

[REDACTED]

From: Stephen Marks [REDACTED]
Sent: 04 September 2020 11:34
To: Paul Everard; Planning Policy
Cc: Mitchell Harper; Deborah Mbofana; ANGUS, Tracey (NHS NENE CCG)
Subject: RE: Northampton Local Plan Part 2 Proposed Submission Consultation Round 2 - extension to deadline

Paul Everard,
Northampton Borough Council
04 September 2020

Dear Paul,

Please find below a response to NBC's current consultation on its Local Plan Part 2. I would appreciate it if you could confirm receipt.

I provide these comments in my capacity as Health & Planning Programme Manager, jointly funded by a number of partners to work on health and planning issues in the county. In this context, please therefore consider these comments as provided on behalf of NCC's Public Health team and Northamptonshire Clinical Commissioning Group.

Firstly, we welcome the fact that health and wellbeing are explicitly recognised within the Local Plan Part 2, integral as they are to creating sustainable communities. Specifically, we support the inclusion of strategic objective 8 – Public Health.

We welcome the fact that the important role of planning in supporting health and wellbeing is acknowledged, both from the perspective of creating new development that supports healthy and active lifestyles as well as the importance of securing appropriate infrastructure through the planning process to support the provision of appropriate and accessible local health services.

This is very much in line with the increased focus on health and wellbeing within the National Planning Policy Framework, notably the sections referred to below:

8. Promoting healthy and safe communities

91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

c) enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

92. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

and Planning Guidance relating to Health and Wellbeing:

<https://www.gov.uk/guidance/health-and-wellbeing>

Local Health and Wellbeing Strategy

It is also in accordance with the Northamptonshire Health and Wellbeing Strategy, which identifies the major health and wellbeing challenges being faced in Northampton and the wider county, recognising the importance of preventing ill health and the role that our local environments and new development can play in achieving that.

Below are comments on specific parts of the local plan.

Policy 6 - Health and Wellbeing

We fully support the inclusion of Policy 6 on the topic of health and wellbeing. This is clearly in alignment with NPPF and reflects the significant local health and wellbeing challenges in Northampton Borough that have been identified by the partners involved in the Northamptonshire Health and Care Partnership (<https://northamptonshirehcp.co.uk/>).

If designed correctly, new developments can play a much greater role in supporting health and wellbeing by supporting healthier lives, rather than making them difficult to attain. This is something we definitely need to achieve to address local health and wellbeing challenges in the Borough.

Health Impact Assessment

The requirement to undertake Health Impact Assessments will be an effective, robust and proportionate way to ensure that planning decisions contribute to these local and national health and wellbeing policy objectives, in accordance with existing guidance.

The requirement for health impact assessment will allow / enable:

- Developers / applicants to systematically identify the health and wellbeing implications of their proposals and therefore whether they are meeting relevant (national and local) planning policy requirements in relation to health and wellbeing.
- Make improvements (for example in design / layout) to mitigate any negative health and wellbeing impacts or maximise the positive contributions to health and wellbeing.
- The planning authority to judge the contribution the development proposals make to health and wellbeing and thus how they meet the health and wellbeing requirements of NPPF and LPP2 Policy 6.
- Inform discussion / consideration of the proposals by consultees such as the local Public Health team and Clinical Commissioning Group.

This approach is aligned to the Planning Practice Guidance. The submitted Health Impact Assessment would inform the views / representations of health sector consultees such as the Northamptonshire Director of Public Health and the local clinical commissioning groups. It would do this by identifying any significant impact on the health and wellbeing of the local population or particular groups within it and inform consideration of whether the new development would have a significant or cumulatively significant effect on health infrastructure and/or the demand for healthcare services.

Policy 20 – Hot Food Takeaways

We fully support the inclusion of policy 20 in relation to hot food takeaways. While it will not solve the Borough's obesity problems on its own, this is an important policy that will support the local approach to addressing poor diet and obesity, which are formally acknowledged by health sector partners as significant health and wellbeing problems.

It responds directly to the specific problems that have been identified in Northampton Borough in relation to people being overweight / obese, including approx. one third of children being overweight or obese by school year 6 and over 60% of the adult population being overweight or obese. It will form a small but important part of the 'whole

systems approach to obesity' being taken by Public Health and its partners to address the many factors that influence whether people and communities are able to maintain a healthy diet and a healthy weight.

