

South Worcestershire Development Plan

Planning for Health Supplementary Planning Document

Statement of Consultation: Draft Planning for Health SPD

July 2017



1. Introduction

- 1.1 This consultation statement has been prepared in accordance with Regulation 12 of The Town and Country Planning (Local Planning) (England) Regulations 2012, which relates to public participation in the preparation of a Supplementary Planning Document (SPD). The statement sets out who was consulted on the draft Planning for Health Supplementary Planning Document (SPD), when and how, and summarises the representations received and how, if at all, they have influenced the final Planning for Health SPD.

2. Name and Purpose of the SPD

Name

- 2.1 Planning for Health Supplementary Planning Document (SPD)

Purpose

- 2.2 The purpose of this SPD is to provide guidance to local authority planning officers, applicants, relevant organisations and the wider community on the planning and creation of healthier developments. 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 our environments. The SPD also aims to provide communities and organisations with information that supports and encourages positive action and participation to improve their health and wellbeing.
- 2.4 The principle of incorporating health and wellbeing into planning in south Worcestershire is embedded throughout the SWDP and is one of the five key Objectives of the SWDP. The main overarching objective of the SWDP is the achievement of sustainable development. SWDP 1 outlines south Worcestershire's approach to this objective, which incorporates the government's mutually dependant dimensions of economic, social and environmental roles. The health and wellbeing of the local population can be significantly influenced by successfully achieving sustainable development.

3. Who was Consulted on the draft Planning for Health SPD

- 3.1 Informal consultation informed the development of the draft SPD. Workshops and presentations were carried out with development management colleagues across the South Worcestershire Councils, and with the Worcestershire Health Improvement Group in September 2016. The Development Management workshop sought views from planning colleagues as to how a health SPD could benefit the planning application process. The discussion raised some important issues and suggested further considerations relating to the content of the SPD, such as air quality management, dementia/memory loss, recreational/exercise opportunities on business developments and the different types of roles that green infrastructure can play. Other more strategic comments related to consideration of the threshold levels for which a HIA should be required, the consistency of the SPD guidance with local and national policy, the use of best practice examples where possible, and a suggestion to set out the aims and objectives of the SPD in a clearer manner. The Health Improvement Group received a presentation from officers in September, where encouraging feedback was provided by the group and the draft Health SPD was endorsed for consultation.
- 3.2 In November 2016, after consideration of responses to the scoping paper, and internal officer consultation within the three south Worcestershire Councils, a draft Planning for Health SPD was

presented to each of the three Councils' relevant committees for approval to go out to further statutory consultation (Regulation 13 of the Town and Country Planning (Local planning) (England) Regulations 2012).

4. How Were People Consulted?

- 4.1 The consultation on the draft Planning for Health SPD took place, from 2nd December 2016 to 27th January 2017, in line with each Council's Statement of Community Involvement.
- 4.2 A letter outlining the consultation period and subject matter was sent to a wide range of consultees as summarised within Appendix 1, in time for the start of the consultation. The draft SPD was also available on the three South Worcestershire Councils' websites and the SWDP website, together with an electronic response form, for the duration of the consultation period. Hard copies of the draft SPD were placed in the Customer Service Centres throughout the south Worcestershire area, together with hard copy response forms. A press release was also issued to promote the consultation within the local area.

5. Summary of Responses

- 5.1 A total of 25 consultation responses were received to the draft Planning for Health SPD, which translated into 119 individual comments. Of the 25 consultees, 6 were from the development industry, 4 were from statutory consultees and 15 were from other representatives.
- 5.2 A summary of the comments and the officer responses to them is set out at Appendix 2 to this report.
- 5.3 All of the responses were either in support of the production of the SPD or raised comments in relation to its content. No responses raised objections to the SPD in principle.

6. Summary of the Main Issues Raised

6.1 The main points raised were:

- the format of the Health Impact Assessment process and the levels of assessment required;
- the development thresholds of the SPD for requesting a Health Impact Assessment;
- requests for clearer distinctions to be made between policy and the additional guidance;
- the approach to hot food takeaways and the SPD's approach to limiting their impact (guidance box 8);
- requests for further information in relation to the mental health benefits of development;
- requests for further information/guidance relating to providing access to health facilities through development;
- the need to include reference to SWDP 1 – sustainable development and its role as the overarching objective of the SPD; and
- the need to provide greater links to the NPPF from a health perspective.

7. Summary of how issues have been addressed in the final Affordable Housing SPD

7.1 The table at Appendix 2 sets out how each of the comments made has been considered within the Draft SPD.

Appendix 1: Summary List of Consultees

- Statutory Bodies listed in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012
- Parish and Town councils in Worcester City, Malvern Hills and Wychavon Districts
- All adjoining District Councils
- All Parish and Town Councils adjoining Malvern Hills and Wychavon Districts
- Worcestershire County Council
- Registered Providers
- Traveller groups
- Tetlow King (who act for local Registered Providers)
- Libraries
- All District Councillors in Malvern Hills District Council, Worcester City Council and Wychavon District Council
- Economic Development officers/ groups
- Local businesses
- Voluntary sector- wide ranging but including national bodies such as the Samaritans, and Age Concern; local residents groups/ tenants associations
- Health and public services organisations, e.g. NHS, police and Fire service (and adjoining ones)
- The utilities
- District Council officers in Housing and Development Management
- Other interested organisations for example the University of Worcester; environmental groups; CPRE
- The development industry/ planning consultants/ landowners/architects

Appendix 2: Summary of the Responses Received and how they were Addressed

Name/Organisation	SPD Reference	Representation Submitted (Summarised Versions)	Officer Comment	Proposed Actions
Cllr Malcolm Victory	1.2	This shows a certain bias in that people live longer as a result of improved medicines but in later life will naturally go out less, exercise little and probably only cook ready meals. The habits of the poor are highlighted here, as quality food is expensive while drink and cigarette can make a hard life easier.	Noted, the SPD aims to promote healthy environments for all Worcestershire residents, in particular those disadvantaged at all stages of their lives.	No further action necessary.
Cllr Malcolm Victory	1.3	The shift of burden onto the County Councils underlines the tragic failure of successive governments in funding the NHS. GP service is almost non-existent due to the funding changes and so more people go direct to Hospital.	Noted.	No further action necessary.
Cllr Malcolm Victory	1.4	It is obvious that a healthy person is not usually in need of a Hospital.	Noted.	No further action necessary.
Cllr Malcolm Victory	1.5	Comment deemed inadmissible.	Comment deemed inadmissible.	No further action necessary. Comment deemed inadmissible.
Cllr Malcolm Victory	1.6	If one looks at the minimum requirement for living space you will find that the UK standard is less than anywhere in the rest of the EU. Access to GPs is highly restricted as compared to even 5 years ago. Air quality kills thousands every year.	Noted. The aim of the SPD is to help tackle these issues where possible, including prevention of illness so less people become ill and are in need of medical attention. The minimum living space standards	Reference SWDP 11 and SWDP 31 in the SPD (guidance boxes). Add information relating to nationally prescribed Space

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			<p>are set by the government. Local planning authorities have the option to set additional technical requirements. Local planning authorities need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans. No such policies are set within the SWDP, which is why this is not within the scope of this SPD.</p> <p>In terms of air quality, SWDP 11 seeks to reduce the impact of HGVs on the Vale of Evesham area due to food and veg production in the area and the impact on villages such as Bretforton and Badsey.</p> <p>SWDP 31 also proposes avoidance of significant impacts on Air Quality Management Areas.</p> <p>The SWDP sets out the strategy to meet the required infrastructure needs of the plan period.</p>	Standards.
Cllr Malcolm Victory	1.7	South Worcestershire is blessed with AONB and Conservation areas but is under pressure to create an additional 27,000 houses. Where will they go? Will this	The SWDP allocates the appropriate number of sites within the plan period to meet the objectively assessed and approved housing requirement for the	Reinforce the links between SWDP 7 and the IDP in the SPD.

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		improve the living standards of those already resident? How will the health service cope?	<p>south Worcestershire area. The housing total is 28,400 but that is for the full Plan period which commenced in 2006 i.e. a lot has already been delivered. Policy SWDP 7 in conjunction with the Infrastructure Delivery Plan sets out the strategy for delivering the infrastructure needed over the plan period. Health facilities and emergency service infrastructure are key considerations of this policy and evidence base.</p> <p>Health requirements have been identified through consultation with the South Worcestershire Clinical Commissioning Group, Worcestershire Acute Hospitals NHS Trust, NHS Property Services, NHS England and Worcestershire County Council.</p>	
Cllr Malcolm Victory	1.8	<p>There is a serious disconnection between the Policy and the reality - Can you not see that? I have to say that this web page is almost indecipherable.</p> <p>Very badly laid out - at great cost to the taxpayer no doubt.</p>	Noted. The councils apologise if the layout of the webpage is causing interested parties any problems.	No further action necessary.
Cllr Malcolm Victory	1.9	In an economy where the real income of the average worker is less than 8 years ago one	Noted. The SPD aims to contribute to health prevention through improving	Reinforce in the SPD that many health related improvements

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		can not expect a good outcome in health terms.	<p>the built and natural environment. These places and spaces will be to serve all residents/visitors whatever their income and status. The SPD aims to reduce health inequalities.</p> <p>Health related improvements can be undertaken which involve the built and natural environment with little or no direct cost to the individual. For example, exercise can be achieved at a low monetary cost and the built and natural environment can be developed to encourage people to undertake exercise, e.g. 'green gyms' in parks or attractively designed public spaces in urban areas to walk around, where people are able to do so.</p>	that people can undertake (i.e. walking, using 'green gyms' in parks) require no or little direct cost to the individual (where they are able to do so).
Cllr Malcolm Victory	1.11	Government requirements for Council involvement and "box ticking" are driving down the quality of service and action rather than planning exercises should be the order of the day.	Comments noted.	No further action necessary.
Cllr Malcolm Victory	1.14	The SPD and SWDP are inherently not compatible, as the economy will not allow progress in health terms.	SWDP 1 (in line with the NPPF) seeks sustainable development as the end result. This means achieving social, environmental and economical improvements. These roles are	No further action necessary.

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			<p>mutually dependent. The SPD builds on these roles in relation the health-related improvements.</p> <p>Health related improvements can be undertaken which involve the built and natural environment with little or no direct cost to the individual. For example, exercise can be achieved at a low monetary cost and the built and natural environment can be developed to encourage people to undertake exercise, e.g. 'green gyms' in parks or attractively designed public spaces in urban areas to walk around, where people are able to do so. The SWDP and the SPD do not restrict these opportunities; rather they seek to facilitate them.</p>	
David Addison	Policy Guidance Box 6	The second bullet point is in conflict with SWDP 27 (A). Not all development needs to incorporate the generation from renewable or low carbon sources equivalent to at least 10% of predicted energy requirements. Only new developments over 100 sq. m or one or more dwellings.	Agreed. The guidance box will be amended accordingly.	Amend guidance box with the correct policy information and link requirements to the HIA process.
David Addison	Policy Guidance	The first point is not reflective of SWDP 39 (A). Housing developments exceeding 10	Agreed. The guidance box will be amended accordingly.	Amend guidance box with the correct policy information and

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	Box 8	dwellings (or 6 in DRA) are not required to contribute towards allotments in Policy SWDP39, but rather the provision of green space and outdoor community uses, which could include allotments. SWDP39 (A) confirms that "the precise amount, form and type of outdoor community use will be informed by local evidence."		link requirements to the HIA process.
Margaret Smith	1.1	I have personal experience of all the too many AGEUKs involved only good at issuing information to the carers who look after their loved ones. It is a minefield and not dealing with the real problems. This issue has been talked about for years but gets worse nothing changes. I had a lot of experience of death in a hospital and in a nursing home but it is just not good enough. Why can't it follow Macmillan St Richards and all the other good charities caring. So simple. Change has to be less people at the top with big salaries and small people at the bottom being paid rubbish doing jobs we can't do ourselves. It always comes down to money.	<p>The aims of the SPD are:</p> <ul style="list-style-type: none"> • to inform pre-application advice (and subsequent planning applications) of any potential health-related issues, and to be a material consideration, where relevant, to be taken into account in determining planning applications; • to provide information and guidance that can be used to support a Health Impact Assessment; • to promote opportunities for healthier lifestyles, encourage healthier choices and help reduce the demand on the NHS, health professionals, councils and individuals across south Worcestershire; 	No further action necessary.

