

## Chapter 5

# Social Infrastructure



## Policy S1 Developing London's social infrastructure

- A Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities.
- 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.
- 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 facilities should be easily accessible by public transport, cycling and walking.
- F 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 Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.

- 5.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes **health provision, education, community, play, youth, recreation, sports, faith, and emergency facilities**. Green infrastructure in all its forms is also a key component of social infrastructure, and is addressed separately in Chapter 8, Policy G3 Metropolitan Open Land and

Policy G4 Local green and open space.

- 5.1.2 Social infrastructure plays an important **role in developing strong and inclusive communities**. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place.
- 5.1.3 **Planning for social infrastructure** in London is complex. There are a wide range of providers and stakeholders and the degree of clarity around future provision and funding varies. It is therefore important that boroughs work collaboratively with service providers and other stakeholders, including the local community, to fully understand existing and future social infrastructure needs and plan appropriately for these, including through the Community Infrastructure Levy. Supplementary Planning Guidance will provide details of how this could be approached.
- 5.1.4 The **loss of social infrastructure** can have a detrimental effect on a community. Where possible, boroughs should protect such facilities and uses, and where a development proposal leads to the loss of a facility, require a replacement that continues to meet the needs of the neighbourhood it serves. To further protect against the loss of social infrastructure that is valued by a local community or group, boroughs should consider approving the designation of a facility as an Asset of Community Value (ACV) if put forward by the local community.
- 5.1.5 In cases where social infrastructure premises may be deemed redundant and a replacement facility is no longer necessary or appropriate, **other forms of social infrastructure should be considered** for the site or part of the site to help to meet other community needs, before alternative uses are pursued.
- 5.1.6 It is recognised that there will be cases where social infrastructure providers are undertaking an agreed programme of social infrastructure re-provision or **service reconfiguration**, such as has been seen within healthcare. Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with parts D and F of Policy S1 Developing London's social infrastructure and Policy S2 Health and social care facilities and any related information or guidance in order to achieve the overall aims of the programme and to continue to meet the needs of Londoners.
- 5.1.7 In all cases, where housing is considered to be an appropriate alternative use, opportunities for **affordable housing provision** should be maximised.

- 5.1.8 Social infrastructure should be easily accessible by walking, cycling and public transport in accordance with the Healthy Streets Approach. It is also important to consider the way that social infrastructure integrates with other facilities and the way people who live or work in the area might want to access it. **Shared use and co-location of facilities** should be encouraged, in order to align service provision, use land more efficiently and facilitate opportunities for different groups of people to come together, encouraging further inclusion and community participation. Shared use and co-location will also help facilities and service providers to work in a more coherent and joined-up way, and share maintenance and management costs. It could also potentially reduce the need to travel thereby improving accessibility. Examples of this include schools opening their facilities out of hours for use by the community, the co-location of health and sports facilities, or the co-location of facilities with housing to ensure effective usage.
- 5.1.9 Voluntary and community groups often find it difficult to find premises suitable for their needs. **Unused or underused facilities should be brought into use**, where possible, to help address these needs. The additional use or reuse of places of worship should be considered for providing accommodation for other traditions or faiths and/or wider community functions.

## Policy S2 Health and social care facilities

- A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:
- 1) identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies
  - 2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes
  - 3) regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues
  - 4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision
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5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.

- B Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.
- C New facilities should be easily accessible by public transport, cycling and walking.

- 5.2.1 London's health care services are vital to maintaining and improving Londoners' quality of life. The health service is also one of the capital's major employers, with over 200,000<sup>63</sup> people working in the NHS in London. Several factors affect the **demand for health services and facilities**. These include a growing and ageing population, an increase in complex and long-term health conditions that need an integrated approach, and changes in patients' personal preferences. New treatments and technologies are also transforming the ability to predict, diagnose and treat conditions.
- 5.2.2 The NHS Five Year Forward View identifies the need to **prevent avoidable illness** and **transform the way that care is organised and delivered** in order to meet increasing demands for healthcare within the resources available. It describes the following priorities:
- supporting and enabling individuals to take better care of their own health and the health of their families and communities
  - undertaking a higher proportion of healthcare in community rather than hospital settings
  - making best use of available assets, including more flexible approaches to how facilities are used and the overall configuration of the health estate, which requires a mix of dis-investment in older, out-of-date facilities and re-investment in more modern, fit for purpose estate
  - ensuring that models of care change and continuously evolve
  - ensuring that existing and planned new health infrastructure supports and facilitates change.

