**Healthwatch City of London response to the draft City Plan**

**Overall impression and concerns**

Healthwatch City of London (HWCoL) are pleased to be able to comment on the draft City Plan. To maximise our impact and in line with our main concerns we have restricted our input to Section Four ‘Flourishing City’, which contains the comment on the City’s approach to health.

Healthwatch City of London is often seen as primarily concerned with the health and wellbeing of residents, however, nearly half a million city workers are present every day during the week and many tourists and visitors both inside and outside of these hours. Healthwatch City of London considers the physical and mental health and wellbeing of all are equally important. The City also has a proportionately high number of rough sleepers, which are of concern to Healthwatch.

Overall the policy recognises the main contributors to poor health. However it is difficult to see how the City will manage its commitment to improving health and managing the impacts of developing a thriving economy and increasingly large and complex construction and building programme together with an increase in day time population density.

The primary aim of the City is to increase its capacity for business together with an increase in night time and weekend footfall as it makes the City a “go to “destination. Many of the priorities compete for the same attention and limited space. Exactly how the City would make provision to meet all the objectives in Flourishing City whilst meeting its primary objectives is unclear. The plan lacks detail on how these competing objectives will be met. Whilst its commitment is obvious, we feel there needs to be more detail on how this will be achieved and the impacts on those who work and live here. The plan does not give confidence that the health considerations are primary and neither does it feel to us that it sufficiently capitalises on the synergy that can be gained from communities working together. The vast number of smaller business and those in the construction industry appear to receive limited attention.

Accessing wellness and fitness facilities and the development of some shared health facilities are options we would ask the City of London to consider. This could include development of primary care facilities that could be accessed by workers who do not receive any additional healthcare benefits; including those on lower wages or working social hours. This would prevent people having to travel home for appointments. A larger diagnostic centre could be created and made available to City residents as a shared benefit.

We would also like to see the expansion of the public defibrillator scheme in all areas of the City including the retail area and there should be 24/7 access.

The use of new technologies has limited reference and we would like to see greater use of these technologies both in terms of achieving the benefits described in this section and keeping people informed. For example, Westminster Council has a Tap the App for supporting homelessness and a robust approach to engagement on planning. We would welcome the City exploring the good practice in other similar boroughs. We are aware of the Street Link service within the City, however in our experience the resources are not there to support it.

The Plan does not mention access to healthy foods. There are any number of restaurants, bars and cafes but there is limited opportunity to buy food that is other than ready prepared. The City should give thought to developing a farmer’s market and increasing the number of fruit and vegetable outlets within the City. Both Barts and the Barbican Centre would make ideal venues in the Northern part of the City whilst Petticoat Square could be considered to the East.

Access to transport for some City residents especially the disabled people and the older people may prohibit going out to shop and greater consideration should be given to access to healthy foods adapting models issued in Tower Hamlets when dealing with urban food deserts.

Finally, the importance of the Cultural Mile in improving mental health has not been emphasized and we would like to see the development of plans to improve health through the work of the Barbican, the Guildhall School of Music and the Museum of London.

**Detailed Comment**

**HIC1 Inclusive buildings and space:** whilst this section provides the right feeling, there is limited comment on how those considering major development will be encouraged to comply with the proposed standards. The language is ‘should ‘. How this will be enforced is not made clear. We would suggest that businesses are required to fully engage with local communities as a condition of their planning application. There has been a feeling recent planning applications have failed to engage sufficiently and often this is ‘lip service’. However, the mutual benefits can be many, and HWCoL would like to suggest a more robust framework for developing these mutual benefits. It is also difficult to see how this policy will work given security issues.

**HIC2 Air Pollution:** Once again the policy expresses the right sentiment however, air quality in the City remains poor. It is essential the City enforces the regulations. We note the recent consultation on the Transport Strategy and expect to see progress as a result of its implementation. Increased building activity will increase traffic to small areas and dust and noise will be a problem. The City should commit to minimising large-scale building works where children live and play. We would like to see a larger number of smoke free public places with a reduction in associated litter. Restricting deliveries and access to night- time hours is one solution, but this must not impact on residents. Night time traffic should not be directed through residential areas.

**HIC3 Noise and Light Pollution:** An important area with the right commitments however, we would like to see a greater emphasis on ‘must’ rather than ‘should’. The City should be at the forefront of managing noise and light pollution and have much to show the rest of the world. Perhaps working with designers and builders to develop new ways of managing these urban problems A commitment to be a world leader in minimising Noise and Light Pollution would be a bold statement. We would recommend that the City commits to reducing light and noise pollution at night in residential areas, where we know the impacts on poor sleep and mental health may be greatest.

**HIC5 Location and protection of Social and Community Facilities:** this section addresses the removal of space due to building programmes and is less about the benefits of a well-developed accessible open space, however we would like to see the City develop an open space strategy, which commits to quiet places. There are many good examples of this around the City. We note the recent consultation on the use of CIL monies and there may be proposals to use monies to develop quiet spaces. Encouraging visitors into the city especially those with small children or indeed young adults, will require access to space that is unpolluted by noise, poor quality air, smoke and the impacts of excessive consumption of alcohol. This equally applies to HIC8

**HIC6 Public conveniences:** Healthwatch supports the increase in facilities, especially at night time when access is more limited and night- time revellers are often in need. This is a problem near residential areas. We are pleased there is a City public toilet App (<https://www.cityoflondon.gov.uk/services/transport-and-streets/clean-streets/Pages/Public-Toilets.aspx>) however feel this could be better publicised and improved through consultation with City residents and workers. We would also ask the City to consider a pilot of some monitored public shower facilities, especially for rough sleepers. We are aware of the Community Toilet Scheme which is excellent and could be further developed as suggested.

**HIC7 Sport and recreation:** this section appears to be aimed at the private market. We would like to see a greater emphasis on facilities for those who cannot afford gym membership, particularly those on zero hours or who work overnight or in unsocial hours. Many of these workers are unseen and their voice is unheard. We would like to the see the City encourage providers of recreational and sports facilities to provide cheaper or free access for these groups of people. Likewise, residents who may not have access to community facilities including young mothers, the elderly, those with disabilities, the unemployed or groups who find gym membership prohibitive. Options for providing access for younger people should also be pursued through working with local business and providers of membership gyms. The City should also consider creating outdoor facilities for gym classes, Pilates etc. The Olympic park and other boroughs have similar facilities.

**HIC8 Play areas and facilities:** whilst this section is highly commendable there is limited information and it appears to be more aspirational. We would urge the City to think about the safeguarding of children and safety generally when considering how to implement more access. We have crossed reference this with HIC5

**H1 Location of New Housing:** HWCoL supports the comments made in 4.3.7 regarding protection of residential areas but given the proximity of business and new developments alongside the established housing stock it is difficult to see how this is enforceable.

Any new housing within the City would require additional primary care services and access to good diagnostic services. This access could be coupled with increased provision for city workers who do have access to healthcare though their workplace. Likewise access to the purchase of high quality, healthy and affordable food.

**H3 Residential Environment:** It is difficult to see how the commitments in this section are achievable given the City’s primary aims. It would be good to see exactly how the City intends to achieve this goal and how communities will work together. HWCoL would like to see more information.

**H8 Older persons Housing:** This section is limited, and we would suggest, given the growing older population, and the requirement to keep people in their homes for longer that more consideration be given to this section. HWCoL would be happy to participate in this. Consideration should be given to access to parking and other facilities for carers and healthcare professionals required to support people in their own homes. Likewise access to open spaces and community facilities should be considered.

 **Gail Beer, Chair Healthwatch City of London on behalf of the Board**

**28 February 2019**