

REPORT OF THE CLERK TO THE JOINT COMMITTEE		
<p>RESPONSE TO THE MAYOR'S DRAFT STRATEGIES (London Plan, Economic Development and Transport Strategies and Health Inequality Strategy)</p> <p>Joint Committee of the London 2012 Olympic and Paralympic Host Boroughs 18th December 2009</p>	<p>Classification</p> <p>Public</p>	<p>Enclosures</p> <p>Appendix A Draft Letter on London Plan and related strategies Appendix B Draft Response on Health Inequalities Strategy</p> <p>AGENDA ITEM NO.</p> <p>4</p>

1. INTRODUCTION

- 1.1 The Mayor has issued several strategies for consultation. Responses are required by 12 January. This report deals with the London Plan, the Transport Strategy and the Economic Development Strategy and, jointly with the Primary Care Trusts (PCTs), with the Health Inequalities Strategy.

2. RECOMMENDATIONS

- 2.1 The Joint Committee of the London 2012 Olympic and Paralympic Host Boroughs is recommended to:
- i) **Approve Appendix A as the joint response from the 5 Host Boroughs dealing with common issues on the Olympic Legacy in the London Plan, the Economic Development Strategy and the Transport Strategy;**
 - ii) **Approve Appendix B as the joint response from the 5 Host Boroughs and the PCTs on the Health Inequalities Strategy.**

3. RELATED DECISIONS

- 3.1 There has been no previous report to the Joint Committee on these issues.

4. ALTERNATIVE OPTIONS

- 4.1 It is open to the committee to vary the drafts to reflect further issues or to conclude that individual borough responses should cover some matters.

5. SUSTAINABILITY AND LEGACY

- 5.1 The agreement by the Olympic Park Regeneration Steering Group on 19 October of the Strategic Regeneration Framework included a commitment by the Mayor to include the objectives of the Framework, especially convergence, in all his strategies and plans. These responses ask that the commitment is met and that the strategies properly and fully reflect the legacy interests of the boroughs.

6. ECONOMIC IMPACT

- 6.1 There is no direct impact from the report although the improvements we seek in the Mayor's strategies would improve the economic future of the boroughs.

7. HUMAN RIGHTS

- 7.1 None.

8. RISK

- 8.1 This is a major opportunity to realign the London wide strategies around the delivery of the Olympic legacy throughout the boroughs. If we do not secure that alignment the legacy benefits may be reduced or delayed.

9. FINANCIAL CONSIDERATIONS

- 9.1 The draft letter at Appendix A points out that the London Plan and Transport Strategy do not sufficiently address infrastructure needs or sources of funding. Also, the scale of population growth proposed for East London requires a matching commitment of additional resources]

10. LEGAL CONSIDERATIONS

- 10.1 There are no immediate legal implications arising from this report.

11. BACKGROUND

- 11.1 The four strategies have been considered by the Boroughs and by the Host Boroughs Unit, together with the PCTs. The drafts attached at Appendix A and Appendix B deal only with those issues on which we advise that a collective response about the Legacy is appropriate. Boroughs will be responding separately to each of the strategies on a wider range of issues. Appendix A covers the three strategies together as they are closely related and key issues are relevant to all three. Appendix B deals with the Health Inequalities Strategy separately; there are some cross references between the two responses.
- 11.2 The drafts are largely self explanatory. While the London Plan acknowledges the commitment made by the Mayor to support convergence the other strategies do not do so fully. The underlying issue about the extent and timing of population growth in this area is fundamental to our planning for the future and to our place in London.

- 11.3 The relevant Borough officers have been consulted and Chief Executives have approved the report. Informal consultations have taken place with the Olympic Park Legacy Company. The Chief Executives of the PCTs have approved Appendix B.
- 11.4 The report has no direct impact on the **equalities** policies of the Host Boroughs although alignment of the strategies towards convergence should support better outcomes.