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<http://content.digital.nhs.uk/catalogue/PUB23046/nhs-work-stat-oct-2016-pdf.pdf>

- 5.2.3 There are currently four broad **types of health infrastructure provision**:
- primary care – GP practices, plus community pharmacists, dentists and opticians
  - community healthcare – this covers a wide range of diagnostic and healthcare services, including non-acute mental health services, which provide a means of delivering care closer to home than from a hospital setting
  - acute provision
  - specialist provision.
- 5.2.4 **Sustainability and Transformation Plans** (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area.
- 5.2.5 Whilst there is no one-size-fits-all model of care, and an increasing blurring of the boundaries between primary, secondary (acute) and tertiary (specialist) health services, there are some broad underlying **principles that underpin the planning of new facilities** or changes to existing facilities. The NHS General Practice Forward View<sup>64</sup> supports the provision of primary care at greater scale, with larger practices and/or more joined up networks of GPs offering a wider range of services to patients, including extended opening hours. This means fewer GP practices serving larger patient catchments (perhaps 10-20,000 people per practice) and operating from larger premises than is the norm at present. Models of community healthcare are based around larger population catchments (50,000 or more people) or localities to ensure individual services are viable, and to maximise the benefits of integrating and/or co-locating services in community healthcare centres or hubs, or in more flexible ways across localities or networks of service providers.
- 5.2.6 In **assessing the need for new health and social care facilities**, consideration should be given to the location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all of the growth. Joint Strategic Needs Assessments produced by local Health and Wellbeing Boards describe the current and future health and wellbeing

needs of the local population and identify priorities for action which are set out in more detail in the Boards' Health and Wellbeing Strategies. These documents are valuable sources of evidence to inform the development and review of Development Plans.

- 5.2.7 Where population growth and change is taking place at fairly modest levels, it may be possible to accommodate this through a combination of **efficiency savings, service reconfiguration and small adjustments in capacity**, for example, through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that **new primary and community facilities or capacity will need to be provided**. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions.
- 5.2.8 The **co-location of facilities with other uses**, such as other forms of social infrastructure or housing, is encouraged to use land more efficiently and to enable a more integrated service delivery.
- 5.2.9 Development and regeneration proposals for an area provide an opportunity to **re-think how land and buildings are used** and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies).