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			<ul style="list-style-type: none"> • to inform the preparation of future plans, strategies, development briefs, and policy decisions; • to provide an evidence base resource, responding to local needs by providing supporting information and guidance; and • to inform communities and provide guidance to aid with the preparation of Neighbourhood Plans. 	
Eileen Marshall – Landscape Officer Wychavon District Council	Policy Guidance Box 5	<p>A further document which may be of interest and which you may wish to refer to in the SPD is the Landscape Institute Position Statement Public Health and Landscape "Creating Healthy Places".</p> <p>Many of the points in that document are already covered in the draft SPD, but there are some additional points which may be worth bringing out and there are some interesting case studies that are referred to, showing the positive links between landscape, health and well-being.</p> <p>For example, there is a link between the presence of vegetation and reduction in crime, and healthy places optimise opportunities for learning and development</p>	Comments noted.	Include a case study on the health benefits of green infrastructure/landscape related development improvements.

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		in both adults and children.		
Henry Harbord - Transport Strategy Officer Worcestershire County Council	Objectives	<p>Change the second bullet point to "more applicants" carrying out Health Impact Assessments.</p> <p>A general point: if the ideal would be for developers to approach planning authorities ahead of making an application, it might be good to replace "applicant" with "prospective developer" (or similar), throughout the document.</p>	<p>The objective could be strengthened by addressing the role of HIAs in helping developments to meet the health related SWDP policies.</p> <p>The SPD states that it is important that a HIA is undertaken at an early stage of a development proposal to help address any relevant health impacts on the population, whilst minimising the costs of changes to plans. HIAs can be undertaken at various stages of the planning process, however it may be more cost-effective for the applicant to approach the planning authority regarding an HIA during the pre-application stage.</p>	Review the document, specifically the objectives, to refer to prospective applicants as well as applicants.
Henry Harbord - Transport Strategy Officer Worcestershire County Council	1.14	<p>Insert a new paragraph after "in the determination of planning applications":</p> <p>"Developers with a proposal for which a HIA is deemed appropriate should find that working through the process of a HIA, particularly pre application, will help shape those proposals such that they meet the SWDP's health-related policies, smoothing the proposal's passage through the planning process. An application can be made</p>	Agreed. Amend as appropriate.	Section to be amended to reflect this comment. It may be more relevant to section 1.12.

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		<p>without a supporting HIA, but such an application could fail to meet those health-related policies and so might fail to gain planning approval."</p> <p>Make "Links between the SPD and Appendix 1" a new (final) paragraph in this section and then add "For guidance on development the size and type thresholds for which HIA will be sought, see Table 1.0 in section 3.8."</p>		
Henry Harbord - Transport Strategy Officer Worcestershire County Council	1.17	Ought the five key objectives to be listed here?	For purposes of brevity the SPD will provide reference to relevant policies and objectives of the SPD.	No further action necessary.
Henry Harbord - Transport Strategy Officer Worcestershire County Council	3.8	Since the size criteria and type criteria (quite understandably) both have "or as requested by the local planning authority" catch-alls, it might be useful to add some words to 3.8 to encourage the prospective developer to contact the planning authority early on for guidance.	Noted. Paragraph 3.10 already refers to HIAs being undertaken at an early stage. However, strengthening this paragraph may be appropriate.	Amend 3.8 as appropriate.
Henry Harbord - Transport Strategy Officer Worcestershire	3.13	Add "Early dialogue with the local planning authority will help establish the appropriate type of HIA."	Agree.	Add this wording to the relevant paragraph in the HIA section i.e. para 3.8.

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County Council				
Henry Harbord - Transport Strategy Officer Worcestershire County Council	4	It is good to see that monitoring/evaluation of the effectiveness of the SPD is proposed, but should there also be mention of rewriting/updating the SPD? And more generally, should the SPD be given a lifespan and/or linked to the lifecycle of the SWDP?	<p>SPDs can be updated but it would mean revoking the current guidance and re-starting the whole process again, which would be counter-productive in a short timescale.</p> <p>No update to the SPD is anticipated in the immediate future as it would at least need some time to 'bed in' and be assessed for its impact/success, unless there is a significant shift in national policy/a review of the SWDP that warranted a change.</p> <p>The best place to monitor performance of the SPD and Health Impact Assessments (HIAs) is through the Authorities' Monitoring Report (AMR).</p>	No further action necessary.
Richard Greenway	1.16	I have concerns about the allocation of housing site in Worcester. It is apparent that the analysis of the site at Hopton Street failed to list it as being within the Green Network before it was approved and its disposal was not discussed in detail as the residents representative wasn't allowed to speak. When the Green Network of other site was discussed this was not dealt with in an equal way. No due regard was taken in	Noted. The particular reasoning of sites allocated within the SWDP is not within the scope of this document. The SPD provides guidance on SWDP policies relating to health.	No further action necessary.

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		<p>determining its allocation as the information was suppressed not being entered into the spread sheets when analysis was undertaken - how is this acceptable and democratic. It calls into question the whole validity of the process and undermines the SWDP2016 and local democracy.</p>		
Daniel Scharf	Policy Guidance Box 2	<p>Could the SPD make more of the stress and other mental health issues relating to the lack of suitable and affordable housing/living? Community Land Trusts are a tried and tested way of securing affordability. Housing associations are also partnering farms for tenant participation.</p>	<p>The housing strategy for South Worcestershire is set out under SWDP 2 and SWDP 3. Affordable housing requirements are set out under SWDP 15.</p> <p>The SPD aims to help tackle the issues of mental health. This is why it promotes social cohesion, provision of community facilities, quality and accessible green spaces and other public spaces. Affordable housing and its related components are one aspect of this issue.</p>	No further action necessary.
Gemma McKinnon - Public Health Officer (Planning) Warwickshire County Council (Public Health)	1.3	<p>Typo 'what is now termed' to replace 'what in now termed'.</p>	Noted.	Amend the typo.

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Gemma McKinnon - Public Health Officer (Planning) Warwickshire County Council (Public Health)	Table 1.0	I think the inclusion of the HIA recommendation within the SPD is really important and valuable. The criteria states 25 dwellings of more and I wondered if you could advise me on how you decided on this threshold? And also who would be expected to carry out the HIA e.g. public health or the developer?	The comment is welcomed. HIAs will be undertaken and submitted to the relevant local authority by applicants or prospective applicants. The threshold of 25 dwellings is based on balanced reasoning taking into account the likelihood and scale of health and wellbeing impacts generated by the proposals versus the time and cost for the applicant preparing the HIA to the applicant. 25 dwellings is therefore considered a reasonably balanced threshold requirement, bearing in mind that the form and density across larger sites will vary in terms of individual requirements on site and the characteristics of the area in which they are located.	No further action necessary..
Gemma McKinnon - Public Health Officer (Planning) Warwickshire County Council (Public Health)	4.1	It's really positive to see that you will be monitoring the SPD to understand the impact it may be having. I think there are many PH guidance documents in the public realm currently but few state how they will monitor. I would be interested to view the commentary on performance in the AMR to see the methodology which has been used for monitoring and also how successful the SPD has been.	The comment is welcomed.	No further action necessary.

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Gemma McKinnon - Public Health Officer (Planning) Warwickshire County Council (Public Health)	4.5	Again I would be interested to understand the methodology used to review HIAs (particularly as the threshold is quite low) as well as how the success is evaluated in line with the SPD.	<p>HIAs will be checked against a number of criteria introduced through this SPD. The measures of success will include:</p> <ul style="list-style-type: none"> - the number of HIAs undertaken - case studies on individual schemes - how the HIA exercise changed the approach of the development in relation to health-related issues. <p>The results will be published in the Authorities Monitoring Reports published each year on the SWDP website and each local authority website.</p>	No further action necessary.
Gemma McKinnon - Public Health Officer (Planning) Warwickshire County Council (Public Health)	1.11	I think this is great - clearly sets out the intention of the SPD and how it can be used.	The comment is welcomed.	No further action necessary.
Dr Rachel Pryke	Aims	I am concerned that the physical activity briefing paper (in the PH newsletter) appears to make not a single mention of children and physical activity. How can services be planned appropriately when a whole sector of our population has been left	Noted, however this is not within the scope of the SPD. These comments have been forwarded to the relevant person in the Public Health Directorate.	No further action necessary.

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		<p>out of the briefing paper? The JSNA 2016 briefing paper on child obesity gives NCMP statistics only and no assessment of existing local services or prevention approaches for child obesity, despite this affecting a third of children and being one of the most profound long term health risk determinants. It is not clear how this briefing paper could have any influence on the decision making of the STP or JSNA as it does not relate to any local actions or give any responses or recommendations to the statistics given.</p>		
<p>Jo Hall - Primary Care Commissioning Manager South Worcestershire CCG</p>	<p>1.5</p>	<p>While we welcome the reference to ensuring access to facilities for those who become ill, we would have liked to see greater emphasis on this throughout the SPD.</p>	<p>Noted. The SPD has addressed this issue but will seek to reinforce its importance throughout the SPD in terms of spatial planning.</p>	<p>Reinforce the importance of access to facilities in the SPD.</p>
<p>Jo Hall - Primary Care Commissioning Manager South Worcestershire CCG</p>	<p>Policy Guidance Box 2</p>	<p>We agree that provision of communication infrastructure allowing online links to modern health and support facilities is important. GP contracts now include a requirement to give patients access to online services such as making appointments, ordering prescriptions and viewing their medical records. They are already planning for online consultations.</p>	<p>Noted. Online services are generally not with the remit of the built environment/planning but technologies could be incorporated that directly/indirectly educate and inform people of health-related activities and/or health benefits. SWDP 26 encourages the provision of broadband internet facilities within new</p>	<p>Include reference to communications infrastructure that could indirectly bring health benefits to communities.</p>

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			developments.	
Jo Hall - Primary Care Commissioning Manager South Worcestershire CCG	3.1	The CCG would endorse the importance of undertaking Health Impact Assessments on all new proposals.	Noted. However, it is not the intention to carry out a HIA on all development proposals. The requirements to undertake a HIA are guided by the thresholds and criteria set out in chapter 3 of the SPD.	No further action necessary.
Jo Hall - Primary Care Commissioning Manager South Worcestershire CCG	Policy Guidance Box 2	Built Community Facilities - existing GP practices may request additional space or where a new medical facility is required to manage an increase in the number of patients and so we would welcome permission being granted in these circumstances.	<p>Noted. CCGs/ Worcestershire Acute Hospitals NHS Trust/ NHS England should engage in the consultation process and submit responses to planning applications that would trigger the need for increases to health provision in the affected area.</p> <p>Contributions can be sought through Section 106 planning obligations, subject to restrictions of the CIL regulations 122 and 123.</p> <p>Health infrastructure is also included in the Community Infrastructure Levy Regulation 123 List as an item that could receive CIL money. 'Bids' can be made for CIL money received albeit the funding pot will likely be small and the number of bids high.</p>	No further action necessary.