This has been an effective approach taken in other parts of the country and has been accepted as an appropriate policy approach to respond to local challenges in relation to this key health and wellbeing issue.

Policy 32 - Designing Sustainable Transport and Travel

We are very supportive of policies that create a shift towards more sustainable and active forms of travel. The benefits to the community / population of higher levels of active / sustainable travel are many and well documented, including less congestion, better health and wellbeing, reduced pollution and economic benefits of improved access to businesses / shops. Despite many years of policy objectives of achieving a modal shift to active travel, progress has been limited. This is even more pertinent now given the massive health and wellbeing challenges we face and the importance of being active in addressing those.

A shift towards more sustainable travel patterns is likely to be crucial for the success of the town and Borough of Northampton in the future. This is particularly the case given the substantial amount of housing growth likely to take place in Northampton in the coming years and the likely increase in car traffic that this will bring. There are a number of reasons why we think this policy is so important:

Physical activity

Very simply, our population is generally not being active enough to maintain good health and wellbeing. The Northamptonshire Physical Activity & Sport Framework – More Active, More Often (<https://www.northamptonshiresport.org/files/59369/northamptonshiremoreactivemoreoften-lowres-mar18.pdf>) notes that we are spending significant amounts of our lives in poor health and one of the most important factors in this is that we are not being physically active enough.

Achieving higher levels of active travel is likely to require significant investment in the public realm and walking and cycling infrastructure. Specific aspects that should be addressed include:

- Way marking – ensuring walking and cycling routes are clear, prominent and easily navigable. You may have good walking / cycling routes but if people cannot easily find where they are going, they are less likely to use them.
- Safe and attractive – walking and cycling routes need to be appealing if they are to be used on a mass scale. Safety is a key aspect of this and should be addressed through high quality infrastructure, including cycleways that are segregated from motor vehicle traffic.
- Cycle parking – needs to be prominently located, to make it accessible and genuinely appealing to use. This has the added benefit of raising the profile of cycling as a means of travel.
- Places to rest / stop – for many people, particularly those with mobility issues, having places to stop and rest will be critical.

Social inclusion

Although many people favour travel by car, a significant proportion of the population do not have access to a motor vehicle and therefore a focus on infrastructure for car travel can greatly exacerbate social inequalities. This in turn is not good for community wellbeing or the local economy.

Air quality

NBC has had several air quality management areas in the town centre for a number of years and I understand is considering amalgamating those into one larger town centre air quality management area. Given the amount of housing growth planned in / adjacent to Northampton and the likely levels of associated car travel, this is likely become even more of an issue. A significant change in approach to sustainable travel is likely to be required to bring air pollution levels below the statutory levels.

General

We note that there are a number of other policies that can significantly contribute to health and wellbeing and we support their inclusion and effective implementation, recognising the contribution they can make to health and wellbeing, notably policies on;

- Placemaking
- Design
- Neighbourhood centres
- Sports facilities and playing pitches
- Community facilities
- Green infrastructure
- Open spaces

Both myself and relevant colleagues would be happy to have further discussions with you on these matters if that should prove helpful.

Regards,

Stephen

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From: Paul Everard [REDACTED]
Sent: 22 July 2020 12:46
To: Stephen Marks [REDACTED]
Subject: Northampton Local Plan Part 2 Proposed Submission Consultation Round 2 - extension to deadline

I contacted you recently to inform you that the Council is consulting for a second time on the Northampton Local Plan Part 2 Proposed Submission and the associated Sustainability Appraisal and Habitats Regulations Assessment. This public consultation is in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

I am writing to let you know that the deadline for making representations has been extended to 5pm on 7 September 2020.

The local plan and its accompanying consultation documents can be viewed online:
<https://www.northampton.gov.uk/lpp2proposedsubmissionround2>

Alternatively, you can view these at the Self-Serve area of the Council's One Stop Shop. Visitors to the One Stop Shop must observe the procedures for health and safety associated with COVID19.

Yours sincerely,

Paul Everard
Planning Policy & Heritage Manager

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