

GROWING UP in HACKNEY

Child-Friendly Places SPD

Consultation Report

June 2021



Child-Friendly Places Supplementary Planning Document consultation report

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Section 1: Developing the draft Child-Friendly Places Supplementary Planning Document

The Child Friendly Places SPD contributes towards delivering the Mayor's manifesto commitment to ensure that Hackney becomes a fully 'child friendly borough' through establishing child-friendly principles and design guidelines for Hackney's built environment, ensuring the borough accommodates and actively plans for people of all ages, abilities and backgrounds.

The engagement and consultation for the development of the Child Friendly Places Supplementary Planning document happened in two key stages:

- **Stage 1:** Developing the Principles | October 2019 - February 2020
- **Stage 2:** Consultation on the draft SPD | October 2020 - February 2021

1.1 Stage 1: Developing the Principles (October 2019 - February 2020)

The draft Principles are specific to Hackney and are a direct outcome of a series of engagement workshops, held with members of the Hackney Youth Parliament, delivered by ZCD architects in Autumn/Winter 2019. The youth parliament workshops focused on their lived experiences of growing up and moving through the Borough. The key aims and objectives:

- To introduce, test and practice ZCD's techniques for analysing space for and with young people
- To build young people's skills in connecting their lived experiences with spatial analysis techniques
- To test and develop a series of strategic and detailed built environment key principles which could be adopted in the child friendly SPD, used to test existing sites and future development proposals
- To engage and consult with young people. Providing an opportunity to input into the legal plan-making process

These workshops involved group focused sessions as well as site visits with follow on discussions and practical exercises.

The key principles were further developed by the recommendations from Hackney's Young Futures Commission's youth-led report (2020).



In addition to this, a cross council working group was established with departments including: Housing, Estate Regeneration, Planning, Streetscene, Parks and Green Spaces, Public Health, Arts and Culture, Education and Environmental Pollution. As the document focuses on the public realm and impacts other service areas, it was vital to bring together key stakeholders within different council departments to share knowledge, test guidance and create a workable document that will be used in the delivery of work streams and programmes in other service areas beyond planning.

1.2 Stage 2: Consultation on the Draft SPD (October 2020 - February 2021)

Below outlines the consultation and engagement approach for consultation on the draft SPD. A strategy was initially developed for the Child Friendly Places SPD however this had to be considerably altered to reflect the fast moving nature of the Covid-19 pandemic.

Consulting during COVID-19 and national lockdowns

The COVID-19 pandemic presented significant challenges to engaging and consulting with residents, especially during the various national lockdowns and the Government's restrictions and Council policy on facilitating face-to-face gatherings.

To respond to these challenges, all face-to-face workshops were moved online, using various video conferencing softwares such as zoom, microsoft teams and google hangouts, taking advantage of the interactive software elements including polling and jamboard.

The project team worked with cross-service council officers to identify different routes to accessing key stakeholders. It should be acknowledged that where these sessions took place the project team made efforts to ensure that a range of voices were present around the table given equal opportunity to contribute to conversations. £10 vouchers were offered to participants as an incentive and in recognition of the value of participants' time.

1.3 Key Communication Methods

To support the consultation a number of established council and third-party communications channels were used, as well as working with other internal project teams to share information where there was significant project overlap, specifically the emerging Parks and Green Space Strategy and the pilot 21st Century Street project.

The consultation was launched using the following communication channels:

- **Dedicated webpage:** This provided information about the Child Friendly Places SPD. Including information about the project, key dates and directions to the dedicated Commonplace page - growingupinhackney.commonplace.is



The website page was regularly updated with project information regarding development of work and varied options for people to have their say by email or phone correspondence.

- **Press Release:** Notices were issued to local publications and journalists covering local, regional and trade press.
- **Social media:** The Council various social media channels were used to share information about the project and issue call outs for participants to workshops. Targeted social media adverts were used for key audiences such as young people, parents and caregivers etc. Social media included:
 - Facebook
 - Twitter
 - Instagram
 - Snapchat
- **Hackney Council's publications:** The consultation was featured in Hackney Life which is delivered to every property (residential and business) in the Borough. An overview and information about the SPD and how to get involved was published in two publications. The first, published 21st September 2020, was coupled with an announcement on the forthcoming Hackney Design Awards, with the second on 16th November 2020.
- **Cabinet Member Outreach:** Joint letter/ email was sent to all schools, local youth providers and early years centres from Cabinet members - sharing directions to access common place and opportunity to put participants forward for consultation.

The project team also issued similar communications to this database as a follow up. In each correspondence, schools, childrens' centres and youth groups were offered a resource pack containing materials and practical exercises for children and young people to get involved in the consultation. See below for further details.

- **Banners in Park Entrances:** Banners were placed on railings in key locations such as entrances or next to play areas in parks to highlight consultation. Venues included: Springfield Park, Haggerston Park, London Fields, Clissold Park
- **Information on the Local Offer page:** Information on how to participate in the consultation was issued via Hackney Education's SEND team to the Local Offer page.
- **Internal communications:** Information about the consultation was issued to all Council staff network via the internal communications newsletter.

1.4 Resource packs and materials for schools

Acknowledging that the project team were unable to arrange or facilitate face-face sessions with children and young people, a resource pack was developed to help teachers, children's centre staff and others to run practical exercises based on the child-friendly SPD consultation. The exercises were age group appropriate and the project team offered support to tailor to specific year group/classes' needs. Understandably schools have



experienced more urgent priorities in relation to disruption and school closures caused by Covid-19. Therefore, whilst a total of seven schools requested the packs to use in class, they did not complete the packs. The packs will and are currently however be used to support the delivery and implementation projects.



The resource pack contained three exercises for children and young people based on the different principles of the SPD. This included:

- Growing up in Hackney: Picture this!**
 This exercise looked at how children and young people perceive and experience their neighborhood and explored the question 'what does a child-friendly borough mean' through photography or pictures.
- Leading the way - my journey to school map**
 In this exercise, students could create a map of their journey from home or a friend or family member's house to school, identifying the good and bad things they find on the way. They were also asked to identify what elements they would change along the route to make it better for them, their friends and /or family members.
- Sticker Challenge**
 A series of traffic-light stickers that children can use to identify positive, negative and neutral spaces in their neighbourhood were created which students could attach to spaces they occupied. This allowed young people to look at the streets and spaces they walk on a daily basis with 'different eyes', exploring the positives and negatives of the spaces.



Section 2: Consultation Process

A mix of qualitative and quantitative data collection methods have been used during the consultation and engagement process. Comments to the online platform have been posted in open-ended questions in prose format as qualitative data. Officers have read every comment on the platform and used a number of qualitative analysis techniques to analyse these. Other data collection methodologies such as recordings, notes and feedback forms have been used and reported on below.

2.1 Commonplace platform

A dedicated platform was set up to collect responses to the consultation using commonplace - growingupinhackney.commonplace.is

The site was set out in to five sections, one for each main chapter of the draft document:

1. Child-friendly Principles
2. Child-friendly design guidelines
3. Shaping my borough: engagement, guidelines, resources and best practice
4. Tools for implementation and delivery

In each section, an overview of the chapter was provided along with key information or examples of existing child-friendly places. Respondents could also click a link to download the specific chapters to read the guidance in more detail.

Responding: Making comments and adding agreements

Respondents were asked to 'grade' what they thought of the proposed guidance for each section on a likert scale of positive to negative. Respondents were then asked to qualify this and provide further comments or ideas on how to improve the guidance . This survey format was replicated across all four sections.

