

3. Health, Inclusion and Safety

3.1 Strategic Policy S1: Healthy and Inclusive City

The City Corporation will work with a range of partners to create a healthy and inclusive environment, promote social and economic inclusivity and enable all communities to access a wide range of health, employment, education, recreation, sport and leisure opportunities, by:

1. Implementing the principles of the City of London Corporation Joint Health and Wellbeing Strategy;
2. Ensuring that the construction, design, use and management of buildings, streets and the public realm helps to protect and improve the health of all the City's communities;
3. Requiring Health Impact Assessments of different levels depending on the scale and impact of the proposed development;
4. Requiring the design and management of buildings, streets and spaces to provide for the access requirements of all the City's communities, including disabled people, older people and people with young children;
5. Requiring inclusive design and management of buildings, streets and public spaces to provide for the requirements of all the City's communities;
6. Expecting developers and development to:
 - engage with neighbours before and during construction to minimise adverse impacts;
 - promote healthy buildings and the use of relevant standards that measure health and wellbeing in buildings;
 - improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM2.5;
 - respect the City's quieter places and spaces;
 - limit unnecessary light spillage and 'sky glow';
 - address land contamination, ensuring development does not result in contaminated land or pollution of the water environment;
7. Protecting and enhancing existing public health and educational facilities, including St Bartholomew's Hospital and existing City schools and higher education providers, working in partnership with neighbouring boroughs to deliver accessible additional educational and health facilities in appropriate locations;

8. Encouraging the further provision of both public and private health facilities. Conditions may be attached to permissions for public healthcare facilities to ensure their future retention;
 9. Promoting opportunities for training and skills development to improve access to employment, particularly for City residents and those in neighbouring boroughs;
 10. Supporting facilities for the provision and improvement of social and educational services through the City's libraries;
 11. Supporting nursery provision and additional childcare facilities;
 12. Protecting and enhancing existing community facilities, allowing for relocation where justified, and providing new facilities where required; and
 13. Protecting and enhancing existing sport, play space and recreation facilities and encouraging the provision of further publicly accessible facilities, within major developments and public realm improvements, in line with the aims of the City Corporation's Sports Strategy.
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Reason for the policy

- 3.1.0 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:
 - Good mental health for all;
 - A healthy urban environment;
 - Effective health and social care integration;
 - All children have the best start in life; and
 - Promoting healthy behaviours.
- 3.1.1 The Local Plan has a particular role in delivering a healthy urban environment, as it can address 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.
- 3.1.2 The City's population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important community. 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.

