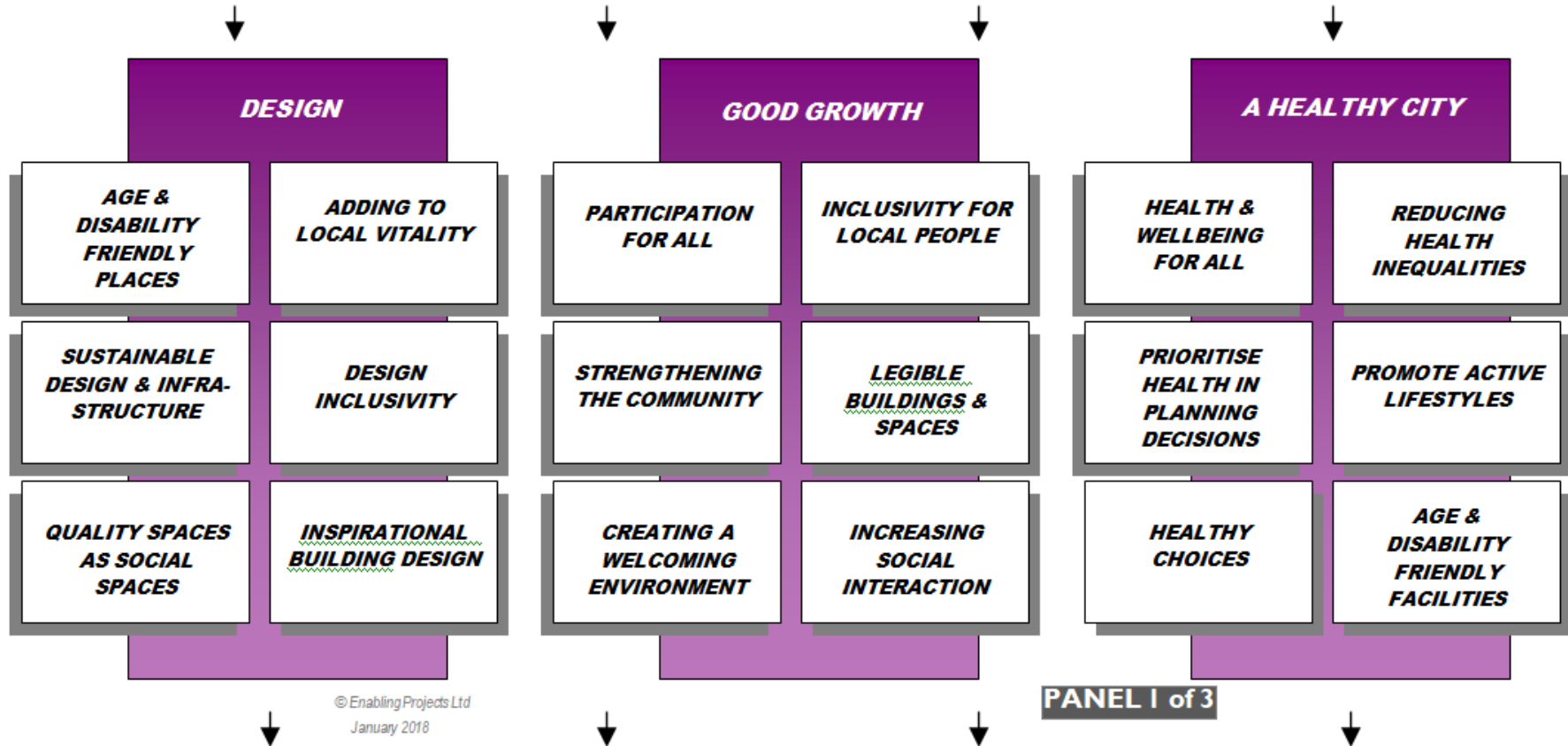
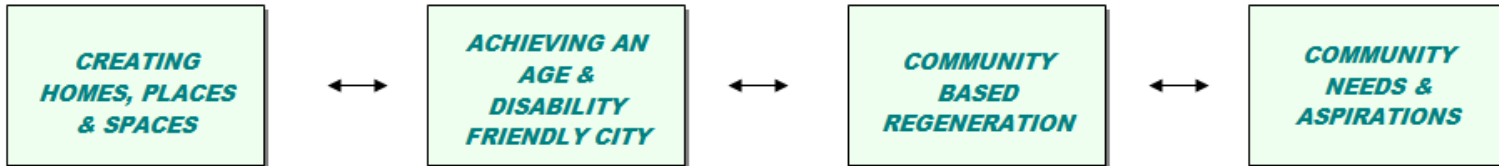
| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-----------|
| Yes | 58.62% | 17 |
| No | 41.38% | 12 |
| TOTAL | | 29 |

