



Rapid Health Impact Assessment Review

Fylde Local Plan to 2032: Draft Publication Version

Lancashire County Council, Public Health Team
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1. Introduction

Preface

In October 2015 Lancashire County Council's Public Health team prepared a Health Impact Assessment (HIA) report on the Fylde Local Plan to 2032 Revised Preferred Option (RPO).

The HIA was completed as one of a range of technical assessments undertaken in the development of the Local Plan. The other technical assessments include the Sustainability Appraisal, Habitats Regulations Assessment, Rural Proofing Assessment and a Viability Assessment.

The HIA identified a number of key health impacts of the RPO Local Plan and made recommendations for Fylde Borough Council to consider as part of the development of the Publication Version.

The Fylde Local Plan to 2032 draft Publication Version has now been prepared and Lancashire County Council's Public Health team have reviewed the Publication plan against the key impacts and recommendations of HIA October 2015, and the findings are presented in this Review report.

The Fylde Local Plan

The future development within Fylde up to the year 2032 will be guided by the spatial vision, strategic objectives and the policies contained within the Fylde Local Plan.

The Local Plan contains a spatial portrait of how the borough looks and functions now, together with a vision for Fylde to the end of the plan period, five strategic objectives, and a development strategy that sets out how Fylde Council would like Fylde to develop over the Plan period, which runs from 1 April 2011 to 31 March 2032. It will not only ensure that new homes, jobs and services required by communities are located in the most sustainable locations, but will also provide the framework for delivering the necessary infrastructure, facilities and other development to make this possible. A separate Infrastructure Delivery Plan (the IDP) has been prepared by Fylde Council, which will seek to establish what additional infrastructure and service needs are required to support and accommodate the level of development proposed in the emerging Local Plan.

Previously, Fylde Council prepared and consulted upon an Issues and Options document in 2012. The purpose of this was to seek initial views on the main issues facing the borough along with views on the objectives for the Local Plan and what the future spatial vision of Fylde should include. Subsequently, in 2013, Fylde Council prepared and consulted upon their Preferred Option Local Plan which outlined the Spatial Development Framework, four Strategic Locations for Development including site allocations and general development management policies. At the Preferred Option stage in 2013, it was the

intention that the plan would comprise a Part 1 including strategic sites and locations; and a separate Part 2 document which would include non-strategic sites, which would have been prepared following the adoption of the Part 1.

In November 2014, Fylde Council resolved to prepare a single Local Plan – combining Part 1 and Part 2 into one document. The Revised Preferred Option (RPO) version of the Local Plan (i.e. the current stage of plan preparation) includes policies on the strategic and non-strategic locations for development, including site allocations for housing, employment, mixed uses, commercial, retail, tourism, leisure and recreational uses; development management policies, which will inform decisions on planning applications, together with policies to protect the natural and built environment.

In 2016 Fylde Council have prepared a draft Publication Version and have invited Lancashire County Council's Public Health team to revisit the HIA process for the Publication Version. The Public Health team have not undertaken a new HIA of the Publication Version but have reviewed the Publication Version against the key health impacts and recommendations of the HIA of the RPO plan. The findings of this review are presented in this report.

Promoting health and wellbeing, together with equality, viability, achieving good design and sustainability are cross cutting themes, which are integral to all of the policies and they run through the Local Plan. Chapter 11 of the Local Plan deals entirely with Health and Wellbeing and includes four policies.

The Local Plan is being prepared in close co-operation with Blackpool Council, Wyre Council and Lancashire County Council, which collectively comprise the Fylde Coast sub-region, together with other statutory consultees including the Environment Agency and Natural England, as part of the **Duty to Co-operate** on strategic planning issues introduced through the Localism Act and the National Planning Policy Framework.

Following the consultation on the RPO version, the Planning Policy Team have prepared the Publication Version of the Local Plan, which will be submitted to the Secretary of State who will appoint an independent inspector to hold an Examination in Public (i.e. a public inquiry) into the document. It is anticipated that the Local Plan will be adopted by the council in 2017.

Figure 1 sets out the timetable for the various stages in the plan preparation process through to adoption.

Figure 1: Fylde Local Plan production process and timetable



2. Rapid Health Impact Assessment - Revised Preferred Option Plan

What is a Health Impact Assessment?