In addition to this, participants were also encouraged to identify places that were child friendly/not child friendly on a heat map of the borough. This allowed participants to choose exact locations they wanted to highlight to the project team as good or bad examples of spaces in the borough, and provide officers with more localised case studies to review.

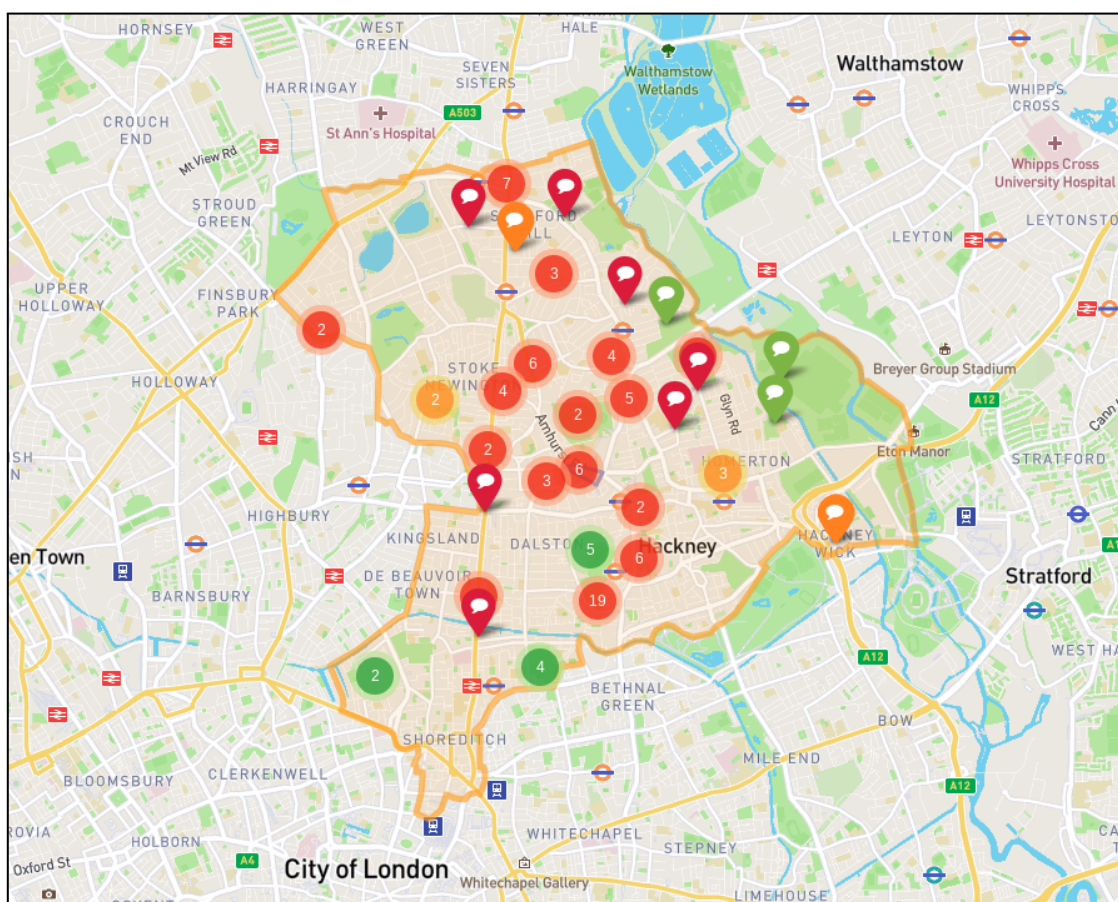


Hard copies of the draft SPD document were placed in Hackney's libraries and were also delivered to those who requested it. It should be noted that due to the 2nd national lockdown (31st October 2021) libraries were closed to public access.

Given the coronavirus restrictions, hard copies of the consultation questionnaire were not printed and distributed.

Hackney Heatmap

In addition to providing comments to each proposal or to the heat map, participants could also add agreements to others' comments. This allows them to add weight behind others ideas and comments or contribute without having to respond directly to questions.



Map of responses on the Commonplace heatmap.

Participants were asked to identify the place they were commenting on by using a drop pin. They were then asked to identify why they felt this way through a series of pre-set responses:

- Easy to walk and cycle
- Lots of cars
- Well lit
- Poorly lit
- Cycle friendly
- Not cycle friendly
- Not enough seating
- Comfortable seating options
- Good access to nature
- No access to nature



- I can meet my friends here
- I can relax here
- Good step-free access
- No step-free access
- Other

If 'other' was noted then participants were asked to provide details.

Lastly, participants were asked to indicate which of the principles would apply to the identified place on the map.

Age restrictions

It should be noted that children below the age of 13 were asked to complete the online survey with an adult due to GDPR rules.

2.2 Internal working group and public workshops

Public workshops

Given the coronavirus restrictions, public workshops were key. The virtual workshops were the primary mechanism to reach different communities, specific groups, demographics and service departments across Hackney as face-to-face work was not possible under coronavirus restrictions. These included:

Group	Age	No . attendees	Date
Xenia Migrant women's group	55+ years	20	14 November 2020
21st Street Colvestone Crescent	30+ years	28	18 November 2020
Hackney Matters Citizen Panel	55+ years	9	25 November 2020
Project Indigo LGBTQI youth group	13-20 years	7	26 November 2020
Built environment professionals	40+ years	13	26 November 2020
HYFC Young People group	16-23 years	8	1 December 2020
Age concern/Connect Hackney	55+ years	10	15 December 2020



Intergenerational group	16-55+ years	8	6 February 2021
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In addition to this, the project team also attended and presented to a number of meetings during the consultation to discuss the SPD. This included:

- Planning User Forum (October 2020)
- Health and Wellbeing Board Meeting (11 November 2020)
- Children and Young People Scrutiny Committee Meeting (7 December 2020)

Internal working group

Alongside working with young people and other key stakeholders, an internal working group was established to monitor the progress of the SPD and corporately feed into its contents. Service areas representatives included:

- Planning
- Area regeneration
- Estate regeneration
- Streetscene
- Public Health
- Housing
- Strategy, Policy & Economic Development
- Education
- Parks and Green Spaces
- Enforcement
- Culture
- Communications and engagement
- Urban Design
- Community Safety

Section 3: Consultation and Engagement Responses

The borough wide consultation ran for approximately 16 weeks from 27 October 2020 until 12 February 2021. Initially the consultation was set to run from November to January but officers extended this due to restrictions and the national lockdown to allow for greater flexibility for participants to respond.

3.1 Growing up in Hackney Commonplace Platform responses

Overview

A total of 2,253 individuals visited the dedicated Commonplace platform, [Growing up in Hackney](#), providing a total of **235 contributions** to the survey questions. These contributions include **163 comments** and **72 agreements to comments**. There were an additional **354 contributions** to the heatmap of **118 comments** and **236 agreements**. It should be noted that not all participants contributed to every question.



