

## **LONDON PLAN RESPONSE FROM TIM GILL**

### **ABOUT THIS RESPONSE**

I am an independent researcher and consultant. My work focuses on children's everyday lives, and aims to support their play and independent mobility. I am a 2017 Churchill Fellow. My fellowship is on child-friendly urban planning, and will allow me to share the lessons from cities in Canada and Europe that are leading the way on this topic. I would be happy to share my findings in due course.

I was co-author of the first GLA supplementary planning guidance on children's play and information recreation, published in 2008. With slight changes, this is still in use (as the SPG *Shaping Neighbourhoods: Play and Informal Recreation*, published Sept 2012).

My website [www.rethinkingchildhood.com](http://www.rethinkingchildhood.com) has more on me and my work.

I am also a London resident and parent.

### **MY COMMENTS**

#### **Policy GG1**

This policy refers to 'building strong and inclusive communities' but other references in the plan are to 'inclusive neighbourhoods'. The plan would be made more achievable to these references were consistent. 'Inclusive neighbourhoods' are not mentioned in chapter 1.

The phrase 'including older people, disabled people and people with young children' appears in a number of policies and should include children and young people. For example in Policy GG1: F

support the creation of a London where all Londoners, including older people, disabled people, *children and young people* and people with young children can move around with ease and enjoy the opportunities the city provides ...

#### **Policy GG3**

I support this policy. The built form of cities has a major impact on health. A long-term approach is vital. If health-enhancing growth is secured during the development process, this avoids the need to retro-fit measures in years to come. Children in particular benefit from long-term health-oriented growth, as this supports the early adoption of health-enhancing behaviours including playing outdoors and active transport choices.

I support the approach emphasising good food and restricting unhealthy options in GG3, given London's high levels of childhood overweight and obesity.

#### **Policy D1**

**Para 3.1.2** – in order to avoid the unnecessary gating of communities, which can restrict movement and does not facilitate an inclusive environment (Policy D1 A 2), the following sentence should be added:

*Shared spaces within developments should be designed and accessible for all ages to use for social activity, play, rest and recreation (see Policy S4 Play and Informal Recreation).*

**Para 3.1.5** - It is good to see a reference to ‘good natural surveillance.’ The point could be made more achievable if it was made clearer that ‘well-used routes’ do not need to be busy with cars. In a local residential setting, people are more likely to feel safe and to move around actively within their neighbourhood (as the Healthy Streets approach advocates) if a route is *not* well-used by cars. This could be clarified by changing the wording to ‘*well-used routes by pedestrians and cyclists*’ or remove all together as it is covered in para 3.1.6 as well.

**Para 3.3.3** – security measures can often inadvertently restrict the usage of spaces, leading to spaces that are no longer inclusive and that restrict the movement of users, particularly children who may then not be able to access a space without adult assistance. The following sentence should added:

*Security measures should not restrict children’s independent mobility; children and young people should be free to access shared and communal spaces without adult assistance or supervision.*

#### **Policy D4**

**Para 3.4.7** - in order to enable children to move around their neighbourhood safely and independently (see policy S4), this should also be noted at para 3.4.7, as it is currently only mentioned in policy S4 and not within the design policies. This objective links to housing development and therefore is likely to be more achievable if it is embedded within housing design policies. It is proposed to add to para 3.4.7:

*‘Streets should allow for children and young people to move around their local neighbourhood safely and independently’*

**Para 3.4.9** - in order to make this more achievable and provide a positive way of creating a more socially inclusive London, the wording of this paragraph could be strengthened. This also links to policy D3 (inclusive design). Gating in any form restricts the usage of space. As there is no other policy covering the design of shared and communal space, it is important that the wording of this paragraph supports an inclusive environment and adds some detail on the design of shared spaces. The public realm policy is not considered to achieve this function in its current form, as it refers to explicitly public spaces,

rather than the semi-private/public spaces that might be found within a housing development. Gated spaces within housing developments, specifically, are known to be underused and restrict freedom of movement, particularly of children who are often intended as one of the main users.

