

		<p>network, has a positive impact on people’s physical and mental health; whilst Green Infrastructure can help to reduce pollution and provides opportunities for formal or informal physical activity. The Trust has no objection to the proposed wording of the Supplementary Planning Document, which defers largely to existing adopted Policy within SP6 of the adopted Local Plan.</p> <p>Please do not hesitate to contact me with any queries you may have.</p>	
2	Historic England	<p>Historic England is the Government’s statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England’s historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p> <p>Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.</p> <p>If you have any queries or would like to discuss anything further, please do not hesitate to contact me.</p>	Noted.
3	Healthier Place Healthier Future/ Food Active	<p>Consultation response on behalf of the Healthier Place Healthier Future Childhood Obesity Trailblazer programme.</p> <p>The Planning for Health SPD is a welcome tool to support the Local Plan in improving the physical and mental health and wellbeing for the residents of Burnley and Padiham.</p>	Support welcomed.

		<p>It is positive to see that the SPD covers a range of the wider determinants which will have a cumulative impact to negate the drivers of childhood obesity and the health and wellbeing of the community as a whole.</p> <p>N.B. P44 The changing health and social care commissioning structure should be updated to reference the new Integrated Care Board which came into existence on 1st July 2022 Lancashire and South Cumbria Integrated Care Board :: Home (icb.nhs.uk)</p>	References to the previous CCG on page 44 have been updated.
4	Habergham Eaves Parish Council	<p>Thank-you for the opportunity to review and comment on the two draft Supplementary Planning Documents (Planning for Health SPD and Residential Extensions SPD).</p> <p>We have read them through and fully support the principles and proposed guidance/policies in each document. They should have a positive effect on the health and well-being of residents the design of future housing extension within Habergham Eaves parish.</p> <p>We do not have any substantive comments or specific comments to make.</p>	General support welcomed.
5	Sport England	<p>Thank you for giving Sport England the opportunity to comment on the emerging Planning for Health SPD. I have the following comments to make:</p> <p>1. Para 2.2.9 <i>"Where Sport England raise an objection to the loss of any existing playing pitch or field and requires replacement provision, or requires new provision to support development; providing this is in accordance with its published policy/standards and national planning policy."</i> This statement is factually incorrect in that Sport England do not condone the use of standards to identify the need for new pitch provision associated with new</p>	Para 2.2.9 of the draft did not refer to local standards. This para (now 2.2.11) has however been amended to refer to the adopted Local Plan and the Rossendale, Pendle and Burnley Playing Pitch Strategy, supported by Sport England, which addresses the concerns raised in the comments about catchments and variable units of demand for individual pitch/court types.

		<p>developments. Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court/pitch ranges from two people if a tennis court to 30 people if a full sized adult rugby pitch. In addition the catchment area for sports range from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means that accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space. I have attached a Guidance Note which may be of some assistance.</p> <p>Suggestion: remove the word 'standards'. Reference to Sport England's Policy is correct.</p> <p>2. In section 2.3 'Other Health-Related Strategies, Initiatives and Guidance' it would be beneficial to include the following strategy and guidance:</p> <p>a. Sport England Strategy 'Uniting the Movement' - Sport England published a new 10-year strategy called 'Uniting the Movement' in 2021. We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities, and rebuilding a stronger society for all. More than anything, it seeks</p>	<p>2 a. The SPD makes clear the important role that physical activity has in improving physical and mental health and the policies of the Local Plan are strong in this regard. Reference to the Uniting the Movement strategy has been added to a new paragraph 2.3.11.</p>