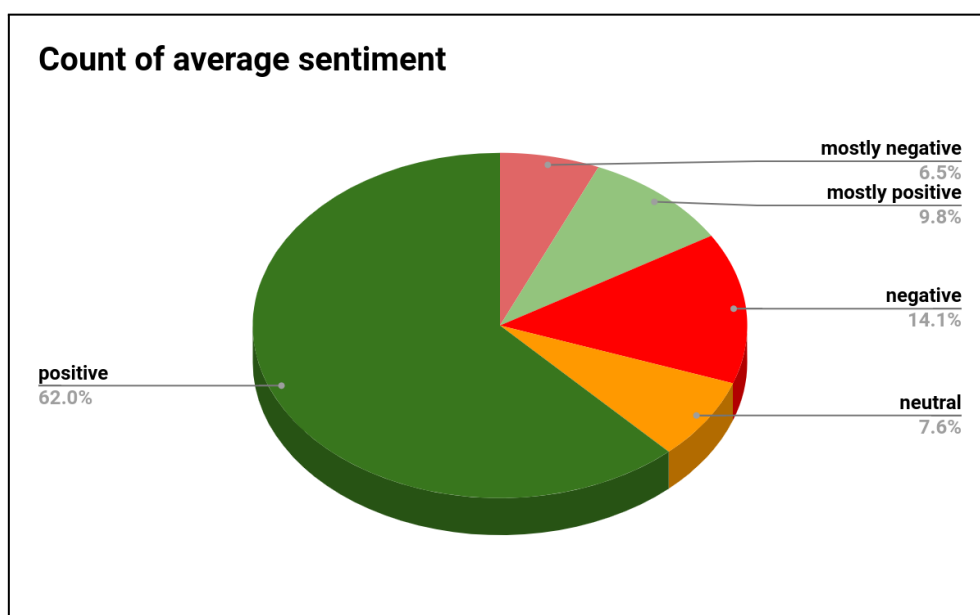


fig.1 Disaggregated average sentiments

Of the comments, respondents were largely positive toward the SPD with **73% (111) were positive**, **15% (23) were negative** and **12% (18) were neutral**. Generally, respondents tended to focus more on the first two guidance sections of the consultation (**Child-Friendly Principles** and **Child-friendly Design Guidelines**), providing more detailed comments and feedback than the Section 3 and Section 4 (Shaping my borough: engagement, guidelines, resources and best practice and Tools for implementation and delivery).

Largely, comments were constructive but it should be noted that there was a pattern of comments arising from a recent campaign against the Council's Low Traffic Neighborhoods schemes being implemented in the borough. While these comments have been counted and reviewed, they were, for the most part, replications of the same comment to the different survey sections.

3.2 Cross-cutting themes in data

From the analysis of the prose comments a series of thematic patterns have been identified within the responses.

- **Opportunities for play supports social interactions and community building**

The importance of fostering relationships across demographic groups is important for social cohesion in the borough. Comments identified how the document is relatable and applicable for other groups with protected characteristics such as the elderly and individuals with special educational needs and disabilities.

- **Inclusion of other groups**



There was a clear call for greater engagement with children and young people with special educational needs and disabilities, including their parents and caregivers. It was noted that these groups are not always present in conversations surrounding changes to the built environment/neighbourhood.

Similarly, it was noted in several comments across different response sections that the overall document emphasised the experiences and design guidance responses on the needs of children, with less focus on teenagers. There was also a call to level this out by addressing the needs and lived experiences of older people / teenagers so that the document encouraged youth engagement or participation in the built environment with all age groups.

- **Use of spaces**

The use of spaces was identified as a clear concern for participants with a focus on cars and the hierarchy of users. Dangerous drivers, more cars on main roads, sitelines blocked by parking and increased air and noise pollution were all raised as issues that needed to be resolved to create more child-friendly spaces. Shared spaces were pointed to as not the most safe or accessible for more vulnerable community members, with both elderly and parents/carers highlighting the dangers of fast moving cyclists near pedestrian footways and fast moving vehicles when crossing roads.

- **Proximity to play space and opportunities to connect with nature**

The respondents noted that proximity of play spaces or parks to the home is important. A number of comments relayed the idea that informal play spaces should be allowed to develop or occur naturally beyond designated or formal spaces where play is permitted. The need for greater access to nature formed a part of this idea of informality, with many participants noting the need to have more exposure to green spaces, wild planting, nature and wildlife.

- **Setting the right tone**

Identifying appropriate language and how best to communicate the project, was a particular point of focus. It was clear that some participants found the concepts or language used in the draft document difficult to understand or conceive of how it would work in practical terms. It was highlighted that this was especially important if children and young people are meant to read and understand the SPD or use it to test or evaluate their environments.

3.3 Growing up in Hackney Platform Responses

Detailed Analysis

When responding to the survey questions, respondents could either choose which chapter (represented as a tile in the image below) they wanted to respond to or work through the document chronologically. The response data is represented in this pattern below.



1. Child-Friendly Principles



75 comments

The Principles set out a vision for a built environment that supports the happiness, health, wellbeing and prosperity of all children and young people in the Hackney

[View details](#)

2. Child-Friendly Design Guidelines



33 comments

The guidelines are the technical tool to support, inform and assess how the Council plans, designs and maintains public spaces and development schemes to ensure that Hackney's built environment meets the needs and rights of children and young people.

[View details](#)

3. Shaping My Borough: Engagement, Guidelines, Resources and Best Practice



24 comments

This section of the document outlines guidelines of best practice for engagement with children and young people in the Borough.

[View details](#)

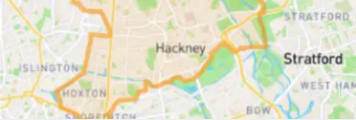
4. Tools for Implementation & Delivery



20 comments

This section of the SPD outlines the tools needed to inform and assess how development proposals ensure that children and young people's rights and specific needs

Share your views on the Growing Up in Hackney map here



Tell us about a specific place or an area in the borough you feel currently does or does not meet the proposed Child-Friendly Principles.

Commonplace platform: participants are able to navigate through each chapter of the draft SPD and respond to questions.