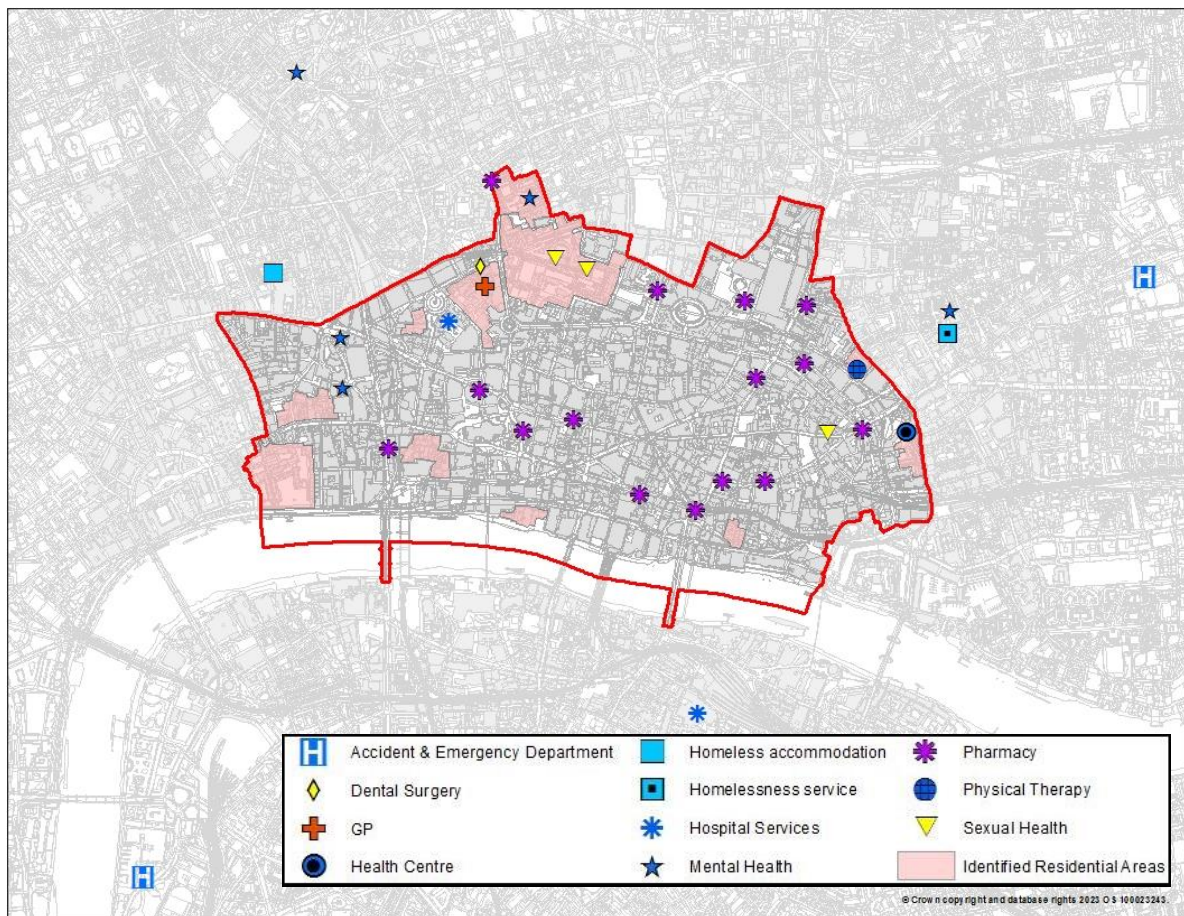


Figure 2: Health facilities in and adjoining the City

- 3.1.3 The small permanent residential population in the City means that it is often not economic to deliver effective services for City residents from locations within the City. The City Corporation therefore works jointly with neighbouring boroughs and service providers to ensure that cost effective services can be provided. The City Corporation will work with the City and Hackney Integrated Care Board and other NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally.
- 3.1.4 The City is intensively occupied with large numbers of people working in office buildings in close proximity. Many City employees work long hours and access leisure, medical and entertainment opportunities within or close to 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.
- 3.1.5 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. The City Corporation established the Business Healthy programme in 2017 to support businesses to promote the health and wellbeing of their employees.

- 3.1.6 Outdoor spaces and the public realm provide places for relaxation, amenity and leisure. The location and nature of the City means that perceptions of tranquillity and quieter areas are often based on the relative noise levels of an area compared to its surroundings, rather than absolute noise levels. The City Corporation's Noise Strategy 2016-2026 supports the creation of tranquil areas in the City and promotes awareness of the importance of protecting and enhancing these locations where possible. Examples of quieter areas in the City are open spaces, parts of the Riverside Walk, churchyards and housing estates. 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. It is therefore important to protect the relative tranquillity of some of the City's open spaces to confer benefits to health and wellbeing by providing places of respite from the City's generally high ambient noise levels, and assisting in the restoration and recovery from sensory overload.
- 3.1.7 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 Local Plan can play a part in tackling such disparities, for instance by securing training and skills programmes through planning obligations associated with major development schemes.

3.2 Policy HL1: Inclusive buildings and spaces

Buildings, open spaces and streets must meet the highest standards of accessibility and inclusive design, ensuring that the City of London is:

1. Inclusive, welcoming and safe for all, regardless of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation. Major applications should develop and submit equality impact assessments, demonstrating how this will be achieved;
 2. convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
 3. responsive to the requirements of all users who visit, work or live in the City, whilst recognising that one solution might not work for all;
 4. a place that promotes equity, diversity and social inclusion in the design and use of buildings and public spaces, including through the provision of spaces that are free to access.
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Reason for the policy

3.2.0 An inclusive environment is one that recognises that everyone benefits from improved accessibility including disabled people, older people, families with children, carers, people with temporary medical conditions or impaired mobility and non-disabled people. The built environment needs to be safe, accessible and convenient to improve the quality of life for all City users. 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 and which feels open and welcoming to people from different backgrounds.

