

# Mrs Holly Weir comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

I am a researcher at the University of Westminster. My work focuses on researching children's mobility and health. Prior to this, I worked at the GLA on the London Plan team and helped to draft the social infrastructure policies, as well as to embed health matters into the plan.

I am also a London resident and parent.

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

Section: [1.1.1](#)

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.

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

Section: [GG1](#)

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 GG3 Creating a healthy city](#)

Section: [GG3](#)

This policy on health is welcomed and supported. It is critical to have this element of the plan referenced so explicitly in the first chapter.

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

Section: [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).*

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

Section: [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.

Page: [Policy D3 Inclusive design](#)

Section: [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 be added to avoid this: *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.*

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.7](#)

In order to ensure that the objective of enabling children to move around their neighbourhood safely and independently is achieved (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'*

Page: [Policy D4 Housing quality and standards](#)

Section: [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** are unacceptable and alternative means of security should be achieved through utilising the principles of good urban design. ?*  
*DELETE: 'that could realistically be provided as a public street '*

Page: [Policy D4 Housing quality and standards](#)

Section: [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 less 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, detrimenting their health. The Good Growth objective of inclusive communities could 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. .... Residential uses and family sized units should be located on lower storeys'*

As the Mayor states in his foreword to the plan, he wants 'to build a city that works for all Londoners.' Table 4.3 shows a high proportion of need for 1 bed properties across the period of the plan. The SHMA states that these figures are based on the GLA's in-house demographic projections. These projections look at current trends and take them forward to the future.

The SHMA acknowledges that the reason the figure for need for 1 beds is so high, is because it does not take full account of the levels of under-occupation that currently exist across London (see SHMA, para 0.21: assuming that private renters (as well as homeowners) continue to under-occupy their homes at current rates results in a more even split of unit sizes required'). This seems to be largely due to a growing older population. The figures from the SHMA assume that these levels of under-occupation will reduce, but the London Plan appears to say nothing explicit to support this shift. There is no reference in the Plan about a strategy for reducing under-occupation. In paragraph 4.15.2, it mentions that 'Boroughs and applicants should recognise the important role that new, non-specialist residential developments play in providing suitable and attractive accommodation options for older Londoners, but needs to be fully embedded in housing policy to have required impact' but this does not seem strong enough to make a difference. In contrast, para 3.5.1 of the Plan states that 'older people should have the choice of remaining in their own homes rather than moving..', conflicting with the principle of reducing under-occupation.

It is therefore unclear what steps are being taken to ensure that these dwellings will be freed up for families who need them and that the assumptions in the SHMA are based off. Given the growth in older people and single-person households projected in the SHMA, there is a risk that they will continue to under-occupy, resulting in a shortage of family housing and pushing families out of London.

Along with an increase in older Londoners, there is also 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, neither does it 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.

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

Section: [S3](#)

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

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

Section: [5.3.10](#)

To make this more achievable, amend 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.*' Evidence shows that distance from home to school is the most significant factor in whether or not a child will travel actively.

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

Section: [S4](#)

it is good to see references to the importance of features other than just play areas for children's play and 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 previous comment) to ensure that the consideration of how children get around their neighbourhoods is considered as an integral part of the residential design process.

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 no natural surveillance

Page: [Policy T2 Healthy streets](#)

Section: [T2](#)

Point D 2) This would be stronger if it said 'reduce the dominance of *motor* vehicles.' Vehicles assumes bikes would be included.

In order to show recognition of the fact that not everyone just uses streets to get from A to B, and children in particular often use the street for play, 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, it seems that this objective could be made more achievable if there was a separate policy on **walking** to highlight his mode of transport and give it more focus, as was the case in the previous plan.