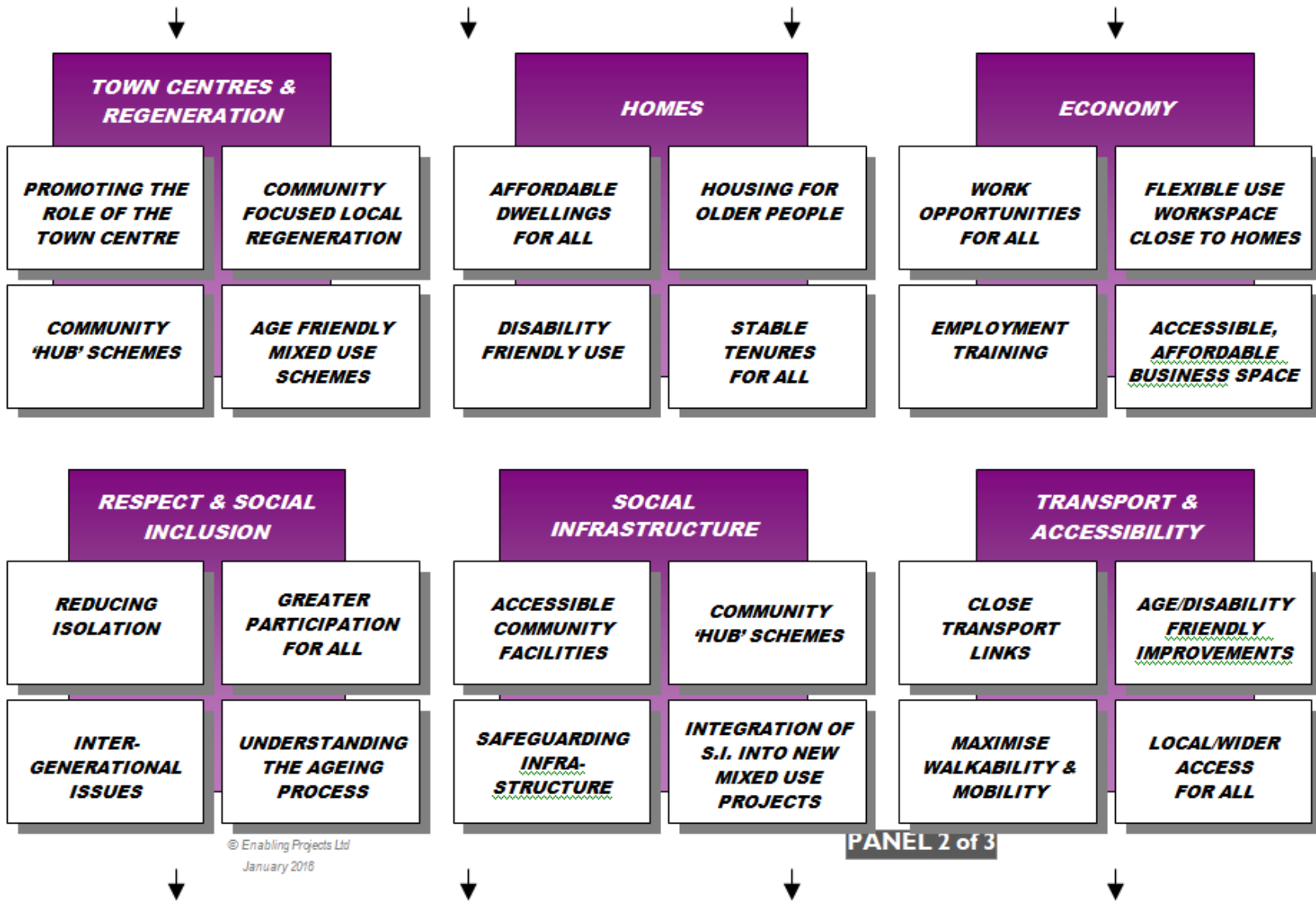
| # | WHY? | DATE |
|----|---|--------------------|
| 1 | Many people unable to walk long distances. Even those that can must have smooth flat surfaces to ensure no falls etc | 2/23/2018 9:54 AM |
| 2 | Local buses use these streets, to remove them will render the streets less accessible to the elderly, the less able and parents with children in buggies. If it means that cycles will also be prohibited, the let's get started! | 2/23/2018 9:52 AM |
| 3 | Not if public transport is adequate. | 2/23/2018 9:43 AM |
| 4 | over half a mile between u/g stations, no benches. | 2/23/2018 12:08 AM |
| 5 | I am fit enough - but some people would have a problem | 2/22/2018 9:50 PM |
| 6 | OLD AND HANDYCAPED PEOPLE NEED WHEEL TRANSPORT | 2/22/2018 8:26 AM |
| 7 | older people with mobility issues would not be able to access the services provided unless some form of mobility transport was provided | 2/21/2018 12:41 PM |
| 8 | My partner is a paraplegic, wheelchair user. I would welcome Oxford St pedestrianisation as long as more disabled car parking spaces are supplied in the side streets. There are far too few. She has to drive around for ages sometimes waiting for a place to be vacated. | 2/20/2018 5:34 PM |
| 9 | Agre,but need to have resting places,seats under shelter etc, well managed pavements- possible opportunity to hire buggies for those with walking problems | 2/20/2018 5:27 PM |
| 10 | It may create accessibility problems to older & disable groups with shopping etc. I e places like Oxford Street. | 2/20/2018 4:52 PM |
| 11 | Although desirable, access can be difficult for people with disabilities -maybe allow access for cars or taxis carrying older/disabled people | 2/20/2018 10:34 AM |
| 12 | Oxford Street is quite a long street. | 2/19/2018 5:31 PM |
| 13 | As before, must have provision for disabled and elderly people who must use a vehicle. | 2/19/2018 5:25 PM |
| 14 | The fumes going from shop to shop are crippling | 2/19/2018 5:05 PM |
| 15 | See previous answer on mobility | 2/19/2018 3:49 PM |
| 16 | Oxford Street is a shopping street. It needs transport of some kind. It is much too long for us to walk along, esp if we are carrying stuff we have bought. | 2/19/2018 3:34 PM |
| 17 | Not sure - it depends - lots of ped areas are reasonably accessible for cars to get disabled people near enough. | 2/19/2018 3:02 PM |

APPENDIX 5

THE COMMUNITY MATRIX

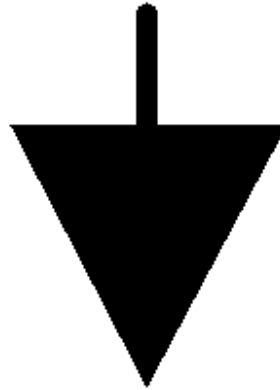
AN AGE & DISABILITY FRIENDLY COMMUNITY MATRIX





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January 2018

PANEL 2 of 3



**CREATING A
HEALTHY,
'FRIENDLY',
'GOOD GROWTH'
CITY**

**BUILDING STRONG
AND INCLUSIVE
COMMUNITIES**

**STRONGER SOCIAL
INFRASTRUCTURE
AS AN ELEMENT OF
GOOD GROWTH**

**GROWING A GOOD
ECONOMY**

**A MORE
PARTICIPATORY
COMMUNITY**

**MAKING THE BEST
USE OF LAND**

**DELIVERING HOMES
FOR ALL
LONDONERS**

**INCREASING
EFFICIENCY AND
RESILIENCE**

Age UK London - a charity working with older Londoners

comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

When setting up the account to comment on the draft Plan, I was shocked that the categories I had to choose among to include myself in did not include voluntary or community organisations or any similar grouping. This suggests a lack of awareness of the importance of communities and the voluntary sector to the range of issues covered by the Plan.

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [N/A](#)

Policy GG1 Includes:

'It [London] is home to an ageing population, with more and more people facing the barriers that already prevent many from participating fully in their communities'. (Para. 1.1.3.)

The policy commendably mentions at CG1(B) the need to encourage and strengthen communities, including issues of active participation and social integration, as well as addressing social isolation. The issue of 'creating places where everyone is welcome' (CG1(C)) is also included. CG1(F) also refers to older people, disabled people and younger people too, thus referring to intergenerational issues and the recognition that an age friendly city is for all ages, not just older people.

A number of amendments to GG1 are proposed, to refer to Age Friendly issues, maintenance issues, safety and security and to the idea of 'inspirational design'. The need to address social isolation is also brought into the GG policies.

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [N/A](#)

POLICY GG1 BUILDING STRONG AND INCLUSIVE COMMUNITIES

To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities FOR ALL AGES, those involved in planning and development must:

A Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, and more-equal AND AGE FRIENDLY city.

C Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places AND SPACES where everyone is welcome, WHICH ARE WELL MAINTAINED, which foster a sense of belonging and community ownership, and where communities can develop and flourish.

E Ensure that new, EXTENDED AND REFURBISHED buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements-NEEDS.

F Support the creation of a SAFE, SECURE AND WELL MANAGED CITY where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently and with choice and dignity, avoiding separation, or segregation AND SOCIAL ISOLATION.

G: ADD Criterion: SEEK INSPIRATIONAL DESIGN AND VIBRANT PLACEMAKING IN ALL DEVELOPMENT PROPOSALS.

H: Add Criterion: PURSUE THOROUGH AND EFFECTIVE COMMUNITY ENGAGEMENT AT ALL STAGES OF THE PLANNING PROCESS, INCLUDING AT PRE-APPLICATION STAGE, AND DEMONSTRATE TO THE LOCAL PLANNING AUTHORITY THAT A PROACTIVE RESPONSE TO CONSULTATIONS HAS BEEN MADE.