3.2.1 Under the public sector equality duty, local authorities are required to have regard to the objectives of eliminate discrimination, harassment and victimisation; to advance equality of opportunity between persons who share a relevant protected characteristic and those who do not; and foster good relations between persons who share a relevant protected characteristic and those who do not.

How the policy works

3.2.2 Developers will be required to submit Design and Access Statements which demonstrate a commitment to inclusive design and the promotion of equity, diversity and social inclusion. Applicants should engage with relevant user groups, including health and social care providers, at early stages to inform their approach. Such engagement should take place before the detailed design stage prior to submission of an application to ensure maximum effectiveness and inclusive design within the building and in the surrounding public realm. Design

and Access Statements must 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.

3.2.3 Applicants should submit Equality Impact Assessments for major developments to ensure the needs of people belonging to groups with protected characteristics are met, and demonstrating how the development would promote equality, diversity and inclusion.

3.3 Policy HL2: Air quality

1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must comply with the requirements of the Air Quality SPD for Air Quality Impact Assessments;
 2. Development that would result in a worsening of the City's nitrogen dioxide or PM₁₀ and PM_{2.5} pollution levels will be strongly resisted;
 3. All developments must be at least Air Quality Neutral. Developments subject to an Environmental Impact Assessment should adopt an air quality positive approach. 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 expected to install non-combustion energy technology where available;
 5. A detailed Air Quality Impact Assessment will be required for combustion based low carbon technologies (e.g. biomass, combined heat and power), and any necessary mitigation must be approved by the City Corporation;
 6. 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;
 7. 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. All developments should comply with the requirements of the London Low Emission Zone for Non Road Mobile Machinery;
 8. 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 part of the development to ensure maximum dispersion of pollutants and be at least 3 metres away from any publicly accessible roof spaces.
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Reason for the policy

- 3.3.0 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. The City, in common with all central London, has been declared an Air Quality Management Area, due to national health-based objectives for the pollutants nitrogen dioxide (NO₂) and small particles (PM₁₀) not being met. National targets for PM_{2.5} are also not met.
- 3.3.1 The City Corporation is working with a wide range of organisations to address this problem and levels of NO₂ are falling, although the health-based limits are still not met everywhere in the Square Mile. The City Corporation's Air Quality Strategy aims to ensure that air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO₂ by the beginning of 2025. Limits set for particulate matter (PM₁₀) are generally met although the national target for PM_{2.5} is not met anywhere in the City. Air Quality Strategy aims to support the Mayor of London to meet the tighter WHO Guidelines for PM₁₀ and PM_{2.5} by 2030.
- 3.3.2 The City Corporation's Transport Strategy contains proposals to reduce air pollution associated with road traffic in the Square Mile. While the main source of pollutants in the City has historically been road transport, buildings now account for over half of NO_x emissions arising in the City. Tackling poor air quality requires a broad 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 on and around buildings and within the public realm can help to trap particulate pollution.

How the policy works

- 3.3.3 The City Corporation's Air Quality Strategy provides detailed information on the air quality issues facing the City and actions being pursued by the City Corporation and a range of partners 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 Corporation'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.
- 3.3.4 Developers will be required to manage the impact of their proposals on air quality, which should as a minimum be air quality neutral. Large-scale developments that are subject to Environmental Impact Assessment procedures should, in particular, propose methods of delivering an air quality positive approach which results in improvements to the City's air quality.

3.3.5 Developers are expected to fully explore the use of non-combustion generators, though it is recognised that there are currently limited options for non-combustion generators. In the short term, alternatives to using diesel as a fuel for generators may be acceptable where non-combustion options are not available. Technological advances during the life of the Plan will create more opportunities to install non-combustion generators.

3.4 Policy HL3: Noise

1. A noise assessment will be required where there may be an impact on noise-sensitive uses. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect nearby land uses, particularly noise-sensitive land uses such as housing, hospitals, schools, nurseries and quiet open spaces. New noise-generating development should include suitable mitigation measures such as noise attenuation or restrictions on operating hours.
2. Any potential noise pollution conflict between existing activities and new development should be minimised, in line with the 'agent of change' principle.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance near the development. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
4. Opportunities will be sought to incorporate improvements to the acoustic environment within major development.
5. When bringing forward major development proposals, developers should explore opportunities to enhance the existing acoustic environment.

