



To:

Economy, Environment and Infrastructure  
Shire Hall  
Westgate Street  
Gloucester, GL1 2TG

Our Ref: LWH/RN

Your Ref:

Date: 12<sup>th</sup> March 2024

Dear Sir/Madam

### **Leckhampton with Warden Hill Draft Neighbourhood Plan Consultation**

Thank you for consulting Gloucestershire County Council (GCC) on the above matter. I have the following officer comments to make.

#### **Education Comments**

Any new housing development proposed for the Leckhampton with Warden Hill area would be assessed for the number of additional school pupils that it would be forecast to generate. If additional education infrastructure is required to meet demand from pupils generated by a new development it would be mitigated through S106 planning obligations for the developer to provide financial contributions towards that infrastructure, and if necessary to provide land for new school sites.

#### **Historic Environment Comments**

The plan should follow the guidance as set out by Historic England on producing Neighbourhood Plans (NP) and should include policies in regards to protecting the Historic Environment using the Historic Environment Record (HER) as the baseline data.

<https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/>

The section on local heritage and appendix 4 appears to omit full details from the Historic Environment Record, particularly in relation to the archaeology of the area. Data from the HER can be obtained from the Gloucestershire HER, email [her@gloucestershire.gov.uk](mailto:her@gloucestershire.gov.uk).

#### **Public Health**

The Public Health and Communities Team at GCC welcomes the opportunity to comment on this NP and on matters specific to the health and wellbeing of residents that live, work and take their enjoyment in Leckhampton, Warden Hill and the surrounding neighbourhood area.

#### Overview

We welcome the work done with your local communities and key stakeholders in the drafting of this NP. The strong level of community engagement and consequent interest from plan

makers in supporting the identified needs of communities within Leckhampton with Warden Hill is apparent, and as the NP identifies, essential. It is evident that this consultation work has shaped the key policies in the NP and informed the priority setting process. Of particular interest was the Reg14 Consultation on the draft plan in 2021, which encompassed a wide range of the community's views, with 280 total responses and over 50 attendees to the two public consultation events. Plan makers will understand the importance of real-time representation of residents, businesses, and the voluntary community sector organisations it supports, particularly post-pandemic which has been a challenging time for communities.

The importance of this engagement is essential, given the substantial role of community groups and facilities in meeting the social, health and recreational needs of residents (policy LWH1). The desire to protect the range of facilities that currently accommodate community use, such as local churches, schools, and halls, is clear.

The provision of such groups supports a range of physical and social activities for those living in Leckhampton with Warden Hill. The importance of these activities is emphasised given, as a nation, we are around 20% less active now than in the 1960's. If the current trend continues, we will be 35% less active by 2030. The health benefits of physical activity are well understood and can reduce your chance of type two diabetes (up to 40%), cardiovascular disease (35%) and joint and back pain (25%) [Physical activity guidelines: UK Chief Medical Officers' report - GOV.UK \(www.gov.uk\)](#) For further information on help to get communities and individuals more active, please see [We Can Move - Inspiring People To Get Active - Health and Wellbeing](#). We Can Move is a social movement of people committed to getting Gloucestershire physically active. Organisations, community groups, activity providers and individuals work together to help others get active.

Additionally, these social activities will support good mental health and in doing so, alleviate some of the know trappings of social isolation and loneliness. As plan makers will be aware, certain groups are particularly susceptible to social isolation and loneliness, with the number of over-50s experiencing loneliness in England set to reach two million by 2025/2026<sup>1</sup>. Given Leckhampton with Warden Hills' ageing population, we welcome the NP's priority for retention and improvement of community facilities (policy LWH1). Likewise, we welcome the NPs consideration of the 2014 engagement "Connecting Warden Hill" to explore the views of older people within the community on loneliness and isolation, identifying the desire for a social club<sup>2</sup>.

The NP rightly cites the need for local people to have access to essential services without dependence on a car. This is particularly pertinent for rural and semi-rural communities, where the challenge of limited transport options can contribute to worsening isolation and mental health difficulties<sup>3</sup>. As such, we welcome the NP's recognition for provision of integrated public transport networks in policy LHW2. The existing need for such provision within the parish is reiterated by the 2021 census, which highlights that 12.6% of households within Leckhampton with Warden Hill had no car or van<sup>9</sup>.

Plan makers will be aware that digital connections play an ever-increasing role in the way we live, work and interact with each other. Plan makers will no doubt be aware of the work being done by [Digital Divides](#) in Gloucestershire, highlighting the digital divide (the gap in society between people who have full access to digital technologies and those who do not) and the impact of this exclusion to specific groups including disabled people, older people, those on low incomes, people with mental health challenges and those living in rural areas where internet connectivity is poor. Online data mapping and community asset mapping are available via [Digital Divides](#) and are recommended to be part of any future assessments and plan making. Plan makers may wish, if not already, to familiarise themselves with the 2022 Director of Public Health annual Report for Gloucestershire; No person is an island; Social connections in Gloucestershire [annual-public-health-report-2022\\_23.pdf](#)

[gloucestershire.gov.uk](http://gloucestershire.gov.uk)). The report highlights both the power of social connections but also the challenges, many of which are experienced by those living in rural areas across Gloucestershire. Crucially, it sharpens a focus on the work being done to tackle social isolation and the responsibility we all share in supporting those most in need.