A Health Impact Assessment (HIA) involves the examination of a policy, programme or project in terms of its potential effects on the health of a population, and the distribution of those effects within the population. This aims to ensure that any adverse health impacts are reduced and positive impacts are maximised for all sections of the population. There is no mandatory requirement to undertake a HIA under planning legislation in England and Wales. However, a HIA is a mechanism to ensure health benefits are integral to the planning process, embedding public health across the Fylde Local Plan and raising awareness amongst strategic partners and deliverers.

Rapid Health Impact Assessment - Revised Preferred Option Plan

A Rapid HIA was undertaken to review the Fylde Local Plan to 2032 RPO in October 2015. The HIA panel adapted the methodology suggested in the Department of Health publication "Health impact assessment tools: Simple tools for recording the results of the Health Impact Assessment".

The chosen methodology followed a four stage process:

1. Screening
2. Identify health outcomes
3. Define key health impacts
4. Recommendations to address outcomes of the Health Impact Assessment

The screening process considered four key questions regarding the potential impact of the RPO plan on the health of Fylde residents and concluded that a Rapid HIA needed to be undertaken. The Rapid HIA then considered how the planning policies of the RPO plan would impact on lifestyles, mental health and wellbeing, social and economic environment, physical environment, equalities in health, health services provision and wider impacts on specific groups, communities and individuals.

The Rapid HIA did not include an assessment of strategic locations as Policy M1 of the RPO plan required strategic sites to have individual Health Impact Screening undertaken as part of the masterplanning process. Policy M1 also needs to be read alongside policy HW1 – in the Health and Wellbeing chapter, which concentrates on three particular aspects, namely the provision of health care services, access to healthy food and the requirement for Health Impact Assessments. Policy HW1 says that 'the council will require health impact screening to be undertaken for all major development proposals on strategic sites through the submission of a masterplan. A full independent Health Impact Assessment will be required if the screening demonstrates a need. The Health Impact Assessments will be assessed by Lancashire County Council as the public health authority.'

This HIA Review document forms part of a continual review process to be completed in parallel to preparing the emerging Fylde Local Plan. As part of the review existing health data for the district has been considered including the Fylde Health Profile (July 2015) and the Fylde Coast Health Economy Neighbourhood Profiles which have been produced by the LCC Public Health Intelligence team.

3. Review of the Key Health Impacts

The HIA of the Revised Preferred Option Plan identified key health impacts for each Local Plan policy chapter. The key health impacts identified have now been reviewed against the draft Publication Version plan and revised comments are provided against each key health impact.

Development Strategy and Masterplanning (Policies S1, DLF1 – Chapter 6 and M1-Chapter 7)

- Ensure the network of walking, cycling and bridleway routes enables walkable access from housing to community facilities and key amenities including public open space (the Green Infrastructure network), to facilitate increased physical activity.

HIA Review Comment

Changes to Policy M1 are supported. Criterion (i) has been altered to add in 'and linking to services and amenities' which will facilitate improved access from walking routes. Changes to Policy GD7 are supported including criterion (o) and (q), and changes to Policy T4. These policies also help to address the HIA key issue raised, by improving access options and giving priority to pedestrians.

HIA Review Recommendation

Fylde Council to extend Policy M, criterion (i) to include linking to greenspaces too, to enable easy walking access to the wider Green Infrastructure network.

- Developers should consider health from the outset as part of the design process, in order to build healthy sustainable communities and maximise positive health impacts.

HIA Review Comment

Acknowledged that Policy M1, criterion (t) does require Health Impact screening for Strategic Locations for Development. The HIA key issue is therefore considered instead below as part of the review of the General Development Policies.

General Development Policies (Policies GD1-GD8 – Chapter 8)

- Need to monitor population trends to ensure that the future demographic needs of the population are addressed.

HIA Review Comment

No relevant changes within the General Development Policies chapter. Amended Policy H2 makes specific provisions to encourage the supply of specialist accommodation for the elderly and requires the provision of 1, 2 and 3 bedroom dwellings. Policy H2 is therefore supported.

- Development should consider health from the outset as part of the design process, in order to build healthy sustainable communities and maximise positive health impacts. Active travel routes providing access to community facilities, public open

spaces (the Green Infrastructure network), education and training should be promoted. Walkable environments can facilitate physical activity and mental wellbeing and, reduce social isolation.

HIA Review Comment

The changes made to Policy GD7 General Principles of Good Design are supported, with particular reference to additions/alterations for criterion (f), (l), (m), (n), (o), (u) and (v). Other policies throughout the plan including Policies S1, DLF1 and M1 help to support the need to build healthy sustainable communities and maximise positive health impacts.