Reason for the policy

3.4.0 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 impacts applies to both development that introduces new sources of noise pollution and development that is sensitive to noise.

3.4.1 The main noise and vibration 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.

3.4.2 Noise sensitive uses and developments in the City include residential developments, hotels and serviced apartments, health facilities, schools and childcare provision and certain open spaces.

3.4.3 Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing to enable consistency of advice and decision making.

How the policy works

3.4.4 The City of London Noise Strategy 2016-2026 sets out the strategic approach to noise in the City and the City Corporation's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise and vibration 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.

3.4.5 Some major developments may have the potential to enhance the City's acoustic environment, for instance by incorporating water features that can aid relaxation, help to mitigate sensory overload and help to mask traffic noise. More information about this can be found in the City Corporation's Noise Strategy.

3.4.6 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.

3.5 Policy HL5: 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

3.5.0 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 term “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

3.5.1 Pre-application discussions will 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.

3.6 Policy HL6: Location and protection of social and community facilities

1. Existing social and community facilities will be protected in situ unless:
 - replacement facilities of at least equivalent quality, quantity and accessibility are provided on-site or within the vicinity which meet existing and predicted future needs for this type of facility; or
 - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and with equivalent or improved accessibility for relevant user groups; 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 social or community use on the site.
2. The development of new social and community facilities should provide flexible, multi-use spaces suitable for a range of different uses and will be permitted:
 - in locations which are convenient to the communities they serve;
 - in or near identified residential areas, providing their amenity is safeguarded; and
 - 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.
3. 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

3.6.0 Social and community facilities contribute to successful communities by providing venues for a wide range of activities and services that are accessible to those

communities. As such they make a significant contribution to people's mental, spiritual and physical wellbeing, sense of community, learning and education. Library and educational facilities and those that support the City's business and cultural roles are particularly important. A definition of social and community facilities, with reference to the Use Classes Order, is provided in the glossary.

How the policy works

- 3.6.1 Existing social and community facilities will be protected in situ, 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, or that necessary services can be delivered from alternative premises without a reduction in service provision. 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 another social and community use in the first instance.
- 3.6.2 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, may be acceptable. There may be advantages in locating organisations together within multi-functional community buildings to maximise the efficient use of resources. Places of worship have the potential to accommodate a range of activities on their premises which can help improve community cohesion. Relocated facilities must be available to communities at a cost/rent equivalent to that charged prior to redevelopment. New facilities provided should similarly provide space at a cost/rent that is affordable to the communities being served.
- 3.6.3 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 size or provide a better quality of service to target communities.
- 3.6.4 Given the limited opportunities to replace such facilities in the City, conditions may be attached to permissions for new public health facilities to ensure that the impacts of any proposed later conversion to another use can be considered through the planning application process. Conditions will not be applied to private healthcare facilities.

3.7 Policy HL7: Public toilets

The City Corporation will promote a widespread distribution of publicly accessible toilets which meet public demand by:

1. requiring the provision of a range of directly accessible public toilet facilities suitable for a range of users including disabled people, families with young children and people of all gender identities in major retail, leisure and transport developments, particularly near visitor attractions, public open spaces and

existing major transport interchanges. Provision should be made for free 'Changing Places' for disabled people and their carers and facilities for feeding infants;

2. Publicly accessible toilets should be 24 hours a day, particularly areas with concentrations of night-time activity;
3. supporting an increase in the membership of the Community Toilet Scheme;
4. resisting the loss of existing publicly accessible toilets as a result of redevelopment, and requiring the provision of replacement facilities, unless adequate provision is available nearby; and
5. requiring the renewal of existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments, such as hotels and office schemes, where they are needed to meet increased demand, especially in locations likely to see significant footfall and visitors.

Reason for the policy

3.7.0 Inclusive and accessible toilet provision is essential to meet the needs of all communities. Publicly accessible toilets are a particularly important facility for certain groups, such as disabled people, older people, families with babies and young children and pregnant women. They are also important to meet the needs of tourists and visitors to the City. It is important when designing toilet provision to include cubicles for people with ambulant mobility impairments which can also be suitable for some older people and people who require additional space.

