

City of London Local Plan Review: Proposed draft policies relating to Healthy and Inclusive City

Context

The City of London is a very densely built up area with a large daytime population and limited open space. The City's economic success results in a high level of construction activity, while the density of development and employment, delivery and servicing requirements and the narrowness of many of the City's streets all contribute to periods of traffic congestion. This can result in poor air quality, noise and light pollution and a shortage of adequate open spaces, play and recreational spaces. The health of residents, workers and visitors to the City can be affected by adverse environmental conditions and lack of access to recreation and leisure opportunities.

The NPPF and the London Plan stress the importance of health and wellbeing and the role that the planning system can play in improving this. Planning policies can perform a social role, including supporting strategies to improve health and cultural wellbeing and promoting healthy communities. Planning decisions can have an influence on people's health, particularly through the design and management of new developments.

The City Corporation is committed to enabling an inclusive environment in which nobody is disadvantaged. Everyone should have equal opportunities to access buildings, spaces, job and training opportunities and health, leisure and educational services. An inclusive environment is one that recognises that everyone benefits from improved accessibility including disabled people, older people and families with children, carers, people with temporary medical conditions and people who do not consider themselves disabled.

An important element of this commitment is breaking down the unnecessary physical barriers and exclusions imposed on disabled people and others by poor design of buildings and spaces. The needs of disabled people should be considered at an early stage of the planning process and not considered separately from the needs of others.

A wide range of elements contribute to a healthy and inclusive environment. The transport and design sections of the Plan also address relevant issues such as: active travel and permeability, inclusive transport; and mitigating the impacts of pollution through the design of streets and public spaces, and providing adequate shade and shelter.

Core Strategic Policy CSXX: Healthy and Inclusive City

The City Corporation will work with a range of partners to create a healthy and inclusive environment in the City and enable all communities to access a wide range of health, education, recreation and leisure opportunities, by:

1. Implementing the principles of the City of London Corporation Joint Health and Wellbeing Strategy;
2. Ensuring that the use, design and management of buildings and the public realm helps to protect and improve the health of all the City's communities;

3. Requiring Health Impact Assessments to be carried out for major development proposals;
4. Requiring the design and management of buildings, streets and spaces to provide for the access needs of all the City's communities, including the particular needs of disabled and older people;
5. Expecting development to:
 - (i) promote healthy buildings and the Well Building Standard;
 - (ii) improve local air quality, particularly nitrogen dioxide and particulates PM₁₀ and PM_{2.5};
 - (iii) respect the City's quieter areas;
 - (iv) limit the City's contribution to unnecessary light spillage and 'sky glow';
 - (v) address land contamination, ensuring development does not result in contaminated land or pollution of the water environment.
6. Protecting and enhancing existing public health and educational facilities, including St Bartholomew's Hospital and existing City schools, working in partnership with neighbouring boroughs to deliver accessible additional educational and health facilities in appropriate locations;
7. Encouraging the further provision of both public and private health facilities;
8. Promoting opportunities for training and skills development to improve access to employment, particularly for City residents and those in neighbouring boroughs;
9. Providing and improving social and educational services through the City's libraries;
10. Supporting nursery provision and additional childcare facilities where a need exists;
11. Protecting and enhancing existing community facilities and providing new facilities where required; and
12. Protecting and enhancing existing sport, play space and recreation facilities and encouraging the provision of further facilities within major developments.

Reason for the policy

The City Corporation's Joint Health and Wellbeing Strategy considers three distinct populations with different needs and health issues: residents, workers and rough sleepers. Using data from the City and Hackney Joint Strategic Needs Assessment, it identifies five priorities for health and wellbeing in the City:

1. Good mental health for all;
2. A healthy urban environment;
3. Effective health and social care integration;
4. All children have the best start in life; and
5. Promoting healthy behaviours.