HIA Review Recommendation

Fylde Council to add an additional criterion for Policy GD7 requiring that the applicants, possibly through Access and Design Statements, provide details on how development proposals have been designed to meet Policy HW1 Health and Wellbeing. It is recommended that applicants are required to explain how health considerations have been taken into account when designing a development. Applicants should provide information on how health (data/intelligence, service provision and preventative measures) have been considered as part of the design process and how the proposed development will help to build healthy sustainable communities and maximise positive health impacts. The inclusion of new or connections to existing active travel routes should be an integral feature of the design, in order to provide active travel access to health, community and education facilities, to employment and training and to the wider green infrastructure network, Walkable environments can facilitate physical activity and mental wellbeing and reduce social isolation. The design of community multi-functional spaces should encourage walking and cycling as a default option. The design and use of green infrastructure (including blue infrastructure) should promote opportunities for connectivity, active travel access, social interaction and the development of stronger communities. This will help to increase physical activity and individual resilience and reduce perception of crime for new and existing communities.

- Need to monitor changes in disease prevalence to ensure that developments are not having an adverse on health, particularly in long term conditions.

HIA Review Comment

The Health Profiles for Fylde District for 2014 and 2015 highlight that the conditions of most concern (higher rate than England average) are smoking at time of delivery; excess weight in adults; incidence of malignant melanoma, life expectancy at birth (females) and killed and seriously injured on the road. Although not diseases, the prevalence of some of these conditions could be impacted by development activity. It is recognised that a number of policies in the Publication Plan aim to encourage physical activity via Green Infrastructure and Sustainable Transport and therefore could help address the excess weight issue in adults. Design and Transport policies could also be used to help reduce the risk of being killed and seriously injured on the road. Policy HW1 should also be used to address the life expectancy rates (at birth) of females.

HIA Review Recommendation

Fylde Council to consider if a policy to prohibit or restrict the availability of hot food takeaways is required, particularly with regard to helping to reduce

the above national average rate of excess weight in adults in the district. Is there evidence demonstrating that a policy restricting hot food takeaways is not required? Consideration needs to be given to health profiles at district and neighbourhood levels and any concentrations of hot food takeaways in the district, particularly in areas which have vulnerable communities e.g. areas of deprivation where consumption of hot food takeaways tends to be higher than consumption in less deprived areas. The Annual Report of the Director of Public Health at Lancashire County Council for 2016 includes a recommendation to tackle obesity through public health action and prevention methods.

- Ensure better use of previously developed land before greenfield development.

HIA Review Comment

Acknowledged that Policy GD1 prioritises development on previously developed land and presumes against the development on the best and most versatile agricultural land.

- Ensure better evidence base for all developments.

HIA Review Comment

Within Policy M1 the requirement to undertake a health impact screening exercise and if necessary a HIA will help to ensure a thorough evidence base (health data/intelligence, health service provision, health impacts) are considered for strategic developments. Policies GD7 and HW1 in particular will also help to ensure that health evidence and impacts are considered for all developments.

The Fylde Economy (Policies EC1-EC6 – Chapter 9)

- Key links should be made with relevant partnerships to agree a mixed approach to economic development and ensure opportunities for young people are maximised through apprenticeships and training.

HIA Review Comment

Acknowledged that Policy EC2 criterion (b) encourages employment opportunities that are accessible to local people and for the young and that criterion (a) ensures developments are flexible to provide for varied business types.

- Encourage employment opportunities for all sectors and demographics within Fylde to assist in continued community and family cohesion.

HIA Review Comment

Acknowledged that Policy EC2 criterion (b) encourages employment opportunities that are accessible to local people and for the young. Policy EC1 Business and Industrial Allocations are located around the district in different settlements and cover a variety of employment use classes.

- Acknowledgement that there is insufficient land in Blackpool to meet the projected employment land requirements. Caution should be exercised to ensure that a

Fylde Coast sub-regional approach does not see funding targeted solely at the more deprived Blackpool borough.

HIA Review Comment

Acknowledged that Policy EC1 employment allocations are intended to meet the employment needs of Fylde district residents, with some additionality for Blackpool.

HIA Review Recommendation

It is recognised that the distribution of funding is not within the remit of local planning policy. Fylde Council however should consider how to maximise opportunities to enable available funding to be equitably distributed within the district and Fylde Coast sub-region.