Roger Taylor

**On behalf of Tim Shields,
Chief Executive of the London Borough of Hackney
Clerk to the Joint Committee**

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Background papers

The following documents have been relied upon in the preparation of this report:

Description of document	Location	Date

APPENDIX A

RESPONSE BY THE OLYMPIC HOST BOROUGHES TO THE LONDON PLAN, THE TRANSPORT STRATEGY AND THE ECONOMIC DEVELOPMENT STRATEGY

I am writing on behalf of of the Olympic Host Boroughs (Greenwich, Hackney, Newham, Tower Hamlets and Waltham Forest) on these three recent consultations. This response deals with a small number of common issues that are relevant to our collective approach to delivering the olympic legacy. The boroughs will also be responding individually on a wider range of issues. We are covering the three consultations together given the close relationship between them. We are responding separately on the Health Inequalities Strategy, jointly with our Primary Care Trusts

SUMMARY

We warmly welcome the commitment made in the draft London Plan to the delivery of the Olympic Legacy across the 5 boroughs and the principle of convergence we have agreed with the Mayor in the Strategic Regeneration Framework (SRF). This commitment needs to be carried through into the Transport Strategy, the Economic Development Strategy,, and the Health Inequalities Strategy and to the Mayor's other strategies including the final version of the Housing Strategy.

The commitment to supporting convergence then needs to influence more clearly the main strategic choices in the plans and to be reflected in the investment that will support the plans. Those strategic and spatial choices should meet the opportunities and demands of both growth and regeneration in east London .

In particular:

- The overall balance of growth across London needs further consideration to demonstrate that all areas are making a proper contribution;
- The key economic centres in the host boroughs both north and south of the river should be more clearly seen as operating in a complementary way and more closely related to the local area
- Reassurance is needed about the delivery of affordable housing
- There should be clearer understanding of the infrastructure needed and the sources of funding
- Transport planning and investment needs to be sufficient to drive the planned growth
- There needs to be a better understanding of how the economic contribution of the Host Boroughs will support both growth in London and prosperity in the boroughs
- The strategic role of the Olympic Park should be more clearly reflected in the Plan.

DETAILED COMMENTS

Numbered paragraphs indented in bold summarise the changes we wish to see in the strategies.

Commitment to convergence

We welcome the clear initial commitment to apply the overall objectives of the London Plan to the Olympic Legacy in paragraph 1.51:

The principles set out in these objectives, and particularly the third, will be applied by the Mayor to the new and existing neighbourhoods in the Lea Valley that will develop and evolve following the 2012 Olympic and Paralympic Games. (see Policy 2.4).

However here and elsewhere in the London Plan the approach is too limited, generally referring to the Lea Valley. This misses the point that the agreement between the Government, the Mayor and the boroughs covers convergence across the whole of the Boroughs.

1: Throughout the plans the commitment to convergence should be expressed as relating to the 5 Host Boroughs as in Policy 2.4.

There are examples where the plan recognises the general importance of the east of the London to the spatial strategy (para 2.4):

In spatial terms, this will mean renewed attention to the large areas of unused land in east London where there is both the potential and need for development and regeneration.

This understates the importance both of the areas and of the strength of the commitment that needs to be made to delivering change in the host boroughs.

2: The Plan should give a clearer commitment to the priority for the East London boroughs, particularly the Host Boroughs, in delivering growth for the benefit of the whole of London and to assist the achievement of regeneration and convergence.

There are no equivalent statements to paragraphs 1.51 and 2.4 or Policy 2.4 in either the draft Transport Strategy or the draft Economic Strategy. In the Strategic Regeneration Framework the Mayor undertook to embed the commitment to convergence with all the relevant strategies.

3: All the relevant strategies (including the final Housing Strategy) should include a specific commitment to supporting the objective of convergence. In particular in the Transport Strategy the sixth strategic goal should explicitly refer to the convergence principle and the associated commentary needs expansion. In the Economic Strategy Strategic Objective 4 should deal with the spatial differences in the current access to employment and the need to achieve convergence and Objective 5 needs to be adapted to deal with the host boroughs specifically as well as the London wide issues.