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [N/A](#)

EVIDENCE TO SUPPORT PROPOSED POLICY AMENDMENT TO GG1:

[LINK TO POLICY CHANGE](#)

1. GG1A Demographics In the UK the projected number of people aged 65 and over is projected to rise from 9.7 million in 2015 to 14.5 million in 2035, an increase of 49%. Those aged 85 and over are projected to rise faster during this period, by over 122% from 1.3 million in 2015 to 2.9 million in 2035 - much of this increase is due to a rise in male life expectancy. It is also expected that the number of people unable to perform one activity of daily living (ADL) will rise by 65% between 2015 and 2035 from around 2.9 million to 4.8 million. Those with more severe disabilities are likely to increase by 74% from 1.15 million in 2015 to 2.0 million in 2035. The GLA's own intelligence unit is aware that there will be over 750,000 Londoners aged over 75 in 2031, an increase of 290,000 from 2015. (GLA Intelligence Unit, 2016). Accompanying this increase will be a rise in Londoners experiencing a long-term health condition or disability. Currently, 37% of Londoners over the age of 65 report disability, accounting for 45% of disabled London residents (Transport for London, 2014). By 2031 it is estimated that there will be an additional 150,000 people in London reporting 'reduced mobility', that is, some kind of disability, bringing the total to over one million (Age, disability and everyday mobility in London: An analysis of the correlates of 'non-travel' in travel diary data Philip Corran et al, Journal of Transport and Health 2017 as quoted in the London Councils Transport Environment Committee, 2018).

2. GG1A Older Londoners Whilst older Londoners aged 50 plus are a smaller proportion of the total London population than in the rest of England, nevertheless, at around 2 million in number, they form 25% of the total population with disproportionate numbers in outer London Boroughs, forming between 32 and 36% in some (GLA Economics: The Economic Contribution of Older Londoners 2013 p. 8).

3. GG1A Ageing Population – implications for London At the same time as this unprecedented, yet welcome, longevity, the birth rate throughout the western world is falling. In the UK in 2015 there were four people working to every one retired person, this is projected to become 2 people working for every retired person in 2060. (Office of National Statistics {ONS} 2012). This has implications for all aspects of society and raises questions as to how productivity will be maintained and how people in retirement will be financed. London thus needs to invest in places, spaces and institutions that help to develop long term health and maintain or increase productivity, improve social cohesion, in particular intergenerational cohesion, and, at the same time, guard against social issues that promote ill health, such as health inequalities, loneliness isolation and poverty. The World Health Organisation (WHO) notes that, "The City's landscape, buildings, transportations system and housing contribute to confident mobility, healthy behaviour, social participation and self-determination, or conversely, to fearful isolation, inactivity and social exclusion. (Global Age Friendly Cities; A Guide World Health Organisation 2007)

4. GG1A Older people: a resource. The WHO further advises that older people require, “supportive and enabling living environments to compensate for physical and social changes associated with ageing and that an age friendly city emphasises enablement rather than disablement”. Before it begins to appear that a special pleading is being made for a particular group, this comment should also be noted: “Healthy older people are a resource for their families, their communities and the economy” (WHO Brasilia Declaration on Ageing, 2006). Research has shown the transfer of assets is downwards from older to younger generations for various reasons, and is both direct, in terms of financial support or indirect in such terms as, for example, baby- sitting. This downward flow of resource is predicted to increase (The British Journal of Sociology 2005 Volume 56 Issue 2 ‘Reciprocity in relationships: socio-economic and health influences on intergenerational exchanges between Third Age parents and their adult children in Great Britain’ Emily Grundy). “Furthermore, older Londoners are generally more educated... and more ethnically diverse than the rest of the population with 27% from BAME communities including 10% of those over 85%(as opposed to 1% in the rest of the population)”. The current economic contribution of older Londoners (aged 50 Plus) is £53 billion p.a. (GLA Economics: The Economic Contribution of Older Londoners Alisdair Barratt 2013).

5. GG1A Older people fulfilling potential There is a link between increased education and increased health. According to Sarah Harper et al “ It is highly likely, however, that future generations of older adults will have higher levels of human capital – in terms of education, skills and abilities – and better health profiles, and this will enable them to remain active, productive and contributory for far longer”. (International Handbook on Ageing and Public Policy 2016) The Plan appears to understand that dealing with the diversity of needs is a complex matter (NLP 5.1.3) however, fulfilling the productive potential of educated older Londoners also needs to permeate every aspect of the Plan.

6. GG1A In conclusion of this section, GG1A, it is recommended that London is signed up to the World Health Organisation’s register of Age Friendly Cities and audited annually towards progress in fulfilling targets, with older people themselves included in the process. It is further recommended that the Plan includes a commitment to incorporate amendments in the light of recommendations arising from impending new research studies. To name just one example, ‘Pathways to Healthy Equitable Cities led by Imperial College and supported by Kings College London was announced in February 2018 by King’s College as, “part of a global consortium of leading universities seeking to answer the fundamental question of how we can design cities to achieve better and more equal health outcomes in six major cities around the world”. Part of the Healthy Lives Healthy Planet to address Urban Health Inequalities and Sustainability this is a major new research Hub funded by the Wellcome Trust.

7. GG1B Part of the vision of the Draft New London Plan is to create cohesive communities and the plan recognises that achieving this is very complex. To be successful GG1B needs to be reiterated within more detailed policies.

8. GG1C Older people have told us that they will not venture out if they feel unsafe, thus being deprived of opportunistic encounters for social interaction that help to alleviate loneliness. It will also undermine the value of spaces created for people if those spaces are not well maintained as they will be perceived as undesirable places to visit.
9. GG1E We are concerned that the Mayor's New London Plan will be undermined if 'extended' or 'refurbished' property is excluded from the plan.
10. GG1F (see 8 above) Include social isolation to tie in with the major government all-party initiative to address social isolation with the appointment of a new ministerial lead on loneliness the MP Tracey Crouch, Minister for Sport and Civil Society who will begin to implement the recommendations of the Jo Cox Commission on Loneliness, including the provision of indicators against which to measure improvements.
11. GG1G The Mayor's work with the House Building Programme, Public Realm and High Street Plan is radical. To achieve the desired impact, it is considered that not just good, but inspirational design is required. Older people themselves concur. One attendee at our London Plan consultation on February 8th suggested that Sir Terence Conran be brought in to design hospitals.
12. GG1H The ambitious nature of the Plan, including densification and the need to improve or amend the infrastructure needs to engage older people, both to take account of their voice and to ensure that they are not excluded by changes to the built environment that will affect their daily lives. Exclusion in this area could lead to the disempowerment and resultant health inequalities that the draft New London Plan is seeking to address. We endorse the strong recommendation by Professor Anthea Tinker in her report commissioned by the GLA in which she says, "Our major recommendations are that older people should be consulted by a variety of means, to enable their views to be taken into account" (An Age Friendly City – how far has London come? Anthea Tinker, and Jay Ginn, King's College London" 2015).