Provision of Homes in Fylde (Policies H1-H7 – Chapter 10)

- Better user friendly approach to the development and use of services and facilities.

HIA Review Comment

Policy M1 provides for the provision of health impact screening and Policy HW1 requires consideration of Health and Wellbeing.

HIA Review Recommendation

Fylde Council should consider whether the existing plan policies particularly Policies GD7, HW1 and Housing Policies will enable the health and wellbeing needs of the local population (existing and new residents) to be adequately met, with regard to the type of housing provided- including size, affordability and independent living capacity for young, elderly and less affluent populations; access (by walking and cycling) to community services and facilities including green infrastructure and road safety measures.

In particular, Fylde Council should include a requirement in Policy M1 that applicants, possibly through Design and Access Statements, provide details on how the development proposals meet Policy HW1 Health and Wellbeing. It is recommended that applications are required to explain how health considerations have been taken into account when designing a development. Applicants should provide information on how health (data/intelligence, service provision and preventative measures) have been considered as part of the masterplan design process and how the proposed development will help to build healthy sustainable communities and maximise positive health impacts. The inclusion of new or connections to existing active travel routes should be an integral feature of the design, in order to provide active travel access to health, community and education facilities. Walkable environments can facilitate physical activity and mental wellbeing and reduce social isolation. The design of community multi-functional spaces should encourage walking and cycling as a default option. The design and use of green infrastructure (including blue infrastructure) should promote opportunities for connectivity, active travel access, social interaction and stronger communities. This will help to increase physical activity and individual resilience and reduce perception of crime for new and existing communities.

- Support Policy H2 and the provision of a mix of densities, housing types, special needs housing and retirement housing, in order to meet the increasingly changing needs of a younger demographic alongside the needs of the elderly population.

HIA Review Comment

Acknowledged that Policy H2 provides a mix of housing densities and types which can support both young and older demographics. Policy H2 also provides for specialist elderly accommodation to meet the needs of an ageing population. The changes to Policy H2 are positively supported.

- Consider adequate school provision and associated infrastructure connected to residential development

HIA Review Comment

Acknowledged that Policies INF1 and INF2 provide for education infrastructure requirements.

- Keeping local skills and the youth in the area

HIA Review Comment

Acknowledged that with regard to housing, Policy H2 requires a broad mix of sizes and types of homes, which are suitable for a broad range of age groups. Also Policy H4 requires the provision of affordable housing and the meeting of the starter homes requirement. With regard to employment, Policies EC3 and EC4 support the two Enterprise Zones in the district at Warton and Blackpool Airport. Policy EC1 also supports the provision of additional employment land to provide sufficient jobs for the borough's residents. These policies should help to keep local skills and the younger demographic in the area.

- Development of communication strategy for better community cohesion. Need to refer to where in the plan indigenous communities have been consulted as part of the plan preparation process and how their needs taken into account.

HIA Review Comment

Acknowledged that a communications strategy is outside of the scope of local planning policy preparation as required by the National Planning Policy Framework (NPPF). Fylde Council has also confirmed that extensive consultation was undertaken at all previous stages of the plan and is detailed in the Statement of Consultation that accompanies the Publication Version.

HIA Review Recommendation

Fylde Council to confirm how the needs of indigenous populations have been considered as part of the plan preparation.

- Ensure proper links with health and transport services for all new developments. All new residential developments should have the 20mph speed limit as per Lancashire County Council's 20's plenty or whatever the LCC's speed limit policy is at the time of submission of development plans.

HIA Review Comment

Acknowledged that Policy GD7 requires good design principles to be applied to new developments including highway safety. Policy H2 is also

supported with regard to the additional requirements on specialist accommodation for the elderly.

HIA Review Recommendation

Fylde Council to confirm whether they are able to adopt 20mph speed limit to new housing developments as a way to help address the rate of killed and seriously injured people in Fylde district. Advice from LCC Highways should be sought. In addition clarification should be provided as to how links with health services will be provided from all new housing developments. Fylde Council should consider whether an additional criterion should be added to Policy M1 with regard to health infrastructure provision or cross reference to health provision in Policies INF1 and INF2. Adequate provision of health services should be planned for in order to avoid stretching existing services. In addition, health infrastructure should ideally be located within walking distance of new housing developments as part of a sustainable healthy community.