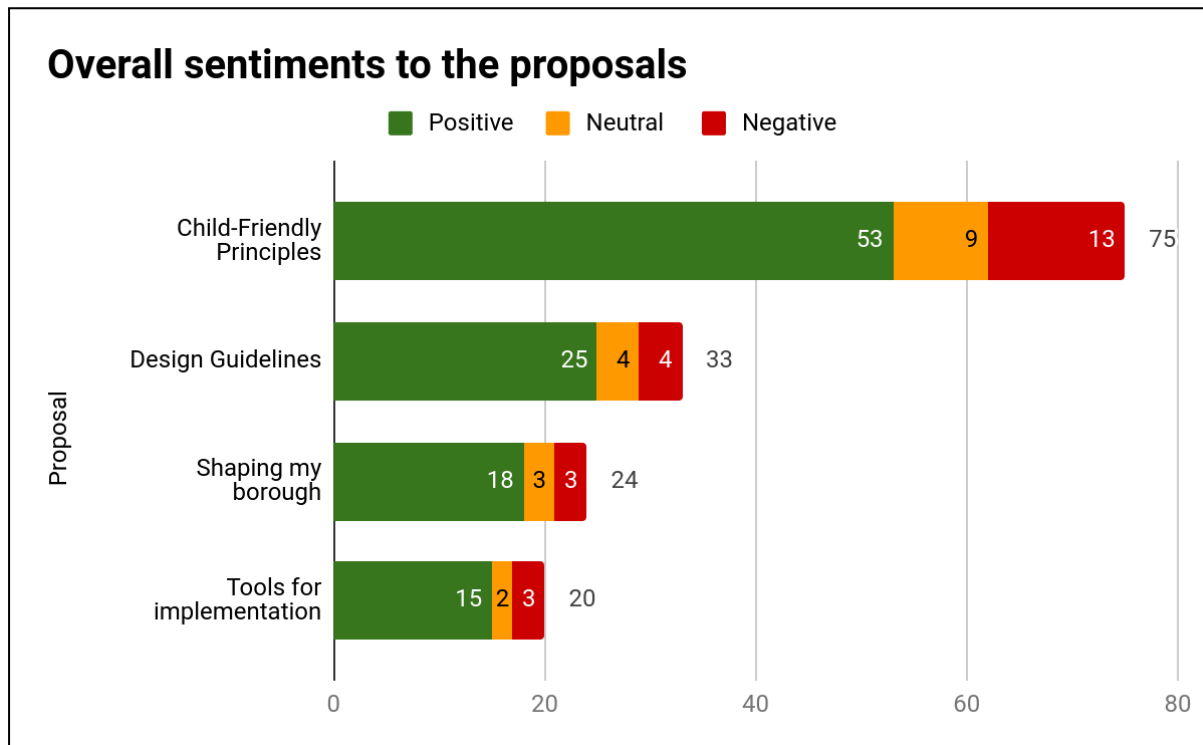


Fig.2 Overall sentiments to the proposals



Section 1: Child-Friendly Principles

This section generated the most comments with **53 positive comments, 13 negative and 9 neutral** comments. Respondents chose to largely focus on only a few of the principles while some used the survey as an opportunity to highlight social, health and infrastructural needs in the borough. Respondents reflected positively on the draft document, stating that it looked to create a safer place for children and promoted and developed the idea of independent movement and play. Similarly, it was highlighted that the Principles will benefit communities wider than children while championing the needs of children in the borough. There was **significant support for the general idea of the *children first* concept** and how they should be **engaged from the outset to design and develop spaces** for them and **move away from a top down or imposing process**.

“Informal Play spaces or activities around the neighbourhood are important. They can be fairly makeshift - there was an element of danger of social/play spaces when I was growing that no longer exists.”

Following this theme, the children before cars principle received significant mentions in the comments posted by participants. A **large anti-car sentiment both in terms of impact on safety, health and sense of place** was evident in many of the online responses. This largely focused on how **the SPD could help to reduce pollution and deal with the climate emergency**, reduction of speeds in/around areas where there are schools and the importance of road safety more generally. Dangerous cycling in certain areas - mostly near parks such as London Fields - was also highlighted as an issue that should be addressed in the SPD. More generally, it was **highlighted that the principles need more detail about safety while playing** to reflect the above concerns, although it was not qualified or detailed in the comments how this specifically could be incorporated into the document. Similarly, two participants stated that there were **not enough references or consideration for children with disabilities and play**.

“Too long have cars been prioritised over people. Kids need to be able to safely play outside, especially when a lot of housing lacks any green or outdoor space.”

A clear and consistent theme across responses to the Principles, and more generally across the response data, was the idea that **the Principles would foster stronger community relations**. This focused on **participants wanting their children to know neighbours/to know their neighbours’ children and the importance of building a sense of community**. Playing in the street was seen as key to this and many welcomed the opportunities this guidance could bring for greater socialisation, but were cautious about safety from, as mentioned above, traffic and, to a lesser extent, issues around crime. **Child participation was seen as essential across a broad range of demographics** as a means of **developing social ties and allowing all of Hackney’s communities to contribute to building the borough’s future**.

“Intergenerational interactions are important. Growing up you always knew your neighbours - there was a sense of collective responsibility of your neighbourhood and neighbours children.”



Related to this sense of community were comments about **intergenerational spaces and how groups use them**. Specifically, respondents identified how spaces such as **play or recreational areas should be multi-functional to be inclusive for different age ranges** i.e. children to young adults as it was highlighted that places to 'play' and socialise are significantly reduced in the borough. It was also highlighted that **many young people face prejudice when they gather in numbers**, especially in or near play areas or spaces such as the highstreet. It was noted that the **SPD should help resolve this and could help foster a sense of belonging for young people within their community**. Another comment stated that the **narrative within the Principles about focusing on all life cycles - from child to adulthood - needs to be more developed and clearer from the outset**.

There were also **calls for the SPD to make greater reference to how it will be used in Hackney's estates** where one participant noted that children and young people have historically been discouraged from playing through 'No Ball Game' signs. There were also a number of **queries on how the Principles could be applied retrospectively on existing developments**.

A number of participants considered **the Principles were too high level and it felt unclear how they can be implemented**, although it should be noted that they did not reference later sections of the SPD document such as tools for implementation and delivery. A number of negative comments focused on the **tension between the Principles and existing council policy such as the Low Traffic Neighbourhoods scheme**. These looked at the impact of road closures leading to more traffic and the cumulative effect on air quality in specific locations. These comments noted that **more space was needed for parking and driving and changes brought about by the SPD would make the borough unsafe for children and young people**. This specifically focused on busier streets, increased areas of concentrated pollution and called into question the appropriateness of promoting play by main roads and what they perceived to be play spaces in streets/roads.

There were also **concerns raised that the SPD guidance and other Council schemes such as the Low Traffic Neighbourhoods may have a greater impact on larger families or BAME groups who are more likely to have larger families or multi-generational households** as existing public transport infrastructure was deemed impractical. Conversely, those with mobility issues who use public transport are fearful of the impact on services and their accessibility to these and the **implications of closed roads to disabled drivers with blue badges**.

A number of comments questioned **how enforceable the document is**, stating that existing schemes are not delivering or being implemented properly, although it should be noted the respondent was not clear which schemes they were referring to.

In response to the question of **what should be added to the Principles**, 39 comments suggested amendments. These have been amalgamated thematically below.



Proposed additions	Comments
Greater inclusivity	View principles in the wider context of multi -use and generational spaces while ensuring spaces are safe. Considering the breadth of childhood including older adolescents and their need for safety in public spaces where they spend time. The Principles should ensure that spaces need to be designed, modified and adapted and ensure adult guardianship in the community to promote safety and well-being There should be a stronger focus on inclusion of children and young people with SEND.
Better environments and greening	Introduce an additional principle to increase more trees, greening and planting There should be a greater focus on clean air initiatives. Introduce measures to stop dog fouling in public parks. Cease guidance such road closures ie Low Traffic Neighbourhoods.
Include concrete/specific/identified guidance or initiatives	A number of respondents wanted to see how the SPD could demonstrate how the Principles could be realised in practice and live examples of projects currently being developed. This could be how future projects (public and private) comply with these Principles and how this could be tracked and recorded? How might this be incentivised or enforced?
Revisit the SPD Principles after the coronavirus pandemic.	The principles and SPD should be reviewed and assessed after coronavirus pandemic to measure its impact and applicability. (needs to be discussed)

Section 2: Child-friendly Design Guidelines

Respondents were overwhelmingly positive (24 comments) about the design guidelines, noting it as a well-considered approach and development of the SPD, with only four negative and 4 neutral comments.



Many of the participants like the idea of more play spaces which are more easily accessible, and help to create more pleasant environments for all generations and (dis)abilities. Participants welcomed the notion of **doorstep play as a way to build community relations**, not just a practical solution for parents to monitor children but also as a **space where children can safely and easily mix with other children and other generations**.

This was particularly evidenced in comments about shared spaces in estates and neighbourhoods which, again, point to emerging support for doorstep play as a promoter of community cohesion.

“Good consideration of the three scales in which young people experience places. The only thing I would pick up on is to include how the elderly, carers and disabled young people would be able to access these spaces with a visual”

Although comments noted how it should be looked at further considering other groups so as to not inadvertently exclude others. This referenced the need to **be more inclusive of disabled residents**, both children and parents, by evidencing this group more explicitly in the design guidelines and case studies.

Beyond the doorstep principle, other concepts that received more traction among participants included **f ideas regarding less traffic, more community orientated and livable streets**. This follows other trends in responses to issues regarding **cars and, to an extent, cyclists negatively impact how children and young people experience their environments** both from a safety perspective but also health and general wellbeing point of view.

“Livable streets with no traffic are thoroughly enjoyable and encourage people to spend time outdoors”

A number of participants called for more evidence on what children experience and want in their local environments and how the council has engaged with them to develop the proposals. It should be noted here that it appears that this is referencing younger children and not teens or young adults, but it is not made explicitly clear by the respondents.