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Cllr Gerry O'Donnell	1	Use of language...can we replace any of the "should's" with "must" or "ensure"	The absence of a specific SWDP policy on health means that imposing stringent or specific requirements would not stand up at appeal. However, the SPD will provide enough planning weight (through other policy links and HIA assessments) to be an influencing factor in the consideration and determination of planning applications.	No further action necessary.
Cllr Gerry O'Donnell	1.1	Reflection that the SPD should relate to the H&WB priorities as they change, not just the current ones and that the SPD should expect developers to consider local health evidence (e.g. child obesity prevalence) which is likely to change over the years bearing in mind it might be a long time before this document is reviewed it therefore needs to be future proofed.	The Health and Well-being Strategy runs to 2021 and reflects the vision and priorities of the Health and Well-being Board. Should the strategy change significantly post 2021, the SPD will consider these changes in the context of whether or not a review is required. Local health evidence will be made available for the HIA process by the Public Health team and applicants will be encouraged to analyse and respond to this.	No further action necessary.
Cllr Gerry O'Donnell	Policy Guidance Box 8	Consideration of covenants on some buildings to prevent the sale of alcohol (e.g. schools), hot takeaway premises (e.g. within xxx metres of schools, play areas, community centres etc.)	Unfortunately covenants are beyond the scope of this SPD given the absence of a specific SWDP policy hook. Guidance box 8 attempts to deal with the issue of hot food takeaways in inappropriate areas, however, there is	Update guidance box 8 to reflect the policy requirements of SWDP 10.

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			<p>no specific SWDP policy dealing with hot food takeaways from which specific requirements can be enforced. SWDP 10 provides some guidance in relation to protecting and promoting centres and local shops in terms of the over-proliferation of particular use classes in certain areas. It is envisaged that HIAs (where undertaken) will identify any particular problems in this area and seek to resolve them. Additionally, proposals may not comply with the principles of SWDP 1, which seeks sustainable development (social, environmental and economic), particularly the social element perspective.</p> <p>Sales of alcohol (including their location) are much harder to control through the built environment and are dealt with through other legal means (e.g. licensing, proof of age, etc.)</p> <p>Designated Public Place Orders (DPPOs) can also be used to place restrictions on areas in terms of alcohol consumption, but this is not a planning function.</p>	

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Cllr Gerry O'Donnell	2.5	More reference to edible planting and for allotments to be distributed across a new development rather than in just one location, so it is more of the default position to have very local allotments, include raised growing beds close to groups of houses across a whole development this makes vegetable gardening easier, more attractive and sociable for local households, using a behavioural insights approach here.	The SPD encourages the provision of allotments. The particular locations for provision will be dependant on those planning applications that are of a sufficient size and scale that could provide allotments as part of their Green Infrastructure quota. The reference to allotments and the detail set out in the SPD could be strengthened to include varying approaches to provision such as smaller plots scattered across developments, or rooftop allotments. Encouragement of small scale community gardens and orchards and more fruit trees in development could also be referred to in the document.	Provide additional information in the SPD in relation to allotments and orchards in terms of their locations and beneficial qualities.
Cllr Gerry O'Donnell	1.1	Rather than reference to "people living with disabilities" refer to vulnerable people, more inclusive.	Agree to change the description where it occurs and is appropriate to do so.	Change relevant references within the SPD from "people living with disabilities" to "vulnerable people" to make the document more inclusive.
Cllr Gerry O'Donnell	Policy Guidance Box 7	Improve requirements for connectivity of walking and cycle routes to routes outside of the development. Make walking and cycling the easiest and more attractive option, so vehicular travel is not the default position.	Transport links and improvements (particularly for non-vehicular movements) are a key component of the Health SPD. In the SWDP (SWDP 4), all major	No further action necessary.

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			<p>development proposals (i.e. 10 or more dwellings), are required to submit Travel Plans that set out measures to reduce the demand for travel by private car and stimulate cycling, walking and public transport use and also show that the layout of development will minimise demand for travel. The SPD echoes these requirements through the guidance boxes and the HIA process.</p> <p>In general, in line with Regulation 122 of CIL, transport improvements on planning applications (i.e. S278 agreements) can only be requested where they are directly related to development.</p>	
Cllr Gerry O'Donnell	Policy Guidance Box 2	Requirement for cycle parking at each home to make it easier for visitors to cycle and park securely (not sheds in gardens) again using a behavioural approach making it as easy to get on a bike, park securely as it is to get in the car.	This is a key element of the SWDP in terms of sustainable travel (SWDP 4, SWDP 21) and the SPD echoes these requirements. Cycle storage/parking should be provided in accordance with the most recent Local Transport Plan/County Highways requirements.	Amend the SPD to make further references to cycle parking requirements. This may be more relevant to the supporting text in the SPD.
Cllr Gerry O'Donnell	Policy Guidance Box 2	More robust wording for use of renewable energy (solar etc.) - reduces poverty, increases warmer homes and reduces excess winter deaths and illnesses (e.g.	The renewable energy requirements can only follow policy, as set out in SWDP 27. A Renewable and Low Carbon Energy SPD is currently in	Include requirements in the policy guidance boxes as per SWDP 27.

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		circulatory and respiratory illnesses).	production, which will support this SWDP policy.	
Cllr Gerry O'Donnell	2.37	Play areas to allow for risk intelligent play by children natural play environments (tree trunks, climbing trees, landscaping undulating).	Play areas are a key part of SWDP 39 and the SPD, however further guidance will be added that encourages the provision of natural play environments, where possible.	Add wording into the SPD which also advocates natural play environments where appropriate.
Cllr Gerry O'Donnell	Policy Guidance Box 5	Shared space for children to be able to "play out" in the streets.	Noted. This is a built environment function that would be difficult to implement. However, the SWDP and SPD do promote specific play spaces for children.	Draw attention to the potential for a shared space and street uses for people and vehicles within new developments.
Cllr Gerry O'Donnell	2.55	Community orchards not to be next to main/busy roads to reduce pollutants on the crop.	The location of community orchards will be a key part of discussions within the Parks and Landscape teams to ensure that the layout of development proposals are satisfactory in this regard.	Add wording relating to the siting of community orchards in proposed layouts of planning applications.
Justin Milward – Woodland Trust	Policy Guidance Box 6	<p>We are pleased to see the references in the draft SPD to green infrastructure and, specifically, to trees in 'Chapter 2 – Planning for healthy developments and healthy lifestyles'.</p> <p>We note the mention of the benefits that trees can deliver for air quality. However trees and woods can play a much wider role</p>	Agree that trees can have positive health and wellbeing outcomes, including cooling the urban 'heat island' effect to reduce respiratory issues, providing a welcoming natural environment for physical exercise and mental health healing and mitigating flooding to reduce mental distress. The	Add further reference to trees supporting health and wellbeing through various roles they perform in the green infrastructure section of the SPD.

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		in supporting positive health and wellbeing outcomes, including cooling the urban 'heat island' effect to reduce respiratory issues, providing a welcoming natural environment for physical exercise and mental health healing and mitigating flooding to reduce mental distress.	SPD already states that the natural environment, including trees and other elements, mitigate extreme temperatures and the impact of flooding and deliver delivering mental and physical health benefits.	
Gillian Driver – Natural England	Policy Guidance Box 5	This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.	Noted, green infrastructure and green spaces can improve public health and quality of life and reduce health inequalities. The SPD covers this in para.2.25-2.28 and Policy Guidance Box 5. The SPD also highlights the role of green spaces in relation to people living with dementia. The highlighted evidence will be reviewed and additional information will be applied if appropriate.	Add reference to the health and wellbeing benefits of individual elements of green infrastructure i.e. para 2.27-2.31 of the SPD.
Gillian Driver – Natural England	2.25	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.	Noted, habitat improvements will indirectly benefit health and wellbeing which is covered in the SPD (para.2.25). Incorporating features such as bird boxes is a detailed design matter which is outside of the scope of this SPD, but does not preclude them from being considered as part of a HIA as a biodiversity consideration.	No further action necessary.

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Gillian Driver – Natural England	Policy Guidance Box 5	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.	Noted, landscape protection and enhancements can benefit health and wellbeing which is covered in this SPD (Policy Guidance Box 2). Further evidence could be provided within the SPD to support this.	Add reference to the relation of landscape/visual qualities of an area to health and wellbeing to the relevant sections i.e. Health & Wellbeing Principles: Green infrastructure and play spaces/recreation and supporting text.
Gillian Driver – Natural England	Policy Guidance Box 1	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.125).	The benefits of landscape and biodiversity on health and wellbeing are noted. The effect of lighting on landscapes and habitats is generally a detailed matter beyond the scope of this document.	Include reference to the benefits of health and wellbeing in relation to landscape and biodiversity considerations in para 2.27-2.31 of the SPD.
Gillian Driver – Natural England	Aims	Strategic Environmental Assessment/Habitats Regulations Assessment - A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the	The SEA Joint Screening Assessment identified that it is unlikely that significant effects on the environment will arise as a result of this SPD. Whilst some, mainly positive effects of	No further action necessary.

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		<p>Planning Practice Guidance. 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.</p>	<p>introducing the SPDs are noted, it is not felt that any of the effects are significant. It has been recommended that SEA is not required for this SPD. The relevant statutory bodies are currently being consulted about this determination.</p>	
H Skate	Policy Guidance Box 6	<p>I would hope that the trees already in existence would therefore be given protection from this development plan.</p> <p>There are many beautiful trees in our original 'green spaces' that are planned to be built on, which certainly aid air quality and well being.</p>	<p>Both existing and newly planted trees will have a positive impact on air quality. The loss of Veteran Trees and their importance in terms of creating ecological networks in covered in SWDP 22.</p>	<p>Add reference to the role of trees in contributing to air quality principles in Guidance Box 6.</p>
Jason Tait - Director Planning Prospects Ltd	3	<p>The requirement for applicants to produce Health Impact Assessments as proposed is completely disproportionate and unreasonable to address this planning issue noting:</p> <ul style="list-style-type: none"> Applicants are not best placed to research and provide for this information and would be reliant upon providers. 	<p>Noted. The level of the assessment should be proportionate to the scale of the proposal - it is not the expectation of the councils for applicants to undertake onerous assessments, particularly on small scale development proposals.</p> <p>The HIA process recommended in the SPD will be simplified and expressed more clearly. A new 'standard' HIA</p>	<p>Update the HIA chapter of the SPD to provide further information in relation to how, when and to what scale HIAs will be sought.</p>

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		<ul style="list-style-type: none"> • The approach is heavily prescriptive and laborious and completely out of scale to proportionate information required with planning applications. • The tiered scales of assessment have no logic. • The estimates of time to produce HIAs again demonstrates the disproportionate level of information required. • The proposals will result in extensive non-registration of application, delays to determination and constrain delivery of development. • There is no resolution of impasse to non-registration. • The HIA will not necessarily result in improved developments. • The types of qualifying development are such that it would be extremely difficult to quantify impacts, particularly change of use. • The proposals are impractical, 	<p>template will be created for all HIA requests (types of development that should undertake an HIA will be specified in Table 1 of the SPD), Other proposals will be encouraged to undertake an HIA screening exercise to identify if an HIA is needed (types of developments will be specified in Table 2 of the SPD). An additional screening template will be prepared to assist applicants with this earlier stage of the process (where applicable).</p> <p>The HIA and screening templates will link with the SPD guidance boxes so that the applicant can assess to what extent their proposal is providing positive health outcomes in line with the SPD guidance, and if not what is being done to resolve any issues.</p> <p>The aim is to make the HIA process less prescriptive and offer flexibility in terms of the way HIA will be carried out. A new HIA template will provide this flexibility.</p> <p>It will be recommended that applicants undertake an HIA and HIA screening at an early stage, ideally before a</p>	

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		<p>disproportionate and will not result in beneficial outcomes.</p> <ul style="list-style-type: none"> • They go fundamentally against government policy to simplify and speed up the planning system. • They merely present more hurdles and tick boxes that will delay and constrain applications and delivery. 	<p>planning application has been submitted. It will help address any relevant health impacts, whilst minimising the costs of changes to plans. Early dialogue with the local planning authority (such as through pre-application advice) will help establish the extent and content of HIA. HIAs can be a stand-alone assessment or submitted as part of other evidence reports such as an Environmental Statement or a Design and Access Statement where they are required, but must still follow the HIA criteria process.</p>	
<p>Mark Strain - District Commissioner Worcester District Scout Council</p>	<p>2</p>	<p>Worcester Scouts which have meeting places in Worcester City and Malvern Hills Council areas with over 1,000 young people and 200+ adults. However to achieve this we need buildings to meet and engage with the local community. The amount of housing developments within the locality at present is putting pressure on existing Scout meeting places which are reaching some already capacity. We need to be involved with ensuring community premises are provided and accessible to Scouts to use for meetings.</p>	<p>Noted, the provision of new, and the enhancement of existing community facilities is covered under SWDP 37.</p> <p>The case for new/expansion of facilities can be made during the consultation process on planning applications that are considered to have a significant impact on the infrastructure requirements on an area as result of growth (e.g. through S106 planning obligations. Bids can also be made through the Community Infrastructure Levy (CIL) process but the funding 'pot'</p>	<p>Provide information in the SPD in relation to the physical and mental health benefits that can be encouraged and/or obtained through sustainable development and community interaction.</p>