Embedding the principle of convergence into the London wide strategies means that those strategies cannot be spatially neutral. They all need to demonstrate that the choices made acknowledge both the existing distribution of social and economic conditions, especially

the deprivation within the host boroughs, and the opportunity to use the potential for growth in the area to transform those conditions.

There are also further opportunities for the Plan to use the policies on physical development to improve social and economic outcomes. For example we identify the need to deal with fast food outlets in our response on the Health Inequalities Strategy.

Balanced growth across London

The Host Boroughs have always been committed to delivering a substantial part of the growth in London, recognising that the major development areas within the boroughs provide substantial capacity for new homes. The Boroughs see this growth as enabling them to address current problems on the availability, affordability, quality and type of housing and transform the overall quality of places throughout the area. However many parts of the Boroughs are already highly developed and there is limited space to provide additional facilities, especially green space. We are therefore surprised that the population projections being used show such sharp disparity between boroughs across London with a tendency for some of those already highly developed and dense to become more so and others to take a disproportionately low share of growth. We assume that the overall population distribution in the plan is based on assumptions on the capacity of the boroughs during the next 10 years being rolled forward throughout the lifetime of the plan. Clearly as the more significant sites in the area are developed there is unlikely to be such a large proportion of major sites available in the future.

You are aware that we already have concerns about the possible understating of the population in our areas and the extent of the churn in population. The long term assumptions about overall population growth need more debate. Without a better understanding of the key drivers for growth we will not be able to plan the appropriate level of infrastructure.

There is a discussion in the Economic Strategy about the impact of migration, the possible effects of any restriction on migration and the impact of that on high level skills. There needs to be a fuller discussion about how the population projections depend on migration assumptions and the implications, especially for East London of the expected balance of skills of migrants and the implications for policies and programmes in matching skills to the future economy of the area.

4: There should be a fuller discussion of the balance of population change across London and how far the London Plan can ensure that there is fair opportunity for improving the economy and local quality of life throughout the London. The rate and scale of population growth proposed by the Plan in East London and the housing therefore needed require a matching commitment to the delivery of the resources to support the transformation.

Focusing on economic centres

We welcome the recognition that key centres within the 5 boroughs will have a strategic economic role in London, including the expanding areas around Canary Wharf, in Stratford and Greenwich.

However the London Plan treats the Isle of Dogs largely as an extension of the City's financial district (although it is unclear in some parts of the analysis whether it is included or excluded). This reflects a strong tendency to focus on the single main centre in London, for example much of the analysis deals with the radial nature of transport and characterises the flows within London mainly as between Outer, Inner and Central. This understates the way in which areas can work coherently as sub regions. As we have set out in the SRF we wish to see the London wide and international role of the Greenwich Peninsula, Canary Wharf Excel, Stratford/and the Olympic site(which we would support) being balanced with the potential role of these centres in the sub region. The way in which areas are designated (for example on the Key Diagram) makes it much easier to see places such as Croydon as the centre of its locality. We need a more sophisticated approach to this area to ensure that the interrelated components serving the five boroughs are properly recognized. This would include a much more positive approach to placing the Thames at the heart of East London going beyond its role as a transport route and seeing it as a unifying feature rather than simply a barrier to be overcome.

6: There should be reinforcement of the economic roles of all the key centres forming the heart of the SRF area both north and south of the river bringing together improved transport (eg the international services at Stratford) and their strategic function with strengthening more local links between the centres and the adjacent areas.

Housing

We have been discussing housing issues separately in the context of the Multi Area Agreement. We support the delivery of affordable homes throughout our area, including a substantial amount of social rented homes. We also support the focus on dealing with overcrowding.