“A huge amount of thought has clearly been put into these guidelines, and I like the three scales and think they work very well. The in-depth, focused consideration of Hackney's children is very encouraging to see. I would really like to see more evidence in this document of proper consultation with children, though: all aspects of this should be rooted in what children want and have experienced.”

A number of participants questioned the level of input from children in the document's development process and pointed to the need to do more to engage younger children in the process going forward. One comment noted that the case studies or examples in the chapter were *sterile* and *manufactured* and challenged officers to find better ones.



“Do the three scales (Doorstep, Streets and Destinations) capture the three main types of ‘places’ that a young person in Hackney will grow up and move through the borough?”

Of the 33 responses to this question, only one participant thought the three scales were not reflective of the main places that a young person will grow up in the borough. The remainder of comments reflected positively on how the document had accurately captured the scales and added further narrative to contextualise on their comments.

As above, the **doorstep was recognised as particularly important to participants in its role to expand opportunities for impromptu play near the home, providing important benefits over more structured and organised activities located in designated spaces** such as parks or designated play areas. **Transforming parking spaces into parklets was expressly welcomed** and encouraged by several respondents and feeds into comments in early sections about reducing car usage in favour of people centred environments.

“The Streets place guidance and case study of transforming parking spaces to parklets is fantastic and parklets should be encouraged for community and businesses, so there are places for young people to stop, park their bike, be with friends and enjoy nature.”

Respondents noted that other key destination points that form an important part of a child or young person’s life such as **school, libraries and community centres were absent in the document** and should be considered within the remit of the SPD. Additionally, some noted that some public spaces are not designed with children or young people in mind, but rather cater for other groups such as young professionals in shops/retail developments. This should be addressed by the SPD’s design guidance, to ensure that wider environments are welcoming, not just those spaces that are deemed for children or young people. These comments relate to the **issue of culture change to make all environments safer and more accessible to children and young people**.

Is there anything that should be added or changed in the draft Design Guidelines?

Proposed additions	Comments
Include schools and educational settings	Schools should be recognised in the Guidelines including their play areas as spaces that children occupy.
Greater inclusion of specific groups	Comments noted a need for more inclusion of and consideration for disable groups. This includes visual representation within the document but also references to how they have fed into the process and where they have and should be considered as a benefactor of child-friendly guidance.



	Similarly, intergenerational issues such as intergenerational living should feature more prominently to foster relations between different demographic groups.
Rebalance the transport user hierarchy	Increasing cycling provision such shared spaces or docking stations. Linked to this are comments about dangerous cyclists and shared spaces and the different modes of transport (walking, cycling, pushchairs and buggies) that are used should be noted. Related to this is the idea that the SPD should note the importance of culture change from driving to pedestrianisation in the borough and how this creates child-friendly spaces and places.
Emphasis on doorstep concept in estates	The Guidelines should look to include more explicit references to the <i>Doorstep</i> in estates, especially in those where play spaces are in need of repair or courtyard spaces are dominated by moving and parked vehicles.

There were also specific mentions of locations across the borough:

- Natural wooded areas of London Fields and Haggerston should be replicated in other areas as unstructured and adventurous places, spaces and good habitats to support biodiversity.
- Downham School was noted as an example of an unsafe space to drop children off due to poor design and street layout.

Section 3: Shaping my borough: engagement, guidelines, resources and best practice



This section generated 24 responses, with 18 respondents positive towards the emerging guidelines, with three were neutral while three were negative.

Positive comments noted the potentially positive impact this section of the SPD could have for children and young people to have an impact on improving public spaces. Comments specifically highlighted how **Hackney's residents should be empowered to shape the future of their borough.**

A number of positive comments also offered **a word of caution about engagement, guidelines and resources, stating steps should be taken so that parents/carers of SEND children** are engaged with to ensure this stakeholder group's voice is represented. Similarly, there were comments that identified smaller children as a key stakeholder to engage with and well as **engaging young people early on in the project development process and to ensure this is not just a tick box exercise.**

"These are a good start, but require significant strengthening from a child rights and participation perspective. "

Neutral comments identified **the draft SPD as a positive start but more is needed to be done to strengthen the rights of children and encourage participation to be inclusive, meaningful and sustainable.** It was also noted children younger than 13 years old should be allowed to participate in online consultations on Commonplace.

As with previous sections, the three identified negative comments were related to car usage and LTNs.

In response to the question **'Is there anything that should be added or changed in the draft Shaping my Borough guidelines?'** six respondents gave substantive responses. Two focused on the impact of cycling and fast cyclists and noted this does not allow for a child-friendly environment. Three respondents called for more detail about dealing with air quality, and the notion of children before cars was also welcomed.

One response highlighted that participatory processes noted in the SPD must be inclusive and accessible to all children, including disabled children, LGBTQI children, care leavers, homeless children, children who speak English as an additional language (or not at all), etc as well as make more explicit references to the rights of children and young people to a better environment.

It was also noted that the document should be clearer that children and young people should give consent for their participation in these processes.

In response to the question **'Do you know of projects or organisations which you feel should be included in the document as a case study/example of best practice?'** respondents listed the below spaces or organisations:

- Children's Centres
- Colvestone Crescent Parklet



- Hackney Play Association
- Hackney Play Bus
- Living Streets
- My Life, My Say
- Play Streets
- SUGI biodiversity project (Barking)
- Young Carers/Carers First
- Young People's playground venture (Huddersfield)
- There was also a call for more case studies with a focus on reducing air pollution.

It should be noted that the participants did not provide any supporting comments for this.

5. Tools for implementation and delivery

A total of 20 comments were posted. Despite fewer comments the trend in responses echoed previous sections with the most positive (15) towards the guidance with only two neutral and three posting negative comments.

The impact assessment tool was perceived to be a positive tool to help developers have greater consideration of children and young people in their schemes. Similarly, the development of a **young design advisory group was well received as a means to engage and train young people to participate in changes within their built environment**, but further details were requested to **understand how this group would have parity with other groups and the weighting of the advice they issue**. The request to see more details about tools and other documentation on the SPD design guidance in general were reiterated in the comments.

That said, there were some that called for **faster implementation of the tools** and to look at **how the document can retrospectively be applied to mitigate past mistakes**. There were also calls for **greater persistence in engaging with young people**.

Similar to previous sections, negative comments were raised regarding the impact of the SPD on car usage in the borough leading to further traffic gridlock and air pollution.

3.4 Workshops Analysis

A total of 12 virtual workshops were conducted during the 16 week consultation. The workshops were held to both test the concepts and ideas in the draft SPD document and gather ideas or examples that could be incorporated into the final guidance.

It should be noted that the virtual workshops were the primary mechanism to reach different communities and service departments across Hackney as face-to-face work was not possible under coronavirus restrictions. The workshops included:



Group	Age	No . attendees	Date
Xenia Migrant women's group	55+ years	20	14 November 2020
21st Street Colvestone Crescent	30+ years	28	18 November 2020
Hackney Matters Citizen Panel	55+ years	9	25 November 2020
Project Indigo LGBTQI youth group	13-20 years	7	26 November 2020
Built environment professionals	40+ years	13	26 November 2020
HYFC Young People group	16-23 years	8	1 December 2020
Age concern/Connect Hackney	55+ years	10	15 December 2020
Intergenerational group	16-55+ years	8	6 February 2021

Workshop outline

Each workshop session began with introductions and icebreakers that asked participants where they grew up and their favourite place to visit as a child or caregiver in the neighbourhood or where they would like to play. This allowed each participant to share their experiences with the project team and other participants, and provided an entry-point for later conversations.