3.7.1 Areas of the City with concentrations of night-time entertainment require adequate publicly accessible toilet provision to prevent fouling on the streets.

How the policy works

3.7.2 The City Corporation will require the provision of publicly accessible toilets in major retail, leisure, transport and commercial developments, secured through legal agreements, or through encouraging membership of the Community Toilet Scheme, and will seek their provision where appropriate in other major developments such as office and hotel schemes. The Community Toilet Scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.

3.7.3 Publicly accessible toilets should be clearly signposted to ensure they are easily found and should be available 24 hours a day other than in exceptional circumstances. 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.

3.7.4 '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, rather than as a replacement. Changing places toilets are particularly encouraged in proximity to cultural attractions and should be available for use on a 24 hour basis. Management and maintenance is important to safe use and should be secured through the planning process. Where publicly accessible toilets are provided, consideration should be given to the provision of self-contained gender-neutral toilets.

3.8 Policy HL8: Sport and recreation

1. The City Corporation will promote the expansion of the City's sport and recreation offer, by encouraging sport and recreation provision as part of appropriate new developments and helping to deliver a network of free outdoor sporting facilities in the City.
2. Existing public sport and recreational facilities will be protected in situ, unless:
 - replacement facilities of at least equivalent quality, quantity and accessibility are provided on-site or within the vicinity that meets existing and predicted future needs for this type of 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, particularly publicly accessible facilities, will be encouraged in locations which are convenient to the communities they serve. New facilities should provide flexible space to accommodate a range of different uses and users, must be accessible to all, and should 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

3.8.0 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, including those within office developments and some hotels. While this is welcome, many facilities charge substantial fees and are not available to those seeking more informal, occasional and cheaper sport and leisure opportunities. By supporting new facilities, and creating a network of facilities across the Square Mile, the City can encourage healthier and more active lifestyles for all. Demand for such facilities is likely to increase due to the rapid growth in the working population and as the City becomes more of a destination for visitors.

How the policy works

3.8.1 The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities that meet Sport England's Active Design principles. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. 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. Current public 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. Where new outdoor facilities are created, priority will be given to those that provide opportunities for recreation that are free or available at low cost. Consideration should be given to locating outdoor exercise facilities for adults and children's play equipment near each other, where appropriate.

3.9 Policy HL9: Play areas and facilities

1. The City Corporation will promote opportunities for inclusive play and the provision of high quality play equipment and spaces in the City, 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;
 - seeking additional or enhanced play equipment and spaces, particularly in areas near to existing or planned attractions, and in places within and well connected to residential areas and other places likely to be used by children and young people;
 - requiring external play space and facilities as part of major new residential developments;
 - Where the creation of new play facilities is not possible, requiring developers to work with the City Corporation to deliver enhanced provision nearby, or provide financial contributions to enable the provision of facilities elsewhere;
 - promoting opportunities for informal play within open spaces where it is not possible to secure formal play areas; and
 - ensuring play facilities are designed inclusively, considering in particular differences in age, gender, neurodiversity and disability. Developers should seek to engage children and young people in the design of play spaces.
 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.
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Reason for the policy

3.9.0 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. As the City increasingly becomes a destination for a wider range of visitors, including families, children and young people, there will be increased demand for play spaces that are free of charge, well-designed, inclusive and accessible. These are likely to be focussed in areas near to leisure destinations such as the new Museum of London in Smithfield and along the Thames riverfront. Play near and within residential areas is also an important component of ensuring communities can be active and healthy and have fun near where they live.

How the policy works

3.9.1 The high rate of development in the City and the creation of new, and improvement of existing, public realm creates opportunities for 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.

3.9.2 Public realm improvements and the creation of new open spaces should be designed imaginatively to serve the needs of all the City's communities but also offer informal play opportunities. Children and young people are diverse in their experiences of the world and have different ways that they want to play and hang out in social spaces. The design of play space should be informed by these differences and children and young people should be involved in helping to design them. Where the opportunity arises, the City Corporation will enable appropriate sensory play areas in the City for disabled children, young people and adults and those with special educational needs and disabilities.

