

**Summary of Representations Received on the
Draft Fylde Healthy Living Supplementary Planning Document
Consultation between 11th July 2019 and 8th August 2019**

Consultee	Key text from representation	Changes sought	Council Response
General			
Cllr Noreen Griffiths	Having read the Draft Plan for Biodiversity and Healthy Living, it gives me confidence that protection for the natural world would be in place.	N/A	
Historic England	No comments to make	N/A	
Homes England	No comments to make	N/A	
Natural England	No comments to make	N/A	
Public Health Lancashire County Council	The absence of reference to improving air quality is noticeable in the SPD and the Fylde Local Plan to 2032. Approximately 4% of deaths across Lancashire are attributable to particulate air pollution (PM2.5) and planning policy has a role to play in addressing this. The National Planning Policy Framework state 'Opportunities to improve air quality or mitigate impacts should be identified'. The Fylde Council 2017 Air Quality Annual Status Report (ASR) identifies a key action for Fylde Council as 'the adoption of the Lancashire Air Quality Planning Guidance note setting out how and when air quality issues need to be considered as part of the planning process'. I recommend that consideration is given to how the Lancashire Air Quality Planning Guidance can be embedded into planning policy in Fylde at the earliest opportunity.	The inclusion of Air Quality in planning policy.	Comment noted. Discussions are underway with Fylde Council's Environmental Health department to determine how the issue of Air Quality can be successfully embedded into future planning policy.

Sport England	Sport England note that the SPD includes policies in Appendix 1, but it is not obvious if these are SPD policies in their own right or copies of policies taken from the Fylde Local Plan. It may help the reader if additional text is included to explain, both in the list of contents and tied to some point in the document.	Additional text to explain the policies in Appendix 1.	Comment noted and issue will be rectified within the document. The Fylde Local Plan to 2032 policies set out in Appendix A will be referenced within the Policy and Guidance section. An additional title will be added to Appendix A for clarity which will also be acknowledged in the contents list.
Whyndyke Garden Village NHS Healthy New Town Board	Due to the length of the SPD we recommend that its content is reviewed so that it is very clear at a glance what the SPD is recommending applicants and developers consider in their planning applications.	Review of content.	Comment noted. It must be recognised that almost half of the document is made up of appendices offering additional information. However, to increase clarity and reduce the length of the main document, case studies will be moved out of the main body of the SPD and placed in the appendices. Specific recommendations will be highlighted and italicised. A 'How to Use this Document' section will also be placed at the front of the SPD to allow easy navigation through the document.
Introduction			
Sport England	1.3 Sport England supports the objective to have a positive impact on the health and well-being of Fylde residents.	N/A	Comment noted.
Planning, Policy and Public Health Context			
Sport England	2.2 Sport England agrees that the nature of the built environment has a significant impact on people's ability to take part in sport and be physically active. All professional disciplines and groups (for example	N/A	Comment noted.

	<p>planning, health, leisure, property, transport and education) should look to work strategically, proactively and collaboratively, including with local communities to maximise opportunities for active lifestyles.</p> <p>2.38 to 2.40 Sport England welcomes the specific references to its' Active Design Guidance (2015). Taking part in regular sport and physical activity is a key part of maintaining a healthy lifestyle. Too few of us are doing enough sport and physical activity to stay healthy. This could have significant long-term implications for the health, wellbeing and quality of life of millions of people. Active Design has been commissioned by Sport England to take a fresh look at the opportunities to encourage and promote sport and physical activity through the design and layout of our built environment, supporting a step change towards healthier and more active lifestyles. Its principles are relevant to Chapters 3, 4, 7 and 8.</p>		
Healthy Places			
Public Health Lancashire County Council	<p>The SPD is a considerable length and I suggest that its content is reviewed so that it is clear at a glance what the SPD recommends applicants and developers consider in their proposals. As part of this I suggest amending and highlighting the following sections to make them clear recommendations for consideration by applicants:</p>	Highlighting of paragraphs.	Comment noted. The paragraphs will be highlighted and italicised for clarity.

	<p>.Paragraph 3.10 and 3.11 regarding embedding Active Design Principles.</p> <p>.Paragraph 3.21 regarding the use of Digital Technology.</p>		
Ian Brooks Sports Development Officer at Fylde Borough Council	There is reference to the YMCA Your Move Programme. The money for the Your Move Programme was drawn down from LCC and is due to stop in March 2020.	Clarify within document.	This will be acknowledged within the document. The reference to the YMCA Your Move Programme will be kept as it as an example of good practice.
Sport England	3.8 to 3.11 also cites further references to active design and Sport England welcomes encouraging applicants to include active design principles within their proposals. Your link to the active design web pages doesn't work, try this one: https://www.sportengland.org/facilities-and-planning/active-design/ Further case study documents have been added to the web pages which may be of relevance to this document. Sport England welcomes inclusion of the Active Design Principles Checklist in Appendix B.	Change link to the active design web page.	Comment noted. The link will be changed and ensured that it is working correctly.
Healthy Living			
Public Health Lancashire County Council	The sections of the SPD titled 'Healthy Living' and 'Community Engagement' do not appear to have any clear recommendations for applicants or developers, I therefore suggest these are reviewed.	Review the 'Healthy Living' section.	The purpose of the Healthy Living SPD is to provide guidance when planning for and creating healthier developments, whilst providing communities with greater support to take positive action to improve their health and wellbeing and encourage more positive forms of participation in healthier