The second of these priorities is the most relevant to land-use planning, as it includes issues such as poor air quality; relatively high levels of noise; a lack of green space, community space and space to exercise; some overcrowding of the housing stock; and road safety. The Joint Health and Wellbeing Strategy notes that there is strong evidence that the environment shapes health outcomes and it seeks to “ensure health and wellbeing issues are embedded into the Local Plan and major planning applications”. This section of the Local Plan sets out policies that relate to many of the issues identified in the Joint Health and Wellbeing Strategy.

The City’s population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important fraction. The number of City employees and residents is forecast to increase during the Plan period, placing additional demands on the provision of health, education and social services to the working and resident populations. City workers may find it difficult to access health services where they live due to their working hours and the provision of additional clinics and pharmacy services in the Square Mile could play an important role in addressing their health needs.

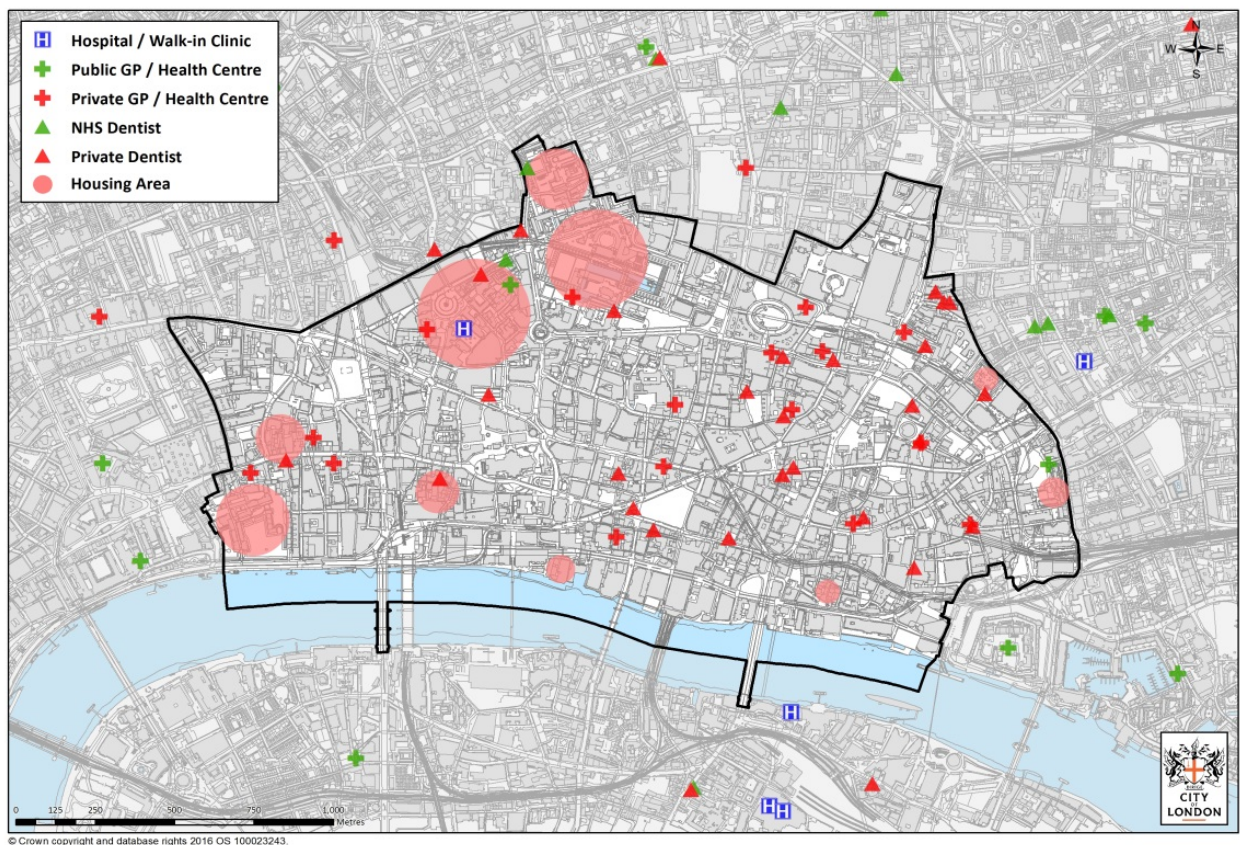


Figure XX: Distribution of health facilities in and adjoining the City

The small permanent residential population in the City means that it is often not economic to deliver effective services within the City. The City Corporation therefore works jointly with neighbouring boroughs and service providers to ensure that cost effective services can be provided. For example, the City Corporation is working jointly with Islington to deliver a new primary academy adjoining the City boundary.

The City is an intensively occupied location with large numbers of people working in office buildings in close proximity. Many City employees work long hours and may

also access leisure, medical and entertainment opportunities within their place of employment. Research suggests that a poor working environment can have a negative impact on the health of workers, and consequently their productivity. It is therefore important that buildings are designed to promote the health and wellbeing of everyone. The City Corporation established the Business Healthy programme in 2017 to support businesses to promote the health and wellbeing of their employees.