3.10 Policy HL10: Health Impact Assessment (HIA)

The City Corporation will require development to deliver health benefits to the City's communities and mitigate any negative impacts.

Major development should submit a rapid HIA. A full HIA will be required on those developments that are subject to an Environmental Impact Assessment. An HIA may also be required for developments considered to have particular health impacts, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent.

The scope of any HIA should be agreed with the City Corporation and be informed by City Corporation guidance on HIA. The assessment should be undertaken as early as possible in the development process so that potential health gains can be maximised, and any negative impacts can be mitigated.

Reason for the policy

- 3.10.0 The City of London is a densely built up central urban location. The scale of development, the busy and congested streets and pavements, limited open space and large numbers of workers can impact on people's physical and mental health.
- 3.10.1 Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, wheeling, cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets.
- 3.10.2 HIAs provide a systematic framework to identify the potential impacts of a development proposal on the health and wellbeing of the population and highlight any health inequalities that may arise. The Covid-19 pandemic has highlighted the important role that health impact assessments can play in enabling developers to understand and plan for potential risks to health and wellbeing.
- 3.10.3 HIAs can highlight mitigation measures that may be appropriate to enable developments to maximise the health of communities.

How the policy works

- 3.10.4 Developers will be expected to identify potential impacts on health resulting from all major developments in the City, following the approach set out in the City Corporation's Health Impact Assessment guidance note.

Rapid HIA

- 3.10.5 This involves focused investigation of health impacts and would normally recommend mitigation and/or enhancement measures. The City Corporation will adapt the London HUDU Rapid HIA Tool to reflect the City's circumstances and will expect this to be used for major developments.

Full HIA

- 3.10.6 This involves comprehensive analysis of all potential health and wellbeing impacts, which may include quantitative and qualitative information, data from health needs assessments, reviews of the evidence base and community engagement. A full HIA will be required on those developments that are subject to an Environmental Impact Assessment and could be included within the Environmental Statement to avoid duplication.

3.10.7 HIAs must look at the issue of health comprehensively, and not focus solely on access to health services. Where significant impacts are identified, measures to mitigate the adverse impact of the development should be provided as part of the proposals or secured through conditions or a Section 106 Agreement.

3.11 Strategic Policy S2: Safe and Secure City

The City Corporation will work with the City of London Police and the London Fire Brigade to ensure that the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism, by:

1. Ensuring that development proposals design-out crime and encourage a mix of uses and natural surveillance of streets and spaces;
2. Implementing measures to enhance the collective security of the City against terrorist threats, applying security measures to broad areas such as the Traffic and Environmental Zone, major development schemes, or to the City as a whole;
3. Developing area-based approaches to implementing security measures where major developments are planned or are under construction simultaneously, and in locations where occupiers have requested collective security measures;
4. Ensuring that development proposals take account of the need for resilience so that residential and business communities are better prepared for, and better able to recover from, emergencies including fire, flood, weather, and other related hazards as set out in the London Risk Register.
5. Requiring development proposals to meet the highest standards of fire safety. Major development proposals must submit a Fire Statement setting out how the development will address fire safety in the design, construction and operation of the building for all building users, including safe and dignified emergency evacuation.
6. Ensuring that development proposals cater to community safety and security requirements particularly those of people more likely to experience crime and fear of safety, including women, girls, children, younger, older and disabled people.

Reason for the policy

3.11.0 The City is a safe place to live, work and visit, with low rates of crime. Safety and security are important to the continuing role of the City of London as a world leading financial and professional services centre, and as an attractive place to live and visit. Ensuring a safe and secure City requires close co-operation between the City Corporation, neighbouring boroughs, the City of London Police and the London Fire Brigade, and between these agencies, the Metropolitan Police, the British Transport Police, the Government and Judiciary and the Mayor of London taking into account the Mayor's Zero Action Plan to eliminate deaths and injuries on city streets. The Safer City Partnership brings together

representatives from both statutory and non-statutory agencies that contribute to the work of keeping the City safe. The Partnership publishes a Strategic Plan and its vision is for the City of London to be a safe place to live, learn, work, and visit. Close working with developers and occupiers is also essential.