Health and Wellbeing (Policies HW1 – HW4 – Chapter 11)

- Appropriate design and use of green and blue spaces (the Green Infrastructure network) to promote opportunities for connectivity, active travel access to community facilities, social interaction and stronger communities, to increase individual resilience and reduce perception of crime.

HIA Review Comment

Acknowledged that Policy M1 criterion (o) refers to the provision of a green infrastructure network which is positively supported. Policy GD7 in criterion (k) also refer to the provision of safe and secure environments and in criterion (l) to the protection of natural landscape features and natural assets in new developments. Policy ENV4 also protects Existing Open Space and the Green Infrastructure Network.

HIA Review Recommendation

Fylde Council to strengthen Policies M1 and GD7 further by requiring developments to have direct access to green infrastructure, either through new provision of active travel routes or connection to the existing network. As a result, overall connectivity between new and existing developments and communities will be improved and the existing green infrastructure network and open space asset base will be enhanced. Improved connectivity in the green infrastructure network will enable increased active travel access to a variety of services and facilities including community, recreation, health, education, employment and training.

- Ensure good links with Clinical Commissioning Groups (CCGs) in developing urban extensions and building new healthy sustainable communities and new homes to ensure that best planning for General Practitioners (GP) services is achieved.

HIA Review Comment

Acknowledged that Fylde Council has maintained and developed good links with the NHS Fylde and Wyre CCG, as set out in the Infrastructure Delivery Plan (IDP). Fylde Council is also working with the CCG on the Whyndyke Farm development which has recently been awarded the NHS Healthy New

Town status. Fylde Council has appointed a Healthy New Town Project Manager who will promote the delivery of necessary facilities for the development.

- Developers should consider health as part of the design process in order to build healthy sustainable communities and maximise positive health impacts.

HIA Review Comment

Acknowledged that the local plan policies, particularly the design policies, are intended to produce healthy sustainable communities and maximising positive health impacts.

HIA Review Recommendation

Fylde Council to add an additional criterion into Policies M1 and GD7 requiring that the applicants (possibly through Access and Design Statements), provide details on how development proposals have been designed to meet Policy HW1 Health and Wellbeing. More detail is provided in the recommendations provided above for Policies M1 and GD7.

Infrastructure, Service Provision and Transport (Policies INF1-T4 – Chapter 12)

- Ensure proper links with transport services for all new developments.

HIA Review Comment

Acknowledged that Policy GD7 (q) refers to provision for all transport modes including public transport and active travel.

- Ensure local, accessible public transport for all, including those with disabilities.

HIA Review Comment

Acknowledged that Policy GD7 criterion (q) refers to the provision of public transport and to the needs of the elderly and disabled. Policy M1 criterion (j) also requires housing, employment, retail and leisure facilities to be located within a maximum walking distance of 400metres of a frequent, viable and accessible bus service.

- Development of Green Infrastructure network options to facilitate active travel and physical activity. Development of Green Infrastructure network options including walking and cycling networks which connect new and existing homes to community facilities and provide safe routes to school training and employment will facilitate active travel and physical activity.

HIA Review Comment

Acknowledged that Policy M1 criterion (i) refers to Green Infrastructure/ cycle and walking route provision and that Policy GD7 refer to good design practice with regard to green infrastructure.

HIA Review Recommendation

Fylde Council to strengthen Policies M1 and GD7 further by requiring applicants to demonstrate how their development proposals connect to community facilities and provide safe routes to school, training and employment via new or existing active travel routes.

- Explore impact on childhood asthma with regard to junction 4 of the M55 Motorway and the proposed new junction 2 on the M55.

HIA Review Comment

Acknowledged that the local plan has no specific Air Quality policy in the local plan reflecting the absence of Air Quality Management Areas (AQMAs) in the district. Paragraph 124 of the National Planning Policy Framework (NPPF), requires that *"Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan."*

HIA Review Recommendation

Fylde Council to clarify if applicants will be required to assess the air quality impacts of developments (as part of transport assessments / planning applications) when making planning decisions on new developments, with particular regard to the cumulative impacts on air quality from individual sites in local areas. Consideration should also be given to a requirement for electric car charging point's provision within developments and other air quality mitigation measures. It should be noted that the asthma rate for Kirkham & Wesham is significantly higher than the national average and the rate for Lytham, Ansdell and St. Annes is also higher than the national average.

Water Resource Management, Flood Risk and Addressing Climate Change (Policies CL1-CL4 – Chapter 13)

- Impacts from risks of flooding may affect the natural environments, health and well-being.