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			<p>is likely to be low and the number of bids for infrastructure high.</p> <p>The use of particular community centres in not within the scope of this SPD but the SPD could acknowledge the role that scouting has in encouraging physical and mental activity in the younger population (and adult volunteers) and to promote the continued availability of suitable venues.</p>	
<p>Mark Strain - District Commissioner Worcester District Scout Council</p>	<p>1.1</p>	<p>Noted this section mentions planning authorities and having a suitable environment for the community to engage has positive effects on all involved. Scouting in Worcester District falls under both Worcester City and Malvern Hills. Worcester Scouts have over 1,000 young people who meet each week around the area and who can make a positive impact on the community especially health and well being. However we need suitable premises to meet and deliver activities that involve the community. The growth of the many housing developments is putting pressure on existing Scout Groups. We need access and consideration given by the planning authorities to ensure developers build</p>	<p>Noted, the provision of new, and the enhancement of existing community facilities is covered under SWDP 37.</p> <p>The case for new/expansion of facilities can be made during the consultation process on planning applications that are considered to have a significant impact on the infrastructure requirements on an area as result of growth (e.g. through S106 planning obligations or the Community infrastructure Levy).</p> <p>The use of particular community centres in not within the scope of this SPD but the SPD could acknowledge the role that scouting has in</p>	<p>Provide information in the SPD in relation to the physical and mental health benefits that can be encouraged and/or obtained through sustainable development and community interaction.</p>

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		premises so Scouting and the community have access to use so the individuals around can flourish.	encouraging physical and mental activity in the younger population (and adult volunteers) and to promote the continued availability of suitable venues.	
Kezia Taylerson - Historic Environment Planning Adviser Historic England	2	We would support the inclusion of a paragraph within Chapter 2 that recognises the important role that the historic environment has for promoting health and wellbeing. Heritage Counts (an annual survey), in 2014 looked at the role of the historic environment in making you happy and promoting health and wellbeing.	Comments noted.	Include reference within Chapter 2 (para. 2.5) of the important role that the historic environment has for promoting health and wellbeing.
Nichola Robinson - Senior Planning Officer Worcester City Council	1	The phrasing is general is a bit woolly - lots of "should consider the" and "will be looked on favourably". I worry that this will not give us the strength to negotiate on proposals, more affirmative language should be used throughout.	The SPD does not set out new policies but rather provides guidance on policies within the SWDP. Wording in this SPD can be strengthened only where it relates to SWDP policy.	Ensure that the language within the SPD provides clear guidance and is supportive of SWDP policy/objectives.
Nichola Robinson - Senior Planning Officer Worcester City Council	Policy Guidance Box 3	I would suggest giving examples of the home types which cater for the elderly here and the facilities they will incorporate. Similarly where there is reference to walking distances to bus stops I suggest setting out what these would be. There's no reference to this in the policy or main body of text. I suggest there is clarification on	Agree that this section requires further clarification in terms of the types of houses. The SPD promotes multiple types of accommodation which meets the need of elderly, this can include ensuring that homes are easily adapted for the elderly to live in them, provision of homes which could	Amend so that the SPD better reflects the multiple types of accommodation that is available to meet the needs of the elderly. Refer to the Inclusive Mobility guidance by the Department of Transport in the Age-friendly

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		<p>what is meant by 'low maintenance flats'.</p>	<p>support multigenerational family living, supported living accommodation, care homes etc. This is expressed in SWDP 14, 15 and 20.</p> <p>The SPD advocates bus stops that are located in accessible locations and in proximity to homes in line with SWDP 4 and the Worcestershire LTP3. The distances are specified in The Department for Transport guide to best practice on access to pedestrian and transport infrastructure. For example, in residential areas bus stops should be located ideally so that nobody in the neighbourhood is required to walk more than 400 metres from their home. Regular bus services designed particularly with elderly and disabled people in mind should be places every 200 metres.</p>	<p>environments and dementia section of the SPD.</p>
<p>Nichola Robinson - Senior Planning Officer Worcester City Council</p>	<p>Policy Guidance Box 3</p>	<p>Promotion of family accommodation including integral flats/ granny annexe - I wonder whether this would actually be used by many for the intended purposes- we could potentially be looking at lots of applications to subdivide these properties in the future without appropriate contributions</p>	<p>The SPD promotes multiple types of accommodation which meets the need of the elderly, this can include ensuring that homes are easily adapted for the elderly to live in them, provision of homes which could support multigenerational family living,</p>	<p>Ensure that the Health & Wellbeing Principles: Age-friendly environments for the elderly and those living with dementia Guidance Box and supporting text reflects the multiple types of</p>

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		etc. I would suggest better to encourage planning of buildings with adaptable ground floor rooms to enable conversion to bedrooms as and when is needed.	supported living accommodation, care homes etc. This is principally covered by SWDP 20 and SWDP 21.	accommodation that is available to meet the needs of the elderly.
Nichola Robinson - Senior Planning Officer Worcester City Council	Policy Guidance Box 4	Delivery of healthcare provision. This statement is very vague - I couldn't see any background on this or how applications can be expected to support this.	<p>Agree that this section is overly vague and could benefit by providing further information on this subject. However, it is considered that it is not the role of the SPD to define standards for health care access.</p> <p>In general, the SPD aims to ensure that new developments have given consideration to access to healthcare facilities. However, the specifics of healthcare requirements and provision are included in the South Worcestershire Infrastructure Delivery Plan. Any detailed conversations regarding the provision of new facilities (e.g. through S106 or CIL) will take place between NHS England for primary health care services and South Worcestershire Clinical Commissioning Group for community, secondary and mental health services, Worcestershire Acute Hospitals NHS Trust for secondary care services and the Worcestershire Health and Care NHS</p>	Guidance relating to access to healthcare will be moved to policy guidance box 5 – community facilities.

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			Trust for community and mental health services.	
Nichola Robinson - Senior Planning Officer Worcester City Council	Policy Guidance Box 5	Play areas and outdoor gyms reasonable distance to travel to- this is vague. What is a reasonable distance- we and developers may differ on this so it needs to be specified. The final point in the policy guidance box 5 is not policy. I suggest that here there could be a policy restricting the loss of green space which builds on the SWDP policy?	Agree. This section requires further clarity. The children's play areas will be in places within the distances set out in SWDP 39. Other types of local green spaces and community uses should be accessible and within walkable distance. The section will be updated with the evidence on how far people should be prepared to walk for leisure.	Clarify this section. Provide evidence on the distances that people are prepared to walk to access green space. Include SWDP 39 requirements.
Nichola Robinson - Senior Planning Officer Worcester City Council	Policy Guidance Box 6	I suggest describing what an AQMA is first then how proposals should avoid contributing to them rather than the other way round. Also reference to future/ possible AQMAs to be made. Could we have some discussions on appropriate uses in AQMAs? For example encouraging car free schemes.	It is a statutory duty for a local authority to develop an Air Quality Action Plan (AQAP) following the declaration of an Air quality Management Area (AQMA) in response to identified exceedence(s) of one or more of the air quality strategy objectives (Worcestershire Air Quality Action Plan – Regulatory Services). Para 2.39 defines Air Quality Management Areas (AQMA). The SPD will include reference to AQMAs and link to the relevant policies in the SWDP.	Update the SPD to include reference to AQMAs and link to the relevant policies in the SWDP.
Nichola Robinson - Senior Planning Officer Worcester	Policy Guidance	Electric cars are not active travel, so not sure why referenced here, but walking and cycling are, so perhaps more information on	Agree, para 2.46 should not refer to electric cars. Agree that more information on how developments	Remove electric cars from active travel section.

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City Council	Box 8	<p>how developments could encourage these e.g. changing facilities in work places, lockers, cycle storage. Last sentence of para 2.46 should go in the previous section 1st policy of policy box 7- there doesn't seem to be a policy here- is this background?</p>	<p>could encourage active travel e.g. changing facilities in work places, lockers, cycle storage should be provided. Agree that the last section of para. 2.46 should be moved to policy box 7 Active Travel.</p>	<p>Provide information on how developments could encourage active travel e.g. changing facilities in work places, lockers, cycle storage.</p> <p>Amend the active travel section where relevant.</p>
Nichola Robinson - Senior Planning Officer Worcester City Council	Policy Guidance Box 8	<p>Explanation of what obesogenic is would be useful as this isn't explained in the document. My main concern with the document is that policy 8- making healthier food choices- is where planning has the potential to make a real difference to health, and yet this is very weak. It is very weak on hot food takeaway policy in particular.</p> <p>This policy doesn't seem to be strong enough to refuse an application on. My preference would be for there to be a threshold beyond which no further hot food takeaway applications will be approved- e.g. a % within XXX m, or no adjacent units. 'Relevant organisations should be considered'- need to point out who these are.</p> <p>Before reference to the HIA process is made in the policy box it needs to be</p>	<p>Agree to explain what 'obesogenic' means in the SPD.</p> <p>Agree that guidance box 8 requires more substantial information and guidance.</p> <p>However, it needs to be noted that this wording is only guidance and it does not introduce new policies over the adopted SWDP.</p> <p>SWDP 10 should be added to this guidance box to support its aims and provide a policy steer.</p>	<p>Explain what 'obesogenic' means in the SPD.</p> <p>Improve the content of guidance box 8 in terms of guidance relating to hot food takeaways. Add guidance relating to SWDP 10 within this section.</p>

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		explained.		
Nichola Robinson - Senior Planning Officer Worcester City Council	Policy Guidance Box 8	Provision and retention of local food shops. Potentially more of an issue for the rural authorities but I worry that this goes beyond our role- we look at the use class only and can't specify local over any other type of retail. Surely the market will decide whether viable. I don't feel this policy is strong enough to refuse an application on.	Specific retention of local food shops goes beyond the scope of this SPD. However, policies SWDP 10 and SWDP 1 can be used to try and create environments that achieve sustainable development. SWDP 10 helps to control the over proliferation of certain use classes in town and local centres. Agree that guidance box 8 needs to be strengthened.	Strengthen guidance box 8 in relation to policy on the promotion and protection of centres and local shops as per SWDP 10.
Heather Lammas - Sustainability Officer Worcestershire County Council	2.41	Refer to the positive impact that lowering energy consumption from households can have on CO ² emissions. Reducing levels of CO ² produced by each household will contribute towards efforts to tackle climate change. Reducing the risk of fuel poverty can also benefit mental wellbeing. Struggling to pay fuel bills and to heat the home effectively and efficiently can negatively impact a person's mental wellbeing and result in anxiety and depression.	The SPD aims to help with the reduction of fuel poverty and supports renewable energy and energy efficiency measures (Guidance Box 2). A Renewable and Low Carbon Energy SPD is currently in production, which will support the SWDP policy.	Refer to the requirements of SWDP 27 in guidance box 3: housing and employment.
Heather Lammas - Sustainability Officer Worcestershire	2.46	Could refer to the benefit of electric vehicles in terms of air quality as no producing tailpipe emissions as a petrol or diesel vehicle would. Active travel as the primary	Agree to mention the use of electric vehicles in the general supportive text of the SPD but not in the 'active travel section'. Electric car use is generally	Include reference to the use of electric vehicles in the air quality section of the SPD rather than the Active travel