The icebreaker sessions were followed by a short presentation about the SPD, the aims of the workshop sessions and how participants' contributions and feedback would be used to inform the update to the final document.

Unique contributions from the workshops

In addition to the general themes and concepts, the below highlights specific comments unique to the individual workshop groups and responses to the presented draft SPD.



21st Century Street Workshop

Conversions were framed around delivering the Council's pilot 21st century street and how the draft SPD could be used to benchmark the scheme.

- Participants welcomed the **opportunities the SPD creates for more connections with their immediate and wider neighbourhood** and neighbours.
- Particularly **welcomed the idea of doorstep play but recognised that work had to be done to remove car parking and the traffic to facilitate this.**

Young Persons workshop

- Welcomed the idea that **small scale green spaces could be used where there is a lack of large open green spaces.** The group noted Hackney's abundance in parks and green spaces so this would work well to help improve the overall 'feel' of neighbourhoods which do have or are close to these.
- Good open spaces are therapeutic and have helped during the pandemic to release the stress and relax.
- Participants noted that the **provision of spaces was focused on younger children. Teenagers don't feel they have outdoor spaces to go to.**
- The group noted it was important to look at designs being put forward for developments at **early stages to see what impact they will have on young people.**
- The group **challenged the Council to engage with young people more frequently** about what they thought about projects, guidance and built environment schemes.
- The group also wanted to see greater provision for training and skills development for young people.

Xenia migrant women group

- **Welcomed the focus and importance placed on parks and play spaces as areas of socialisation** for parents as well as children. This has been especially important during the national lockdowns.
- The group highlighted the **need to be careful not to create "silos"** in parks. Parks are great also because they bring diverse cultural and age groups together and people whose lives would otherwise never cross mix and mingle.



- Sometimes **older teenagers in parks create a threatening environment** for children and their parents.
- **Access to nature** (blue/green) such as green spaces as well as trees, flowers, and wildlife is very important, especially in dense urban areas.
- **Safety in parks and open spaces** is an issue, especially during the winter/evenings where lighting can be a problem and the participants feel unsafe.
- **Control of dogs in public spaces** is a big problem in the borough, including fouling, signage where to put dog faeces (in bags) and dogs not being on leads.

Project Indigo LGBTQI Group

- The group highlighted how **safe spaces are important**, as are **providing a range of activities in those spaces that can meet different needs of communities**.
- It is important that the design of spaces - either formal or informal - do not exclude certain groups or draw negative attention to a group unnecessarily. It was noted that sometimes the best intentions can be either view as just
- More elements could be **designed for LGBTQI youth in mind**.

Hackney Matters Citizen Panel

- The participants highlighted **how informal and accidental play spaces and independent play were a key part of their growing up** and recognised that the SPD was looking to re-establish this through promoting playing near the doorstep . The group noted that you should **never underestimate the ingenuity and imagination of children** to find joy wherever they are.
- Overlooking and playing in the streets is important for **creating a collective sense of responsibility for your neighbourhood and your neighbour's children**.
- Community and neighbourliness was important to the group who felt that this has been lost in the borough. The group liked how the SPD sought to reconnect children, families and friends.

Connect Hackney & Age Concern

- The group appreciated the presence of wildlife and its impact on softening urban environments. Any new **interventions to increase biodiversity, greening and contact with nature would be welcomed**.



- **Pedestrians before cars and bikes** (not just cars). The council needs to re-establish the user hierarchy. Traffic needs to be dealt with in a **HOLISTIC** way. Not piecemeal interventions.
- There needs to be an **attitude change to outdoor spaces and play for people to come together more.**

Intergenerational workshop (with elderly groups and young people)

- The group recognised many design guidance topic areas that reached across generations
- **Young people need spaces that are challenging** to their imagination.
- It is **important to have a connection to space and connections to the culture of a place for all generations** and what can be learnt from different generations like through the Dalston mural.
- Seating for all ages is a problem. There is not enough of it. **It needs to be recognised that both young and older persons want to have the opportunity to sit, rest and 'watch the world go by'.**
- Both groups acknowledged that there is a stigma attached to young people 'hanging around' in large groups.
- There should be **more youth provision - either in the form of physical spaces or through programmes.** It was suggested that these hubs or programmes could also involve inter-generational elements. An example of this is the Made in Hackney project in the old toilet in Clapton. It provided young people with an opportunity to develop knowledge and skills. Participants thought the SPD could help to apply this to the public realm.

Key themes across all the sessions

Participants from each workshop presented a variety of personal and collective experiences and ideas on growing up. A number of participants were either not originally from Hackney, for example they had grown up elsewhere, or had since moved away from the borough. This gave further insights and comparative ideas for the project team to consider. While the lived experiences and ideas shared by individual participants and groups were all unique, there were clear key themes emerging across the different workshops. Below identifies the key themes and sub-themes.

It should be noted that these themes are interrelated and there is a significant cross over between them. Many of the comments represent reflections on growing up in Hackney in response to the SPD as well as suggested amendments.

1. Creating spaces that build stronger communities



Participants were supportive of the SPD and noted its importance in fostering community relations. They were eager to underscore that the document created a number of opportunities for interactions and exchanges between different groups in public spaces.

Intergenerational opportunities

'Parks are one of the most inclusive environments, they are the main places people use to get outdoors. In parks there is space for everyone, but I would like to see more benches and chairs for disabled people'

Participants across the different workshops were interested in exploring how spaces could work for intergenerational exchanges, where different age ranges from young children to the elderly could occupy the same spaces either simultaneously or at different times to allow for continual use of public spaces.

It was evident that many of the issues raised by young people in the workshops were similar to other groups, in particular those in later life. This included:

- The sense of not belonging or not feeling welcomed in certain environments or spaces.
- The need for different types of spaces to fulfill their needs.
- The importance of providing a variety of comfortable seating to rest both alone and in groups
- The need for having different areas for different activities and groups of individuals. Not everywhere needs to be shared all the time.

Doorstep and street interactions

The different groups all emphasised the importance of knowing your neighbours, but recognised that this was not as common or possible under the current circumstances.

Many recalled that as children they would know their peers locally, but as they progressed into adulthood this was less common. The participants welcomed the general approach of the SPD to create environments that facilitated more incidental social interactions, while also noting the limitations of the built environment to solely create community cohesion.

When discussing the general concepts behind the SPD, the participants were eager to allow for more doorstep and street interactions with neighbours and the broader community.

2. Creating welcoming spaces

Creating welcoming public spaces was a key element of creating a child-friendly borough. Participants highlighted that welcoming spaces not only support young people's mental and physical well-being but it was also essential in developing a sense of security, safety and belonging. Participants were eager to challenge the project team to develop the SPD to further incorporate this theme through the document and make it more present in its narrative and in individual guidance.



Connection to places through art, play or social interactions

“...the importance of having a connection to space and connections to culture of a place for all generations and what can be learnt from different generations like through the Dalston mural’

Outdoor cultural spaces that supported performance and art were identified as spaces that bring residents of different backgrounds together while providing young people with challenging, playful and stimulating places to occupy. Similarly, spaces such as outdoor gyms were noted to bring people together in a more positive and active way.

‘A swing is good for the soul at any age’

“Those outdoor gyms with swingy bits are good for everyone”

Many young people in the workshop stressed that play provision was aimed at young children and that there was little provision of facilities for early teens and young adults other than places such as adventure playgrounds that closed at certain hours. This notion of *play* was discussed by young people as an important element of public perceptions on how they (young people) occupy spaces and that it was problematic as play is largely considered something only children take part in. Participants in our older generation group echoed this and encouraged play to be thought of more broadly than early years of life. Many of the younger participants stated that young people want the opportunity to play but this could take different forms such as using swings or having skateparks etc. That said, spaces that felt welcoming and inclusive for girls and young women were also noted as lacking. Where provision is available, participants felt the facility focused on the needs of boys and young men.