However we will want to be reassured both that the funding is available to support such housing (whether through direct public funding or developer contributions) and that these homes will be used to meet the need arising in the host boroughs.

The further work we propose above around population growth will need to be informed by a realistic assessment of the delivery of new affordable homes.

Funding and Delivering Infrastructure

Through the preparation of their LDF core strategies the boroughs are bringing forward a much better understanding of the social and transport infrastructure that is needed to accommodate the growth planned in their areas. The London Plan and the Transport Strategy do not sufficiently address either the infrastructure needs or the sources of funding. The proposals on s106 and the prospective levy are largely left to a further SPG. However the Plan proposes that priority is to be given to funding Cross Rail, even ahead of other local transport improvement. Cross Rail is clearly a top priority for us as it is for the

Mayor but we will want to be assured that there is an effective investment plan for all the other transport and social infrastructure as well..

This links to the amount of growth expected to take place in the Host Boroughs. Without an effective programme of investment to provide social infrastructure there is a risk that the growth will simply damage the quality of the area and not support convergence. In particular as we note in the response on the Health Inequality Strategy there needs to be effective provision for the revenue and capital costs of new health facilities.

7: The Plan should make more explicit assessments of the aggregate infrastructure requirements to support the planned growth especially in the host boroughs where such a high proportion of the growth is concentrated. Such an assessment should set out overall priorities for the use of public investment streams and the likely contributions from development gain or other funding mechanisms.

Transport to support growth and convergence

Taken together the Transport Strategy and the London Plan do not deal sufficiently clearly with the implications of and support for growth in East London and the 5 boroughs specifically. While there are references in the London Plan to a sub regional transport strategy, and projects, these are not followed through in the Transport Strategy

For example there is no mention of additional rail or station investment in east London, beyond the '*investigation of the feasibility of [DLR] capacity and network expansion to Dagenham Dock.*'(para 290) (Stations specified as needing investment all lie outside the 5 boroughs). While the Transport Strategy acknowledges the need for continued development of the bus network to allow it '*to respond to change including new homes, workplaces shopping centres and leisure attractions*', (para 330), no specific proposals are made and there is no mention of refreshing East London Transit or similar rapid bus based options (which are mapped in the London Plan). Similarly there is reference to some potential need for local capacity enhancements in certain circumstances and river crossings are seen in this light.

Given the stated objectives of the London Plan and the Transport Strategy, particularly when the commitment to convergence is made more explicit the geography and scale of future growth foreseen in the London Plan will place particular pressures and new demands on a sub regional transport system that evolved historically around a very different economic and urban structure. focused on a radial structure to London. In practice the transport investment will be one of the key drivers of the location of growth. In east London in particular, a more detailed analysis of its sub regional London needs leading to a more calibrated set of proposals is essential. The employment projections in the London plan depend upon an assessment of capacity and this assessment has been based on continuing investment in the longer term.

8: A clearer sub regional focus on transport to support growth and convergence is required. It will need to deal specifically with;

- **High speed rail – a recognition of Stratford's future strategic London role as a London 'parkway' station**

- **Metropolitan hubs – recognition of the role of Stratford and Woolwich as metropolitan hubs (currently not reflected in any analysis or diagram)**
- **River crossings - The current limited proposals do not deliver the specific new river crossings which will be needed to make East London work effectively as a whole and deliver better economic performance**
- **Regional/ Sub rail and bus networks – greater focus on the needs/ opportunities for improved infrastructure and services to provide the area with a more complete intraregional network (eg improved Stratford rail links to Stansted, and Chingford)**

Delivering for the local London and national economy

We broadly support the objectives set out in the Economic Strategy and the approach in the Economy Chapter of the London Plan. In principle these can align with the SRF. But they do not yet deal sufficiently with the question of convergence. The spatial distribution of severe unemployment and disadvantage focused in key areas of the city has to be tackled directly. The only spatial discussion deals with outer London and the document is silent on some of the severe challenges in East London which has the worst unemployment figures in the country.