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		<p>to tackle the inequalities we've long seen in sport and physical activity. Providing opportunities to people and communities that have traditionally been left behind, and helping to remove the barriers to activity, has never been more important. The key issue relevant to this SPD is 'Creating an Active Environment'. https://www.sportengland.org/why-were-here/uniting-the-movement</p> <p>b. Health Impact Assessment In Spatial Planning - HIA as a tool can help to identify and inform the health impacts from a project or development and provide recommendations to make a positive influence to minimise negative effects. This can therefore help to create better quality environments to support communities particularly in areas which demonstrate significant deprivation. The application of the tool therefore can help to improve numerous health outcomes, provide better opportunities for active travel, improvements to air quality, inclusive spaces for all ages and improve environments to support physical activity which can have a significant influence on mental and physical health delivering benefits to individual quality of life. Public Health England have recently published a Health Impact Assessment Guidance tool in collaboration with several organisations including Sport England. It would be useful and welcomed by Sport England if a reference could be made to the guidance within the SPD. https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning</p> <p>3. Para 3.4.6 to 3.4.8 Validation Checklist – Sport England would welcome a recommendation in the SPD to include the need for an HIA in any update of the Validation Checklist.</p>	<p>2 b. and 3) Health Impact Assessment can be done at a plan or application level. The SPD is concerned with applications. It explains that for the Local Plan this was integrated into the Sustainability Appraisal and this is considered to be the best approach at the plan level.</p> <p>As the SPD also states at para 3.4.6, the Council's current Validation Checklist does not refer to a separate Health Impact Assessment. As with the plan making level, having multiple separate assessments at the application stage looking separately at issues which overlap and/or conflict is not necessarily helpful in achieving the best decisions or efficient in terms of the use of resources. The SPD encourages an assessment of all the relevant policy areas via a 'planning statement' which is required for all major applications. For most applications the matrix at Section 8 of this SPD will provide the trigger for any assessment of health impacts. Whilst there may be occasions when a separate HIA is required, information requirements must be appropriate to the nature and scale of the development and be proportionate. Reference to the national guidance has been added as a footnote to paragraph 3.4.6 and the request for this to be appropriately addressed in the updated Validation</p>
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		<p>4. Para 4.2.11 to 4.2.15 Design, Layout and Appearance - Sport England support the general approach proposed to improve design quality however would further welcome a specific reference to Active Design. https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</p> <p>Active Design is Sport England’s contribution to the wider debate on developing healthy communities. Active Design is rooted in Sport England’s aims and objectives to promote the role of sport and physical activity in creating healthy and sustainable communities. Active Design wraps together the planning and considerations that should be made when designing the places and spaces we live in. It’s about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice.</p> <p>Sport England would encourage good design that should contribute positively to making places better for people, to create environments that make the active choice the easy and attractive choice for people and communities. The creation of healthy places, which promote and enable participation in sport and physical activity, requires the collaborative input of many different partners through many disciplines including planning, design, transport, and health, along with developers working with local communities. Active Design is a key guidance document intended to help unify health, design, and planning by promoting the right conditions and environments for individuals and communities to lead active and healthy lifestyles. The guidance sets out practical case studies and pointers to best practice are set</p>	<p>Checklist has been passed to Development Management.</p> <p>4. Active Design is mentioned in the Local Plan itself at Para 4.5.22 and reference has been added to the SPD at new para 4.2.18.</p>
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		<p>out to inspire and encourage those engaged in shaping our environments to deliver more active and healthier environments where communities can be naturally active as part of their daily lives.</p> <p>Sport England have worked in collaboration with a number of authorities in order to produce design guides and design panels, including the Livewell accreditation in Essex which has been developed specifically incorporating Sport England's Active Design Principles. https://www.essexdesignguide.co.uk/about/introduction/</p> <p>5. Policy TC7 Hot Food Takeaways Additional Interpretation. If possible Sport England would like to see the additional interpretation include active promotion of healthy food options/businesses in addition to the restrictive purposes associated with limiting Hot food takeaways. Sport England consider that policies such as these and their implementation should seek to address food deserts and promote access to healthy food convenience stores in all communities particularly low seg groups.