How the policy works

- 3.11.1 Security and fire safety features should be considered at the outset of the design process to be most effective and avoid the need for retrofitting later during the development process or following completion. Early engagement with the City Corporation, the City of London Police and the London Fire Brigade is particularly important, including through the pre-application process.
- 3.11.2 The design of a scheme should create safe, inclusive and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or social cohesion. Designs should take into account the most up-to-date information and advice regarding security needs in the area, working with local advisors to reduce vulnerability and increase resilience. Where appropriate, developers will be required to contribute towards the funding of measures designed to enhance security.
- 3.11.3 All development proposals must achieve the highest standards of fire safety and developers must liaise at an early stage in the design process with the City Corporation's District Surveyor and the London Fire Brigade on fire safety considerations, incorporating London Plan fire safety requirements. Major development proposals must be accompanied by a Fire Statement which sets out how the development will address fire safety in the design, construction and operation of the building.

3.12 Policy SA1: Publicly accessible locations

All major developments are required to address the issue of publicly accessible locations and counter-terrorism by:

1. Conducting a full risk assessment;
2. Undertaking early consultation with the City of London Police on risk mitigation measures; and
3. Restricting or rationalising motor vehicle access where required.

Reason for the policy

- 3.12.0 Places that are attractive, open and easily accessible can often become crowded. Such places are a potential target for crime and terrorism and offer the prospect of serious disruption or worse.
- 3.12.1 Crowded places include mainline and underground stations, shopping centres, bars and clubs which are all easily accessible. The high density of development,

the substantial daytime population and the high-profile of many City buildings and businesses make the area a potential target for terrorism. Measures such as traffic calming may be employed to limit the opportunity for hostile vehicle approach.

How the policy works

3.12.2 A risk assessment should be submitted for approval by the City Corporation as part of a planning application for major development or transport proposals. The risk assessment should be proportionate to the nature of the risk identified through consultation with the City of London Police and will typically include:

- Assessment of the risk of structural damage from an attack;
- Identification of measures to minimise any risk;
- Detail on how the perimeter is treated, including glazing;
- Consideration of adjacent land-uses and commuter routes.

3.12.3 The City Corporation will liaise with the City of London Police in considering and approving risk assessments submitted as part of a planning application.

3.13 Policy SA2: Dispersal Routes

Applications for major commercial development and developments which propose night-time uses must include a Management Statement setting out detailed proposals for the dispersal of patrons and workers from premises to ensure the safe egress of **all** people, minimise the potential for over-crowding and reduce the instances of noise nuisance and anti-social behaviour, particularly in residential areas.

Reason for the policy

3.13.0 The City increasingly operates on a 7 day a week basis, with an increase in evening and night-time uses. This will result in an increase in pedestrian movements within the City as patrons enter and exit public houses, bars, night-clubs and restaurants. Anti-social behaviour, including noise, disturbance and odours arising from the operation of the premises can be disruptive to City residents and occupiers and proposals should seek to mitigate any negative impacts that may arise, incorporating the Agent of Change principle.

3.13.1 The City's daytime population places pressure on the City's public realm at peak times. It is therefore necessary to provide details of dispersal routes as part of planning applications for major commercial developments to understand their implications for movement and amenity.

- 3.13.2 The planning and design of dispersal routes should be inclusive and take into account the needs of disabled people, older people, people with impaired mobility and people with children.

How the policy works

- 3.13.3 The dispersal of patrons from premises, particularly late at night should not have an unacceptable impact on the amenity of residents and other noise-sensitive uses. Adverse impacts will require mitigation in line with Policy CV4: Evening and Night-time Economy.
- 3.13.4 Major commercial developments should incorporate measures to reduce pedestrian flow at peak times or provide alternative routes to avoid overcrowding on existing streets to ensure the safety and security of the City and to avoid further stress on the City's public realm.
- 3.13.5 A management statement will be required, setting out the measures incorporated into the scheme to mitigate the adverse impacts of night-time economy uses. Early engagement with nearby residents and occupiers, as well as the City of London Police and the City Corporation as Licensing Authority, can help ensure that the measures contained in the management statement are appropriate to local circumstances. Assessment of the management statement will have regard to the City of London Noise Strategy, the provisions of the City of London Statement of Licensing Policy and any submitted licence application operating schedule.