			environments. The information provided in the 'Healthy Living' section (which contains 'community engagement'), whilst not having any specific recommendations provides a good background of how to engage in practices that encourage healthy living which can influence both developers and residents. Understanding the roles of the built and natural environments and their effect on health and wellbeing can help to improve people's quality of life and provide a sustainable approach to the design and management of environments.
Sport England	4.1 to 4.4 Sport England also welcomes references to our Active Lives data, our Active Lives Surveys measure the activity levels of people across England. There are two surveys: Active Lives Adult, which is published twice a year, and the world-leading Active Lives Children and Young People, which is published annually. Both give a unique and comprehensive view of how people are getting active. Further references to Sport England data are acknowledged elsewhere in the document (Chapter 8).	N/A	Comment noted.
Healthy Food Environment – Nutrition and Health			
No comments made on this section.			
Healthy Food Environment – Hot Food Takeaways			
Public Health Lancashire	The SPD is a considerable length and I suggest that its content is reviewed so that it is clear at a glance what		Comment noted. The paragraphs will be highlighted and italicised for clarity. The recommendation from Lancashire

County Council	<p>the SPD recommends applicants and developers consider in their proposals. As part of this I suggest amending and highlighting the following sections to make them clear recommendations for consideration by applicants:</p> <p>Paragraph 5.15 regarding hot food takeaways.</p> <p>We recommend this is amended to include the recommendation from the Hot Food Takeaways and Spatial Planning. Public Health Advisory Note published by the Lancashire County Council Director of Public Health and Wellbeing 'Refusing new A5 uses within wards where more than 15% of year 6 pupils are classed as obese'.</p>		County Council's Public Health Advisory Note on Hot Food Takeaways will be added.
SSA Planning – on behalf of Kentucky Fried Chicken	<p>As you will be aware, we commented on the Scoping Stage of this document and stated that we considered over-concentrations of any use in a town centre detrimental to retail variety and therefore footfall, which is itself a form of active travel. We are disappointed therefore that the final draft still focusses solely on hot food takeaways, when there is good evidence (see, for example, Robinson et al BMJ 2018 (363) 4982, attached), that food high in calories, fat, salt and sugar are available from a range of uses within several of the use classes.</p> <p>We are also concerned that the ward threshold for action is arbitrary - there is no explanation provided for why 10% is a significant figure, nor any sense of what levels of obesity in any given population might</p>		<p>Policy EC5 of the Fylde Local Plan to 2032 sets out the retail hierarchy for Fylde in order to maintain and enhance the vitality and viability of town, district and local centres. This will support a thriving economy as well as influencing active travel to and from centres, which will be supported through the SPD.</p> <p>Policy HW1 Health and Wellbeing – of the Fylde Local Plan to 2032 is concerned with the health and wellbeing of Fylde's residents. It states that the Council will integrate public health principles and planning to reduce health inequalities. Criterion a)-g) describe how this will be achieved and criterion g) states 'The reduction of health inequalities and initiatives to facilitate healthier lifestyles will be supported, where these</p>