Within the SRF we are addressing this spatial concentration of low economic activity both because it needs to be dealt with in its own terms and because it underpins so much of the wider improvement in social conditions to which we (and the Mayor) are committed.

We support the emphasis on the low carbon economy and are already working on the detailed sustainability implications of the SRF, aiming to understand how we can achieve the economic growth without the previously expected impact on carbon emissions.

Beyond this the Economic Strategy is largely silent on the potential offered by the land, connectivity and existing business base in east London to offer new economic opportunity for the metropolitan economy.

9: The clear subregional economic focus offered by the SRF needs to be fully reflected in the London Plan and Economic Strategy with an explicit spatial assessment of how convergence will be achieved not only for the benefit of the host boroughs but as part of the delivery of wider economic growth.

Setting the Olympic Park in context

The overall Legacy from the Olympics as expressed in the SRF is about the whole of the 5 boroughs. We recognise the importance of the development of the Park as one of the major drivers for change, the need for it to deliver the direct and tangible legacy of the Games, and for it to offer benefits to the the areas immediately surrounding it.

We agree that there may be a case for Supplementary Planning Guidance (SPG) to deal with some detailed issues in the Lower Lea Valley as envisaged in Policy 2.4 in the London Plan. Discussions are already underway between the Boroughs and the GLA

team. However the Plan itself should be much clearer about the overall strategic vision for the Park and the surrounding area, leaving the SPG to add deal with any specific matters which cannot be adequately covered in the Boroughs' Core Strategies or area plans. This strategic vision could then be reflected in Proposal 5C in the Economic Strategy - which currently says nothing of substance - and in Policy 26 in the Transport Strategy - which equally has virtually nothing to say on the legacy in either a local or wider sense.

10: The London Plan should set out the strategic vision for the Olympic Park focusing on both its direct legacy and its role in the wider development of the Host Boroughs. This should set it clearly in the context of the wider subregion, identify the related strategic transport links and clarify the economic contribution expected from the development

Conclusion

The London Plan has begun to recognise the role of East London and particularly the Host Boroughs in delivering growth for London as whole. However this is not yet followed through adequately into the other strategies nor do any of the plans sufficiently grasp the scale of the change that is being proposed and contribute to the outcomes for local people.

The host boroughs are the equivalent of a city of the scale of Birmingham, with all the features of a city. The Plan assumes that over 20 years the population will grow by more than 500,000. This is more than 3 times the growth that Milton Keynes achieved in over 40 years. The Plan does not yet show how we can collectively meet the challenge of expanding so rapidly in an already densely populated area while enhancing the economic prosperity and quality of life of current and future residents.

We would welcome the opportunity to discuss these issues further.

APPENDIX B

The Mayor's Draft London Health Inequalities Strategy Response from the Host Boroughs Unit and Health & Well Being Strategic Regeneration Framework Steering Group

1. Introduction

1.1 The five Olympic and Paralympic host boroughs and Primary Care Trusts welcome this opportunity to respond to the Mayor's draft Health Inequalities Strategy. The publication of the draft is timely, as it coincides with the publication of the Olympic and Paralympic Strategic Regeneration Framework, Stage 1. These strategies and frameworks together, and alongside the other statutory Mayoral strategies and plans currently being considered – London Plan; Economic Development Strategy; Transport Plan; Housing Strategy; Investment Strategy and Sustainability Strategy – afford a critical opportunity to tackle health inequalities in east and south-east London, and London as a whole.

1.2 We expect to see the delivery of the Olympic Legacy across the five host boroughs and the principle of convergence we have agreed with the Mayor in the Strategic Regeneration Framework embedded in the final version of the Mayor's Health Inequalities Strategy. We welcome the commitment made in the draft London Plan to these ends but this commitment needs to be made across all the pan-London strategies currently being re-drafted to make an impact in this part of London.