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County Council		<p>focus but making electric vehicle travel easier could support the shift away from petrol and diesel vehicles. Consider including the importance of building design alongside green infrastructure when addressing the impacts of climate extremes. Reduce the risk of overheating by providing opportunities for shading, building design to reduce flood risk such as the use of water butts to store rainwater and wider guttering to cope with heavier rainfall. Limited reference to the expected impact if climate change on health and factoring in climate change to the design of the building can make the property fit for the future. E.g. impact of flooding on mental wellbeing, impact of temperature on air quality.</p>	<p>beyond the scope of the SPD, but electric car charging points for example could be encouraged through this document.</p>	<p>section. Add reference to flood risk, water usage and management within the SPD.</p>
James Morris - Planning Manager Sport England	1	<p>I would take this opportunity to draw your attention to Sport England's strategy, guidance and other information which we hope you will find useful. Sport England Strategy 2016-2021: Towards and Active Nation. Our vision is that everyone, regardless of their age, background or level of ability feels able to engage in sport and physical activity.</p> <p>Health and inactivity - We know that many of the leading causes of ill health could be</p>	<p>Noted, sports and physical activity brings benefits in terms of physical and mental wellbeing and individual, community and economic development. The SPD aims to encourage greater participation in physical activity amongst South Worcestershire residents.</p>	<p>No further action necessary.</p>

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		<p>prevented if people were to play more sport and increase their overall levels of physical activity - please see our website for more information with support and resources. See in particular tackling inactivity http://www.sportengland.org/our-work/health-and-inactivity/ Local Sports data The Local Sport Profile provides councils with a profile of up-to-date data for their local area, covering sports participation, facilities, health, economic and demographics, all in one place.</p>		
<p>Gleeson Strategic Land Ltd and Welbeck Strategic Land LLP (c/o RPS)</p>	<p>3</p>	<p>It is our view that the wording of Table 1.0 in Chapter 3 of the draft SPD is currently too vague and, therefore, has the potential to place onerous and unreasonable requirements upon applicants in relation to HIA.</p> <p>Whilst the NPPF includes a whole section on “Promoting Healthy Communities”, there is no reference to HIA (nor are they defined in the Glossary). The policy requirements in this section (8) of the NPPF are delivered through development plan policies relating to different policy topic areas including inter alia design and access, community facilities, designing out crime and open space.</p>	<p>It is not considered that the HIA process places onerous and unreasonable requirements upon applicants. The SPD is intended to be used as additional guidance in which health considerations are being taken into account. This section of the SPD was never meant to be a requirement but a recommendation of good practice and as such it is in line with the NPPF and particularly NPPG which states that HIAs can be utilised as a tool where there are expected to be significant impacts on health and wellbeing.</p> <p>HIA is the tool that can be used to</p>	<p>Update the HIA chapter of the SPD to provide further information in relation to how, when and to what scale HIAs will be sought.</p> <p>Provide information in relation to the acceptance of the inclusion of HIAs in Environmental Statements or Design and Access Statement as part of planning applications, where appropriate.</p>

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		<p>The PPG includes a section on “Health and Wellbeing” although the guidance on how such considerations should be taken into account in “planning decision-making” is brief (and provides) the sole reference to HIA within national planning policy and guidance.</p> <p>It makes clear that HIA is a “useful tool” which “may” (rather than should) be used where the impacts on health and wellbeing are likely to be “significant”. Does Chapter 3 reflect national policy and guidance?</p> <p>The draft SPD makes reference to the PPG guidance above but Table 1.0 in Chapter 3 – providing “Criteria for undertaking HIA” – fails to accord with it because the types of application listed are all-encompassing regardless of whether or not they may result in “significant” health impacts.</p> <p>Requested Modification to Table 1.0 We would suggest that Table 1.0 be replaced with a simple statement entitled; “When will planning applications need to be subjected to HIA?”. This should specifically refer to applications in which significant impacts are expected and we therefore suggest that the statement be reworded to read as follows: “HIA will be required for strategic-scale and major applications in which the proposed development is expected to have significant</p>	<p>assess the likely impact on the health and wellbeing of the local population or particular groups within it.</p> <p>The thresholds and types of planning applications in Table 1 where a HIA could be sought are the types of development that have the potential for the most significant impacts upon health and wellbeing.</p> <p>The level of the assessment should be proportionate to the scale of the proposal - it is not the expectation of the councils for applicants to undertake onerous assessments, particularly on small scale development proposals.</p> <p>The HIA process recommended in the SPD will be simplified and expressed more clearly. A new ‘standard’ HIA template will be created for all relevant HIA requests (types of development that should undertake an HIA will be specified in Table 1 of the SPD), Other proposals will be encouraged to undertake an HIA screening exercise to identify if an HIA is needed (types of developments will be specified in Table 2 of the SPD). An additional screening</p>	

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		<p>impacts upon health and wellbeing. As a general guide this is considered to be residential or mixed-use development of at least 100 dwellings; employment sites of at least 10ha; and retail developments proposing at least 500 sq.m (GIA). The potential need for HIA will be screened and discussed with the applicant during pre-application discussions.”</p> <p>Table 1.0 as drafted would potentially require HIA for all planning applications, which renders the guidance pointless and, furthermore, is contrary to national planning guidance.</p> <p>Exemptions From HIA - Having regard to the expense and timescales of providing such assessments, there should also be consideration of whether much of the requested information is already available through the application submission process. Should a planning application be submitted or required to be submitted with an accompanying Environmental Statement, the scope of which includes a socio-economic assessment, then information on a developments impact on social and community assets and wider health implications will already be available and in such circumstances should not be requested. Additionally, as a transitional measure, should any planning application</p>	<p>template will be prepared to assist applicants with this earlier stage of the process.</p> <p>The HIA and screening templates will link with the SPD guidance boxes so that the applicant can assess to what extent their proposal is providing positive health outcomes in line with the SPD guidance, and if not what is being done to resolve any issues.</p> <p>The aim is to make the HIA process less prescriptive and offer flexibility in terms of the way HIA will be carried out. A new HIA template will provide this flexibility.</p> <p>Agree to accept HIAs if submitted as part of an overall ‘Environmental Statement’ on planning applications where these are submitted and/or required.</p> <p>Elements in a HIA such as renewable energy can be covered by an energy statement that has already been prepared as part of the planning application package.</p> <p>Planning applications that have already</p>	

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		<p>which may fall within the requirements of this SPD already be submitted to the LPA and under consideration, it would be unreasonable to require a HIA for such application submissions and as a transitional measure they should be exempted.</p> <p>How to undertake HIA - paras. 3.12 – 3.16 of the draft SPD concern how HIA should be undertaken. It lists the three types of HIA but does not provide any guidance on which specific types of assessment relate to specific types of development/application.</p>	<p>been registered as valid will not be subject to a HIA. If applications are re-submitted, a HIA may be required and/or requested.</p>	
Hallam Land Management c/o David Lock Associates	1.7	<p>Hallam Land Management welcome the context provided in relation to the preparation of the SPD in para. 1.11 namely that it should build on policies in the Local Plan and not add to the financial burdens of development unnecessarily. The remaining context from the PPG is also relevant that SPDs should be prepared only where necessary. Hallam Land Management questions whether the document, and elements of it, are necessary other than in providing information to assist the development process for all parties. Hallam Land Management's concern is that in a number of cases the Draft SPD sets out guidance or requirements that go beyond the requirements of the recently adopted</p>	<p>It is not the intention of the SPD to place any additional financial burdens on applicants/agents/developers. The SPD states that it does not introduce new policy.</p>	<p>No further action necessary.</p>

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		<p>and tested SWDP policy and/or which do appear to unnecessarily impose additional financial burdens on development. This is notwithstanding the assertion in para 1.14 that the SPD does not introduce new policy. The SPD should clearly state that the policy to be applied in respect of the matters covered in the SPD is that in the SWDP and not as amplified in the SPD. It should similarly state that it the Council's intention in progressing an SPD is not to extend in any way the financial obligation placed on development over and above that set out in the SWDP. The SPD is not in a position to provide evidence in relation to additional costs or to be tested as to its effects on development and should not therefore extend into such areas. The focus of the LPA's approach to the SPD, if it is to be progressed, should be directed to encouraging or advising rather than requiring - not least where there is no policy requirement.</p>		
Hallam Land Management c/o David Lock Associates	Policy Guidance Box 2	<p>Policy Guidance Box 2 - Item 1 There appears to be a limited link in the SWDP to a specific planning purpose being to reduce fuel poverty, albeit that policy SWDP 27 does address renewable (but also low carbon) energy. The first line of box 2</p>	<p>It is noted that Policy Guidance Box 2 in its current form confuses the policy requirements i.e. SWDP 27 and additional guidance which is promoted through this SPD. The final version of the SPD will ensure that this distinction</p>	<p>Ensure that the SPD clearly distinguishes the requirements of policy SWDP 27 from additional guidance on renewable energy.</p>

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		should be amended in line with policy 27 to refer to the encouragement given to renewable and low carbon energy, and where viable. A consequence of the policy may be the reduction of fuel poverty.	is clearer. A Renewable and Low Carbon Energy SPD is currently in production, which will support the SWDP policy.	
Hallam Land Management c/o David Lock Associates	Policy Guidance Box 2	Policy Guidance Box 2 - Item 5 The requirement of policy SWDP21 vii is for schemes to address flexible design and the adaptability of spaces. It is not necessarily that all buildings should be future proofed from the outset, or that that this would necessarily require an obligation beyond the recent enhancements in Building Regulations standards. The SPD appears to go beyond this policy expectation if all homes are to be adaptable at the outset. Hallam would expect the adaptability of buildings to be provided for through the current and regular updating of Building regulations. It is suggested that to ensure consistency with Policy 27 that the first sentence in Policy Box 2 should be amended accordingly and if necessary with reference to Building Regulations. The second two sentences relating to future proofing should be deleted.	It is noted that Policy Guidance Box 2 in its current form confuses the policy requirements and additional guidance which is promoted through this SPD. This relates to future proofing of homes and building new homes to Building Regulations standards. The final version of the SPD will ensure that this distinction is clearer.	Ensure that the SPD clearly distinguishes SWDP policy requirements from additional guidance.
Hallam Land Management c/o	Policy Guidance	Policy Guidance Box 3 Item 1 and 2 Reference is made in the SPD to Building	Agree. However, it is also noted It is noted that Policy Guidance Box 3 in its	Amend wording of the SPD to be consistent with SWDP 20 in

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David Lock Associates	Box 3	<p>Homes to Lifetime Homes Standards and the provision of home types which cater for the needs of the elderly. The SWDP in Policy 20 does indeed seek to encourage the provision of housing suitable for the needs of older people on all allocated and windfall sites to be determined as part of the housing mix for each development to be agreed through the provisions of SWDP policies 14 and 15. On the other hand the SWDP does not appear to refer specifically to Lifetime Homes Standards or to which units such standards should apply. The SPD in setting a principle that new homes should be built to Lifetime Homes this might be taken to imply all homes and prejudice the discussion as to mix and details as is envisaged in Policy 20, 14 and 15 of the SWDP. A significant potential additional cost burden. To be consistent with the policy the principles in item 1 of Box 3 should reflect the wording of Policy 20. Encouragement will be given to provision which meets the needs of older people as part of the housing mix to be agreed in each development. References to a 'principle' in relation to 'Lifetime homes standards' would seem to be misplaced in terms of the policy and in the SPD (at least as expressed) By the same token, for consistency with Policy 20,</p>	<p>current form confuses the policy requirements and additional guidance which is promoted through this SPD. The final version of the SPD will ensure that this distinction is clearer.</p>	<p>which encouragement will be given to provision which meets the needs of older people as part of the housing mix to be agreed in each development. References to the principle in relation to Lifetime homes standards will be promoted as guidance only. In addition, it will be ensured that the SPD clearly distinguishes policy requirements of SWDP 10 from additional/voluntary guidance.</p> <p>Add reference to SWDP 21 which also refers to flexible design.</p>

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		the word 'provided'• should be replaced with 'encouraged' in the first sentence of item 2 in Policy Guidance Box 3.		
Hallam Land Management c/o David Lock Associates	Policy Guidance Box 4	Policy Guidance Box 4 Item 1 Reference to civic squares and spaces in the public realm should be "civic squares and/or spaces in the public realm" as the circumstances of each development will not necessarily require both but one or the other.	Agree.	Change the wording to "civic squares and/or spaces in the public realm".
Hallam Land Management c/o David Lock Associates	Policy Guidance Box 6	Policy Guidance Box 6 Item 1 Bullet 2 To replicate policy 27 the wording of the SPD should add "subject to viability".	Agree.	References to SWDP 27 to be removed from guidance box 6.
Hallam Land Management c/o David Lock Associates	Policy Guidance Box 6	Policy Guidance Box 6 Item 2 The expectation that buildings will need to be designed to minimise exposure to pollution sources and maximise energy efficiency go well beyond the expectations of Policy SWDP31. Properly reflecting the National Planning Policy Framework and Guidance SWDP31 requires simply that "Development proposals must be designed in order to avoid any significant adverse impacts from pollution, including cumulative ones". Minimising exposure to pollution (as opposed to avoiding significant impacts) and requiring design e.g. locating all habitable	Ensure that it is clear the SPD is primarily a guidance document but does contain SWDP policy requirements where these can be	Amend text/guidance boxes across the SPD to reflect the requirements of relevant SWDP policies and ensure that they are distinguished from additional guidance.