</p> <p>If you would like to discuss these comments please contact planning.north@sportengland.org</p>	<p>5. As the SPD sets out at para 1.1.2 and 7.1.31 SPDs cannot introduce new policies that are not referenced in a local plan, but can explain/address new national planning policy which post-date a local plan's adoption and how these will be applied when they are a material consideration. As the SPD sets out, Policy TC7 of the Local Plan does not refer specifically to health impacts, but these are acknowledged in its supporting text. The SPD also explains in para 7.1.4, the revised NPPF does mention access to healthier food and on this basis an amended interpretation of Policy TC7 is set out in the SPD. This would, in limited situations, restrict new outlets. What Sport England is asking is that where new outlets are approved, conditions about their menu offer are attached. The menu offer of takeaways was one of the matters explored through the Pennine Childhood Obesity Trailblazer Programme (which was wider than just planning). This was looked at through a refresh of the previous LCC 'Recipe 4 Health' accreditation scheme for takeaways, through exploring how social power can improve the quality of the food offer and through</p>
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			<p>working with businesses to ensure healthier food. There is no evidence of the success of planning conditions seeking to control the menu offer of food outlets. Incentives and social power are likely to be far more effective than the planning system here, which at best could seek to control the menu offer of a small number of new takeaways and would be difficult to enforce. Whilst the Council would not like to rule this out entirely as an option, given the lack of evidence of its effectiveness, the lack of specific support for such an approach in national planning policy and practice guidance or mention in Policy TC7, there is considered to be insufficient justification to introduce this as a general or location-specific requirement through the SPD. Introducing such a requirement would need to be subject to further consultation on an amended draft SPD.</p>
6	The Coal Authority	<p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the Burnley area there are recorded coal mining features present at surface and shallow depth including; mine entries, shallow coal workings, reported surface hazards, surface coal mining and mine gas sites. These recorded features may pose a potential risk to surface stability and public safety.</p> <p>The Coal Authority's records also indicate that surface coal resource is present in the area, although this should not be taken to imply that mineral extraction would be economically viable,</p>	Noted.

		<p>technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.</p> <p>It is noted that this current consultation relates to Supplementary Planning Documents for Planning for Health and Residential Extensions. I can confirm that the Planning team at the Coal Authority have no specific comments to make on these consultation documents.</p> <p>Please do not hesitate to contact me should you wish to discuss this further.</p>	
7	Homes England	<p>As a prescribed body and land-owner in Burnley, we would firstly like to thank you for the opportunity to comment on the above consultation.</p> <p>Homes England is the government’s housing accelerator. We have the appetite, influence, expertise, and resources to drive positive market change.</p> <p>By releasing more land to developers who want to make a difference, we’re making possible the new homes England needs, helping to improve neighbourhoods and grow communities.</p> <p>Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.</p>	Noted.

8	Lancashire County Council	<p>Thank you for consulting the Council on the above document and I hope the response set out below is of assistance to you in its preparation.</p> <p>Green Infrastructure – flood and water management Lancashire County Council is the Lead Local Flood Authority (LLFA) for the County Council's administrative area. The Flood and Water Management Act (FWMA) sets out the requirement for the LLFA to manage 'local' flood risk (flooding from surface water, groundwater, and ordinary watercourses) within their area.</p> <p>The Lead Local Flood Authority has reviewed the Planning for Health SPD, and has the following comments:</p> <p>Section 5.1 (Policy SP6: Green Infrastructure) should be expanded to link to wider policies in the adopted local plan that reference Green Infrastructure, including sustainable drainage systems (SuDS), as per policy CC5.</p> <p>It is widely recognised that SuDS have a significant part to play in delivering high-quality urban green spaces, as there is compelling evidence that people who are near to nature and live near green spaces live longer, healthier and happier lives. SuDS can contribute to high-quality blue-green infrastructure, particularly where well-designed and attractive SuDS components are used, such as wetlands, ponds, rain gardens, swales, and large open basins. These can contribute to a more attractive area, encouraging residents to spend more time outdoors, increasing their physical activity and providing benefits for both physical and mental health.