Page: [Policy GG2 Making the best use of land](#)

Section: [N/A](#)

13. GG2 (see also evidence for GG1 above nos. 1, 3 and 6) Please note also that several international designers consider the interest of cyclists and pedestrians to be conflicting: Dissing and Weitling with their award-winning bicycle snake; “The area around the Fisketorvet Shopping Centre in Copenhagen was characterised by a particular problem - two distinctive groups of users, each with conflicting interests, cyclists and pedestrians.” Also, Converging Grounds: A design ‘charrette’ on Density in Denmark hosted by the Van Alen Institute New York looked at multi modal use of streets. Amongst the proposals were different uses and users at different times of day. Older people themselves have told us that they are afraid of cyclists who jump lights when they, pedestrians, are crossing roads and that they are afraid of cyclists on pavements. They asked for a number of measures including increased cycle lanes.

Page: [Policy GG2 Making the best use of land](#)

Section: [N/A](#)

POLICY GG2 MAKING THE BEST USE OF LAND

To create high-density, mixed-use AND AGE AND DISABILITY FRIENDLY places that make the best use of land, those involved in planning and development must: (rest of policy).

Page: [Policy GG3 Creating a healthy city](#)

Section: [N/A](#)

POLICY GG3 CREATING A HEALTHY CITY

Add criterion

SEEK DEVELOPMENT PROPOSALS THAT PROMOTE MAXIMUM SOCIAL COHESION AND THE MINIMISATION OF SOCIAL ISOLATION. THIS INCLUDES ADDRESSING INTERGENERATIONAL INEQUALITIES BY INSPIRATIONAL DESIGN AND VIBRANT PLACE MAKING.

Also: To add a further criterion here, or elsewhere if more appropriate, to sign London up to the global register of Age Friendly Cities.

Page: [Policy GG3 Creating a healthy city](#)

Section: [N/A](#)

15. GG4 (see evidence for GG1) LINK TO POLICY CHANGE Include conversions in addition to new build otherwise the Mayor's New Plan can be thwarted. Furthermore, by re-iterating the need for age-friendly and disability-friendly construction, a clear, consistent instruction is provided to and reinforces the message for, developers. Good design is seen to be a crucial element, see GG4C, of the Plan and the need to provide for an ageing population has been established, see GG1 nos 1-6 above and GG1F LP.

16. GG4 Adding Criterion F strengthens the New London Plan, helps to ensure that new developments are 'Fit for purpose' and contributes to social cohesion.

Page: [Policy GG4 Delivering the homes Londoners need](#)

Section: [N/A](#)

POLICY GG4 DELIVERING THE HOMES LONDONERS NEED

A Ensure that more NEW AND CONVERTED homes are delivered, WHICH SHOULD BE AGE AND DISABILITY FRIENDLY.

C Create mixed, and inclusive AND ACCESSIBLE communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

ADD CRITERION:F. ENGAGE WITH LOCAL PEOPLE AND PROSPECTIVE END USERS AT ALL PLANNING AND DESIGN STAGES, TO ENSURE THAT HOUSING DESIGNS ARE RESPONSIVE TO NEEDS AND INSPIRATIONAL IN TERMS OF DESIGN AND FUTURE USE.

Page: [Policy SD4 The Central Activities Zone \(CAZ\)](#)

Section: [N/A](#)

SD4 Criterion F adding safety (see 8 above) Whilst safety is also mentioned in Criterion J entry here reinforces the intention for town centres.

Page: [Policy SD6 Town centres](#)

Section: [N/A](#)

POLICY SD6: TOWN CENTRES

CRITERION F: The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, AND SAFETY, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity.

Page: [Policy SD9 Town centres: Local partnerships and implementation](#)

Section: [N/A](#)

POLICY SD9: TOWN CENTRES & IMPLEMENTATION

Policy SD9 Town centres: Local partnerships, COMMUNITY ENGAGEMENT and implementation

A To develop strong, resilient and adaptable town centres, fulfilling their full potential to accommodate growth and development, strategic and local partnership approaches, community engagement, town centre management, business associations and Business Improvement Districts MUST be supported, and encouraged AND UNDERTAKEN. Each town centre MUST have a Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.

2) take a proactive PARTICIPATORY and partnership-based approach to bring sites forward for redevelopment, supporting land assembly in collaboration with local stakeholders including, where appropriate, through the compulsory purchase process

Page: [Policy SD9 Town centres: Local partnerships and implementation](#)

Section: [N/A](#)

18. SD9A LINK TO POLICY CHANGE Given the key significance of Town Centres in the Mayor's Draft New Plan, replacing SHOULD with MUST strengthens the policy and the use of UNDERTAKEN ensures that plans will be carried through.

19. SD9 The addition of Community Engagement in the policy will help to achieve the intentions of policy SD6. Community involvement and the participation of the local voluntary sector will ensure that town centres match local needs and aspirations and the insertion of a participatory approach in SD9C 3 will add to community cohesion.

Page: [Policy SD10 Strategic and local regeneration](#)

Section: [N/A](#)

ADD 3): RECOGNISE THAT REGENERATION IS BOTH SOCIAL AND PHYSICAL AND IDENTIFY ASPECTS OF SOCIAL CHANGE AND PHYSICAL TRANSFORMATION, FOR EACH DEVELOPMENT PROPOSAL. (ADD TO POLICY JUSTIFICATION: Commentary on the social and physical aspects of regeneration).

SD10 Adding Criterion 3 enhances understanding of regeneration and goes some way towards guarding against the loss of social capital when existing communities are disrupted.

Page: [Policy SD10 Strategic and local regeneration](#)

Section: [N/A](#)

2) seek to identify Local Areas for Regeneration taking into account local Circumstances AND THE NEEDS OF THE LOCAL COMMUNITY.

SD10 2 LINK TO POLICY CHANGE Insertion of 'needs of the local community' ties into Policy S1 and improves the chances of achieving the Mayor's aims for social cohesion.

Page: [Policy D1 London's form and characteristics](#)

Section: [N/A](#)

POLICY D1: LONDON'S FORM AND CHARACTERISTICS.

PROPOSED POLICY AMENDMENTS:

ADD TO A: THE FORM AND LAYOUT OF A PLACE AND DEVELOPMENT DESIGN SHOULD BE AGE AND DISABLED FRIENDLY.

ADD NEW CRITERION C: COMMUNITY ENGAGEMENT SHALL BE UNDERTAKEN AT ALL STAGES OF THE PLANNING AND DESIGN PROCESS, WHICH SHOULD BE FOCUSED ON LOCAL PEOPLE, THEIR NEEDS AND ASPIRATIONS.

Page: [Policy D1 London's form and characteristics](#)

Section: [N/A](#)

22. D1 (see notes 1 – 6 re GG1 above) [LINK TO POLICY CHANGE](#) It is considered that the addition of the amendment to Policy A and the insertion of new criterion C are critical for the appropriate transformation of London and coheres with the mayor's intentions for London to serve the needs of Londoners as well as creating a vibrant city.

Page: [Policy D2 Delivering good design](#)

Section: [N/A](#)

POLICY D2: 'DELIVERING GOOD DESIGN'

PROPOSED POLICY AMENDMENT:

- 1) TO EXPLICITLY MENTION LONDON'S AGEING POPULATION AND DISABILITY FACTORS AS IMPORTANT SOCIO-ECONOMIC DATA TO HAVE REGARD TO.
- 2) ADD INTO THE POLICY THE NEED FOR COMMUNITY ENGAGEMENT WITH LOCAL PEOPLE AND VOLUNTARY ORGANISATIONS AT ALL STAGES.