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		rooms away from main roads (para. 2.40) is neither a national nor local policy requirement nor practicable in most instances. It adds substantial costs. Nor do the energy policies of the SWDP require energy efficiencies to be maximised but to accord with the ever more stringent building regulation standards. Item 2 of Policy Box 6 should therefore be deleted. Any reference that the Council proposes to retain should be couched in terms of encouragement and no more.	applied with no further requirements added by the SPD.	
Hallam Land Management c/o David Lock Associates	3	Hallam Land Management considers that it should not be the case that the SPD should be requiring Health Impact Assessments to be prepared as part of planning applications. Table 1 and para 3.8 appear to require HIAs for all developments of over 25 dwellings plus for other categories of development. There is no mention of Health Impact Assessments in the SWDP. They are potentially costly to produce. SPDs should address only matters which are necessary. While the Planning Practice Guidance addresses the relationship between planning and health issues, much of its focus is ensuring that the LPA	This section of the SPD was never meant to be a requirement but a recommendation of good practice and as such it is in line with the NPPF and particularly NPPG which states that HIAs can be utilised as a tool where there are expected to be significant impacts on health and wellbeing.	No further action necessary.

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		<p>establishes effective liaison mechanisms with health agencies and providers to inform in particular the plan-making but also decision making arena of Authorities. The SPD instead focuses mainly on potential developers and the placing of an obligation to undertake a HIA when applications are submitted notwithstanding the limited scope of developers to influence the health policies of agencies and providers. The National PPG certainly does not require HIAs to be produced simply noting that "A health impact assessment may be a useful tool to use where there are expected to be significant impacts". To the extent that the LPAs wish to retain reference to HIAs in the SPD, such references should be no more expansive than that encouragement would be given to those that wish to undertake such assessments. The requirement for HIAs in section 3 should be removed.</p>		
<p>Mr Steve Simms Director SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited</p>	<p>Policy Guidance Box 8</p>	<p>We object to the content of the second row of this table because the policy it purports to supplement is so general as to give no indication that this could be the detail that an SPD might cover, thereby avoiding independent scrutiny. It therefore contrary to The Town and Country Planning (Local Planning) (England) Regulations 2012</p>	<p>Comments noted. The intention of the SPD is to provide guidance in relation to the mix and frequency of use classes in towns and local centres that could cumulatively result in an over proliferation of unhealthy options, such as food choices, particularly in sensitive areas such as proximity to</p>	<p>Update guidance box 8 to provide the appropriate information in relation to A5 uses. Use SWDP 10 as a policy steer.</p> <p>Revise the wording in the guidance box to refer to the</p>

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		<p>regulation 8, National Planning Policy Framework paragraph 153 and Planning Practice Guidance paragraph 12-028-20140306. The policy guidance appears based on a link between the proximity of specifically hot food takeaways to a list of receptors and elevated levels of obesity amongst users of those receptors, but provides no evidence in support of this. The supporting text at paragraph 2.46 in fact cites evidence of elevated levels of obesity in communities with high concentrations (proximities of receptors) of fast food outlets (not hot food takeaways within Class A5). So, using proximity of hot food takeaways as a consultation trigger would miss developments (e.g. pubs, bakeries, coffee shops) with possible health impacts (e.g. where concentrations are high) and use the wrong basis. A further adverse consequence of focussing solely on Class A5 uses is that it takes no account of measures that individual operators might take to encourage healthy eating (e.g. displaying calorie information and offering healthy alternatives).</p>	<p>schools where pupils could easily obtain food from unhealthy sources without parental supervision. Accept that it is not just solely A5 hot food takeaways that can provide unhealthy food/drink options.</p>	<p>requirements of SWDP 10 in terms of the proliferation of use classes in towns and local centres and how they will be controlled.</p>
Peter Fryers - Public Health Consultant Worcestershire	1	The DPH welcomes that this document builds upon the priorities of the Health and Wellbeing Strategy 2016-2021 and uses	Comments noted.	No further action necessary.

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County Council		robust Public Health data to inform the approach to improving health and wellbeing in South Worcestershire. We also welcome its promotion of Health Impact Assessment as a tool to test whether new developments meet the criteria set out in the SPD. Overall, we feel that the guidance in this document, supported by HIAs, will help to raise awareness of the impact that development growth may have on the health and wellbeing of local people. It will also drive positive actions towards improving health outcomes and reducing health inequalities in South Worcestershire. It will become an important instrument in shaping health-promoting environments. Notwithstanding the above, we feel that this document could be more effective with a few amendments which are outlined below.		
Peter Fryers - Public Health Consultant Worcestershire County Council	Policy Guidance Box 1	The Policy Guidance Boxes could provide guidance in a more structured way to form a step-by-step checklist of what is recommended for each of the topics. This could be done by bullet-pointing the most important facts. As an example, the provision of green space could include the following bullet points: Accessible for everyone in terms of distance	Comments Noted.	Agree to re-consider the structure of the content in the guidance boxes and how this can be better related to the HIA process.

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		<p>and adaptation for those more vulnerable, i.e. dropped kerbs and seating areas along the routes linking green spaces with communities.</p> <p>Safe, overlooked, even surfaces, soft/natural areas for children to play well maintained to preserve their functionality.</p> <p>Supporting interaction and physical activity of the elderly through strategically located benches, etc.</p>		
Peter Fryers - Public Health Consultant Worcestershire County Council	1.2	<p>Health inequalities and vulnerable people - The link between the SPD and health inequalities and vulnerable people such as children and adults with learning disabilities could be stronger throughout the document. Guidance which promotes identification of areas of particular need, and using this evidence to prioritise actions, could be two small steps towards improving health outcomes for different population groups and geographical areas in South Worcestershire. As an example, increased ill-health and lower life expectancy is often associated with communities living in deprived areas. Some types of development, such as hot-food takeaways, betting and payday loan shops, and</p>	<p>Agree to provide further reference in the SPD to health inequalities and vulnerable people.</p> <p>Make use of policy SWDP 10 - Protection and promotion of shopping choice, which does provide policy requirements on the provision of A5 uses in Primary, Secondary and non-frontages in shopping areas. This is not currently referred to in the SPD but should be added, possibly as part of guidance box 8 and the associated text.</p>	<p>Provide further reference in the SPD to Health inequalities and vulnerable people.</p> <p>Make use of policy SWDP 10 - Protection and promotion of shopping choice, which does provide policy requirements on the provision of A5 uses in Primary, Secondary and non-frontages in shopping areas.</p>

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		premises selling alcohol, can even increase the risks within these areas. The SPD has the potential to address these issues through limiting development of and access to these premises in proximity to particularly troubled areas.		
Peter Fryers - Public Health Consultant Worcestershire County Council	3	Health Impact Assessment checklist - We feel that the HIA section could be strengthened by providing a checklist of the criteria based on the Policy Guidance Boxes. This could become a clear template to be followed by developers and an easy checklist for the planning authorities to test the appropriateness of the assessment.	Comments noted.	Agree to re-consider the structure of the content in the guidance boxes and how this can be better related to the HIA process.
Peter Fryers - Public Health Consultant Worcestershire County Council	Policy Guidance Box 7	<p>Active travel - The SPD should be more explicit regarding active travel, including walking and cycling. The following matters should be considered:</p> <p>Walking: o Provision of safe and segregated pathways which cater for the needs of older people and people living with dementia - safe walking pathways which will not have cyclists on them.</p> <p>o Segregated pathways linking the new development with areas of interest, services and facilities and green spaces.</p>	Comments noted.	Further commentary in relation to active and sustainable travel measures could be added into Guidance box 7 and the related text.

Name/Organisation	SPD Reference	Representation Submitted (Summarised Versions)	Officer Comment	Proposed Actions
		<ul style="list-style-type: none"> o Disability access in relation to walkaways and Cycling: o Ensuring connectivity within new developments. o New cycle ways to be linked to the national cycle network and areas of interests. o Identify pedestrian and cycle desire lines before roadways, so genuine priority can be given to pedestrians and cyclists by planning these routes before vehicular routes. o Parking: Ensure the adequate provision of cycle parking and storage for housing developments, employment areas and public spaces. o Provide sufficient car parking to avoid cars parking on pathways/green spaces. o Encourage small-scale shared drives. 		
Peter Fryers - Public Health Consultant Worcestershire County Council	Policy Guidance Box 8	Hot food takeaways - We accept that there are no hot food takeaway policies in the SWDP and that the SPD cannot set any limitations/targets for reducing this type of premises in South Worcestershire.	Comments noted. SWDP 10 - Protection and promotion of shopping choice does provide policy requirements on the provision of A5 uses in Primary, Secondary and non-	Add in reference to SWDP 10 in the SPD in relation to guidance box 8 and the associated text. Refer to SWDP 1 as a requirement for achieving

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		<p>However, we feel that the SPD should be stronger in recommending this limitation. It is recommended that takeaway food outlets should not be allowed where they cause:</p> <ul style="list-style-type: none"> o Environmental, public nuisance and safety concerns o Impact on the surrounding environment. o Negative impact on the health and wellbeing of local residents, in particular vulnerable groups. This includes the proximity to schools, community centres, parks/playgrounds and facilities for adults with learning difficulties. It is recommended that a 400m buffer is used for these areas. o Accessibility of the site by public transport and cycling. o The cumulative impact of multiple takeaway food outlets in the locality should also be considered. o It is recommended that no more than two adjacent A5 uses should be permitted in all areas. o It is recommended that no more than 5% of number of premises should consist of A5 	<p>frontages in shopping areas. This is not currently referred to in the SPD but should be added, possibly as part of guidance box 8 and the associated text.</p> <p>Further commentary in relation to the provision and related health impacts of hot food takeaways could be added into the SPD. The recommendations referred to could be considered as part of a HIA assessment and could also be considered under SWDP 1 under the requirements for the achievement of sustainable development.</p>	<p>sustainable development – add in an additional guidance box that relates to this aim that is to be considered for all applications undertaking a HIA or HIA screening.</p>

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		<p>uses in the town/city centres, retail parades etc.</p> <ul style="list-style-type: none"> o Any new takeaway food outlet proposal should have an HIA undertaken. o Should the application feature any of the above concerns, the Directorate of Public Health should be consulted in order to help identify the likely scale of consequences on the health and wellbeing of local residents. 		
Peter Fryers - Public Health Consultant Worcestershire County Council	Figure 1.0 HIA Process	<p>Development construction phase - The SPD could better address the wellbeing impacts arising from the construction of the development. The anticipation of the unknown, and exposure to sudden or on-going traffic movement can lead to increased stress levels amongst surrounding residents. Guidance on the impacts of the construction phases on local residents and how these might be minimised by measures such as regular updates on construction progress and any potential disruptions to residents' day-to-day lives would be welcomed. Additionally, some guidance for applicants on adjusting vehicle movements and operating hours to benefit surrounding communities should be provided.</p>	<p>These elements are generally controlled by planning conditions that would be applied to a planning permission regardless of a HIA being undertaken.</p> <p>Refer to planning conditions that take into account health considerations during the pre-commencement and construction phases of development in the SPD.</p>	<p>Refer to planning conditions that take into account health considerations during commencement of construction in the Air quality, Noise, Light and Water Quality section of the SPD.</p>