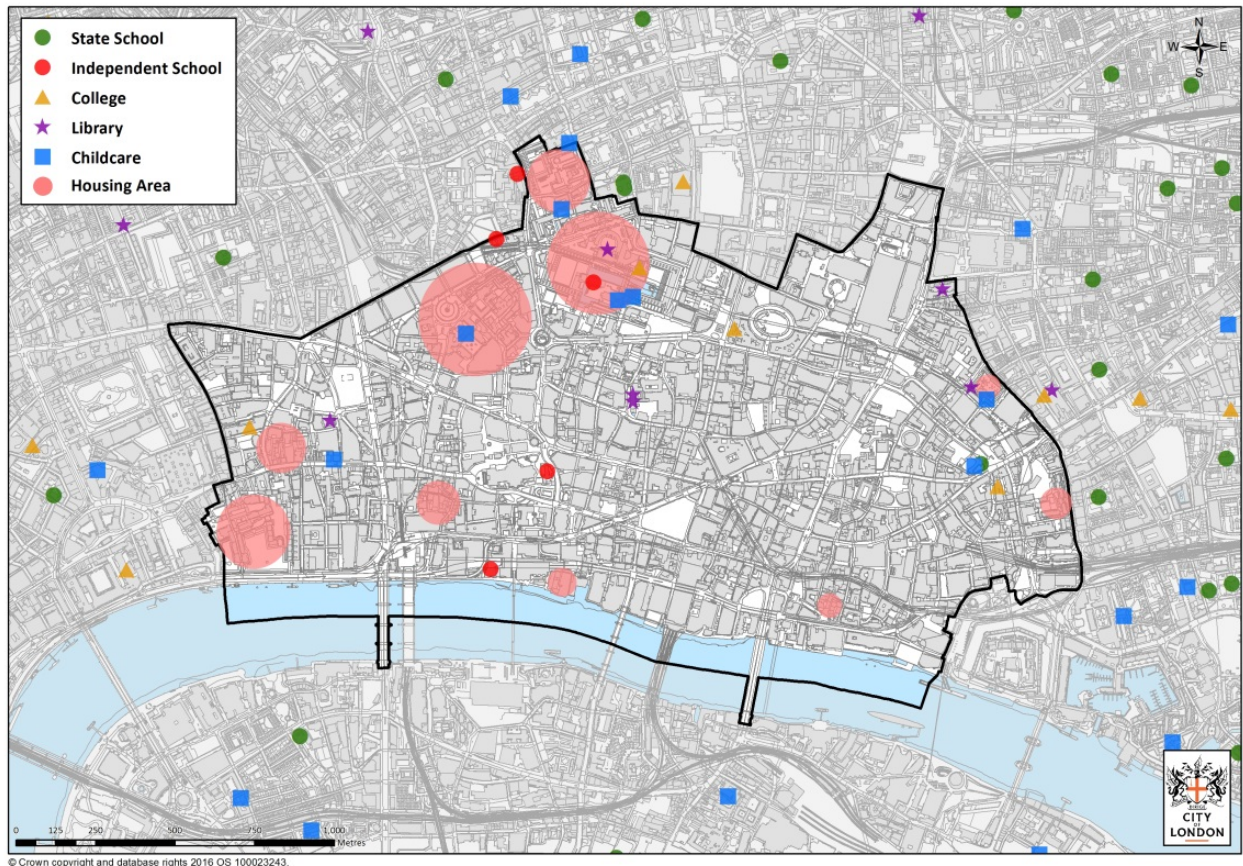


Figure XX: Distribution of skills and education facilities in and adjoining the City

Advances in technology and an awareness of how office environments can impact people's mental and physical health has highlighted the importance of striving to create a healthy City environment. A sense of community inclusion and belonging is important for both physical and mental health. People who live in cohesive communities with a wide range of employment opportunities, services, infrastructure and low crime are less likely to suffer poor health.

Outdoor spaces and the public realm are under increasing pressure to provide places for flexible working whilst also providing for relaxation and amenity. Protecting the relative tranquillity of at least some of the City's open spaces would confer benefits to health and wellbeing by providing places of respite from the City's generally high ambient noise levels. For instance, research on traffic noise has found that long-term exposure to noise above a certain level can have negative impacts on physical and mental health.

The location and nature of the City means that quieter areas, such as churchyards and open spaces, in the City cannot reasonably be expected to be as quiet as similar areas in suburban locations. Nonetheless, perceptions of tranquillity are often based

on the relative noise levels of an area compared to its surroundings, rather than absolute noise levels.

The City is a relatively affluent area and is the third least deprived local authority area in London. However, disparities exist. While the Barbican is amongst the 20% least deprived residential areas in England, Mansell Street and Petticoat Lane areas are amongst the 40% most deprived. The planning system can play a part in tackling such disparities, for instance by securing training and skills programmes through planning obligations associated with major development schemes.

How the policy works

To protect and enhance people's physical and mental health, new development should be designed to promote physical activity and well-being, through appropriate arrangements of buildings and uses, access, increased green infrastructure, and the provision of facilities to support walking and cycling.