</p> <p>Where entirely underground, piped or tanked solutions are used, these benefits are missed. To maximise the health benefits of</p>	<p>Noted.</p> <p>The SPD clearly outlines the importance link between access to GI and mental and physical health, and whilst SuDS can indeed contribute to high quality blue-green infrastructure, they are primarily intended to protect from flooding which in itself can harm physical and mental health. As set out in paragraph 3.2.1 of the SPD almost every policy of the local plan and every type of development could have a health impact and it is not considered that any detailed analysis or amplification of the SuDS policy (CC5) is necessary in the SPD. Brief reference to the role of SuDS in this regard has however been added to paragraph 5.1.2 and 5.1 7.</p>
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		<p>SuDS, they should be integrated with the wider green infrastructure, for example, amenity spaces, from early in the planning of a site, rather than fenced off in the corner of a site.</p> <p>Not only does this create more optimum use of space for developers, but it also ensures multiple benefits are unlocked, including for the health of local communities.</p> <p>More useful information is available at: https://www.susdrain.org/delivering-suds/using-suds/benefits-of-suds/health-and_well-being https://www.ucl.ac.uk/engineering_exchange/sites/engineering_exchange/files/119746_ucl_green_inf_fact_sheets_health.pdf</p> <p>I hope you find these comments valuable and should you require further information or clarification on the contents of this letter please contact me at the email address provided.</p> <p>Once again the County Council would like to thank you for the opportunity to respond to the latest consultation and the continued cooperation received.</p>	
9	Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We have reviewed the Planning for Health: Supplementary Planning Document (SPD) Consultation Draft – dated June 2022 and we have the following comments to make:</p> <p>There is lots of evidence that connecting with nature improves mental wellbeing (Nature connection is something that can be measured) and improves personal resilience.</p>	<p>Noted.</p> <p>The positive impact on people’s physical and mental health of opportunities to enjoy nature is mentioned in paragraph 5.1.2, and the Local Plan itself has strong</p>

	<p>Places that are designed to facilitate social interaction and improve access to nature are an important tool to reduce and prevent mental and physical ill health as well as develop resilient communities.</p> <p>Social Prescribing (SP) is a non-medical intervention to support a holistic approach to people’s health and wellbeing. Referrals routes are typically GPs, other medical professionals and include self-referrals.</p> <p>These interventions are often provided by the Voluntary, Community, Faith and Social Enterprise sector (VCFSE). Green Social Prescribing (GSP) involves referrals into nature-based interventions and activities that link people to natural environments. As more and more studies show that nature plays a critical role in our physical and mental wellbeing, more people are being referred and encouraged to access ever-growing GSP provision (such as allotments and food growing spaces).</p> <p>Natural England want to support and embed social prescribing across the natural environment sector as a means of delivering nature-based activities to support the needs of people referred through the health system.</p> <p>As a way of raising awareness of both SP and GSP we would advise both definitions are included in this document and referenced in sections 5.1, 5.3.9 and 5.3.12 where they can help the creation of healthier places through tackling mental and physical ill health.</p> <p>If you have any queries relating to the advice in this letter please contact me.</p>	<p>policies in place to protect nature. No changes to the SPD are considered necessary.</p> <p>Reference to Social Prescribing and Green Social Prescribing has been added at a new paragraph 2.3.19/20 and at 5.1.5.</p>
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10	Environment Agency	<p>The SPD should reference the government’s 25 Year government’s 25 Year Environment Plan (https://www.gov.uk/government/publications/25-year-environment_plan), which includes a policy to connect people with the environment to improve health and wellbeing (chapter 3), and how development can help achieve the objectives.</p> <p>Links in this regard should also be made to achieving biodiversity and wider environmental net gains as set out in the Plan. By working with and improving the natural environment, development opportunities can be used to deliver positive actions that can contribute to improved resilience for communities in relation to extreme weather events and flooding, climate change and pollution, which would also benefit health and well-being by creating better places to live and work.