Page: [Policy D2 Delivering good design](#)

Section: [N/A](#)

23. D2 LINK TO POLICY CHANGE Once again, the insertion of the policy amendments signals a consistent requirement to provide for an ageing population and to the fact that community engagement with proposed new developments is essential for the success of the project, where success is taken to mean well designed developments and strengthened communities.

Page: [Policy D3 Inclusive design](#)

Section: [N/A](#)

POLICY D3: INCLUSIVE DESIGN

PROPOSED POLICY AMENDMENT:

AGE AND DISABILITY FRIENDLY DESIGN should be mentioned, plus the issue of 'INSPIRATIONAL DESIGN'.

Page8

Add to the front of the policy:

TO DELIVER AN INCLUSIVE AND SOCIALLY COHESIVE ENVIRONMENT THAT ADDRESSES SOCIAL ISOLATION AND INTERGENERATIONAL INEQUALITIES BY INSPIRATIONAL DESIGN AND VIBRANT PLACEMAKING. ALL DEVELOPMENT PROPOSALS WILL BE REQUIRED TO ACHIEVE THE HIGHEST STANDARDS OF ACCESSIBLE, INCLUSIVE AND USER-FRIENDLY DESIGN, ENSURING THEY: (rest of policy as is).

CHANGE the name of the policy to: POLICY D3: INCLUSIVE '& INSPIRATIONAL' DESIGN.

Page: [Policy D3 Inclusive design](#)

Section: [N/A](#)

24. D3 LINK TO POLICY CHANGE We would like to see ‘Inclusive design’ renamed as ‘Inclusive and Inspirational design’. The new London Plan should not become a charter for mass building that does not take account of the Mayor’s desire for locally appropriate solutions. We consider the use of the word ‘inspirational’ lifts design concepts out of the danger of being mundane and pedestrian to those that could create joy. This is necessary because clever design is required to offset effects of increased densification, and pleasure in the built environment will encourage, rather than discourage, people to go out from their homes into the public realm. This in turn will help to realise the Good Growth Policies in GG1 – 6.

Page: [Policy D5 Accessible housing](#)

Section: [N/A](#)

POLICY D5: ACCESSIBLE HOUSING

The policy mentions disabled and older people.

PROPOSED POLICY AMENDMENT:

ADD standard for FLAT CONVERSIONS, which might be that all ground floor flat conversions should be wheelchair accessible. And a further 1 in 4 should be disability friendly, including the provision of stair lifts where a full lift cannot be provided.

Page: [Policy D5 Accessible housing](#)

Section: [N/A](#)

25. D5 LINK TO POLICY CHANGE This amendment ensures that conversions are not exempt from the design requirements of the London Plan and that the resultant dwellings add to the variety of choice available to older and/or disabled people. The provisions of stair lifts where possible, means the inclusion of converted properties in the housing stock being available to older and disabled people, again, so providing choice. This also provides a conformity of approach towards new build and conversions.

Page: [Policy D7 Public realm](#)

Section: [N/A](#)

POLICY D7 PUBLIC REALM

The policy mentions provision of the public realm for people of all ages (see K), which is welcomed.

PROPOSED POLICY AMENDMENTS:

D7(I): TAKE OUT 'where appropriate' at the end of the first sentence, as this weakens the policy.

J Explore opportunities for innovative approaches, INVOLVING VIBRANT PLACEMAKING AND INSPIRATIONAL DESIGN, to improve ing the public realm AND INCREASE SOCIAL INTERACTION, such as open street events.

NEW POLICY – RESIDENTIAL CONVERSIONS.

PROPOSED POLICY AMENDMENT:

To word a new policy that will promote residential conversions in accessible locations, which should be age and disabled friendly. The importance of conversions in providing 'friendly' housing should not be under-emphasised.

Page: [Policy D7 Public realm](#)

Section: [N/A](#)

26. D7 LINK TO POLICY CHANGE Add to F '...and a variety of uses' after surveillance to reinforce the purpose of the public realm. Remove 'where appropriate' from D7(I); this weakens the policy.

27. D7 H Strengthen H, perhaps by rewording to stress the importance of greening the public realm. This is because research has demonstrated the value of green space on mental well-being (Urban Mind: Using Smartphone technology Bio science 10.1.18: research between King's College London and landscape architects). In this study, J L Gibbon and Art foundation Nomad Projects used smart phone technology to assess the impact of nature in cities, and found that being outdoors, hearing bird song, seeing the sky and feeling in contact with nature were beneficial and particularly so to those individuals with greater impulsivity who were at risk of mental health issues. It has also been demonstrated that good access to public parks is a buffer against cognitive decline: Mobility Mood and Place (MMP) is a co- produced piece of research between architects, landscape architects, a neuro scientist and 750 older people into understanding the role of the urban environment on brain activity in older adults and is co-authored by Professor Catharine Ward Thompson of University of Edinburgh and director of OPENspace (<http://www.openspace.eca.ac.uk>). MMP builds on evidence that demonstrates how mood and the willingness to be active is influenced by how the environment is experienced.

28. D7 Expand/explore opportunities for innovative approaches in J, to give clearer direction by inserting the words, 'involving vibrant placemaking and inspirational design.' Include increasing social engagement in the policy so that, again, there can be no doubt about the purpose of the public realm to designers and developers. This is to maximise opportunities to improve the public realm and realise the vision of the New London Plan.

Page: [Policy H1 Increasing housing supply](#)

Section: [N/A](#)

POLICY H1: INCREASING HOUSING SUPPLY

PROPOSED POLICY AMENDMENT:

ADD reference to: To ensure that community engagement is promoted at all housing target consultation stages.

Page: [Policy H1 Increasing housing supply](#)

Section: [N/A](#)

29. H1 LINK TO POLICY CHANGE Add a proposed new policy to H1 Increasing Housing Supply to incorporate residential conversions in accessible locations which should be age and disability friendly. Not to do so is to exclude a valuable resource, and the importance of refurbished dwellings as age friendly and disability friendly homes should not be under-emphasised.

30. H1 LINK TO POLICY CHANGE Add H1 (B) d Ensure that community engagement is promoted at all stages. There is evidence that lack of engagement and consultation will interfere with the Mayor's wish for an inclusive city: "When urban development is driven by market led imperatives and does not involve older people in the planning process this can lead to their social exclusion" (Handler 2014 cited by A Tinker and J Ginn 'How far has London come as an Age Friendly City?').

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

POLICY H2: SMALL SITES

PROPOSED POLICY AMENDMENT:

In H2(E) change 'residential privacy' to 'residential amenity'. This widens the considerations that should be undertaken in assessing small site proposals.

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

31. H2 E LINK TO POLICY CHANGE Proposed amendment speaks for itself.

Page: [Policy H6 Threshold approach to applications](#)

Section: [N/A](#)

32. H6 E LINK TO POLICY CHANGE Proposed amendment speaks for itself.

Page: [Policy H6 Threshold approach to applications](#)

Section: [N/A](#)

POLICY H6: THRESHOLD APPROACH TO APPLICATIONS

PROPOSED POLICY AMENDMENT:

E. Where an application does not meet the requirements set out in part C it must follow the Viability Tested Route. This requires detailed supporting viability evidence to be submitted in a standardised, EASY TO UNDERSTAND and accessible format as part of the PUBLICLY ACCESSIBLE PLANNING application:

Page: [Policy H7 Affordable housing tenure](#)

Section: [N/A](#)

POLICY H7: AFFORDABLE HOUSING TENURE

PROPOSED POLICY AMENDMENT:

A. The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:

- 1) a minimum of 30 45 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)
- 2) a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership

3) 40 25 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.