	<p>be considered normal or typical. This is particularly important, as child obesity is not based on a linear measure. We are furthermore concerned that part of the policy appears to relate to deprivation rather than obesity. This not only confuses correlation with causation (the two correlations - density with deprivation and deprivation with obesity - are separate and it is spurious to link them), but fails to set any objective, so that monitoring is impossible. Again, we suggest that a far better approach is to set an objective of having a healthy proportion of each use type in each town centre, but also perhaps across other wider geographies.</p> <p>Finally, we reiterate that the evidence for the proximity of hot food takeaways to schools causing overweight or obesity in pupils of those schools (or generally) is limited and conflicting. It would require that pupils were (a) leaving unaccompanied, (b) able to get to the nearest hot food takeaway in time, (c) actually were visiting them (and not cafes, coffee shops or convenience stores), (d) consuming more calories there than they would if they were to eat elsewhere (see Robinson et al, 2018) and (e) visiting and (relatively) over-consuming frequently enough for it to contribute to obesity.</p> <p>If the hypothesis were correct, one might see a greater incidence of obesity in pupils of schools closer to hot food takeaways than in those of schools further away from them, and increasing incidence of obesity in schools when hot food takeaways open nearby and decreasing incidence when nearby hot food</p>		<p>can be delivered through the planning system'. The advisory note published by Lancashire County Council, which contains the recommendation of "refusing new A5 uses within wards where more than 15% of year 6 pupils and 10% of reception pupils are classed as obese," evidences a link between hot food takeaways and obesity. Therefore, there is a strong local policy basis and associated evidence to support this SPD and the approach that it will take to controlling hot food takeaways.</p> <p>Additionally, many Local Planning Authorities have now successfully adopted policies which control Hot Food Takeaways and are successfully implementing them through planning decisions. Hot Food Takeaway outlets tend to sell larger portions of food that is high in fat, salt and sugar and low in fruit and vegetables. Although there are implications from the purchasing of unhealthy foods from any of the A1, A3 and A5 uses, they are, on the whole, likely to be of smaller portions and contain less fat, salt and sugar than food from Hot Food Takeaways.</p> <p>Restrictions that will prevent the clustering of Hot Food Takeaways, especially close to schools, will provide one means of tackling obesogenic environments and influencing healthy eating habits in the Borough.</p>
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	takeaways close. No evidence of either is referred to in the references. Many references are to policy papers that refer to other policy papers rather than peer-reviewed primary research.		
Healthy Food Environment – Opportunities for Food Growing			
Public Health Lancashire County Council	<p>The SPD is a considerable length and I suggest that its content is reviewed so that it is clear at a glance what the SPD recommends applicants and developers consider in their proposals. As part of this I suggest amending and highlighting the following sections to make them clear recommendations for consideration by applicants:</p> <p>.Paragraph 5.34 regarding open spaces.</p> <p>We recommend an amendment to this to highlight the need for open spaces to be accessible by all members of the community regardless of age or disability.</p> <p>.Paragraph 5.44 regarding workplace allotments.</p>	Highlight paragraphs 5.34 and 5.44 and make amendment to open spaces paragraph.	Comment noted. The paragraphs will be highlighted and italicised for clarity. The amendment requested will be made.
Alcohol			
Lancashire County Council Public Health	Paragraph 6.6 of the SPD needs amending. All premises licensed to sell alcohol require a licence regardless of their opening hours.	Make correction to paragraph 6.6.	Comment noted. The document will be amended.

Homes for Lifelong Living			
Public Health Lancashire County Council	<p>The SPD is a considerable length and I suggest that its content is reviewed so that it is clear at a glance what the SPD recommends applicants and developers consider in their proposals. As part of this I suggest amending and highlighting the following sections to make them clear recommendations for consideration by applicants:</p> <p>. Paragraph 7.5 regarding adaptable homes.</p> <p>We recommend an amendment to the wording of this to state 'Applicants and developers are encouraged to adopt as a minimum the Building Regulations Accessible and Adaptable Standard (M4(2) Category2) within their proposals'.</p>	Highlight paragraph 7.5 and amend recommendation regarding Building Regulations.	Comment note. The paragraphs will be highlighted and italicised for clarity. The recommendation will be amended.
Community Facilities			
Public Health Lancashire County Council	<p>The SPD is a considerable length and I suggest that its content is reviewed so that it is clear at a glance what the SPD recommends applicants and developers consider in their proposals. As part of this I suggest amending and highlighting the following sections to make them clear recommendations for consideration by applicants:</p> <p>. Paragraph 8.15 regarding community needs.</p> <p>.Paragraph 8.20 regarding community facilities.</p>	Highlighting of the paragraphs mentioned.	Comment noted. The paragraphs will be highlighted and italicised for clarity.
Ian Brooks Sports Development	The Sports Development Plan referred to in paragraph 8.13 has not been taken forward for ratification. However, it is on the agenda.	Clarify that the Sports Development	Comment noted and this will be clarified within the document.

Officer at Fylde Borough Council		Plan has not been ratified.	
Cycling and Walking – Policy Background			
No comments made on this section.			
Cycling and Walking – Current cycling and walking position			
No comments made on this section.			
Cycling and Walking – Opportunities			
No comments made on this section.			
Access to Natural Areas			
United Utilities	<p>We believe that developers should seek to maximize opportunities for using space in a multi-functional way and for enabling sustainable drainage features to form part of the character of the development. Open space and recreation provision in new developments present a clear opportunity to provide much needed sustainable drainage, whilst also contributing to quality neighbourhoods, providing opportunities for wildlife and enhancing the leisure and play on offer, resulting in a significant positive health effect.</p> <p>If promoting the development of blue/green infrastructure and walking and cycling in new development in order to promote healthy living, we want to ensure that the opportunities of using these</p>	Encourage the use of sustainable drainage within the development of blue/green infrastructure and walking and cycling in new developments.	Comment noted. Opportunities for sustainable drainage will be incorporated into the document within the 'Access to Natural Areas' section.

	areas for sustainable drainage are not missed, and as such we encourage you to make this point in your draft SPD.		
Health Impact Assessment (HIA)			
No comments made on this section.			