3.14 Policy SA3: Designing in Security

1. Security measures must be incorporated into the design of development at an early stage, taking account 'secured by design' principles, to avoid the need for later retrofitting and measures that would adversely impact on the public realm or the quality of design. Applicants must liaise with the City Corporation and the City of London Police and incorporate their advice into the scheme design as required.
2. Security measures should be designed within the development's boundaries and integrated with those of adjacent buildings and surrounding public realm. Area-wide approaches should be considered.
3. Where it is required, Hostile Vehicle Mitigation (HVM) should be integrated into the design of the building. Development proposals should avoid the need for HVM on the public highway and public realm. In exceptional circumstances, where non-integrated HVM is shown to be necessary, consideration should be given to the use of trees, planters and benches to reduce its visual impact. Design and location of any HVM should ensure that public realm and pedestrian permeability is not adversely impacted, and should be designed to ensure an inclusive and accessible public realm.
4. Developers will be expected to contribute towards the cost of necessary and proportionate on-street mitigation of the risk of vehicle attacks in the vicinity of their

developments, or within a wider area where area-based security measures are proposed.

5. Where mixed use schemes are proposed, developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.
 6. All security measures which are expected to be more than very short-term should take account of the functionality of the area and needs of its users and should be sympathetic to surrounding buildings, the public realm and any heritage assets, and must be of a high-quality design.
 7. An assessment of the environmental impact of security measures will be required. It should address the visual impact and impact on pedestrian flows.
 8. Security and safety measures are incorporated into the design at an early stage to avoid the need to retro-fit measures that adversely impact on the public realm or the quality of design.
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Reason for the policy

3.14.0 Measures to design out crime, including counter-terrorism measures, should be integral to development proposals and may be applicable to crowded spaces around a development as well as the building itself. Security measures should be proportionate to the risk and the likely consequences of an attack, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. Late consideration of security in developments can be more costly, inefficient, and less effective, and can have a negative impact on the architectural quality and design of a building and the surrounding public realm. These difficulties can be avoided by considering security at the early design stage. Given the limited space within the City, and the density of development, it is important that any required HVM is an integral part of the design of new development, and that it does not disrupt the permeability, accessibility and enjoyment of public spaces for everyone.

How the policy works

- 3.14.1 All new developments must incorporate appropriate security provision to reduce the risk and the likely impact of an attack. It is not always possible to provide security measures wholly within the building or development site, particularly when there is a need to provide stand-off distances to protect against potential vehicle-borne attacks, or where the building line is immediately bounded by public highway. Security features for individual buildings on the public highway should be a last resort when all other alternative proposals have been exhausted including the scope for an area-based approach.
- 3.14.2 A collective approach to security is likely to be more effective than an individual building approach, particularly in areas of high-density development such as the

City Cluster. The City Corporation will use s106 planning obligations requiring developers to contribute to measures to enhance collective security, where appropriate.

- 3.14.3 In considering the impact of new development on the public realm, the City Corporation will take into account the need for additional security measures within the public realm to reduce the risk to individuals from motor vehicles and the potential for vehicles to mount pavements. Developers will be expected to contribute towards the cost of on-street mitigation of the risk of vehicle attacks in the vicinity of their developments, through the use of s106 planning obligations.
- 3.14.4 Developments should aim to achieve a high level of natural surveillance of all surrounding public areas including the highway. Mixed use developments can generate greater activity and surveillance, but a mix of uses within individual buildings may give rise to problems of security, management and amenity. The provision of independent primary and secondary access points will be required so that proposed uses are separate and self-contained. In appropriate circumstances, use of CCTV should be considered.
- 3.14.5 Early engagement with the City of London Police and the City Corporation is essential to ensure that security measures are appropriate to evolving threats. Where the development has an impact on heritage assets, early discussion with Historic England is also recommended.
- 3.14.6 Design and Access Statements should incorporate recommendations from the City of London Police, City Corporation and 'Secured by Design' principles or equivalent, setting out how an inclusive approach to security has been considered at the design stage. Advice in the City Corporation's Public Realm Technical Manual should be incorporated into proposals to ensure developments offer a lasting contribution to the streets and spaces of the City.