</p> <p>In addition to managing and reducing flood risk, sustainable drainage systems (SuDS) and natural flood management (NFM) provide a range of benefits to people and the environment.</p> <p>We recommend that the SPD links SuDS and NFM, which can be provided as part of development proposals, with green and blue infrastructure, and with benefits that can be provided physical and mental health and well-being of people.</p> <p>SuDS can often increase the physical and mental health and well-being of communities through providing access to open, green spaces that can be used for recreational activities (such as walking, cycling and sports). SuDS, such as green roofs, green walls and swales, can reduce air and water pollution and regulate building temperatures which can help reduce the urban heat island effect.</p>	<p>Reference has been added at new paragraph 2.3.12.</p> <p>The SPD already acknowledges and strongly focuses on the importance of protecting/enhancing the natural environment for people’s physical and mental health. Para 5.1.2 has been amended to include specific reference to flooding and wider climate change mitigation and adaptation.</p> <p>Reference has to SuDS has been added at paragraph 5.1.2 - see also response to Lancashire County Council comments on page 10.</p>
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		<p>Some SuDS could also be used as an educational resource as result of improving biodiversity and ecosystem quality, which can contribute to well-being benefits.</p> <p>NFM techniques, such as river and floodplain restoration, flood storage and tree planting, can also contribute to improved health by providing increased green space (such as wetlands, ponds and woodlands) and aesthetically pleasing environments with increased amenity value, which can benefit communities by encouraging recreational activities (such as walking, cycling and sports) and connecting with the natural environment.</p> <p>The restoration of river corridors by removing or opening sections of existing culverting and restoring natural riverbeds and riverbanks, should be encouraged as part of development proposals. In addition to providing habitat for wildlife and improving its connectivity, and providing additional flood storage capacity and slowing flows, this can have wider benefits, including ameliorating the urban heat island effect, providing areas for recreational use and improving amenity, health and educational opportunities.</p>	<p>Local Plan Policy CC4 3) makes clear that culverts should be opened up where possible to improve drainage and flood flows. As well as helping to protecting against flooding this can have health benefits through the creation GI. The benefits of GI to physical and mental health are considered to be already adequately highlighted in the SPD and no additional explanation considered necessary.</p>
11	Office for Health Improvement and Disparities	<p>Introduction:</p> <p>The Office for Health Improvement and Disparities (OHID) works across the Department of Health and Social Care (DHSC), the rest of government, the healthcare system, local government and industry to be creative about how we shift our focus towards preventing ill health, in particular in the places and communities where there are the most significant disparities.</p> <p>As part of DHSC, OHID brings together expert advice, analysis and evidence with policy development and implementation to shape and drive health improvement and equalities priorities for</p>	Noted.

	<p>government.</p> <p>We recognise that this Supplementary Planning Documents (SPD) provides detailed guidance on the application of the Local Plan policies in respect of health-related matters. We agree that as Burnley Council state ‘The SPD highlights the ways in which the planning system can contribute to protecting and improving people’s physical and mental health and promote the creation of healthy places. It explains how the Local Plan policies can be applied to achieve better health outcomes and outlines or signposts other strategies and initiatives that support and complement the Local Plan policies.’ Consequently, we believe that this SPD lays out good foundations for the consideration of Health in Planning Decisions across the authority area.</p> <p>It is clear that the SPD highlights the focus of both the Council’s Strategic Plan and the Community COVID Recovery Plan. Both of which include actions to reduce long term health improvement and recognises that this requires action to tackle poverty and the living environment.</p> <p>Key Health Issues in Burnley:</p> <p>The SPD correctly highlights that the authority is the 8th most deprived area of England, but also has stark disparities between the most significant pockets of deprivation and the more affluent rural areas. Life expectancy in Burnley is significantly lower in Burnley than both the regional and national average. Modifiable risk factors such as diet, smoking, inactivity all lead to an increase in non-communicable diseases. These are confounded by historical environmental factors such as pollution and living environments, now being affected by more modern pollution. Consequently, mortality rates from non-communicable diseases</p>	<p>Comments noted and support welcomed.</p>