### **Policy S3 Education and childcare facilities**

- A To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:
- 1) identify and address local needs and any shortages in supply, both locally and sub-regionally, including cross-boundary issues
  - 2) identify sites for future provision through the Local Plan process, particularly in areas with significant planned growth and/or need
  - 3) ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.
- B Development proposals for education and childcare facilities should:
- 1) locate facilities in areas of identified need
  - 2) locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling
  - 3) locate entrances and playgrounds away from busy roads, with traffic calming at entrances
  - 4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling
  - 5) maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures
  - 6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities
  - 7) ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach
  - 8) ensure that facilities incorporate suitable, accessible outdoor space
  - 9) locate facilities next to parks or green spaces, where possible
  - 10) ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.
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- 5.3.1 **Access to high quality education and training** has a profound effect on people's life chances and is one of the most powerful ways to break down inequalities and improve social mobility. Every child, young person and adult should be given the best possible chance for success and be equipped to make the most of the economic opportunities the capital has to offer. High quality education and training provision, including the allocation of sufficient sites and the development of childcare facilities, schools, colleges and universities in appropriate places, will not only help to provide greater educational choice but will also improve skills, which is critical in tackling disadvantage. Good quality education and training are vital for supporting people into sustainable employment, which is also essential to London's continued economic success.
- 5.3.2 **Access to affordable, accessible and high quality childcare** (pre-school and school age) provision can play a significant role in children's development and positively influence school-readiness, future educational attainment, economic participation and health. Universal, high-quality, early childhood education and care not only benefits the whole population but can particularly benefit children from the most disadvantaged backgrounds. As well as the positive benefit for children, it also helps to enable parents to go back to work.
- 5.3.3 It is estimated that an additional 71,000 **childcare places** are needed between 2016 - 2041<sup>65</sup>. The Childcare Act 2006 places a duty on local authorities to ensure that there are enough childcare places to enable parents to work or train, and also to ensure that there are sufficient funded early education places for all three and four year-olds within the local authority area. In consultation with parents, the private, voluntary and independent sectors, and other key partners, boroughs should ensure the location and provision of a range of childcare services in different types of settings to meet the needs of local communities.
- 5.3.4 **Childcare facilities** should be safe, accessible for all, and provide both indoor and outdoor learning opportunities and should be provided within new housing and commercial developments, where there is a need. Nurseries should be incorporated into new primary schools, where appropriate.
- 5.3.5 There is a **growing need for school places** in London, with projected demand for an additional 60,000-67,000 primary school places and 105,000-122,000 secondary school places in state maintained schools up

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Childcare Demand Projections (2017) GLA Intelligence Unit

to 2025<sup>66</sup>. This demand, particularly for secondary school places, requires a strategic approach to delivery, making it harder to quantify within individual boroughs. Boroughs are encouraged to work together to meet the needs for secondary school places. Where possible, sites for schools should be allocated within Development Plans.

- 5.3.6 There is a need for an increase in **Special Educational Needs and Disability** (SEND) **provision** in London. Some of this provision will be within mainstream schools and some within specialist schools. It is important that all schools are designed to be accessible and inclusive, meeting the highest standards of accessible and inclusive design (see Policy D3 Inclusive design).
- 5.3.7 The **London Schools Atlas**<sup>67</sup> is an interactive map and dataset enabling users to view both existing patterns of schooling across the capital, and projections of future changes in the school age population. The Atlas is intended to be a resource for both parents and school place planners that supports collaborative working between providers in London.
- 5.3.8 **Higher education** in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced research, and infrastructure to support business growth, such as incubation space and business support services. It is also a significant employer and attracts major international companies able to benefit from universities' research reputations, such as in pharmaceuticals and life sciences. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. The Mayor has established a forum for higher education institutions and further education establishments to work with boroughs and other stakeholders to plan future developments, including student accommodation, in locations which are well-connected to public transport.
- 5.3.9 Access to **further education** (FE) plays a key role in skills development and life-long learning and assists with Londoners' progression into, and through, sustainable employment, including apprenticeships. There is a predicted increase in demand for FE provision, due to the growing number of 16-19 year-olds and the new requirement for all young people to remain in learning until they are 18. Meeting this growing demand will require strategic planning and working across boroughs. FE institutions

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<sup>66</sup> Projected Demand for School Places (2015) GLA Intelligence Unit

<sup>67</sup> <https://maps.london.gov.uk/schools/>

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also provide valuable community facilities and services. The Mayor will continue to support the enhancement of FE colleges and other training facilities through the Skills for Londoners Capital Fund.