To facilitate the delivery of a healthy city, developers are encouraged to use established methodologies, such as Well Certification under the Well Building standard. The Well Building standard is an accreditation system that attempts to measure how building features impact on health and wellbeing. Compliance requirements for the standard fit into seven key areas; air, water, nourishment, light, fitness, comfort and mind. Each category is scored out of 10 and, depending on the total achieved, silver, gold or platinum certification is achieved.

Full Health Impact Assessments (HIA) should be submitted to support planning applications for over 10,000 sqm GIA for commercial developments or 100 or more residential units. Such assessments consider the impact on people's health of the development. For schemes of between 10 and 99 dwellings or between 1,000 - 9,999 m² of commercial floorspace, developers should use the NHS London Healthy Urban Development Unit's Rapid Health Impact Assessment Tool for preparing their HIA. This allows for a focused investigation of health impacts and should address the most significant impacts and/or those most likely to occur.

Larger commercial developments should seek to reach outwards into the community by providing relevant services with health impacts such as publicly available drinking water, defibrillators and toilets. Signage at the front of buildings should be displayed to make the public aware of the availability of these facilities.

Policy DM XX: Inclusive buildings and spaces

1. To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:
 - inclusive and safe for all who wish to use it, regardless of disability, age, gender, gender expression, ethnicity, faith or economic circumstance;
 - convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;

- responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

Reason for the policy

The built environment needs to be safe, accessible and convenient to improve the quality of life for all City users and particularly for disabled and older people. Despite progress in building a more accessible City, some people still experience considerable barriers to living independent and dignified lives as a result of the way the built environment is designed, built and managed. The outcome of embracing inclusive design should be a City where people want to live, work and visit.