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		<p>are higher than the England average and whilst they had been declining are increasing.</p> <p>The SPD details these factors and concerns well, including recognising the potential impacts on both physical and mental health. There is recognition of the benefits of green infrastructure to increase physical activity (and recognition that these opportunities were brought to the fore during the COVID-19 lockdowns).</p> <p>Observations on referenced Policies:</p> <p>Having reviewed the draft SPD, we have identified the following observations.</p> <ul style="list-style-type: none"> • Clauses 4.2.8 to 4.2.15 outline policy SP5 and specifically crime. We believe that the link between crime and health is greater than outlined here. There is strong evidence that mental health is effected greatly by crime (and fear of crime), this is recognised by Victim Support. We would recommend strengthening the narrative in relation to this here. However, we do not believe that this will change the Impact Level in this context. • Although much of the background and health information refers to children and children’s health, there is little reference to the impact of planning policies on children’s health in the document. The focus in relation to children is nearly entirely focussed on healthy weight (Section 2.3). We welcome the reference to Policy TC 7 which includes the consideration of Imposing conditions on opening hours under Clause 4) where a new takeaway is close to a secondary school requiring the outlet to shut at school letting out times. 	<p>The draft SPD identified the direct effect of crime and the fear of crime on people’s mental and/or physical health. It did not state a level of effect but it is agreed that health is greatly affected by crime and the fear of crime both directly and indirectly through deterring healthy lifestyles. Para 4.2.8 has been expanded to further emphasise these points.</p> <p>The SPD covers health issues for all age groups and although the nature of the impact may vary depending on age, most of the issues and impacts are not age-specific.</p>
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		<ul style="list-style-type: none"> • The SPD covers the potential impact of housing on health extensively, it does not however identify policies which may be used to improve housing in order to improve the health and educational attainment of children. We are unable to identify any reference to reducing the amount of housing stock which may be unsuitable for children to live and develop, such as damp and cold environments. This could be built upon whilst addressing heating costs in the document. 	<p>Whilst the Local Plan identifies addressing poor quality housing and reducing fuel poverty as a key issue and challenge (page 12), the Local Plan and SPD can only directly address new development that requires planning permission. The draft SPD at Section 1.3 and at para 5.4.9 highlights the issue with regard to the quality of the existing housing stock, particularly in terms of the lack of private gardens and secure parking which is addressed directly through the provision of new stock and the protection and enhancement of GI. The higher than average levels of fuel poverty in Burnley is also outlined in Section 1.3 of the SPD. Whilst the evidence dates from 2009, the Pennine Lancashire House Condition Survey found that levels of excess cold and poor thermal comfort in Burnley homes were higher than the England average and 13,100 homes failed the thermal comfort criterion of the decent homes definition. Reference to this issue has been added in new para 1.3.19 and the links between thermally inefficient stock and fuel poverty at new para 1.3.29.</p> <p>Whilst the Local Plan itself and the SPD cannot introduce policies directly addressing the refurbishment of the existing housing stock, through the Plan's Vision, Objectives and suite of policies and allocations which support economic growth it aims to facilitate and support wider improvement and investment in the existing housing stock. This is supported by a wide range of complementary actions such as the Council's Empty Homes Programme, Selective Licencing, Good Landlord and Agent Scheme and various grant schemes. This is referred to at new para 2.2.5. The winding up of</p>