Welcoming spaces for teenagers

‘Young people needs space to challenge and test their imaginations ‘

‘I don’t like being outside, I don’t feel safe...you got to walk like you know where you’re going. [parks are a] through route. Not for leisure’

The workshops with young people highlighted the importance of addressing the very particular need of young people in the design of the built environment to help them feel welcomed and safe. Many participants pointed to the delicate balance between safety and the *securitisation* of spaces or safe but not watched. This related largely to the discussed idea that teenagers are perceived as nuisances by other groups which results in them being removed and purposefully designed out from certain public spaces. Here, the notion that certain spaces were also not welcoming to different sub-groups such as London Fields being identified as a place young, and in particular young black people, could/would not spend time in.

Many young participants identified a clear public misunderstanding of what young people need and want from their environments such as clear sightlines in public space, the



presence of adults to feel safe but not monitored, flexible spaces for usage by different groups, and the ability to be with friends without being disturbed. The idea that young people loitering was also discussed, highlighting that sometimes there is nothing wrong with groups of people simply hanging out with their friends, but in the absence of spaces such as youth centres then this can be the only opportunity they have to be with their peers.

Positive signage

Participants noted that informative and user friendly signage and wayfinding had a positive psychological impact on people and how they perceive and occupy spaces. This was particularly an issue for teenagers who felt that a perceived lack of play provision in estates and signage stating 'No Ball Games' etc created an environment of exclusion and a *move on* culture.

Specifically, different groups called for the removal of No Ball Games signs and to improve wayfinding to better signpost places where games and play can take place.

Outdoor Seating: social, individual, age inclusive, disability inclusive

'Parks are one of the most inclusive environments, they are the main places people use to get outdoors. In parks there is space for everyone, but I would like to see more benches and chairs for disabled people'

'I like to be able to sit and watch my children play and to play with them too..'

Seating was noted as a key issue in places like parks and on the high street as it reflects broader issues such as loitering, as discussed above, as well as issues such as creating spaces that are inviting. Specifically, seating was viewed through the prism of being asked to move on or making way for others. It was also noted that seating was more often not age appropriate or disability friendly.

Contact with wild nature: insects, plant species, wildlife, edible plants

'I like it to feel more natural. Near me in Woodberry Down the new developments are all a bit plasticity and all man made, all looks contrived, they've cut down the trees, I'd like to see more trees..'

Across the different groups, participants acknowledge the importance of nature and green environments and how it can create a borough friendlier for all. Greening and planting was highlighted as it softens environments and can change how groups interact with each other and public spaces. There were calls for more green infrastructure and welcomed the SPDs attempts to deliver this.

3. Maintaining public spaces

Maintenance of park and sports facilities

Litter and bins are a key concern across the group. This was identified in highstreet areas and a particular problem in parks. It was noted that the lack of bins next to seating was linked to this issue.



“People leaving their rubbish and litter. Need better and bigger bins. they need to be changed more regularly... make people pick up their litter and look after their park”

“Need better signage to take care of parks”

Maintenance and accessibility of Public Space amenities

Accessible and well maintained public toilets were a problem for all groups regardless of gender, age, disability. Participants called for more outdoor performative spaces where different groups could socialise and enjoy, as well as more water features.

Sunlight and tall buildings

Access to direct sunlight in the city was noted as a problem. Participants highlighted that it's not high on the agenda, but as people build taller buildings there is a loss of sunlight in some areas (of the city). Every location should have access to natural light.

Not overly interfere with design of space

Participants noted that some spaces should be left to 'wild' similar to London Fields or have less formal boundaries etc. Overly manicured lawns, one way walking systems can create beautiful but 'boring' environments that give a sense of formality and restricted access. Participants wanted to see spaces that allow for imagination in play, an element of risk and informality.

4. Sustainable transport and movement around the borough

Much like the commonplace data, the workshops highlighted the current tensions between car users, current traffic reduction schemes and how this is impacting on others in terms of public transport and moving around the borough. Specifically, young people welcomed the intervention but noted that their main mode of transport, buses, were being heavily affected by increased traffic on the main roads.

Holistic response to restrictive car, traffic and parking measures

Many welcomed current steps taken by the Council to reduce traffic through the Low Traffic neighbourhoods scheme but recognised the impact this has had on congestion on main arterial roads. The groups stated it was important to make sure car access is still supported where needed and that traffic and parking needs to be dealt with in a holistic way, not piecemeal interventions.

Safer Roads/ Crossings

The participants were clear that safer roads and crossings were integral to child and young people's independence and freedom to move around neighbourhoods. That said,



discussions focused on how to improve road safety in residential areas to implement the SPD and welcomed the idea of people before cars.

Air pollution and air quality

Poor air quality and its impact on young people was directly linked to a heavy presence of vehicular traffic in certain areas of the borough. This was generally more of an issue for older groups and adults who were concerned about its impact on young children, and wanted to see more references to combating this in the SPD document.

Cyclists slowing down and separate cycling lanes

'Cycling lanes are problematic. Cyclists feel safe and confident using them, but children don't understand the danger, they don't have any sense of danger, they'll just step out... They build cycle lanes across bus lanes, you have to cross the cycle lane, there are loads of near misses.'

'Cyclist go too fast... Need more signs to encourage dismount/slowing down'

Cyclists were noted by elderly participants and parents as problematic, especially in shared spaces such as parks or greenspaces. Similarly, the issue of young people cycling on pavements and not adhering to the rules of the road, such as cycling through red lights, was a key topic for discussion in the older persons and intergenerational workshops

3.5 Submitted Responses

15 statutory bodies and organisations submitted formal consultation responses to the planmaking@hackney.gov.uk. The list of consultees who responded are listed below:

External organisations:

- Luke Billingham, Hackney Quest
- Dinah Bornat, ZCD Architects
- Holly Weir, Child-friendly specialist
- Peter Kraftl, University of Birmingham
- Tim Gill, Independent researcher
- Graham Jones, Leisure and play consultant
- Huan Rimington, BuildUp
- Susanne Tutsch, Erect Architecture

Statutory consultees:

- Canal & River Trust
- Highways England
- Sport England
- Metropolitan Police Designing Out Crime Office
- Natural England
- Transport for London
- Port of London Authority