2. General comments

The strategy is of critical importance to East London. The area has historically suffered high levels of deprivation and resultant health inequalities including disproportionately high mortality rates compared to less deprived areas, with this pattern being little changed in a hundred years¹. The Strategic Regeneration Framework (SRF) represents an ambitious plan to address these inequalities in a generation but it will not be achievable unless all other partners play their role to the full in addressing these issues.

2.1 The SRF fully embraces the social determinants of health which are also outlined in part one of the Mayor's draft strategy. The SRF sets the framework for East London to achieve convergence with the rest of London across key socio-economic indicators. There are seven objectives in the SRF which address the main social determinants of health and health inequalities and the SRF gives prominence to health and wellbeing as the pivotal cross-cutting issue. The task for the SRF is clearly immense and all potential policy leverage needs to be maximised in order for it to tackle the root causes of health inequalities. The Mayor's draft strategy as a pan London document is one of these policy components and one that has an important role in supporting the SRF to achieve the aim of convergence.

2.2 The Mayor's draft strategy underplays the impact the Mayor can have in tackling some of the root causes of health inequalities. Direct budgetary intervention is not the only or indeed main contribution. The critical influence is through the statutory strategies and plans that the Mayor is responsible for. A clear commitment to ensuring that addressing

¹ Gregory I N, Comparisons between geographies of mortality and deprivation from the 1900s and 2001: spatial analysis of census and mortality statistics, BMJ 2009;339-b3454

the drivers of health inequalities is prioritised in all these strategies is essential for tackling health inequalities and strongly commended to the Mayor by the host boroughs and Primary Care Trusts.

2.3 There should be a close relationship between the Strategic Regeneration Framework and the Mayor's Health Inequalities Strategy. The implementation of key, high impact actions set out in the final Health Inequalities Strategy could provide a supportive environment for the delivery of SRF and narrow the health inequalities gap between boroughs and within boroughs. The SRF, alongside the other key Mayoral strategies and plans, will address some of the root causes of health inequalities in London.

2.4 The evidence base (published as a separate document) and Part One of the Mayor's draft strategy, are logically set out and there is a clear coherence flowing from one into the other. The link between the evidence base and Part Two is less coherent and we would welcome Part Two being more robustly derived from the evidence base. We would welcome a more systematic linkage of the causal and system analysis of the evidence to actions outlined in the document, and a focus on those actions. These may be at a policy, infrastructure, community engagement or service delivery level – according to where they are likely to make the most significant contribution to reducing health inequalities in London.

2.5 Considering the health inequalities within the host boroughs, we are concerned by the rate and scale of population growth proposed by the London Plan. East and south-east London has been historically underfunded given its level of need. The Health Inequalities Strategy and the SRF both aim to achieve convergence between areas with the worst and average health outcomes. There needs to be recognition that population growth within the host boroughs will require a matching resource commitment in order to deliver the level of service required to prevent further health inequalities.

3. Opportunities and linkages

3.1 We feel there are obvious linkages with other key strategies and plans which are under the control of the Mayor. A commitment to addressing health inequalities should be included in these plans – principally the London Plan, Transport Plan, Economic Development Strategy and Sustainability Strategy. We note that many of these strategies are also undergoing revision at this time and feel this represents a unique opportunity to embed tackling health inequalities within London's strategic framework.

3.2 The Mayor and GLA, as recognised in Part Three of the document, work at many different levels i.e. regional, sub-regional and local, and should use both their powers and influence to help tackle barriers to addressing health inequalities. We particularly note the Mayor's role to influence upwards with Government, and downwards and sideways with sub-regional and local structures and partners, and would urge these roles be used to robustly advocate the tackling health inequalities.

3.3 It is clear that one organisation alone cannot tackle deeply ingrained health inequalities. Strong and effective local partnerships have a vital role in helping address these issues. The Mayor can play an important part in championing the role of Local Strategic Partnerships and local area partnerships, supporting joined-up responses to joined-up problems at the local level.

