

MR Adrian Voce comments

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

Section: [N/A](#)

This policy refers in some places to 'building strong and inclusive communities' and in others to 'inclusive neighbourhoods'. Consistency of terminology would make the intention clearer and its achievement more likely. I suggest 'inclusive neighbourhoods' because this is a planning document and the neighbourhood is a unit of the built environment that is identifiable to both planners and residents. Community is a less tangible or measurable concept, especially in the metropolis, with many communities forming along non-geographical lines, influenced by factors outside the scope of this plan. But London is comprised of people who live in homes that are in streets or estates that together form neighbourhoods. Making the neighbourhood as the central focus for improving London's liveability will make good sense to everyone, and will be easier to monitor for progress.

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 ...

Page: [Policy D7 Public realm](#)

Section: [N/A](#)

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 fully transparent and in accordance with the Public London Charter, and this requirement should be secured through legal agreement or planning condition.

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

Section: [N/A](#)

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.

There is no need to qualify the term 'play', which is guaranteed under article 31 of the UN Convention on the rights of the child without any such qualification. Terms like 'safe' and 'stimulating' are problematic. How safe? A key element of children's play is that they need to be able to take some risks. Play space that is too safe will be ignored by them. And 'stimulating' is too ambiguous; inviting designs on children's play by adult agendas, when playing is in fact innate and self-directed by the child, who, I repeat does not need to be stimulated.

Also, I suggest avoiding describing play as an activity. Most academics agree that it is much a disposition, and can therefore be quite inactive. A playable environment is one which simply recognises and responds to the child as an agent within the space and therefore has design features that make it accessible to children and affords opportunities for their engagement and interaction with it and with others.

I suggest this rewording

5.4.1

Play is essential for children and young people's mental and physical health. Playing is not confined to playgrounds and play areas, but manifests in all aspects of a child's life, in a wide variety of locations and environments. Accessing opportunities for play, and being able to be independently mobile within their neighbourhood, is fundamental to children and young people's happiness and important for their wellbeing and development.

Page: [Policy T2 Healthy streets](#)

Section: [N/A](#)

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

The plan could be stronger by making a distinction between streets and roads, emphasising that streets, especially residential streets, have numerous other functions that are crucial to liveable neighbourhoods. Pedestrian accessibility, active travel, public health and children's right to play outside where they live are all essential functions of a street, which are often overlooked by planners when the street is conceived as primarily a road.

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.