HIA Review Comment

Acknowledged that policies in this chapter aim to avoid or mitigate impacts of flooding.

HIA Review Recommendation

Fylde Council to consider how resilient (new and existing) communities are in terms of the risk of flooding to new and existing settlement areas and what measures need to be taken either through planning policy or through other activities e.g. emergency planning.

- Impacts of improved energy measures to reduce *(the impacts of)* health inequalities

HIA Review Comment

Acknowledged that energy efficiency measures are now dealt with solely through building regulations.

- The development of multi-functional spaces should be exploited to benefit health and wellbeing.

HIA Review Comment

Acknowledged that Policy GD7 criterion (l) refers to green infrastructure as multi-functional. Policy CL1 criterion (f) in turn refers to the flooding function of green infrastructure.

Conserving and Enhancing the Natural, Historic and Built Environment (Policies ENV1-ENV6 – Chapter 14)

- Better use of green space and good design to help safeguard the built and natural environment will have positive impacts on health and wellbeing.

HIA Review Comment

Acknowledged that these are the objectives of the Chapter 14 policies including ENV2 (Biodiversity) and ENV3 (Protecting Open Space, the Green infrastructure Network). Paragraph 14.34 refers to the quality of life benefits for local communities and Paragraph 14.35 lists the different types of green infrastructure. General policies also refer to protecting and enhancing habits.

- Fylde has many natural and heritage assets that should be preserved and enhanced to encourage greater prosperity and community cohesion.

HIA Review Comment

Acknowledged that the Chapter 14 polices aim to achieve this objective.

4. Review of the HIA Recommendations

The HIA of the Revised Preferred Options plan identified Recommendations to address outcomes of the Health Impact Assessment of the RPO Plan. The recommendations have now been reviewed and revised comments are provided against each recommendation.

- The key issues and recommendations identified in the HIA should be considered alongside the consultation responses received to the Revised Preferred Option document. This should inform the development of the Publication Version of the Local Plan and a HIA of the Publication Version.

HIA Review Comment

Acknowledged that Fylde Council have considered HIA key issues and recommendation alongside consultation responses and have shown plan changes in the tracked changed version of the draft Publication Version of the Local Plan. Lancashire County Council's Public Health Team reviewed the need for a new HIA of the Publication Version of the Local Plan and agreed that a Review of the key impacts and recommendations of the Rapid HIA of the Revised Preferred Option Plan is sufficient to ensure health is considered in the development of the Fylde Local Plan to 2032.

- The HIA of the Publication Version should have a more thorough assessment of each policy (instead of policy chapters) to ensure that all positive and negative health impacts are identified and considered.

HIA Review Comment

As per the recommendation review comment above a HIA of the Publication Version was not considered necessary by the Public Health Team. It is noted that the local plan policies are designed to be read as a whole plan rather than on a chapter or individual policy basis as many potential impacts are considered specifically by other policies. A thorough assessment of the local plan policies has also been covered by the Fylde Council Sustainability Appraisal of the plan, which includes some consideration of health impacts.

HIA Review Recommendation

It is considered that future Health Impact Assessments where required, may be better placed to be an integral part of the Sustainability Appraisal of the Plan. Lancashire County Council Public Health team will look to explore this option further including the provision of specification guidance

- During the preparation of the Publication Version of the Local Plan, an implementation plan should be developed to help shape local partnership health and wellbeing plans. This needs to take account of the Lancashire Health and Wellbeing Strategy and the consultation responses to the Revised Preferred Option document.

HIA Review Comment

Acknowledged that the Infrastructure Delivery Plan (IDP) which accompanies the local plan, details the necessary measures to provide

health infrastructure, based on the needs of the local Clinical Commissioning Group (CCG). The CCG takes account of the Lancashire Health and Wellbeing Strategy in its discussions with Fylde Council.

- The requirement to undertake a Health Impact screening and full HIA as required in policy HW1 should be undertaken. Guidance should be provided by Lancashire County Council's Public Health Team on how the screening and assessment processes should be undertaken.

HIA Review Comment

This recommendation remains and the requirements of Policies M1 and HWI are supported. Lancashire County Council's Public Health Team will explore the provision of screening and assessment processes.

- Lancashire County Council's Public Health Team should develop a screening template and HIA templates and/or guidance for the completion of Health Impact Assessments for Strategic Site planning applications, for use by all Lancashire Authorities.