3.4 Given the importance of the social-economic Olympic legacy for the host boroughs – and the rest of London - the Mayor can provide ownership and leadership, advocating for the importance of legacy with national government and acting as an honest broker between the boroughs and partners.

4. SPECIFIC COMMENTS

The strategy is divided into three parts:

- Part One - The case for action
- Part Two - The Mayor's proposal for action
- Part Three - Key partners and their responsibilities

Part one - The case for action

4.1 This section provides a solid background to understanding health inequalities in London. The acknowledgement of the gradient in health inequalities is welcomed, as is the need to address the whole gradient if we are to tackle health inequalities rather than focusing interventions just at the bottom end, with the poorest residents. This is an important concept but one that is not carried through the entire document. Many of the actions set out in Part Two seem to advocate targeting interventions at the most deprived sections of the community as the sole method of tackling inequalities.

4.1 We support the broad definition of health and wellbeing set out in the draft strategy and we are keen that mental wellbeing is considered equally alongside physical health. This focus on mental as well as physical health and wellbeing runs through the SRF. It is important to remember there are also inequalities in “being well” and “well being” as noted in the first report of the Marmot Review into health inequalities.

Part Two - The Mayor's proposals for action

4.3 The draft strategy is accompanied by a review of the evidence that informed the strategy. However throughout the strategy reference is made to many small scale or pilot initiatives some of which have yet to be evaluated and that do not appear to fully align with the evidence base.

Objective One: empowering individuals and communities

4.3.1 We welcome the inclusion of community empowerment but feel that this could go much further into political and social structures than the provision of knowledge. In the evidence base there is an example of young people being involved in both the design and delivery of sexual health services, which increased the ability of the service to reach vulnerable groups. This is nearer the model we would wish to see adopted for community empowerment and engagement with service planning and delivery.

4.3.2 We are concerned that achieving this objective, as set out in the draft strategy, seems overly reliant on individual behaviour change. While individual and community behaviour change needs to happen, the barriers to behaviour change – which are social, economic, environmental as well as personal – need to be addressed as well as exhortations to change. Most people know what healthy lifestyle behaviour should be, it is

making the changes that people find challenging. As the Marmot Review Task Group on delivery systems and mechanisms notes, research evidence shows that strategies that rely solely on behaviour change do not work.

4.3.3 Social marketing when carried out properly can have an impact on behaviours. To help facilitate this, the GLA should collaborate with the Department of Health to produce a London specific segmentation that will allow greater insight into health behaviours in the capital. This will also facilitate better design and targeting of services and initiatives by both statutory and voluntary agencies. Social marketing is more than just marketing. The national social marketing centre defines it as *'the systematic application of marketing, along with other concepts and techniques, to achieve specific behavioral goals for a social good'* which can encompass changing service delivery to overcome barriers to behavioural change. The strategy would benefit from greater emphasis on these broader outcomes.

4.3.4 Proposals A1, A2, A5, A6 and A7 are on balance supported.

4.3.5 Proposals A3 and A4 are not strongly supported as key actions to tackle health inequalities, as we do not feel are supported by evidence base.

Objective two: equitable access to high quality health and social care services

4.4.1 The SRF recognises the role improved access to health services can have in contributing to tackling health inequalities and its inclusion in the Mayor's draft strategy is welcome.

4.4.2 Proposal A8 is strongly supported, east and south-east London has been historically underfunded compared to its need, and without equitable funding regimes the delivery of the SRF could be compromised. We are, however, concerned by the rate and scale of population growth proposed by the London Plan in relation to underfunding and the level of need across the host boroughs. There needs to be a fuller discussion around the balance of population change across London , and a recognition that population growth requires a matching resource commitment in order to deliver the level of service required to prevent further health inequalities.

4.4.3 Proposals A9, A10, A11 & A12 are supported but we feel the proposals should go further to seek Equalities Impact Assessments on all significant changes in either health or social care service delivery. There is also scope for Integrated Impact Assessments (which consider environmental, equalities and health concerns together) on major developments and policies.