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Peter Fryers - Public Health Consultant Worcestershire County Council	Table 1.0	Environmental hazards The SPD would benefit from additional guidance on how environmental hazards can affect the health and wellbeing of local residents, and which measures could reduce or eliminate the impacts. This includes: Impact of flooding on human health and wellbeing and guidance on mitigation of these impacts, impact of noise and light pollution and guidance on mitigation of these impacts.	Agree.	Add commentary into the SPD in relation to environmental hazards. Noise and Light could be additional to guidance box 6. Add reference to flood risk, water usage and management within the SPD.
Peter Fryers - Public Health Consultant Worcestershire County Council	Figure 1.0 HIA Process	Emergency planning Emergency planning is not included in the document. It is important that developments are designed to allow rapid responses during critical health situations or emergency incidents. This involves the location (proximity/availability of emergency services) and layout (accessibility for the emergency services) and responsible building design. Additional guidance on emergency planning could contribute to the essential protection of the local population and prevent the escalation of serious incidents.	Noted, however this is beyond the scope of this SPD. Emergency planning matters are dealt with by the relevant departments of Worcestershire County Council.	No further action necessary.
Peter Fryers - Public Health Consultant Worcestershire County Council	1	Please remove reference to 'dementia sufferers' and replace with 'people living with dementia'. Consideration should be given to innovative	Agree to remove reference to 'dementia sufferers' and replace with 'people living with dementia'. Agree to add information relating to	Remove reference to 'dementia sufferers'• and replace with 'people living with dementia'. Add information relating to

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		<p>development design and use of public spaces, for example: designing opportunities for future creation of play streets, green space/play spaces which support children to become risk intelligent and the use of natural imaginative play areas using natural environments, this may be tree trunks, undulating landscapes, tree climbing etc.</p> <p>Home Zones - residential areas designed with streets to be places for people, instead of just for motor traffic.</p> <p>Increased guidance on the mitigation of climate change related health impacts on the local population, especially those with increased risks such as the elderly, would be beneficial. Guidance on provision of street trees and resting areas and reducing the health island effect would also be welcome.</p>	<p>natural play space for children.</p> <p>Agree to add reference to 'Home Zones'.</p> <p>Other comments are already considered to be part of the draft SPD.</p>	<p>natural play space for children.</p> <p>Add reference to 'Home Zones'.</p>
Peter Fryers - Public Health Consultant Worcestershire County Council	1.9	We feel that the SPD should be more specific in this section. The purpose of the SPD is to provide clear guidance to planners, applicants and consultees around the design of new developments which will promote healthier behaviour choices etc.	Comments noted. Agree that this section should be more specific in describing the purpose of the SPD, particularly in relation to planners, developers, etc.	Make para 1.9 more specific in relation to planners, developers, etc. in terms of its purpose.

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Peter Fryers - Public Health Consultant Worcestershire County Council	Objectives	2nd bullet point: We suggest replacing "more all applicants carrying out Health Impact Assessments" to strengthen the objective.	Disagree. Only the larger proposed development will require a HIA.	No further action necessary.
Peter Fryers - Public Health Consultant Worcestershire County Council	1.12	"Submission of robust planning applications and any associated Health Impact Assessments". We suggest deleting the word "any" as this implies a HIA may not have been undertaken.	Only the larger proposed developments will require HIA but agree that the removal of the word 'any' would be beneficial.	Remove the word 'any' from para 1.12.
Peter Fryers - Public Health Consultant Worcestershire County Council	1.21	We suggest explaining more about the Health and Wellbeing Priorities e.g. the physical activity priority and making reference to obesity otherwise there is no evidential argument for addressing the food environment created by new developments.	Comments noted.	As this is relevant to para 1.19 - add additional wording to para. 1.19 in relation to bolstering the explanation of what the Health and Wellbeing Strategy is aiming to achieve.
Peter Fryers - Public Health Consultant Worcestershire County Council	1.22	We suggest deleting this paragraph. We accept that the planning system has limited controls over alcohol premises and consumption. However, there may be some contribution towards this goal through the night time economy restrictions and some indirect impact such as encouraging physical activity which can have a positive impact on people's mental health and wellbeing which then will reduce the antisocial behaviour.	Comments noted. The SPD may be able to have an indirect influence on this issue.	Delete para. 1.22.

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Peter Fryers - Public Health Consultant Worcestershire County Council	2.4	We suggest including a reference to allotments and edible planting in this paragraph.	Agree.	Include a reference to healthy food options in paragraph. 2.4
Peter Fryers - Public Health Consultant Worcestershire County Council	2.7	"This is particularly important when addressing needs of the elderly". We suggest adding 'and people living with disabilities'.	Agree.	Add 'and people living with disabilities' to para. 2.7.
Peter Fryers - Public Health Consultant Worcestershire County Council	Policy Guidance Box 1	2nd row: This box should include reference to active travel. 3rd box: We suggest adding, for example, "and make it easier, faster and more sociable to move around by non-vehicular means compared with vehicular means".	Agree.	Reference to active travel to be made in the 2nd row for guidance box 1. 3rd box: Add: "and make it easier, faster and more sociable to move around by non-vehicular means compared with vehicular means".
Peter Fryers - Public Health Consultant Worcestershire County Council	Policy Guidance Box 2	The SPD should address issues around planning for economic prosperity and positive impact this may have on reducing health inequalities in South Worcestershire. Further guidance on how businesses and employers can support the health and wellbeing of their employees, including supporting physical activity through provision of active travel opportunities.	Agree.	Add guidance and associated text relating to economic prosperity. Add information relating to employer opportunities to provide and /or encourage active travel to/from work, or other forms of exercise (e.g. gyms at or close to work areas).

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Peter Fryers - Public Health Consultant Worcestershire County Council	2.12	New build homes (and refurbishment projects) have to be insulated to the required minimum standard in accordance with the latest published Building Regulations. Any improvements on the minimum standards are welcomed from a planning perspective.	Agree.	Amendment to Para. 2.12: "New build homes (and refurbishment projects) have to be insulated to the required minimum standard in accordance with the latest published Building Regulations. Any improvements on the minimum standards are welcomed from a planning perspective."
Peter Fryers - Public Health Consultant Worcestershire County Council	2.13	We suggest this section include reference to cycle storage and parking in this section.	Agree.	Add reference to cycle storage and parking in para. 2.13.
Peter Fryers - Public Health Consultant Worcestershire County Council	Policy Guidance Box 2	This guidance needs reference to continuous active travel routes between housing and local and more distant employment and transport hubs (rail stations and bus stops). 1st row: New developments should also consider include outside space for drying washing to reduce the amount of moisture in the property from drying clothes in the house. 2nd row: New developments should consider the inclusion where practical include district heating networks. 5th row: wheelchair accessible, they should all be designed so that they are	<p>Agree to the first points raised regarding active travel routes.</p> <p>1st row suggestion is already included in the SPD.</p> <p>2nd row suggestion is already included in the SPD.</p> <p>5th row suggestion is already included in the SPD.</p> <p>6th row suggestion is already included</p>	Add reference to continuous active travel routes between housing and local and more distant employment and transport hubs (rail stations and bus stops) in guidance box 2.

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		easily and cheaply adaptable. 6th row: as well as areas that could be used to grow food (as appropriate).	in the SPD.	
Peter Fryers - Public Health Consultant Worcestershire County Council	Policy Guidance Box 3	1st row: We suggest adding reference to the provision/availability of toilets in parks and public areas. Elderly in particular may feel discouraged to go out when toilets are not provided which can contribute to their social isolation. 2nd row: We suggest removing the reference to the provision of community retirement villages as they might be perceived as separating out communities and preventing intergenerational benefits.	Agree to 1st row amendment to policy guidance box 3. Disagree with proposed amendment to 2nd row of policy guidance box 3. Community retirement villages are one option in terms of accommodation choices, particularly for those who can no longer live independently. However, the text should highlight that some people may wish to continue to live in their own homes for as long as possible.	1st row: Add reference to the provision/availability of public facilities such as toilets Ensure the SPD supports various types of accommodation to meet the need of elderly.
Peter Fryers - Public Health Consultant Worcestershire County Council	2.36	This paragraph needs clarification - 20 min travel where?	Comments noted. This indicator refers to Indoor Sports Facilities. The SWDP 39 sentiment is in terms of playing pitches. Agree that this paragraph requires clarification.	Update para. 2.36 to explain what the requirements are to be used for (Indoor Sports Facilities for the 20 min drive/walk time and playing pitches for SWDP 39).
Peter Fryers - Public Health Consultant	Policy Guidance	We suggest including reference to active travel.	Agree.	Reference active travel in the guidance box

Name/Organisation	SPD Reference	Representation Submitted (Summarised Versions)	Officer Comment	Proposed Actions
Worcestershire County Council	Box 5			
Peter Fryers - Public Health Consultant Worcestershire County Council	2.4	Please can there be reference to particulate accumulation on plants grown for human consumption e.g. community orchards and allotments. Include reference to edible planting in areas away from busy roads e.g. apple, pear, plum and for landscapes with lower growing plant; bay trees, rosemary, sage etc.	Agree.	Provide reference in para. 2.4 to particulate accumulation on plants grown for human consumption e.g. community orchards and allotments in terms of reference to edible planting in areas away from busy roads e.g. apple, pear, plum and for landscapes with lower growing plant; bay trees, rosemary, sage etc.
Peter Fryers - Public Health Consultant Worcestershire County Council	2.46	NB numbering needs correcting, there are two 2.45 and 2.46.	Noted.	Amend the paragraph numbering error.
Peter Fryers - Public Health Consultant Worcestershire County Council	Policy Guidance Box 7	1st row: final sentence change to "promoting accessibility to everyday facilities for all, making walking and cycling the more attractive option especially for those without a car."• 3rd box: strengthen this guidance with more definitive wording 4th box: delete "where possible".•	Agree. However, wording in this SPD can be strengthened only where it relates to SWDP policy.	1st row: final sentence change to "promoting accessibility to everyday facilities for all, making walking and cycling the more attractive option especially for those without a car." 3rd box & 4 th box strengthen this guidance with more definitive wording where

Name/Organisation	SPD Reference	Representation Submitted (Summarised Versions)	Officer Comment	Proposed Actions
				appropriate.
Peter Fryers - Public Health Consultant Worcestershire County Council	2.51	We support references to vertical gardening and Local Green Space.	Comments noted.	No further action necessary.
Peter Fryers - Public Health Consultant Worcestershire County Council	2.55	The paragraph numbering needs amending here.	Noted.	Amend paragraph numbering error.
Peter Fryers - Public Health Consultant Worcestershire County Council	Policy Guidance Box 8	1st row: Provide further guidance on allotments: 'provided walking distance from homes' consider one larger allotment area or a number of smaller allotment areas scattered across the site 2nd row: This guidance should be strengthened. 3rd box: A HIA on the Takeaway Food Outlets should demonstrate that there is no significant negative impact on the health and wellbeing of the local population through assessing the levels of obesity amongst the local population and its proximity to vulnerable people such as children and adults with learning disabilities.	Agree to provide additional commentary in relation to allotment provision. Agree that HIAs should request that Hot Food Takeaways can demonstrate that there is no significant negative impact on the health and wellbeing of the local population through assessing the levels of obesity amongst the local population and its proximity to vulnerable people such as children and adults with learning disabilities.	Provide additional commentary in relation to allotment provision. Provide additional guidance in relation to Hot Food Takeaways and HIA requirements to help potential applicants demonstrate that there is no significant negative impact on the health and wellbeing of the local population through assessing the levels of obesity amongst the local population and its proximity to vulnerable people such as children and adults with learning disabilities.