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		<ul style="list-style-type: none"> • 5.4.1 refers to HS4 and set privacy distances in new housing developments. Does this also account for sufficient shade in a changing climate? • We welcome the council approach to developing a road user hierarchy as described in 6.1.7. This will benefit the health of both the road user and others in the area. • 4.2.16 and 6.1 both refer to sustainable travel but do not mention an Active Travel Strategy, does Burnley Council have such a strategy? We note that Lancashire Council is developing a Local Cycling and Walking Infrastructure Plan. If there is no Burnley Active Travel Strategy we would advise referring to the Lancashire Cycling and Walking Infrastructure Plan. • 4.2.14 may benefit from referring to limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation in clause 185c) of the NPPF. 	<p>the Pathfinder Housing Market Renewal Programme in 2011 prevented any consideration in the Local Plan of major housing stock clearance.</p> <p>The distances set out in Policy HS4 referred to in para 5.4.1 are intended to address privacy and amenity only; the wider issue of design is addressed in Policy SP5 to which Policy HS4 cross refers in its clause 1). New Paragraph 5.4.3 has been added to refer to Policy HS4 clause 3 a) to state that in providing private and functional outdoor space for occupants, consideration should be given to using buildings and/or landscaping to provide adequate shading.</p> <p>Support noted.</p> <p>The Council does not currently have a stand-alone 'active travel strategy' but through its Local Plan and its cooperation with Lancashire County Council as highway authority on the LCWIP and a number of other projects and initiatives, the Council supports and takes forward wherever possible all the principles that are involved in active travel. The LCWIP is currently being developed and link to the relevant webpages have been added as footnotes to para 6.1.3.</p> <p>Paragraph 4.2.14 is a summary paragraph covering all aspects of design and it's not considered necessary to add reference here to one specific detailed point. Light pollution is addressed by Local Plan Policy NE5) 5) to which section 4.1 of the SPD refers.</p>
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		<ul style="list-style-type: none"> • We would also recommend providing information relating to the Burnley Council 2019 Climate Emergency Commitments in 4.2. • We were pleased to see that Burnley have signed the Healthy Weight Declaration and have taken authority wide action to address obesity including food supply and enabling physical activity. • The SPD identifies the excellent work carried out through the Pennine Lancashire Childhood Obesity Programme supported by the Healthier Place Healthier Future Programme (HPHF). All four levers of this process (System Leadership, Business, Planning and Communities) are relevant to this SPD. This has clearly influenced some of the planning decisions, particularly in relation to Late Night refreshment and Take-Aways. An example of this is that no more than two consecutive hot food takeaway uses in any length of secondary frontage will be allowed and there should be a gap of at least two non-takeaway uses between premises. However, 7.1.7 recognises the recent change in behaviours and operational practice towards food delivery services as a result of the pandemic. • The SPD highlights key physical activity programmes such as 'Together an Active Future' <p>Policy Health Impact Matrix:</p> <p>Subject to the points raised above, we agree with the council's assessment of impact in the Impact Matrix.</p>	<p>Reference to the climate emergency declaration and the Climate Change Strategy adopted In February 2022 has been added at section 2.2 'Local Policy'.</p> <p>Support noted. Since the draft SPD was written, the Council has signed up to the Healthy Weight Declaration and the text of para 2.3.3 has been amended to this effect.</p> <p>Noted.</p> <p>Noted.</p> <p>Support noted.</p>
12	G Moroney	I don't really understand these plans but in terms of health, from a personal perspective, I would like to see outdoor gym facilities	Comments welcomed.

		<p>such as pull up bars, monkey bars and other facilities which can be seen in other locations and viewed on YouTube. The little exercisers were of little use and so weren't used and yet children have large areas for their recreational health. Don't get me wrong these are brilliant for children! Also I saw a sign in Blackburn for free gym and swimming sessions for residents. I live in Hapton and I would love to see health and exercise being taken seriously by our council. I think it was terrible that fast food was allowed to flourish in lockdown but exercise was almost banned when health should have been a priority.</p>	<p>The Local Plan and SPD recognise the role of Green Infrastructure in providing opportunities for formal or informal physical activity. Although in most cases they do not generally prescribe the particulars of the required offer to support development proposals (apart for example for Policy HS4 which requires specific amounts and types of play areas for children for certain sizes of housing development), new or enhanced GI can include things such as outdoor gyms - indeed one such facility is planned through the recently approved (subject to a S106 agreement) expansion of Burnley College at site EMP1/3 at Stoneyholme (Ref FUL/2021/0270). The comments on facilities in Hapton have been forwarded to the Council's Green Spaces and Amenity department.</p>
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