- 5.3.10 The **design of education and childcare facilities** is critical to the creation of a good learning environment. Education and childcare facilities should be in locations well-connected by public transport. The design of entrances to schools and playgrounds is important in ensuring that children are encouraged to walk and cycle to the school gate, and can do so safely. All children should be able to travel to school by walking, cycling or public transport. Facilities should be located away from busy roads, with traffic calming at entrances, to benefit from reduced levels of air pollution, noise and road danger. Where possible, natural features such as trees, greenery and spaces for food growing should be incorporated into playgrounds and school sites, recognising both the health and educational benefits these can provide. Healthy and safe routes to education and childcare facilities, should be considered through the design process.
- 5.3.11 The Department for Education gives area guidelines for mainstream schools<sup>68</sup>. Accepting that these guidelines can sometimes be difficult to achieve in London, **innovative design solutions** should be considered in order to meet the needs of the school, including the provision of outdoor space.
- 5.3.12 School and college facilities - in particular sports, play, training and meeting facilities - should be capable of use by the wider community outside their main operating hours. They can provide venues for a range of community activities, including nurseries, children's centres, cultural, youth and sports activities. Designing schools and colleges with this shared use in mind, and ensuring they are safe for a range of uses, also allows for more adaptability around changing work and lifestyle patterns, and extended childcare and holiday provision. Sharing of facilities such as sports pitches and multi-use games areas and locating schools next to parks and open spaces can also further encourage the **shared use of space**, particularly where space on a school or college site is limited. Education and childcare facilities could also be co-located with other uses such as housing and mixed-use developments at higher densities.

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<sup>68</sup> Education Funding Agency (2015) Notes on area guidelines for mainstream schools: BB103 <https://www.gov.uk/government/publications/mainstream-schools-area-guidelines/area-planning-for-maintained-schools>

## Policy S4 Play and informal recreation

### A Boroughs should:

- 1) undertake audits of existing play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision
- 2) produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs.

### B Development proposals for schemes that are likely to be used by children and young people should:

- 1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile
- 2) for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that:
  - a) provides a stimulating environment
  - b) can be accessed safely from the street by children and young people independently
  - c) forms an integral part of the surrounding neighbourhood
  - d) incorporates trees and/or other forms of greenery.
- 3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently
- 4) for large-scale public realm developments, incorporate incidental play space to make the space more playable
- 5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

- 5.4.1 **Safe and stimulating play** is essential for children and young people's mental and physical health. It is not just an activity confined to playgrounds and play areas, but is something that can be done 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 important for children and young people's wellbeing and development.

- 5.4.2 Many children and young people, however, find that there are limited opportunities for them to play in their local neighbourhood. This is often not because of a lack of formal play provision, but due to restrictive street design and layouts, poor links between spaces for play and recreation, and the threat of busy roads and traffic. Developments should **encourage children and young people to move around freely** through safe streets and footpath networks that connect to more formal play provision, green spaces and parks, and that follow the Healthy Streets Approach.
- 5.4.3 Where **formal play provision** is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads. Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security. Integrating natural environments into play provision is encouraged, acknowledging the benefits to learning, and to help to support a green infrastructure network across the city.
- 5.4.4 There should be **appropriate provision for different age groups**, including older children and teenagers. Particular consideration should be given to consultation with children and young people in the design of new provision to understand their changing needs. The needs of parents and carers should also be considered in the design of these spaces. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Youth facilities for young people should also be incorporated where possible to ensure that young people have suitable spaces to meet and play and feel welcome and included in developments and the public realm.
- 5.4.5 Formal play provision should normally be made **on-site** and in accordance with Development Plans' play policies for the area, using a benchmark of 10 square metres per child as a basis for assessing future requirements arising from a projected increase in the child population of the area. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.
- 5.4.6 **Off-site provision**, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution,

may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400 metres of the development and be accessible via a safe route from children's homes. Schools, school playing fields and other facilities can also provide an important contribution to play and informal recreation facilities and should be encouraged to allow community access to facilities out of hours.

- 5.4.7 Through the development of **play strategies**, boroughs should ensure the integration of play provision and child-friendly neighbourhoods into other borough strategies.

### Policy S5 Sports and recreation facilities

- A In order to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:
- 1) regularly assess the need for sports and recreation facilities at the local and sub-regional level
  - 2) secure sites for a range of sports and recreation facilities
  - 3) maintain and promote the Walk London Network shown on Figure 5.1 and encourage networks for walking, cycling and other activities.
- B Development proposals for sports and recreation facilities should:
- 1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling
  - 2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities
  - 3) support the provision of sports lighting within reasonable hours where there is an identified need for sports facilities and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity
  - 4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

- C Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space ([Policy G3 Metropolitan Open Land](#)) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.