Name/Organisation	SPD Reference	Representation Submitted (Summarised Versions)	Officer Comment	Proposed Actions
Peter Fryers - Public Health Consultant Worcestershire County Council	3.8	Table 1.0 - We broadly support the threshold of 25 dwellings plus for HIAs to be required from the applicants. The higher threshold would generate a risk of significant health impacts not recognised and opportunities for enhancements missed.	Comments noted.	No further action necessary.
Peter Fryers - Public Health Consultant Worcestershire County Council	3.13	Should there be more guidance on when to carry out the specific level of HIA rather than at the applicants' discretion?	Agree.	Provide further information in relation to when certain HIA assessments should be undertaken.
Richard Tisdall - Principal Tisdall Associates	Policy Guidance Box 1	<p>Strengthen link between health to sustainable development principles of the NPPF (and SWDP 1), particularly the social element.</p> <p>Insert a paragraph on each element to draw in health (e.g. the economic advantages). Explain that SWDP1 can be used as a refusal reason if, for example, the social (health) elements of sustainable development have not been demonstrated.</p> <p>Need more information in the SPD on the 'social' aspect of sustainable development - give the developers a steer on what we mean by this from a health perspective.</p> <p>Health as part of Sustainable Development• needs to be seen as a</p>	Agree with many of these comments and will look to provide additional information in the SPD in relation to these matters, where appropriate.	<p>Agree that links between the SPD and SWDP 1/NPPF Sustainable Development requirements should be strengthened, particularly the social element. Include the Sustainable Development guidance box to reflect this.</p> <p>Agree to insert commentary on these elements into the SPD that focuses on health e.g. the economic, social and environmental advantages.</p> <p>Agree to provide more information on the 'social' aspect of sustainable development to help give</p>

Name/Organisation	SPD Reference	Representation Submitted (Summarised Versions)	Officer Comment	Proposed Actions
		<p>Material consideration “is it possible to link other policies / SPD's in that obviously or inadvertently covers health impact (e.g. GI/active travel)?</p> <p>Can the SPD be used as a vehicle for Public Health to re-interpret SWDP and NPPF policies from a health point of view (particularly for the policy guidance boxes).</p> <p>Explain why the SPD needs to be taken into account (in policy terms) at the start of the document i.e. health benefits/ economic benefits etc.</p> <p>Add in a section on S106 and CIL in terms of funding/bidding for health infrastructure.</p> <p>Noise pollution needs to be referred to and not just Air Quality.</p> <p>Strengthen the links between the built and natural environment and social cohesion and social capital Social prescribing section? ('Social prescribing is a way of linking patients in primary care with sources of support within the community. It provides GPs with a non-medical referral option that can operate alongside existing treatments to improve health and well-being.')</p>		<p>applicants a steer on what is meant by this from a health perspective.</p> <p>Agree that the SPD needs to explain that health considerations can be taken into account in policy terms at the start of the document i.e. what are the environmental, economic and social benefits, etc.</p> <p>Provide additional information in the SPD in relation to the infrastructure requirements of the SWDP and how the SPD can contribute towards delivering them.</p> <p>Agree to add noise pollution as a consideration in policy guidance box 6.</p>

Name/Organisation	SPD Reference	Representation Submitted (Summarised Versions)	Officer Comment	Proposed Actions
Richard Tisdall - Principal Tisdall Associates	3	<p>Assess Masterplans as part of the HIA - does it need an extra assessment box (requiring a report) in the HIA process route diagram? Perhaps entitled 'mitigation' and 'delivery'? (Equivalent to Monitoring and Review in a LEMP)</p> <p>Process that the SPD should follow: Planning application, then HIA, then Masterplan assessment</p> <ul style="list-style-type: none"> · Supplementary question for HIAs “How are the results of your HIA reflected / incorporated into your masterplan/scheme/layout plans? (reserved matters or outline stage?) · Get HIAs onto the validation checklist applications produce them, who assesses them? (Policy team/County Council?). <p>Need to improve the links with the DM process.</p> <p>Case studies of policy guidance boxes and effective HIAs?</p>	<p>Agree that links to the Development Management process should be improved.</p> <p>Masterplan/proposed layout analysis could form part of the HIA process.</p> <p>HIAs will not be part of the validation checklist on planning applications but will be requested as per the thresholds in the SPD. HIAs will also be accepted as part of an Environmental Statement for appropriate applications.</p> <p>Case Studies are intended for the revised version of the SPD.</p>	<p>Provide additional information in the SPD in relation to these matters, including an update to the HIA process.</p> <p>Inclusion of masterplans for assessment as part of the HIA process will be encouraged.</p> <p>Include case studies in the final version of the SPD.</p>

Appendix 3: Consultation Letter and SPD Matters

25 November 2016

Dear Sir/Madam,

Notification of SWDP-related Consultation

Planning for Health in South Worcestershire Draft Supplementary Planning Document

A new eight-week consultation on a planning document supporting the South Worcestershire Development Plan (SWDP) will commence on Friday 2 December 2016.

Residents, developers, town and parish councils, and other interested parties can make their views known at www.swdevelopmentplan.org. The consultation concludes at 5:00pm on 27 January 2017.

Comments are being sought on the draft Planning for Health Supplementary Planning Document (SPD), which covers the South Worcestershire authorities of Malvern Hills District Council, Worcester City Council and Wychavon District Council (known collectively as the South Worcestershire Councils). It has been prepared in partnership between the Strategic Planning team and Directorate of Public Health at Worcestershire County Council and representatives from Planning Policy and Development Management teams within the three South Worcestershire Councils.

The purpose of this draft SPD is to provide guidance when planning for and creating healthier developments, whilst providing communities and organisations with greater support to take positive action to improve their health and wellbeing and encourage more positive forms of participation in healthier environments. 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 our environments.

The draft SPD complements the SWDP and is intended to be used by planners, health professionals and applicants/agents/investors/developers in conjunction with the policies of the SWDP.

The consultation is part of a programme of work in the Local Development Scheme 2016-2019 that will come into effect on 1 December 2016.

How to Comment

Comments can be made via the [online consultation portal](#). Copies of the document, including response forms for alternative methods of responding, can be viewed online and downloaded via the following web address:

- http://www.swdevelopmentplan.org/?page_id=13121

For background context on the SWDP and all other associated evidence material, please see the [SWDP website](#).

Comments can be made via the following means:

- **On-line** by submitting your response to the consultation portal at: http://swjcs.limehouse.co.uk/portal/spd/draft_health_spd (live from 2 December 2016)
- **Email** contact@swdevelopmentplan.org
- **Post** South Worcestershire Development Plan
c/o Wychavon Civic Centre
Queen Elizabeth Drive

Pershore
Worcestershire
WR10 1PT

If possible, please respond by using the [online consultation portal](#). If you are responding by alternative methods, please use the response form (available via the SWDP links above).

Representations must be received by 5:00pm on 27 January 2017. Any representations made after that date and time will be considered "Not Duly Made" and will not be taken into account.

Please note that your comments cannot be treated as confidential and will be available as public documents, although your personal details (other than your name) will not be published.

If you have any questions relating to the SPD, please contact Angie Matthews (Wychavon) on 01386 565187 (email: angie.matthews@wychavon.gov.uk) or Corin Beames (Malvern Hills) on 01684 862140 (email: corin.beames@malvern hills.gov.uk).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Fred Davies', with a horizontal line underneath.

**Fred Davies,
Acting SWDP Project Manager**



The Town and Country Planning (Local Planning) (England) Regulations 2012

Planning for Health Supplementary Planning Document (SPD)

Worcester City Council, Malvern Hills District Council and Wychavon District Council have jointly published a Draft Planning for Health SPD for consultation in accordance with Regulations 12 and 13 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Subject Matter and Area Covered: The Planning for Health SPD explains the details of the South Worcestershire Development Plan (SWDP) policies that relate to the provision of health and wellbeing across South Worcestershire. It is a guide intended to help developers, landowners, applicants for planning permission, and others who are seeking to provide or benefit from health and wellbeing principles. The Planning for Health SPD covers the administrative areas of Worcester City Council, Malvern Hills District Council and Wychavon District Council.

Period of Representations: The consultation period runs for eight weeks from Friday 2nd December 2016 until Friday 27th January 2017. All representations must be received by 5:00 pm on the closing date.

Where to Inspect the Document: The draft document is available to view on the South Worcestershire Development Plan website at: <http://www.swdevelopmentplan.org>. Printed copies of the Draft SPD can be viewed and consultation response forms can be collected at:

- Worcester Customer Service Centre at The Hive; Libraries at St. John's and Warndon
- Wychavon Community Contact Centres in Pershore, Evesham and Droitwich; Libraries at Evesham, Droitwich, Pershore and Broadway
- Malvern Hills Customer Services Centres at Malvern, Tenbury Wells and Upton upon Severn; Libraries at Malvern, Tenbury Wells and Upton upon Severn

How to make a Representation: Representations can be made in the following ways:

- **On-line:** by submitting your response to the consultation portal at: http://swjcs.limehouse.co.uk/portal/spd/draft_health_spd (live from 2 December 2016)
- **By e-mail:** contact@swdevelopmentplan.org
- **In Writing:** South Worcestershire Development Plan Team, Civic Centre, Queen Elizabeth Drive, Pershore, WR10 1PT

Please note that comments made on the document, together with your name, will be published by the Council. **Notification of Adoption:** Any representations made may be accompanied by a request to be notified at a specified address of the adoption of the SPD.

Appendix 4: Press Release

For immediate release: 6 December 2016

Have your say on planning for a healthier future in south Worcestershire

New guidelines on how housing and other developments can be designed to encourage healthier lifestyles have been released for south Worcestershire – and residents and developers are being urged to have their say on them.

The guidelines cover issues like encouraging walking and cycling, ensuring land is available to grow food and encouraging the use of efficient and sustainable energy.

Malvern Hills, Worcester City and Wychavon councils have published the proposed guidelines in a document called “Planning for Health”, and residents and other interested parties can have their say by going to www.swdevelopmentplan.org. The consultation runs to January 27.

The final guidelines will be published in a Supplementary Planning Document and it is hoped they will be used by developers to design housing and other schemes that help people to live healthier lifestyles.

The guidelines build on national policies that set out links between planning and health, and aim to provide more detail on how policies in the South Worcestershire Development Plan (SWDP) should be applied by developers when they seek planning permission.

They have been prepared with significant input from Worcestershire County Council, which has local responsibility for health and wellbeing.

Councillor Geoff Williams, who chairs the SWDP Joint Advisory Panel, said: “Having a healthy and active lifestyle is easier if you live in an environment where there is fresh air, green space, and access to shopping and other facilities you need without always having to use a car. These guidelines are aimed at ensuring more of our residents can benefit from that sort of lifestyle.”

The draft guidelines cover a range of subjects, including:

- The importance of good design for housing and commercial developments that encourages walking and cycling
- Encouraging healthier diets by making space available to enable communities to grow food locally and discouraging a build-up of hot food takeaways, especially near schools
- Encouraging energy efficiency and the use of sustainable energy to help reduce fuel poverty
- Encouraging healthy work spaces which are well ventilated and offer access to green space and other recreational opportunities, with the aim of improving physical and mental health
- Encouraging development that can be adapted to changing needs throughout residents’ lives, allowing people to continue to live in their homes
- Providing open spaces and seating to encourage social interaction
- Ensuring services and facilities are accessible to people without a car.

It is also proposed that planning applications for larger developments of 25 homes or more should include a Health Impact Assessment. This would ensure health considerations have been taken into consideration and the assessment would be taken into account when a decision was made on the planning application.

Anyone who wants to give their views on the provisional guidelines can complete the consultation at www.swdevelopmentplan.org. Printed copies of the documents are also available at libraries and customer contact centres in south Worcestershire.

The consultation runs until January 27 2017.

The three south Worcestershire councils expect to adopt the final Planning for Health Supplementary Planning Document in May 2017.

- ENDS -