



Physical Activity for Health (PAfH) Network Response to Mayor of London London Plan consultation

About the London Physical Activity for Health (PAfH) Network

The London Physical Activity for Health (PAfH) Network was established in 2009. The network was set up to bring together those working in health, physical activity and sport with other sectors that can influence physical activity, such as transport. The aim of the PAfH network is 'to promote physical activity for health strategically influencing key bodies within London whilst informing effective and efficient delivery'.

The PAfH network meets three times a year and has representation from: London Sport; Public Health England; NHS Healthy London Partnership; GLA; Transport for London; Sport England; Local Authority Public Health & Leisure; London Councils; NGBs, voluntary and community sector organisations and education. The network is co-ordinated by London Sport in partnership with the Institute of Sport Exercise and Health and reports to the London Association of Directors of Public Health.

About this response

The PAfH Network hosted a presentation on the Mayor's draft London Plan at the network meeting on 31st January 2018. It was agreed at the meeting that London Sport would submit a response on behalf of the PAfH Network informed by comments received from the network membership.

It is important to note that whilst this response seeks to represent the collective views of the PAfH network some aspects of the response might have potential resource implications for other organisations, such as local authorities. Therefore, we would recommend that these organisations are consulted with where there is likely to be an impact on resources.

It should also be noted that London Sport will be submitting its own response to this consultation.

General comments

- The PAFH Network strongly support commitments made throughout the Draft London Plan that relate to improving the infrastructure and opportunities for the promotion of physical activity in London.
- The PAFH Network believe that the Draft London Plan would be strengthened by explicit reference to [Sport England's Active Design Principles](#) and the associated Active Design Checklist and [TCPA Six Elements to Planning a Healthy Weight Environment](#). We recommend that these are incorporated into assessments of planning applications and health impact assessments.
- The PAFH Network strongly supports the commitment to increase active forms of travel but suggests that greater emphasis should be placed on physical activity in all its forms (as set out in the Sport England/Public Health England Active Design guidance)

Detailed comments (based on London Plan individual chapters)

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

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

PAfH Network response:

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

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

PAfH Network response:

We strongly support policy areas GG3 A/B/C/E, but suggest it is important to acknowledge that physical activity consists of more than just active travel as described in statement 1.3.3

Chapter 3: Design

- D1: London's form and characteristics
 7. Provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity

PAfH Network response:

We strongly support these policies that maximise green and open space which encourage a range of activities that in turn will contribute towards improving health and wellbeing.

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

PAfH Network response:

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

- D7 Development Plans and development proposals should:
 - b) Maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds.
 - c) Be based on an understanding of how the public realm in an area functions and creates a sense of place, during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists
 - d) Ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area

should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings.

- i) Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused.
- j) Explore opportunities for innovative approaches to improving the public realm such as open street events.

PAfH Network response:

We strongly support these – and other – policies that seek to maximise walking and cycling in the public realm, that reduce barriers to active travel, and that minimise car use (including limiting residential/street parking)

- D13 A: In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
 - 1) Avoiding significant adverse noise impacts on health and quality of life
 - 2) Reflecting the Agent of Change principle to ensure measures do not add unduly to the costs and administrative burdens on existing noise-generating uses
 - 3) Mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development
 - 4) Improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
 - 5) Separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation
 - 6) Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
 - 7) Promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver

PAfH Network response:

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

Noise management is undeniably an important aspect of planning consideration, but where mitigation is required in reference to outdoor space to enable physical activity to take place,

there should in the first instance be consideration as to how noise could be designed out through natural measures that achieve noise-absorption.

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

Chapter 5: Social Infrastructure

- S3 B: Development proposals for education and childcare facilities should:
 - 5) Maximise the extended or multiple use of education facilities for community or recreational use, through appropriate design measures
 - 10) Ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand

PAfH Network response:

We strongly support the statement which encourages schools to open up their facilities, which could provide many more opportunities for both informal and formal recreation, and a range of physical activities, as well as formal sport. In addition, we strongly support that opportunities to maximise active travel to and from school and play facilities are maximised.

- S4: Play and informal recreation

PAfH Network response:

We support the commitments and the spirit of policies outlined around play and informal recreation, and welcome reinforcement of the role of play and informal recreation strategies.

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

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

Chapter 6: Economy

- E9 Retail, markets and hot food takeaways

c) Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also consider whether it is appropriate to manage an over-concentration of A5 hot food takeaway uses within Local, District and other town centres through the use of locally-defined thresholds in Development Plans.

PAfH Network response:

While the primary focus of the PAfH Network is increasing physical activity we also support policies which encourage people to adopt more active lifestyles as these behaviours are often interrelated. We therefore strongly support restricting A5 hot food takeaways within 400m proximity to schools. However, we suggest that policy needs to be further strengthened to ensure that premises developed/purchased under one use are not subsequently changed to A5 usage. This is particularly important given the Mayors statutory duty to promote health and prevalence of both adult and childhood obesity in London.

- E11 Skills and opportunities for all

PAfH Network response:

Volunteering plays a significant part of maintaining local sports clubs and teams. In London, those involved in sport and physical activity account for 50% of formal volunteering (NCVO UK Civil Society Almanac, 2015-16). We would therefore like to see the role of volunteering strengthened within this policy and that new developments seek to support local volunteering opportunities in the physical activity and sport sector.

Chapter 8: Green infrastructure and natural environment

- G8 Food growing

PAfH Network response:

We strongly support the protection of existing space and provision of new space for community gardening and food growing. Community spaces that encourage food growing contribute towards supporting healthy lifestyles and provide wider social benefits.

Chapter 9: Sustainable Infrastructure

- SI1: Improving air quality

PAfH Network response:

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

Chapter 10: Transport

- T1: Strategic approach to transport

PAfH Network response:

We support these points fully and particularly endorse the role of the Healthy Streets Approach outlined in detail in Policy T2 Healthy Streets.

- T5: Cycling

PAfH Network response:

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

Chapter 12: Monitoring

- Health KPI: Londoners engaging in active travel

PAfH Network:

We strongly support a KPI measure around Londoners engaging in active travel, but believe cycle parking is too limited as a measure of both physical activity and health. We would like to see included a measure around Londoners' participation in 2x10 minutes of active travel as measured in the travel Demand Survey, and also connected to Sport England's Active Lives Survey (150 mins of physical activity for adults).

For further information please contact:

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