- 5.5.1 Sport and recreation facilities are important components of social infrastructure. Both **formal and informal facilities** should be provided, to encourage physical activity and deliver a range of social, health and wellbeing benefits to communities. People take part in various forms of sport and recreation which require a number of different types of facility. Many activities require minimal facilities, and often an open space or community hall can be sufficient.
- 5.5.2 Current provision of swimming pools, artificial grass pitches (AGPs), and sports halls is not meeting demand<sup>69</sup>. The need is most significant for AGPs where only 55 per cent of demand is currently being met. Swimming pools currently meet 93 per cent of total demand across London and sports halls meet 85 per cent of demand. For all types of facilities, the level of **unmet demand is projected to increase** by 2041 if no new facilities are provided. Increasing the catchment areas of existing facilities by improving public transport accessibility and access by walking and cycling, plus extending their opening hours, could increase their availability and potential number of users. Where new facilities are to be provided, they should be located in accessible locations, with the ability to maximise opening hours.
- 5.5.3 It is essential that boroughs **plan strategically for future provision** of these core sports facilities. Boroughs should assess the need for sport and recreation facilities to ensure appropriate levels of provision and help tackle inequality of access in London, particularly in areas or for groups with low participation. By their nature, sports facilities often form a part of open space, so sports and open space needs assessments should have regard to one another. Built sports facilities should only be accommodated on green open space if that area has been identified as surplus to requirements as per an open space strategy.

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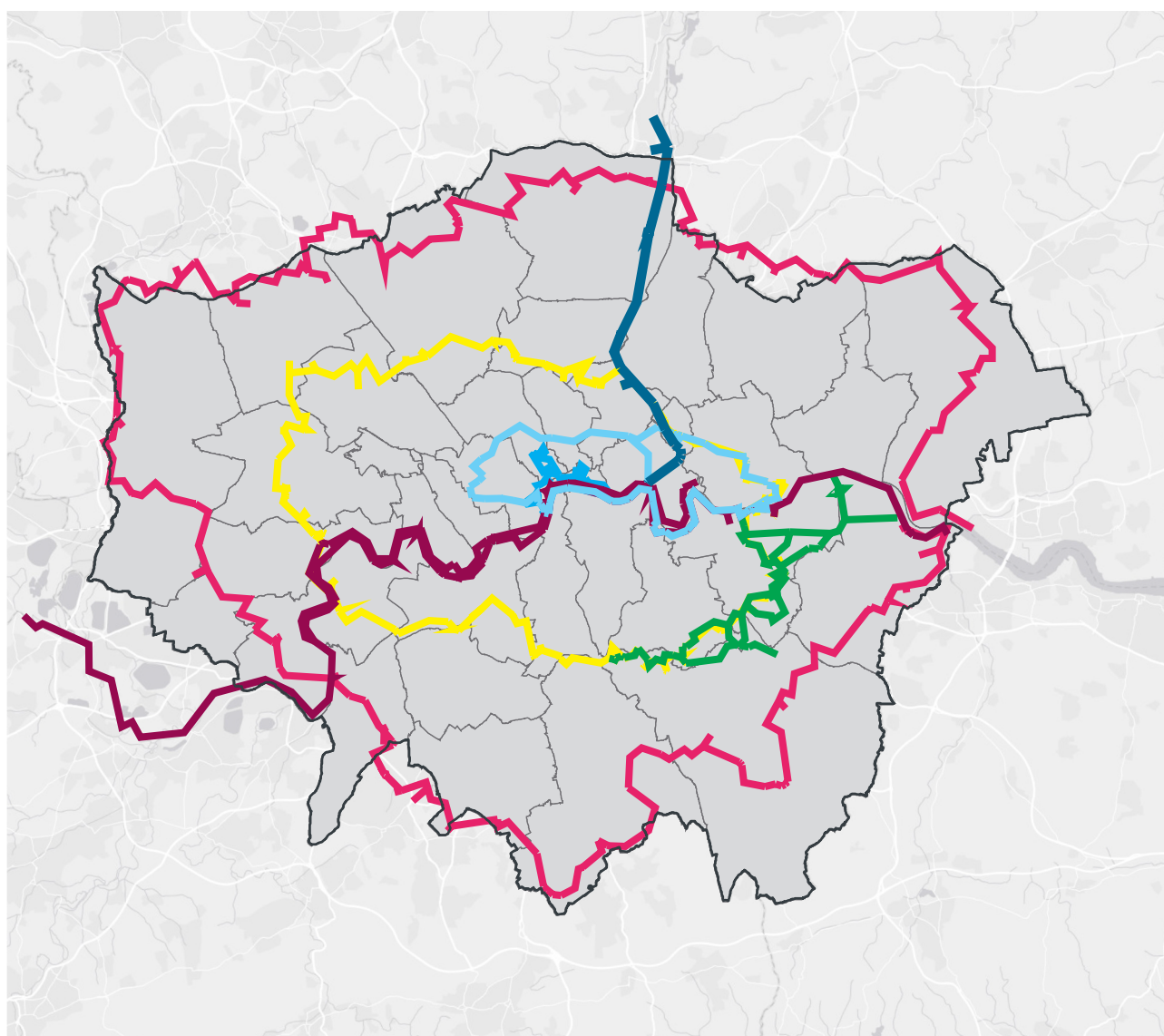
<sup>69</sup> Strategic Assessment of Need: Swimming Pools, Sports Halls and Artificial Grass Pitch provision in London 2017-2041 Facilities Planning Model. Sport England. July 2017