Organisation	Comments
Canal & River Trust	• The Trust is supportive of the aims of this supplementary planning document. • It welcomes the role new developments can play in increasing the provision for children, and supporting the Canal & River Trust in meeting these aims, through funding canal improvement projects that can be related to these developments. For example, developments adjacent to or nearby our waterways present opportunities to make links to the towpath and waterspace environment, while carefully assessing the safety considerations of a waterside space. • The Canal & River Trust is already working towards many of the same aims of the SPD, in response to demand from children and young people in the borough, and we welcome opportunities to work with the Council, with the support of developers, to provide: ○ safe, welcoming and clean public spaces • protected walking and cycling routes ○ clean air to breathe ○ access to safe, pleasant and inviting open spaces ○ opportunities for outdoor play, places to gather, and entertainment ○ to connect with other people and the wider environment ○ a sense of safety and security at home and away from home. In particular we welcome opportunities to: ■ make more legible links between the walking and cycling network in the borough and the canal network the Lee Navigation between Springfield Park/rowing club and Craven Park Road to encourage more young people to walk and cycle. ■ improve the environment of the canal through place-making projects that engage young people and local communities and provide. ■ deliver projects that engage young people in the canal, its environment, nature, and with others. • The Canal and River Trust has a Skills & Learning Coordinator,, who is also involved in STEM education who has advised that the Trust are already developing mini-sites on the Regents Canal in LB Hackney with local schools to adopt and reinvigorate areas of the canalside with design improvements. The Trust is aiming to repeat the programme and involve the children on a journey to create more child-friendly spaces on the canal. The trust has the following specific comments to make on the document, below: Green & Blue Infrastructure Networks Proposed developments should contribute towards making streets and neighbourhoods more liveable and: 20.1 Signposting clear and engaging links to nearby green and open spaces creatively at a range of heights. 20.4 Examining opportunities where boundaries to parks and open spaces could be removed or made smaller, or where the entrances could be widened, or new entrances added. 20.7 Enhancing reservoir and canal use and safety by ensuring they are well overlooked and, where appropriate, well lit The Trust supports all of these relevant aims. However, lighting near the waterway will need to be assessed on a case by-case basis for appropriateness in relation to ecological and safety considerations. It should usually also be adopted and maintained by adjacent third party development, or by Hackney Council as street lighting asset managers, as the Trust would not be able to take on this liability



Port of London Authority	• Organisation acknowledged • No further comments received
Sport England	• Sport England along with Public Health England have developed guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy with the SPD. • The SPD seeks to create child-friendly places and spaces that, amongst others, can support and accommodate physical activity, whether that be through creating/maintaining open spaces, closing streets to traffic, improving active travel links/infrastructure and many more. Sport England supports this approach. • To assist developers and further inform the SPD Sport England recommend that the strong links between the SPD and Active Design are drawn out in the document. For instance, the SPD could have clear references to Active Design, its principles and the Active Design Checklist. Active Design principles and the checklist, for example, could be added to the design traffic light assessment. More information on Active Design, including the guidance, can be found via the following link; http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/ • Sport England also supports community use of school facilities outside school core hours. It recommends that new educational facilities are designed with community use in mind thereby easily facilitating such use outside the education facility core hours. Sport England also has a free online resource called Use Our School that offers further guidance and information for Local Authorities and other education providers on how to make the best use of school facilities for the benefit of the local community. It is especially useful for those who have responsibility within a school for establishing, sustaining and growing community activity on school sites. 'Use Our School' can be accessed here; www.sportengland.org/useourschool
Highways England	• Interest in the documents specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. • For Hackney, Highways England's interests lie in the M11 and M25 which are approximately 4 and 8 miles away respectively. • Highways England noted it satisfactions that the changes will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109). • No comments or objections were received.



TFL

- The reference to our 2017 Healthy Streets document in the 'Policy, Research & Guidance Context' section is very welcome. We would welcome reference also being made to the Mayor's Transport Strategy (MTS), which focuses strongly on children and the importance of physical activity during childhood in its promotion of the Healthy Streets Approach and the Mayor's aim for all Londoners do at least 20 minutes of active travel per day by 2041.
- Elsewhere (p. 45) the MTS emphasises that "Children aged five–18 are recommended to do at least 60 minutes of moderate intensity activity (brisk walking or cycling) each day" and "In childhood, physical activity helps our bodies to grow, strengthening our muscles and bones, and assists in the development of skills such as balance and coordination." (ibid) At page 13 of your draft document, the acknowledgement that "The noted gradual decline in children's independent outdoor play and mobility has been attributed to a wide range of factors including: greater car dominance on streets" is somewhat indirect and could be strengthened. As the section starts with a title asking "What is child-friendly urban design?", we would support bullet points subsequently being used to directly answer that question, including one for "Healthy Streets free from car dominance" or similar.
- Child-Friendly Design Principle 4 in the document (p. 17), 'People before cars' is direct and clear. It aligns well with the MTS and policies T1 (Strategic approach to transport), T2 (Healthy Streets), T5 (Cycling), and D8 (Public realm) of the Publication London Plan. We strongly support and welcome it. At the longer section on this principle (p. 22), it may help to add some or all of the Healthy Streets indicators alongside the explanatory text, to help succinctly communicate the exact characteristics which TfL and the Mayor of London recommend should be created and expected on London's streets. Also, Child-Friendly Design Principle 8 'Health and well-being' should perhaps explicitly mention 'physical activity' and increasing physical activity, or activeTravel.
- In general we would encourage you to strengthen all assertions within the document arguing that private motor vehicles and the infrastructure and space required to support them directly prevent and contribute nothing to the creation of child-friendly spaces. This includes parking.
- We also support a stronger focus throughout the document on highway and pedestrian safety in urban space, to support the Mayor's Vision Zero goal to eliminate death and serious injuries from London's transport networks and streets by 2041. This may justify its own Child-Friendly Design Principle given that children are especially vulnerable to collisions caused by conflict between vehicles and pedestrians or cyclists, especially when encouraged to spend more time outdoors in London increasing their physical activity. Checking the following documents for references to 'children' could support this:
 - The Planning for Walking Toolkit
 - Vision Zero action plan
 - Achieving lower speeds: the slow speeds toolkit
- Overall, the case studies and child-friendly 'Design Criteria' in the rest of the document are well-communicated and useful. The relationships between advice in the SPD and adopted local policy are made very clear. In particular we strongly support the case study of filtered permeability and greening at Palatine and Petherton Roads, and the advice on 'Designing a public realm for everyone' at page 104.
- We would support 'Healthy Streets', 'Active Travel' and 'Vision Zero' being added into and defined within the document, including at the closing Child-Friendly SPD Glossary (p. 143).



Metropolitan Police Designing Out Crime Office	- Considering the draft supplementary document and in particular section 9. Under the heading STREET DESIGN STANDARDS, p66, we fully support this aim. Building frontages overlooking public spaces provide good natural surveillance which can help to significantly reduce the fear of crime. With reference to section 20.4 under the heading GREEN & BLUE INFRASTRUCTURE NETWORKS, p74, I would ask that the paragraph be worded as follows: 20.4 Examining opportunities where boundaries to parks and open spaces could be removed or made smaller, or where the entrances could be widened, or new entrances added. Proposals must be in line with Secure by Design Guidelines. Expert advice on the Secured by Design scheme should be sought from the Metropolitan Police's Designing out Crime Officers. - With reference to section 6.3 under the heading DESIGNING A PUBLIC REALM FOR EVERYONE, p104, we fully support this aim. - We would go further with this and state we want these paths to be well used, with good sight lines and no hiding points, which will allow young people to move safely around the borough. - In reference to section 6.4 under the same heading DESIGNING A PUBLIC REALM FOR EVERYONE, p104, please could this be slightly reworded to clarify where the advice will derive from: 6.4 Providing ample, safe and consistent lighting throughout space at all hours of the day, consistent with Secure by Design guidelines. Good lighting makes a place less threatening after dark. Please refer to Hackney biodiversity action plan to ensure lighting avoids any potential harm to wildlife species. Expert advice on the Secured by Design scheme from the Metropolitan Police's Designing out Crime Officers should be sought.
Natural England	- Natural England welcomes the opportunity to give our views, however, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues: - Green Infrastructure - This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. - The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure;'. The Planning Practice Guidance on Green Infrastructure provides more detail on this. - Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. - There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through: - green roof systems and roof gardens; - green walls to provide insulation or shading and cooling; - new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). - The document could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. - Further information on GI is included within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity". Biodiversity



	enhancement. ● This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit. Landscape enhancement ● The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. ● Other design considerations ○ The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180). ○ Strategic Environmental Assessment/Habitats Regulations Assessment. A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.
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