Page: [Policy H7 Affordable housing tenure](#)

Section: [N/A](#)

33. H7 A1 and 3. LINK TO POLICY CHANGE The proposed amendments suggest a more appropriate split between low cost social housing and other affordable housing products; they are based on the following evidence:

(i) “To alleviate London’s current housing crisis, where demand outstrips supply, more affordable social housing is urgently required. We recommend that available public land be transferred to LAs and HAs (Housing Associations) at low prices and LA borrowing limits eased enabling them to build new social housing and to refurbish existing stock to a decent standard.

To retain these valuable assets for future generations, we recommend LAs and HAs should be able to choose not to sell.

For a sustainable housing policy that ensures sufficient decent affordable homes for all Londoners in future, housing demand must be stabilised by discouraging overseas buyers from using ‘Buy to Leave’ and ‘Buy-to-Let’. We recommend disincentives to using London housing need as an investment for capital gain and policies at national and regional level to distribute employment opportunities more evenly across the UK”

(Professor Anthea Tinker and Professor Jay Ginn, ‘How Far has London Come as an Age Friendly City?’).

(ii) From our consultation conference on 8.2.18

“£170k a year is the average income in Kensington and Chelsea. The average income in our Housing Association is £12k a year I and my friends would never be able to afford a so-called ‘affordable rent’. Many older people have low fixed incomes, just above benefit levels or at benefit levels. Our incomes won’t go up as rents go up. This has to be taken into account” see Appendix 2.

(iii) This was a top priority for people extensively consulted by Age UK London, with reference to the Mayor’s Draft London Housing Strategy and submitted in December 2017.

(iv) It is our view that inadequate housing perpetuates poverty and ill health. It contributes to social unrest, and to a lack of social cohesiveness. In an ageing society, inter-generational reciprocity, one of the planks of the UK pension system, continues to be crucial. Investing in the young, therefore, starting with decent low- cost social rented homes that give rise to settled communities is deemed to be essential. The proposed variations in the split in 1 and 3 in our view better reflect the need for low cost social rented housing whilst observing the Mayor's desire to assist those Londoners with middle incomes.

Page: [Policy H15 Specialist older persons housing](#)

Section: [N/A](#)

Policy H15 Specialist older persons housing

A Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons AND AGE FRIENDLY DESIGNED housing taking account of:

B Specialist older persons housing (Use Class C3) provision should deliver:

B3 ADD and the design recommendations of the HAPPI report, HAPPI -Housing our Ageing Population: Panel for Innovation 2009

Page: [Policy H15 Specialist older persons housing](#)

Section: [N/A](#)

34. H15 LINK TO POLICY CHANGE In relation to H15, older people themselves have told us that not all want to live in specialist housing; some want to live in the general community. In our view, the title should change to Specialist and Non- specialist older persons' housing. "Our group is interested in the development of multi- generational community led housing. Kensington and Chelsea have very little housing. They offer older people bungalows by the seaside or housing in clusters of older people. But we want to live in mixed age communities." And again, "Co-housing provides opportunity to remain independent and able to participate in wider community. Avoids loneliness." These are the words of participants in the Consultation Conference 8.2.18.

Where specialist housing is built however, incorporation of the HAPPI design recommendations should be applied. These were endorsed by the report of the All Party Parliamentary Group on Housing and Care for Older People (HAPPI 2 Housing our Ageing Population: Plan for Implementation 2012. Chair Richard Best; Secretary Jeremy Porteus) and have already been adopted by some London Boroughs. Adoption of these will ensure the production of well-designed 'age' as well as 'community ' friendly housing.

35. H15 Amendments to sections A and B H15 follow on from 34 and are self- explanatory.

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [N/A](#)

POLICY S1: DEVELOPING LONDON'S SOCIAL INFRASTRUCTURE
PROPOSED POLICY AMENDMENT:

Policy S1:

A Boroughs, in their Development Plans AND SUPPLEMENTARY GUIDANCE, ~~should~~ MUST undertake AND MAINTAIN AN ONGOING needs assessment of social infrastructure to meet the needs of London's diverse communities, INCLUDING PEOPLE OF ALL AGES AND THOSE WITH DEMENTIA AND THE GROUPS THAT SUPPORT THEM. THE NEEDS ASSESSMENT SHALL BE SUBJECT TO ONGOING COMMUNITY ENGAGEMENT, INCLUDING LOCAL PEOPLE AND VOLUNTARY ORGANISATIONS.

B In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans AND AGE FRIENDLY AUDITS

E New SOCIAL INFRASTRUCTURE facilities should be SAFELY AND easily accessible by public transport, cycling and Walking AND SHOULD BE DESIGNED AS HUB SCHEMES, PROVIDING A RANGE OF INTEGRATED FACILITIES, AS REFERRED TO UNDER POLICY SD6(A)(1).

F. WHERE POSSIBLE SOCIAL INFRASTRUCTURE FLOOR SPACE SHOULD BE DESIGNED AND MANAGED FOR FLEXIBLE USE, WITH A RANGE OF COMMUNITY USES AT DIFFERENT TIMES, ACCORDING TO THE NEEDS OF THE LOCAL COMMUNITY.

~~F~~ G. Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:

~~G~~ H. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, WHICH SHOULD OCCUR IN CONSULTATION WITH LOCAL VOLUNTARY ORGANISATIONS.

36. S1A LINK TO POLICY CHANGE We believe this policy intends to improve and increase London's Social Infrastructure. We consider that the proposed amendments strengthen the intention of the policy by the inclusion of SPG and by expanding the description of London's diverse communities. The replacement of SHOULD by MUST gives ongoing community engagement is essential if local plans are to be effective in achieving the aims of the Plan.

37. S1B The inclusion of the words 'Age Friendly Audits' will assist the Mayor to achieve the aims and intentions of GG1.

38. S1E Professor Anthea Tinker and Professor Jay Ginn recommend that L.As recognise the importance of community centres, libraries, and the services of the voluntary sector. Professor Tinker's report recommends hub schemes in every borough where a range of impartial information and advice be available on the whole variety of issues of importance to older people. This is considered to be an essential facility to enable older people to achieve the advice they need to maintain their lives as citizens (Professor Anthea Tinker and Professor Jay Ginn, 'How Far has London Come as an Age Friendly City?').

39. S1F This amendment adds a further strand to enhance the intention of the policy and keep in line with other principles of flexible use of developments.

40. S1F now becomes S1G.

41. S1G becomes S1H to which should be added the condition to consult with local voluntary organisations in order to consistently ensure that stakeholder participation helps to contribute to locally effective solutions.

Page: [Policy S2 Health and social care facilities](#)

Section: [N/A](#)

POLICY S2: HEALTH & SOCIAL CARE FACILITIES

PROPOSED POLICY AMENDMENT: ADD access to information services for local communities.