How the policy works

Developers will be required to submit Design and Access Statements which demonstrate a commitment to inclusive design and engagement with relevant user groups. Design and Access Statements should include details both on how best practice standards have been complied with and how inclusion will be maintained and managed throughout the lifetime of the building.

Policy DM XX: Air quality

1. Developers will be required to effectively manage the impact of their proposals on air quality and all major developments must provide an Air Quality Impact Assessment;
2. Development that would result in deterioration of the City's nitrogen dioxide or PM₁₀ and PM_{2.5} pollution levels will be refused;
3. All developments should be at least Air Quality Neutral. Major developments must maximise credits for the pollution section of the BREEAM assessment relating to on-site emissions of oxides of nitrogen (NO_x);
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed Air Quality Impact Assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation;
5. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions;
6. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible. Impacts from these activities must be addressed within submitted Air Quality Impact Assessments;

7. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development to ensure maximum dispersion of pollutants.

Reason for the policy

Due to its location at the heart of London and the density of development, the City of London has high levels of air pollution. Poor air quality can harm human health, particularly for young people while their lungs are developing, and increase the incidence of cardiovascular and lung disease. National health based objectives for the pollutants nitrogen dioxide (NO₂) and small particles (PM₁₀) are not being met in the City, in common with all central London, so the whole of the Square Mile has been declared an Air Quality Management Area. The City Corporation has also designated a Low Emission Neighbourhood in the Barbican, Guildhall and Bart's Hospital area of the City with the aim of improving local air quality by reducing the amount of traffic and encouraging and supporting low and zero emission vehicles in the locality.

Tackling poor air quality requires a range of actions, including reducing traffic congestion and supporting low emissions vehicles, reducing emissions associated with combustion based heating and cooling systems, and limiting emissions linked with demolition and construction. The addition of green space and planting within the public realm can help to trap particulate pollution. The main source of pollutants in the City is currently road transport, but following implementation of the Mayor's Ultra Low Emission Zone in 2019 it is forecast that a greater share of air pollutants will be generated by buildings. It is predicted that by 2020 buildings will account for almost half of NO₂ emissions arising in the City.

How the policy works

The City Corporation's Air Quality Strategy provides detailed information on the air quality issues facing the City and the various actions being pursued to improve air quality. The Air Quality SPD sets out specific guidance for developers on the City Corporation's requirements for reducing air pollution from developments within the Square Mile. The City's Code of Practice for Deconstruction and Construction Sites and the Mayor's Control of Dust and Emissions during Construction and Demolition SPG provide guidance on procedures to be adopted to minimise the impacts of demolition and construction activities on air quality.

The Air Quality SPD sets out the circumstances in which an Air Quality Impact Assessment is required and provides guidance on the information required. Such an assessment must be submitted for all major development.

Policy DM XX: Noise and light pollution

1. Developers will be required to consider the noise and lighting impacts of their developments and, where there may be an impact on noise-sensitive uses, to provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours,

particularly noise-sensitive land uses such as housing, hospitals, schools, nurseries and quiet open spaces.

2. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.
3. Any potential noise or light pollution conflicts between existing activities and new development should be minimised. Where the avoidance of such conflicts is impractical, the new development must include suitable mitigation measures such as attenuation of noise or light spillage or restrictions on operating hours.
4. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance near the development.
5. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
6. Opportunities will be sought to incorporate improvements to the acoustic environment and existing lighting within major development.

Reason for the policy

The City has a complex, densely developed and intensively used built environment in which space is at a premium and where multiple activities occur in very close proximity. Therefore, the effective management of noise and light pollution impacts applies to both development that introduces new sources of noise and light pollution or development that is sensitive to noise and light pollution.