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- 5.5.4 Up-to-date **playing pitch strategies** can be used to protect and enhance the use of existing playing fields and help to plan for where more are needed. Sport England provides guidance on the preparation of these strategies, which underscores the importance of a strategic approach to provision to take account of demand for facilities crossing borough boundaries, particularly in relation to specialist activities.
  - 5.5.5 **Specialist sporting venues and stadiums** also have a role to play in providing facilities and enabling wider access to sport, as well as having an important cultural value.
  - 5.5.6 The **co-location** of sports facilities should be encouraged, particularly within new and existing schools, colleges, commercial schemes and community centres. This will help ensure the right mix of facilities in the right places to meet sporting demand and to increase participation.
  - 5.5.7 **Lighting** can be important for the accessibility of outdoor sports facilities and can help to improve their use. The form of lighting required will depend on the facility and its use, but efforts should be made to minimise the impact on the surrounding areas, and to not cause a demonstrable harm to the local community or biodiversity. The hours of use of lighting should be agreed early in the process.
  - 5.5.8 Places that are designed for people to be active and to move around freely will also encourage more physical activity in people's daily lives. Existing networks, such as the **Walk London Network**, also help to encourage this further.
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**Figure 5.1 - Walk London Network****Walk London Network**

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|--------------------|----------------|
| ● Lea Valley Walk  | ● Capital Ring |
| ● Jubilee Walk     | ● Thames Path  |
| ● Jubilee Greenway | ● London Loop  |
| ● Green Chain      |                |

Source: Transport for London (TfL)

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## Policy S6 Public toilets

- A Development proposals that include large-scale commercial 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 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.
- 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.