Page: [Policy S2 Health and social care facilities](#)

Section: [N/A](#)

42. S2 LINK TO POLICY CHANGE Health advice service for local communities would complement other information and advice services (see S1E above) and together provide an essential strand of social infrastructure. Health advice services could be co-located with other social infrastructure buildings or with purpose built sheltered housing.

Page: [Policy S3 Education and childcare facilities](#)

Section: [N/A](#)

POLICY S3: EDUCATION AND CHILDCARE FACILITIES

PROPOSED POLICY AMENDMENT:

- 1) Add to S3(B)(7): '....including disabled AND OLDER people'.
- 2) Add 'further education' facilities to S3(B).

Page: [Policy S3 Education and childcare facilities](#)

Section: [N/A](#)

43. S3 LINK TO POLICY CHANGE should include a reference to further education, training and re-training. Professor Tinker recommended that the GLA worked with the then Age and Employment Network to persuade employers that re-training older workers is a sound investment. Whilst Equal opportunities policies have become more widespread, practices have not and older workers are less likely to receive training than other workers, (but those that do are satisfied with the training offered) (Older Workers and the Workplace DWP Feb 2017) Professor Tinker also refers to the fact that older people will continue to require carers but that care workers are in need of improved training, if older people are to maintain quality of life.(Professor Anthea Tinker and Professor Jay Ginn, 'How Far has London Come as an Age Friendly City?').

44. S3B7 Add 'and Older 'after disabled please refer to GG1A 4.

Page: [Policy S4 Play and informal recreation](#)

Section: [N/A](#)

POLICY S4: PLAY AND INFORMAL RECREATION

PROPOSED POLICY AMENDMENT:

ADD NEW CRITERION:

C. DEVELOPMENT PROPOSALS SHALL, WHERE POSSIBLE, HAVE REGARD TO THE NEED FOR INFORMAL RECREATION FOR OLDER PEOPLE, (INSERT IN JUSTIFICATION examples of open air gyms and flat walking routes).

Page: [Policy S4 Play and informal recreation](#)

Section: [N/A](#)

45. S4 LINK TO POLICY CHANGE Add new Criterion C. According to research ('The relationship between outdoor activity and health in older adults using GPS' J Kerr et al 2012 International Journal of Environmental Research and Public Health Research 2012 Dec; 9(12): 4615–4625), being outdoors and being active were both related to greater self-reported physical functioning, less fear of falling and fewer depressive symptoms. This research also suggests that currently "limitations in physical functioning, fear of falling and neighbourhood design may prevent older adults from being active outdoors so safe environments to support such activity will be crucial." The London Plan, insistent on producing Healthy Streets and promoting activity, should therefore incorporate external recreational activity for older adults including, for example, facilities such as outdoor gyms for older people, routes for flat walking and by supporting free exercise activity in parks.

Page: [Policy S6 Public toilets](#)

Section: [N/A](#)

POLICY S6: PUBLIC TOILETS

PROPOSED POLICY AMENDMENT:

Age UK London agrees strongly with the objectives of this policy but feel that smaller town centre type developments should make a contribution to toilet provision. This may be by way of an off-site contribution.

Policy S6:

A Development proposals that include MEDIUM TO large-scale commercial AND TOWN CENTRE developments that are open to the public, such as shops, leisure facilities and large areas of public realm, should provide and secure the future management of free ON SITE publicly-accessible toilets. These should be available during opening hours, or 24 hours a day in areas of public realm and should be suitable for a range of users including disabled people and families with young children. WHERE A NEW TOILET CANNOT BE PROVIDED ON-SITE IT SHALL BE APPROPRIATELY LOCATED IN THE VICINITY OF THE DEVELOPMENT PROPOSAL.

B Larger developments where users are expected to spend long periods of time or where there is no other local provision, should also provide 'Changing Places' toilets as identified in the British Standard BS8300.

C. WHERE, IN SMALLER COMMERCIAL AND TOWN CENTRE DEVELOPMENTS, A TOILET CANNOT VIABLY BE PROVIDED, THE SCHEME SHALL MAKE AN OFF-SITE FINANCIAL CONTRIBUTION TOWARDS SUCH PROVISION.

D. ALL PUBLIC TOILET PROPOSALS SHALL PROVIDE A PUBLICLY ACCESSIBLE MANAGEMENT PLAN, WHICH SHOULD BE KEPT UP TO DATE AND RELEVANT TO THE NEEDS OF THE LOCAL COMMUNITY.

START PARA 5.6.1. with the words 'WELL MANAGED'...

NEW POLICY ON LIVE/WORK

PROPOSED POLICY AMENDMENT:

NEW POLICY on live/work accommodation, which should mention how this type of development can be disability and age friendly.

Page: [Policy S6 Public toilets](#)

Section: [N/A](#)

46. S6 LINK TO POLICY CHANGE Age UK London strongly welcomes this policy, which was carefully considered at a conference held to consult on aspects of the NLP. We welcome the Mayor's recognition that lack of toilet provision prevents many older people from going out and the diminution of quality of life that ensues. What perhaps may not be as well understood, is the extent of the critical importance of public toilets to older people. In addition to the proposed amendments, people desired a grid map of public toilets, determining the walking distance between them and also to have them available at every underground station and at every bus terminus. Older people wanted reassurance that public W.C.s would be well maintained and be permanent. Concern was expressed that public W.C.s were closed down and not reopened in centres if they were found to be in need of repair.

Page: [Policy E1 Offices](#)

Section: [N/A](#)

47. E1 LINK TO POLICY CHANGE It is considered that live/work units provide a flexible work opportunity for the Capital and that these should now incorporate age and disability friendly design features in order to be socially inclusive.

Page: [Policy E3 Affordable workspace](#)

Section: [N/A](#)

POLICY E3: AFFORDABLE WORKSPACE

PROPOSED POLICY AMENDMENT:

ADD age and disability friendly requirements to this policy.

Page: [Policy E3 Affordable workspace](#)

Section: [N/A](#)

48. E3 LINK TO POLICY CHANGE We consider affordable workspace to be of significance to older people. To begin with, older people require support from voluntary agencies and it is likely that this need will increase so, especially in an environment of increasing market rates, it is crucial that rental costs for charities and voluntary organisations are reduced as their presence and continued existence will directly impact positively on the quality of life for older people. Secondly, given the scenario described in GG1 points 1-6 above, it is also likely that newly retired people will begin to diversify into new self-employed roles and therefore, the availability of low cost work space will be an advantage for them. And finally, given the scenario described in notes GG1 1- 6 all work spaces should now be designed to be disability and age friendly.

Page: [Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function](#)

Section: N/A

POLICY E7: DEVELOPMENT OF INDUSTRIAL SITES

PROPOSED POLICY AMENDMENT:

ADD NEW D(5): SOCIAL INFRASTRUCTURE IS PROVIDED AS AN INTEGRATED ELEMENT OF THE DEVELOPMENT PROPOSAL.

Page: [Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function](#)

Section: N/A

49. E7 LINK TO POLICY CHANGE Adding a new D5 will provide consistency with the rest of the London Plan which places substantial emphasis on social infrastructure, states social cohesion to be one of its aims in GG1 and seeks to reduce travel to essential services. T1, T2 For the sake of absolute clarity, housing without social infrastructure cannot create a community.