HIA Review Comment

The principle of this recommendation remains. Lancashire County Council's Public Health Team will explore the potential for developing screening and HIA templates and/or guidance for the completion of Health Impact Assessments for Strategic Site planning applications, for use by all Lancashire Authorities including Fylde Council. Consideration will be given to ensuring that any health proofing tools which are developed do not duplicate matters that would normally be considered through the normal development management process. Any criteria that are considered a genuine technical assessment could be requested when specifically needed.

- Potential health and wellbeing issues resulting from cumulative impacts of numerous non-strategic developments in the borough should be monitored by Fylde Council in collaboration with Lancashire County Council's Public Health Team. Lancashire County Council Public Health Team should develop the use of a screening template to assist this monitoring process.

HIA Review Comment

The principle of this recommendation remains. Lancashire County Council's Public Health Team will explore the potential for developing a monitoring methodology / screening template, in order to assess the cumulative health impacts of non-strategic developments.

HIA Review Recommendation

Fylde Council to monitor the of health impacts of development as part of the Local Plan monitoring process. With regard to Policy HW1 the Publication Version of the plan refers to monitoring the number of Health Impact Assessments undertaken. Whilst this is supported, it does not necessarily represent a robust indicator of how Policy HW1 can be measured to show improved health in the district. It would be useful to use neighbourhood data sets to help monitor the health impacts of specific developments over the local plan period with regard to health

service provision and impacts on health conditions, disease burden and wellbeing.

The Fylde Coast Health Economy Neighbourhood Profiles, for Kirkham and Wesham, and Lytham, Ansdell and St. Annes have been produced by LCC PH Intelligence Team. The profiles provide a data baseline regarding GP practices, demographics, deprivation and health data. The profiles can be updated annually and used to provide neighbourhood level data which may provide evidence of the impacts of further development in the neighbourhood areas. The profiles can be analysed to consider impacts on resident population, health service planning, deprivation levels, health profiles, the burden of disease and community assets.

In addition the Community Safety Partnership provides analysis of crime and anti-social behaviour in the Fylde district in order that informed decisions can be made in relation to tasking and allocating resources. Inferences and recommendations will be made if necessary, based on objective analysis produced. The report is prepared utilising data from Lancashire Constabulary crime recording systems, intelligence systems and the MADE (Multi Agency Data Exchange) database. As a result neighbourhood data, including the prevalence of substance misuse, could be used to benchmark and measure the health impacts from new residents on existing wider communities. Potential negative impacts e.g. increased fear of crime, which may result in social isolation and associated health and wellbeing impacts.

- Neighbourhood Development Plans should consider the impacts on health and wellbeing.

HIA Review Comment

Acknowledged that this recommendation is beyond the authority of Fylde Council, as the relevant neighbourhood forum prepares a neighbourhood plan for an approved neighbourhood area.

- Strategic Actions for Fylde Council
 - To assure the Fylde Local Plan is in line with the Fylde Road Safety Action Plan contributing to the Lancashire County Council's Road Safety Strategy to target a reduction in road deaths and injuries.

HIA Review Comment

Fylde Council to review the Lancashire Partnership Road Safety Strategy 2016 and Lancashire Road Safety Plan. The primary objective of these documents is to achieve the outcome 'towards zero Lancashire', by preventing collisions that result in death or serious injury.

- To ensure the Fylde Local Plan contributes towards the Community Safety Partnership's priority work of alcohol harm reduction.

HIA Review Comment

Fylde Council to review if there is a need to restrict the development of new licenced premises in the district. The Health Profile for Fylde highlights that alcohol related hospital stays are higher than the England average. The Annual Report of the Director of Public Health at Lancashire County Council for 2016 includes a recommendation to tackle alcohol consumption through public health action and prevention methods.

- Continue to operate the landlord standard for affordable warmth within the private rented housing stock.

HIA Review Comment

Acknowledged that affordable warmth controls with regard to private rented housing stock is outside the scope of planning controls.

- Follow best practice and recommendations identified in the report of the Fylde Coast Affordable Warmth steering group.

HIA Review Comment

The Fylde Coast Affordable Warmth steering group produced an Action Plan for Fylde and Wyre district for March 2014 to April 2015. The Action Plan tasks included:

- Prevent affordable warmth impacts on vulnerable citizens including, the elderly, families with young children, people with mental health problems, people receiving cancer treatment and/or palliative care or people receiving End of Life care at home.
- Address preventable affordable warmth issues affecting health and reduce hospital admissions, promote early discharge for those with long term conditions and reduce GP visits.
- Address affordable warmth issues in the private rental sector;
- Implement actions to maximise the income of residents at risk of fuel poverty
- Identify funding for winter warmth programmes
- Prepare for extreme weather conditions
- Address affordable warmth issues in park homes
- Share best practice knowledge.