The main noise sources related to new developments in the City are:

- Construction and demolition work and associated activities, such as piling, heavy goods vehicle movements and street works;
- Building services plant and equipment, such as ventilation fans, air-conditioning and emergency generators;
- Leisure facilities and licensed premises, involving noise from people and amplified music; and
- Servicing activities such as deliveries, window cleaning and building maintenance.

Noise sensitive developments in the City include residential developments (including hotels and serviced apartments), health facilities, schools and childcare provision and certain open spaces. For noise sensitive developments, confirmation will be sought of appropriate acoustic standards at the design stage. The City Corporation will apply the 'agent of change' principle, meaning that the responsibility for mitigating the impact of noise will fall on the new development.

Developments, including changes of use, may require permission under both the planning and licensing regimes, which operate under different legislation. In implementing planning policy, liaison will take place with licensing to enable consistency of advice and decision making as far as possible. Policy DM XX: Evening and Night-Time Economy sets out the planning policy approach to evening and night-time entertainment uses in the Square Mile.

How the policy works

The City of London Noise Strategy 2016-2026 identifies the strategic approach to noise in the City and the City's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise impacts of development. The use of planning conditions or obligations will be considered where this could successfully moderate adverse effects, for example, by limiting hours of operation.

When bringing forward major development proposals, developers are encouraged to consider whether there may be opportunities to enhance the existing acoustic environment, for instance by incorporating water features that can aid relaxation and help to mask traffic noise. More information about this can be found in the City's Noise Strategy.

The City Corporation is preparing a Lighting Strategy, which includes a range of proposals to improve the quality of lighting across the City with specific recommendations for different character areas. The Lighting Strategy includes guidelines to help reduce light spillage and glare from retail and office premises, and from signage. The redevelopment or refurbishment of buildings may present opportunities to reduce the impacts of existing insensitive lighting schemes.

Policy DM XX: Contaminated land and water quality

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

Reason for the policy

When a site is developed and ground conditions change there is potential for contaminants to be mobilised, increasing the risk of harm. Site investigation should establish whether the proposed use is compatible with the land condition. The phrase non-human receptors encompasses buildings and other property, or ecological systems and habitats, which may be harmed as a result of contaminated land or water.

How the policy works

Pre-application discussions should be used to identify the particular issues related to environmental protection that are relevant to each development site. The City

Corporation has published a Contaminated Land Strategy and a Contaminated Land Inspection Strategy, which provide details of the issues likely to be encountered in different parts of the City and should be used for reference by developers.

Policy DM XX: Location and protection of social and community facilities

1. Existing social and community facilities will be protected in situ unless:
 - replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - it has been demonstrated through active marketing, at reasonable terms for public, social and community floorspace, that there is no demand for the existing facility or another similar facility on the site.
3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:
 - where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
 - in locations which are convenient to the communities they serve;
 - in or near identified residential areas, providing their amenity is safeguarded;
 - as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

Reason for the policy

Social and community facilities contribute to successful communities by providing venues for a wide range of activities and services. As such they make a significant contribution to people's mental and physical well-being, sense of community, learning and education. Library and educational facilities for children and those that support the City's business and cultural roles are particularly important and will be protected where there is a demand for these facilities.

Existing social and community facilities will be protected, unless it can be demonstrated to the City Corporation's satisfaction that there is no demand from social and community users for the facilities or that their loss is part of a published asset management plan, in the case of non-commercial enterprises. The presumption is that current facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of social and community use in the first instance. Proposals for the redevelopment or change of use of social and community facilities to an alternative use must be accompanied by evidence of the lack of need for those facilities.

Where existing social and community facilities are to be relocated, the replacement facilities should be within the City. However, for services that serve a wider catchment area, relocation outside the City, but within a reasonable distance, might be acceptable. There may be advantages in locating organisations together within multi-functional community buildings to maximise the efficient use of resources.