4.4.4 We welcome the commitment to planning contributions for health facilities contained in policy 8.2E of the draft London plan. We would suggest making this more explicit in seeking planning contributions for both revenue (at least to reflect the gap in the funding formula for 2-3 years) and capital for health facilities and services. This would significantly contribute to securing the provision of accessible health services in areas of high growth such as the Thames Gateway which contain many of the capitals most deprived communities

Objective Three: income inequality and health

4.5.1 We are strongly supportive of action to tackle income inequality as this is essential to address health inequalities and is important to the success of the SRF.

4.5.2 We are supportive of proposals A13 and A14 but think they could be bolder in encouraging organisations – particularly in the public sector – to adopt programmes to enable and encourage local people into employment and support them while they do so.

4.5.3 We are supportive of the London Living Wage (LLW) and feel it has an important role to play in beginning to address the issue of low pay. We feel the LLW could be more robustly promoted by insisting that any public sector procurement only take place from firms that are committed to paying this. The Mayor should continue to take a lead and vigorously champion the adoption of the LLW along the “supply chain” with all other public sector bodies and encourage all private sector organisations to adopt similar practices.

Objective Four: health, work and wellbeing

4.6.1 We are supportive of the benefits that “good work” can deliver. We are generally supportive of proposals A17, A18, A19, A20 and A21 but feel that they could be more robust in trying to achieve the objective of all work within the capital being perceived as “good work”.

4.6.2 Similarly to our suggestions for the LLW, the GLA could use its purchasing power to secure “good work” in public sector contracts and use its leverage with other public sector bodies to get this adopted across London. The GLA, with its local authority partners, could develop a system to assess the quality of work provided by businesses which could then be used to inform the awarding public sector contracts.

Objective Five: healthy places

4.7.1 Many of the gains from the SRF are contingent on there being a well-designed, health-promoting, built environment to drive improved health outcomes. Unlike the rest of London, which have existing places with established land uses, large parts of the SRF area are, or will be, a newly-created and constructed environment. This presents a unique opportunity to provide large-scale, health-promoting environments. As such, the host boroughs and partners would wish to see stronger action, as set out below, around healthy places to support this objective.

4.7.2 : The built environment is a key influence on social processes, including the behaviour that people adopt. The Mayor can directly influence spatial planning through the London Plan which all planning authorities must have regard to. The opportunity to prioritise tackling health inequalities and the promotion of wellbeing in the new emerging London Plan is of key importance if progress is to be made in providing healthy places. We therefore welcome and support the proposals in the plan to help achieve this in particular policy 3.2 – Addressing health inequalities. We feel the draft plan could be improved and strengthened by the inclusion of policies to:

- Explicitly support planning contributions both capital and revenue (whether s106 or CIL) for health facilities.

- Promote healthy food provision by exploring the potential of a London wide policy to limit concentrations of unhealthy fast food outlets

4.7.3 Although proposals A22, A23, A24, A25 and A26 are on balance supported they should be made more specific as to how they will ensure healthy environments.

Cross-cutting objective: knowledge and learning

4.8.1 We would generally support the proposals A27, A28, A29 and A30 but would prefer to see a commitment to ensure the work of key GLA groups such the Data Management and Analysis Group are supported to enable them to add their expertise to help develop a set of health inequality indicators.

Part Three – Key Partners and Their Responsibilities

4.9.1 This section is largely descriptive but we welcome the acknowledgement of the greater role the GLA plays in the policy landscape of London..

4.9.2 The Host Boroughs Unit, and the Health and Wellbeing SRF steering group, which brings together the host borough Primary Care Trusts with support from the Olympic Park Legacy Company, the Regional Public Health Group, NHS London and the Healthy Urban Development Unit, would welcome any opportunity to discuss and develop further our comments with the GLA.