Matters Arising Changes Representation Form

As part of the Examination into the Cardiff Local Development Plan (LDP) a number of Matters Arising Changes have been proposed to the LDP. These changes are set out in the Matters Arising Changes Schedule. This is your opportunity to comment on the Matters Arising Changes. All comments previously made at Deposit stage have already been considered by the Inspectors and so this form should only be used to comment on the Matters Arising Changes.

All completed forms should be returned by midnight on 23rd July 2015 to: LDP Team, Room 131, City Hall, Cardiff, CF10 3ND, or email LDP@Cardiff.gov.uk

Also available for comment are the Sustainability Appraisal and Habitats Regulations Assessment of the Matters Arising Changes at www.cardiff.gov.uk.

PART 1: Contact details

<table>
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<tr>
<th>Your/ your Client's details</th>
<th>Agent's details (if relevant)</th>
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<tbody>
<tr>
<td>Title:</td>
<td>Ms</td>
</tr>
<tr>
<td>Name:</td>
<td>Marie Davies</td>
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<tr>
<td>Job title: (where relevant)</td>
<td>Deputy Director of Planning</td>
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<tr>
<td>Organisation: (where relevant)</td>
<td>Cardiff &amp; Vale University Health Board (UHB)</td>
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<td>Address:</td>
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<td>Email:</td>
<td><a href="mailto:marie.davies1@wales.nhs.uk">marie.davies1@wales.nhs.uk</a></td>
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Please note that all representations will be made available for public inspection and cannot be treated as confidential. However to ensure data protection we will remove personal details from publically accessible documents.

Signed: Marie Davies  Date: 23 July 2015
PART 2: Commenting on Matters Arising Changes

Which Matters Arising Changes do you wish to comment on (Please refer to the Matters Arising Changes Schedule)

Matters Arising Changes reference (e.g. MAC 1)

MAC5 ........................... Support
MAC49 ........................... Support
MAC52 ........................... Support
MAC53 ........................... Object
MAC54 ........................... Object
MAC55 ........................... Object
MAC58 ........................... Object

If you are objecting to a change it would be helpful if you could indicate which Test of Soundness you consider it to fails (Please refer to guidance note).

C1 & C2

Please note if you do not identify a test it will not mean your comments will not be considered.

PART 3: Your Response

Your comments should be set out in full and relate to the Matters Arising Changes only.
Response of the Cardiff & Vale University Health Board to the Matters Arising Changes of the Cardiff Local Development Plan 2006 -2016 Deposit Plan

MAC5 KP2 Strategic Sites
The UHB welcomes and supports the strengthening of Policy KP2 to ensure that infrastructure requirements are delivered in the strategic sites. The provision of healthcare infrastructure for service delivery across the strategic sites is imperative and we welcome the embedding of this concept across this policy together with inclusion in the Infrastructure Plan. The provision of care close to people’s home is a priority for the UHB and Welsh Government as outlined in the following policy documents:-


MAC49 C1: Community Facilities
The UHB welcomes the inclusion of health facilities into Policy C1.

MAC52 C4: Provision for Open Space, Outdoor Recreation, Children’s Play and Sport
The UHB welcomes and supports the inclusion of children’s play into Policy C4. Play is crucial to children’s healthy development and happiness and evidence demonstrates that one of the best ways for children to stay both physically and mentally healthy is through access to a variety of unstructured play experiences. Further information is available in the ‘Shaping Neighbourhoods: Play and Informal Recreation SPG’ developed by the Mayor of London Office https://www.london.gov.uk/priorities/planning/publications/shaping-neighbourhoods-play-and-informal-recreation-spg

MAC53 Policy C5: Provision for Allotments and Community Growing
The UHB objects to the deletion of Policy C5. Access to a food environment that promotes healthy eating is known to improve health, maintain a healthy weight and reduce the risks of developing long term chronic conditions. The built environment can provide access to food growing spaces within communities as gardens, allocated food growing spaces near
community buildings and as allotments. Evidence in the literature recommends the provision of food growing spaces in developments
http://www.sustainweb.org/publications/the_benefits_of_gardening_and_food_growing

We are, however, pleased to note that the provision of allotments has been included in Policy KP6 New Infrastructure and in Policy KP16 Green Infrastructure.

MAC54 Policy C6: Provision of Children’s Play
The UHB objects to the deletion of this policy based on the importance of play to child health and development. We are, however, pleased to note that play is incorporated into Policy C4 Provision of Open Space, Outdoor Recreation, Children’s Play and Sport and into Policy KP6 New Infrastructure.

MAC55 Policy C7: Health
The UHB objects to the changes within paragraphs 5.355, 5.350 and 5.362 and to the deletion of
- (iii) managing the location of fast food takeaways to appropriate locations
- (iv) demonstrating that the effect of new developments on health is taken into account.