Add/amend as follows: *'Development should help create a more socially inclusive London, by creating local networks of streets that are safe and easy to get around whilst travelling actively. Shared spaces should be well overlooked and accessible from the street and from the dwellings. At low level shared space should be directly accessible from the dwellings. From upper levels, vertical circulation should aim for continuous sight lines from the dwelling to the shared space – or stairs and lobbies with direct views and continuous sight lines to the shared space. Circulation and alternative routes through these spaces should be encouraged to increase activity and encourage social use. To protect very young children and some vulnerable people, low gates and fences could be introduced at the perimeter. Gated forms of development that could realistically be provided as a public street are unacceptable and alternative means of security should be achieved through utilising the principles of good urban design.'*

**Para 3.4.11** - the first bullet notes the importance of building height but only in relation to design rather than its impact on the user. High rises (usually considered over six storeys) are known to limit social interactions, reducing social integration as people are less likely to know their neighbours. High rises have particularly negative effects on children, in terms of their health and being granted fewer freedoms than children on lower floors. It is much more difficult to supervise a child's play if living on a higher storey, which leads to restrictions on children's mobility and play, and less direct access to the outdoors, adversely affecting their health and well-being. The Good Growth objective of inclusive communities would be better achieved if this point on high rises and building height is noted in the policies. I propose adding to the first bullet in 3.4.11 as follows:

the built form, massing and height of the development is appropriate for the surrounding context *and intended users. .... There should be a presumption against building new housing in which family units are located above the 4th storey.'*

### **Policy D7**

Negative attitudes towards teenagers and young people should be redressed. Suggest the following wording for **Para 3.7.9**:

The effective management and ongoing maintenance of public realm should be a key consideration in the design of places and secured through the planning system where appropriate. Whether publicly or privately owned, public realm should be open, free to use and offer the highest level of public access. These spaces should only have rules

restricting the behaviour of the public that are considered essential for safe management of the space. *Targeting teenagers and young people as being responsible for anti social behaviour is not acceptable. This age group should feel valued as part of the community and welcomed in all public spaces.* The Mayor will develop a 'Public London Charter' which will set out the rights and responsibilities for the users, owners and managers of public spaces irrespective of land ownership. The rules and restrictions on public access and behaviour covering all new or redeveloped public space and its management should be in accordance with the Public London Charter, and this requirement should be secured through legal agreement or planning condition.

## **Policy H2**

This section should improve protection for children and young people's play areas, formal and informal. Suggest the following new point in policy H2 F (exclusions):

*sites that are formal play areas or where there is evidence of children's use for informal play.*

## **Policy H7**

There is a predicted increase in children in London (see SHMA, fig. 26). The current housing mix table in the Plan does not seem to reflect this fact, and does not reflect the aims of policy GG4 to 'create mixed and inclusive communities.' The Plan should either be updated to reflect the need for more family housing, or set out a clear strategy to reduce levels of under-occupation and free up existing family housing for families that need it.

## **Policy S3**

The reference to 'healthy routes to school' is welcomed. Evidence shows that the distance and route to school are amongst the most significant factors in ensuring children travel actively.

**Para 5.3.10** - To make this more achievable, I suggest amending the fourth sentence to read:

*'All children should be able to travel to school by walking, cycling or public transport and the closer their home is to school the more likely they are to do this.'*

## **Policy S4**

I support the recognition of the importance of features other than just play areas for children's play – in particular the importance of safe and accessible routes for children within their local neighbourhoods. This should also be noted within the design policies (policy D4 – see earlier comment) to ensure that the consideration of how children get around their neighbourhoods is considered as an integral part of the residential design process.

To support this, I suggest amending the wording of two of the points in this policy, as follows.

can be *directly accessed from the* home or accessed safely from the street by children and young people independently

incorporate accessible routes for children and young people to existing *and proposed* play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently.

The text following S4 should mention the importance of seeking the views of children and young people in the design of new provision and in proposed changes to existing provision to understand their needs.

Point B b) – add '*Roof spaces are not acceptable*' – this is for the reasons mentioned in comments on policy D4, largely due to poor accessibility and the lack of natural surveillance.

## **Policy T2**

Point D 2) I assume this should say 'reduce the dominance of *motor* vehicles.' Vehicles imply that bikes would be included.

In order to recognise the fact that not everyone just uses streets to get from A to B, and children in particular often use the street for play (as shown by the interest from residents in many boroughs in organising resident-led play street sessions) I suggest the following amend to point B 2):

identify opportunities to improve the balance of space given to people to dwell, *play*, walk, cycle, and travel.

Given the Transport policies' focus on Healthy Streets and walking and cycling, this objective could be made more achievable if there were a separate policy on walking, to highlight this mode of transport (which is particularly relevant to children, and to parents with young children) and to give it more focus, as was the case in the previous plan.

Tim Gill, 2 March 2018