The steering group has not met since September 2015 although partners are still engaged in delivering the Action Plan tasks. The agenda of the Lancashire countywide energy group includes domestic energy efficiency, fuel poverty and affordable warmth.

From a public health viewpoint a priority is to adhere to the NICE Guidance on Excess winter deaths and illness and the health risks associated with cold homes (March 2015). The guidance provides 12 recommendations with regard to:

- Strategy development
- Housing referral services
- Identification of people at risk

- Front line staff in health, home care and social services to assess heating needs of people
- Vulnerable people having warm homes
- Training staff on warm home measures
- Ensuring buildings meet ventilation and other building and trading standards

The Public Health team acknowledge that the Action Plan tasks of the Fylde Coast Affordable Warmth steering group and the recommendations of the NICE guidance are outside the scope of the planning system.

HIA Review Recommendation

It is recommended that Fylde Council continue to work towards delivering the Action Plan tasks and the NICE recommendations, as part of collaborative working with countywide partners including LCC Public Health.

5. Review of Publication Plan, Key Policy changes

Fylde Council have informed the Lancashire County Council (LCC) Public Health Team that there are no significant alterations between the Revised Preferred Options local plan and the Publication Version. In terms of policy changes, the most significant alterations to the plan are in the provision of Policy H2 and Policy H4.

Policy H2 Density and Mix of New Residential Development

Policy H2 now includes provision for Specialist Accommodation for the Elderly. The policy requires developments of 20 or more homes to have 20% designed specifically to meet the needs of the elderly and to also be compliant with optional technical standard M4 (3A) (wheelchair accessible dwellings).

HIA Review Comment

The policy changes are supported by the LCC Public Health Team

Policy H4 Affordable Housing

Policy H4 now includes provision for Starter Homes. Policy H2 requires that market housing schemes of more than 10 homes, have a provision of 30% affordable housing/starter homes. A Starter Home is defined by the Housing and Planning Bill as a new dwelling only, which will be available for purchase by qualifying first-time buyers under the age of 40 and sold at a discount of at least 20 per cent of the market price, which is price capped at £250,000 outside of Greater London. Developers will be required to provide the number of starter homes on site to meet the Starter Homes Requirement in accordance with the proportion of new homes specified in the Regulations.

HIA Review Comment

Acknowledged that the policy has been amended to reflect new planning legislation and draft regulations regarding Starter Homes. A possible impact of this new approach to Starter Homes could be that local residents are unable to afford the Starter Homes if they are sold at the price cap. The Starter Homes initiative could compromise the ability of the target population (first time buyers/under the age of 40) to purchase an affordable property, resulting in health and wellbeing impacts.

6. Conclusion and Next Steps

A wide range of factors affect health, including lifestyle, income, education, housing and transport. Actions taken regarding any of these factors will also have an impact on health. This review of the Health Impact Assessment of the Revised Preferred Options version of the Fylde Local Plan has enabled the LCC Public Health Team to proactively consider how Fylde Council are preparing and amending Local Plan policies to minimise harm to health and improve health impacts for those with the most to gain. The opportunity to carry out this review of the previous Health Impact Assessment is seen as an example of good practice for integrating public health within the planning system.

Next Steps

- The Fylde Local Plan to 2032 Publication version will be issued for consultation, along with accompanying technical assessments including the Health Impact Assessment Review for a 6 week period from 11th August to 22nd September 2016. All local plan documents and consultation responses are due to be submitted to the Secretary of State in December 2016.
- The LCC Public Health Team will explore further collaboration with relevant partners to review the Health Impact Assessment process for the Fylde Local Plan and to make recommendations on the methodology for ongoing review of the Fylde Local Plan through the submission and Examination in Public stages of the plan.
- The LCC Public Health Team will explore further collaboration with Fylde Council to develop a process to monitor the outcomes of the HIA of the RPO and the HIA Review of the Publication plan. This may take the form of an annual review of the plan to assess real progress against the HIA/ HIA Review recommendations. The annual review may include consideration of progress of health related indicators, including the Local Plan performance monitoring indicators and the Sustainability Appraisal monitoring framework.

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