- 5.6.1 **Public toilets are a vital facility**, both for Londoners and visitors to the city. They are especially important for certain groups including disabled people, older people, people with babies and young children and pregnant women, as well as tourists and visitors who may be less familiar with their surroundings. Public toilets can support businesses in boosting customer footfall, by giving people more confidence to move around the city and spend more time in a place or space, as well as helping to keep London clean.
  - 5.6.2 Public toilets should be provided as part of **large-scale commercial developments** that are open to the public. Boroughs should define 'large-scale' for their local circumstances.
  - 5.6.3 Taking into account the needs of all Londoners, **a range of toilet facilities** should be provided. They should include unisex disabled persons' toilets, separate accessible baby change/family toilets, and cubicles for people with ambulant mobility impairments which can also be suitable for some older people or people who require additional space. Further guidance on the provision and design of these facilities can be found in British Standard BS8300. Consideration should also be given to the provision of gender-neutral toilets.
  - 5.6.4 Public toilets which are **open 24 hours** can be of great benefit to people accessing London's night-time economy. These, whether permanent or temporary, should provide facilities which can be used by disabled people and people of all genders.
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- 5.6.5 Public toilet facilities, whether provided inside buildings or externally, should be safe and clean. Surveillance of entrances is an important consideration when planning facilities. Ongoing **management and cleaning** of facilities should be secured and agreed at the planning stage to ensure long-term provision is achievable.
- 5.6.6 Standard wheelchair accessible toilets do not meet the needs of all disabled people. People with profound and multiple impairments, learning disabilities, and other impairments such as spinal injuries, muscular dystrophy, multiple sclerosis or acquired brain injury, often need extra facilities to allow them to use a toilet comfortably. **Changing Places toilets** are different to standard accessible toilets as they are designed for assisted use, are larger, and have additional features. Without Changing Places toilets many people are limited in terms of how long they can be away from home, or where they can go. The provision of Changing Places toilets can open up new areas and experiences for people with profound and multiple impairments, and their companions, removing the barrier that the lack of provision can create.
- 5.6.7 **Further guidance** on the types of development where it would be appropriate to provide a Changing Places toilet can be found in British Standard BS8300. Changing Places toilets are not designed for independent use and should be provided in addition to standard unisex disabled persons' toilets, baby change and family facilities, not as a substitution.

## Policy S7 Burial space

- A Cemeteries should be protected and the re-use of burial space supported.
- B When preparing Development Plans, boroughs should ensure provision is made for the different burial needs and requirements of London's communities, including for those groups for whom burial is the only option. Cross-borough and/or sub-regional working is encouraged where appropriate to identify and address the requirements of these groups and to tackle burial space shortages within the sub-region.
- C Development proposals for new cemetery provision should be supported. This may include provision in one borough to assist faith groups from another borough facing burial space shortages.

- 5.7.1 In assessing the requirements for burial space, account should be taken of the fact that different faith groups have **different needs for burial provision**. In London, the demand for burial space for particular faith groups is not always well matched with the availability of burial space. Some boroughs have little or no burial space available<sup>70</sup>. For inner and central London boroughs, this requires them to seek provision in outer London or beyond. This can cause problems of access and cost which has a disproportionate effect on London's poorest communities. It also risks undermining community cohesion and social integration. The Mayor favours the principle of proximity as a general rule, but there may be cases where meeting the needs of residents in one borough may require burial provision to be located in another borough. This may require a sub-regional approach to the provision of burial space.
- 5.7.2 The **re-use of graves** can provide some additional capacity. Both Section 74 of the Local Authorities Act 2007 and Section 25 of the Burial Act 1857 allow for the re-use of graves in certain circumstances and boroughs are encouraged to actively examine the potential that re-use offers them.
- 5.7.3 Ensuring that community and cultural facilities and services required to meet local needs are planned for and provided is one of the core principles of the planning system. Provision of facilities for cemeteries may not be inappropriate development in the **Green Belt or on Metropolitan Open Land** as long as it preserves the openness and does not conflict with the purposes of including land within it.
- 5.7.4 When making new provision, boroughs are encouraged to take into account the Mayor's broader aims for **green infrastructure and the natural environment**, including, but not limited to, the creation of new parks and open spaces, the enhancement of existing open spaces and natural environments, and the provision of enhanced links to London's green infrastructure. Woodland or parkland burial grounds can offer broad burial provision as well as wider public access. Amenity provision and environmental enhancements should be encouraged.
- 5.7.5 Boroughs should continue to make traditional burial provision but **innovative approaches** to the provision of community burial space, particularly in inner and central London, may also need to be taken. These

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<sup>70</sup> An Audit of London Burial Provision – A report for the Greater London Authority by Julie Rugg and Nicholas Pleace, Cemetery Research Group University of York 2011, available from <https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports>

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could include creating public gardens for the burial of ashes on underused pockets of open land, parkland and brownfield land. Such gardens could also offer broader community utility, improved amenity provision and environmental enhancement.