Page: [Policy T1 Strategic approach to transport](#)

Section: [N/A](#)

POLICY T1: STRATEGIC APPROACH TO TRANSPORT

3) SPECIALIST TRANSPORT SERVICES FOR OLDER AND DISABLED PEOPLE (E.G. DIAL-A-RIDE).

Page: [Policy T1 Strategic approach to transport](#)

Section: [N/A](#)

50. T1 LINK TO POLICY CHANGE As you can imagine public transport is of great importance to Older Londoners, who are still quoting the same longstanding issues of short crossing times at pedestrian lights, buses not pulling up to the kerb and setting off before older people are seated. There have been improvements at many crossings; these need to continue. The other issues mentioned may appear to be minor, however they cause discomfort and can cause injury, often unreported. At our conference on 8.2.18 older people in Camden reported overcrowding on buses which made it difficult for wheel chair users to access. People also reported that they wished to have direct routes to major areas such as CAZ especially Oxford Street. Of great importance was the creation of direct routes to and from hospitals especially where car parking was restricted.

A survey of Age UK London members demonstrated broad support for T1 but noted that frail elderly people would be excluded if they did not feel confident and if there was insufficient investment to create sufficient user-friendly, accessible transport to meet increased demands. It was noted this would benefit all travellers. The considerably increased length of journey time was noted together with the discomfort of carrying heavy bags of shopping.

Page25

One member disagreed entirely and felt that disabled and older people with mobility restrictions or impairments who could not walk or cycle and may not feel safe using public transport were completely ignored. The fact that there are those who cannot walk or cycle was corroborated by others. Another recommended the provision of small run around buses with a drop-on drop-off facility outside of traditional bus stops but noted that this would only work with fewer cars. Another respondent agreed with the strategy because they “would have given up driving by then”. It is felt that the insertion of A3, provided that the specialist transport services were adequately resourced, will help to mitigate the adverse comments for T1.

Page: [Policy T2 Healthy streets](#)

Section: [N/A](#)

POLICY T2: HEALTHY STREETS

PROPOSED POLICY AMENDMENT:

Policy T2:

2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently, and streets are greener and more pleasant.

ADD at the end of the policy:

4) PROVIDE FOR STREET LEGIBILITY INCLUDING STREET AND BUILDING SIGNAGE

Page: [Policy T2 Healthy streets](#)

Section: [N/A](#)

51. T2 LINK TO POLICY CHANGE 59% of respondents to a question on healthy streets and pedestrianisation of Oxford Street mentioned there would be problems with accessibility for older people and disabled people if there were not sufficient parking places or drop off points in Oxford Street itself, or other pedestrianised shopping areas. One person mentioned the possibility of the hire of buggies for older people. The point about inability to walk, or to walk long distances, as mentioned in 50 above is reiterated here. As well as substantially increasing the numbers of Blue Badge parking spaces, another improvement would be to review the rules for Blue Badge eligibility as some people experience restricted mobility that compromises their ability to get about, yet do not qualify for a Blue Badge. Long distances between drop off points and access to public buildings also creates exclusion for older disabled people and makes life very difficult for them and their carers. Please note also point 13 above which comments on the conflicting interest of cyclists and pedestrians and requires appropriate planning to take account of these. Finally, the addition of No. 4 to T2D provides a new requirement that is essential for older people if they are to navigate journeys with ease and which is currently often missing in London streets.

The value of clean air was noted by one respondent and clean air was also mentioned in 'Wishes for London' expressed at the beginning of the conference on 8.2.18.

Page: [Policy DF1 Delivery of the Plan and Planning Obligations](#)

Section: [N/A](#)

52. DF1 LINK TO POLICY CHANGE This proposed policy amendment to be inserted between (C) and (D) pursues, and is consistent with, the principle of collaboration with stakeholders. The amendment of D2 also provides a consistent approach to the Mayor's intention regarding social infrastructure which is essential in delivering good growth.

Page: [Policy DF1 Delivery of the Plan and Planning Obligations](#)

Section: [N/A](#)

POLICY DF1: DELIVERY & PLANNING OBLIGATIONS

PROPOSED POLICY AMENDMENT:

ADD BETWEEN (C) AND (D):

ALL VIABILITY ASSESSMENTS SHALL BE SUBJECT TO COMMUNITY ENGAGEMENT AND SHALL BE PUBLICLY ACCESSIBLE.

AMEND D(2):

2) Recognise the importance of SOCIAL INFRASTRUCTURE, affordable workspace and culture and leisure facilities in delivering good growth.

IN THE 'ENABLING INFRASTRUCTURE' SECTION, ADD IN A SECTION ON 'SOCIAL INFRASTRUCTURE'.

Page: [Chapter 12 Monitoring](#)

Section: [M1](#)

CHAPTER 12: MONITORING

AMEND KPIs

PROPOSED POLICY AMENDMENT:

The KPIs are lacking. Add KPIs on:

? HEALTH AND WELLBEING

? THE PROPORTION OF AFFORDABLE DWELLINGS

? THE PROPORTION OF WHEELCHAIR ACCESSIBLE DWELLINGS

? THE PROPORTION OF AGE FRIENDLY DWELLINGS

? MONITORING OF BUILD QUALITY STANDARDS

? A REDUCING TREND FOR SOCIAL ISOLATION

? THE TREND FOR SOCIAL INFRASTRUCTURE BUILD OUT INC. COMMUNITY SCHEMES, BURIAL SPACE AND PUBLIC TOILETS.

? GREEN INFRASTRUCTURE PROVISION

? EDUCATION: IMPROVING PROVISION TREND.

? THE PROVISION OF AFFORDABLE WORKSPACE

Page: [Chapter 12 Monitoring](#)

Section: [M1](#)

53. KPIs LINK TO POLICY CHANGE We consider that the strength of the Mayor's intention in his six Good Growth Policies is not reflected in the KPIs which then severely limits the Mayor's ability to achieve Good Growth. We feel that the areas we propose better reflect the expressed aims of the Mayor for a successful city and should therefore be included.

Page: [Multi-policy response](#)

Section: [N/A](#)

see attachment

Page: [Annex Three Glossary](#)

Section: [N/A](#)

54. Glossary LINK TO POLICY CHANGE We believe that the glossary will benefit from the inclusion of the proposed definitions.

Page: [Annex Three Glossary](#)

Section: [N/A](#)

GLOSSARY

PROPOSED AMENDMENTS:

ADD DEFINITION OF 'SOCIAL INFRASTRUCTURE'

ADD DEFINITION OF 'SOCIAL ISOLATION'

ADD DEFINITION OF 'AGE AND DISABILITY FRIENDLY CITY'.

'INCLUSIVE NEIGHBOURHOODS': ADD IN THE IMPORTANCE OF 'SOCIAL INFRASTRUCTURE' IN PROVIDING OPPORTUNITIES FOR SOCIAL INTERACTION

ADD TO 'COMMUNITY ENGAGEMENT':

'....AND CAN INCLUDE FACE TO FACE, ONLINE AND VOLUNTARY SECTOR ENGAGEMENT'.