Where rationalisation of services would result in either the reduction or relocation of social and community floorspace, the replacement floorspace must be of a comparable or better standard.

Policy DM XX: Public conveniences

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of directly accessible public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. Larger developments should include provision for disabled people and their carers (changing places toilets). Public toilets should be available during normal opening hours, or 24 hours a day in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets, unless adequate provision is available nearby, and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

Reason for the policy

Inclusive and accessible toilet provision is essential to meet the needs of all communities. Public conveniences are a particularly important facility for a number of groups, such as disabled people, older people and parents with young children and are a necessity in areas where people spend considerable time such as tourist areas. Areas of the City with concentrations of night-time entertainment require adequate toilet provision to prevent fouling of the streets.

The City Corporation provides public toilets and aims to provide a distribution which effectively meets public demand, but this needs to be supplemented by provision in major retail and leisure development through membership of the Community Toilet Scheme. The City Corporation provides attended toilets equipped with baby changing units and accessible toilet facilities, while automatic toilets provide a 24-hour service. The Community Toilet Scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.

Public toilets should be clearly signposted to ensure they are easily found. The City Corporation has produced a free toilet finder app suitable for use on mobile phones.

Facilities should be maintained by the owner as part of the overall maintenance of any development.

Consideration should be given to the provision of self-contained gender-neutral toilets. 'Changing places' toilets are not designed for independent use and should be provided in addition to standard unisex accessible toilets, baby change and family facilities, rather than as a replacement.

Policy DM XX: Sport and recreation

1. Existing public sport and recreational facilities will be protected in situ, unless:
 - replacement facilities are provided on-site or within the vicinity that meets the needs of the users of that facility; or
 - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - it has been demonstrated through active marketing, at reasonable terms for sport and recreational use, that there is no demand for the existing facility or alternative sport and recreation facilities which could be met on the site.
2. The provision of new sport and recreation facilities will be encouraged:
 - where they provide flexible space to accommodate a range of different uses/users and are accessible to all;
 - in locations which are convenient to the communities they serve, including open spaces;
 - near existing residential areas;
 - as part of major developments subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses;
 - where they will not cause undue disturbance to neighbouring occupiers.
3. The use of vacant development sites for a temporary sport or recreational use will be encouraged where appropriate and where this does not preclude return to the original use or other suitable use on redevelopment.

Reason for the policy

There has been an increase in sport and recreational facilities in the City in recent years, with much of the increase resulting from additional private gym facilities within office developments and some hotels. The rapid growth in the working population, as well as the increasing recognition of the importance of healthy lifestyles, means there is a continued demand for these facilities. While such facilities are important in meeting sport and recreational needs, it will not always be necessary to prevent their change of use, due to the fluid nature of the private market.

However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. The presumption is that current facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of sport and recreational use in the first instance.

Open spaces and publicly accessible rooftops can provide valuable sports and recreational facilities in the densely built City environment.

Policy DM XX: Play areas and facilities

1. The City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas where a need has been identified, by:
 - protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
 - requiring external play space and facilities as part of major new residential developments;
 - ensuring that where the creation of new play facilities is not possible, requiring developers to work with the City Corporation to deliver enhanced provision nearby;
 - promoting opportunities for informal play and play within open spaces where it is not possible to secure formal play areas.
2. Play areas and facilities must be inclusive and not be located in areas of poor air quality due to the negative health impacts on young children.

Reason for the policy

Play is essential for the healthy development of children and takes place in both formal and informal spaces. Formal play spaces include areas specifically designed and designated for play. Due to the City's large working population there are also opportunities to create informal play spaces in the City, which are not designated solely for that purpose but contain features that can be used for imaginative play. These spaces would also benefit the increasing numbers of children who visit the City.

Public realm spaces should be designed imaginatively to serve the needs of workers but also offer informal play opportunities. The City Corporation plans to provide appropriate sensory play areas in the City for children and young people with special educational needs.