Evidence of the explicit connections between health and planning has been emerging in recent years with the growth of the concept of healthy urban planning. Health Impact Assessment (HIA) has been identified as a useful tool and process within this concept, ensuring that health issues and concerns are explicitly identified and addressed within land use plans. Although HIA is not a statutory process, its use is viewed as good practice to embed health across all policies and we should ensure that all future policies and plans, including LDPs, promote and adopt its use. Further information is available in
• The health in all policies guidance (in development) supporting actions within the Well-being Goals implementing the Well-being of Future Generations Act 2015 (http://gov.wales/legislation/programme/assemblybills/future-generations/?lang=en) recommends the use of HIA
• The NHS Wales Infrastructure Investment Guidance (WG, 2015) advocates for the mandatory use of HIA as part of developing Business Cases for new capital builds and other development and relocation projects in the NHS in Wales. http://llyw.cymru/topics/health/nhswales/circulars/estates/?lang=en. HIA is referenced in paragraph 2.5, page 11. HIA is listed as a statutory requirement as part of the Business Case checklist in Annex 2.

The LDP recognises that the built environment can support population health through promoting walking and cycling, providing access to food growing spaces and through the provision of well maintained open spaces. However, evidence is emerging that planning authorities are able to further influence the built environment to improve health and reduce the extent to which it promotes obesity through the implementation of additional relevant policies and plans. An example of this is restricting the positioning of hot food takeaways in
communities, particularly near schools. There is a strong association between deprivation and the density of fast food outlets, with more deprived areas having a higher proportion of fast food outlets per head of population than others. Action on the food environment is supported by the NICE public health guidance, ‘Prevention of Cardiovascular Disease’ (https://www.nice.org.uk/guidance/ph25) which recommends restricting ‘planning permission for takeaways and other food retail outlets in specific areas (for example, within walking distance of schools)’. It is only in recent years that local authorities have started to use the legal and planning systems to regulate the growth of fast food restaurants, including those near schools and there is thus a lack of evidence that can demonstrate a causal link between actions and outcomes. This lack of evidence should not deter us from developing appropriate policies and action. The following provides further information:-


The UHB recommends the re-insertion of points (iii) and (iv) of Policy C7 to ensure that

- New developments through all planning stages take into account impact on health, ensuring that strategic and non-strategic sites are developed to promote and protect the health of those living within the developments. The use of HIA tools should be recognised as a key element of this.

- Fast food takeaways are restricted to appropriate locations and in particular away from schools and our most deprived communities.

We do however, welcome the reference in Policy C7 to the identification of sites for new health facilities in new developments.

MAC58 Policy C10: Health Employment Non Strategic Allocation

The UHB objects to the deletion of Policy C10. The land allocated at St Agnes Road, Heath represents an opportunity to deliver a biomedical and life-sciences campus for Cardiff University and to enable the UHB to expand the University Hospital of Wales relieving some of the space constraints it currently experiences.

The UHB recommends the reinstatement of Policy C10 into the LDP.

PART 4: What Happens Next?

All comments received by the closing date will be forwarded directly to the Inspectors for consideration; noting that they will not receive a response from the Council. Should the Inspectors decide that further hearing sessions are necessary please indicate whether you would want to speak at a session.
It is important to note that written comments will be given the same weight by the inspectors as those made verbally at a hearing session.

4a) Do you want your comments to be considered by ‘written representations’ or do you want to speak at a hearing session?

(Please tick ✓ one of the following)

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector

I do want to speak at a hearing session. ✓

4b) If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing

The UHB would wish to make representation about the following:-

- MAC55 Policy C7: Health
- MAC58 Policy C10: Health Employment Non Strategic Allocation

At the Hearing, the UHB would take the opportunity to provide information available and discuss the merits of reinstating the wording of Policy C7 and Policy C10.

The Matters Arising Changes Schedule is available on the Council website at: www.cardiff.gov.uk Hard copies are also available for public inspection during the consultation period at: City Hall, Cathays Park and County Hall, Atlantic Wharf, Monday to Friday between 9.00am and 4.00pm. They will also be made available at all local libraries.

Additional Assistance

If you require assistance to complete the form or have any questions relating to your representation please contact:

LDP Team,  
Strategic Planning – Policy  
Cardiff Council  
Room 131  
City Hall  
Cathays Park  
Cardiff  
CF10 3ND

Telephone: 029 2087 1297  
E-mail: LDP@cardiff.gov.uk
## Tests of Soundness

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Thank you for the opportunity to comment on the Matters Arising Changes.

Please find attached the Matters Arising Changes Consultation response from the Cardiff and Vale University Health Board.

Please contact me if you require further information.

Regards

Susan Toner
On behalf of Cardiff & Vale University Health Board and Cardiff & Vale Public Health Team

Susan Toner

Prif Arbenigwr Hyrwyddiad Iechyd, Iechyd Cyhoeddus Cymru, Tim Iechyd Cyhoeddus Caerdydd a’r Fro, Ysbty’r Eglwys Newydd, Heol Parc, Caerdydd, CF14 7XB.

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