### Transport/Active Travel

The transport systems and the wider built environment in Leckhampton with Warden Hill play a crucial role by either promoting or hindering physical activity. The NP frequently highlights the importance of sustainable, active travel for environment and health, as well as the priority to develop safe opportunities for sustainable travel (LWH objective 4). The NP highlights existing barriers to this, including the currently absent cycle network (note 133) as well as some residents being unable to take advantage of existing active travel opportunities due to distances greater than 500m, as identified in the community consultation (note 68). The benefit of improved walking and cycling routes is significant, as it has been estimated that socio-economic and physical environments determine 60% of health outcomes<sup>4</sup>. Therefore, it is encouraging to note the prominence of active travel, safe pedestrian routes and cycle links within the plan and embedded in policy themes.

The NP rightly highlights the positive association between developing walking and cycling connections to key destinations (outlined in policy LWH2) and the potential to contribute to an improving picture of air quality in Leckhampton with Warden Hill. Air pollution has negative effects on health throughout the life course, from pre-birth to old age. Children are particularly vulnerable to dirty air, with research showing that nursery and primary school children can be exposed to as much as 30% more pollution as a result of being smaller and closer to exhaust fumes when walking along busy roads, compared to adults<sup>5</sup>. The health implications of air pollution are summarised by [Gloucestershire County Council's review of air quality and health](#) in Gloucestershire, and include affected lung development and exacerbated asthma in children. As such, we welcome the plan's purposeful policies based around sustainability that should contribute to improving the air we breathe.

Plan makers will be aware of the positive progress made within Cheltenham Borough to reduce air pollution, resulting in revision of the borough wide Air Quality Management Area (AQMA) in 2011<sup>6</sup>. As a result, there are no AQMAs within the Leckhampton with Warden Hill boundary and we recognise the positive steps being made to improve air quality within Cheltenham Borough, as outlined in [Air quality annual status report 2023](#). The cumulative impact of workplace travel plans, improvements in engine efficiency and an increase in low emission/electric car ownership all play an important part. Plan makers will be aware of the good practice guide for planners and developers regarding air quality set out by Cheltenham Borough Council (CBC), which provides useful guidance to developers when [Planning for Air Quality](#).

The NP frequently cites the desire to improve safe active travel routes for young people within the parish to increase independence, which is of particular interest given the newly built High School Leckhampton. The community wish to encourage students to walk and cycle to school is evident within the plan (note 138). We welcome this awareness of promoting active travel for children, as according to the [2022 Pupil Wellbeing Survey](#), 3 in 4 children in Gloucestershire would like to do more exercise<sup>7</sup>. The wellbeing benefits of this are significant, including children being more likely to enjoy school, feel confident and have greater resilience<sup>7</sup>.

The Public Health and Communities Team recognises the importance of the Safe System approach to road safety management [Safe System - PACTS](#). The system is based on the principle that our health should not be compromised by our needs to travel, irrespective of

mode. The approach highlights a number of what they regard as demonstrably effective strategies. At a place making/planning stage, these include:

- Encouraging use of safer modes and safer routes;
- Safety conscious planning and proactive safety engineering design; and
- Safe separation or safe integration of mixed road use

The Gloucestershire Road Safety Partnership was launched in December 2022 and is committed to delivering a 'Safer roads – together' approach to make the roads of Gloucestershire safer for all users, reducing the number of people killed or injured on our roads and aspiring to a 'vision zero' approach. Further information on the partnership is available on the GCC website: [Gloucestershire Road Safety Partnership | Highways](#).

### Employment

There is evidence that good work, sustained employment, and skills progression can improve health and wellbeing across people's lives and protect against social exclusion. Conversely, there is also clear evidence that unemployment is bad for your health as it is associated with an increased risk of mortality and morbidity<sup>8</sup>.

The NP identifies a number of businesses located within the Neighbourhood Centre, including a mix of retail and community services (note 98). As investors in your community, local businesses can play a pivotal role in reducing [health inequalities](#) (defined by the King's Fund as systematic differences in health between different groups of people) through social value. Local businesses within Leckhampton with Warden Hill may be familiar with Environment, Society and Governance (ESG) - the collective term for a business's impact on the environment and society, as well as how robust and transparent its governance is in terms of leadership and internal controls. Organisations can positively contribute to fairness in society, improving conditions for employees, the supply chain, and local communities.

We welcome the plan's awareness of support for local businesses and supporting future use of vacant properties to benefit the community, such as through libraries (note 124). In considering the role that businesses play in communities, we would also encourage plan makers to consider the 2021 Director of Public Health annual report, [Sources of Strength: Securing Gloucestershire's health and wellbeing through an anchor institutions approach](#).

Anchor institutions are organisations that are unlikely to relocate and have a significant stake in their local area. These anchor institutions are well positioned to use their assets and resources to benefit the communities around them to improve health and reduce health inequalities. Consequently, these organisations have the potential to impact on some of the key social determinants of health, which drive health inequalities.

## Housing

We welcome the NP's objective to work with partners to ensure future housing developments meet the needs of the Leckhampton with Warden Hill community (LWH objective 2). The current aging population is a national issue, and as appreciated by the plan, is particularly pronounced in Leckhampton with Warden Hill (note 73). Between 2018 and 2043 Gloucestershire's 65+ population is projected to experience the greatest growth, increasing by almost 71,000 people or 52.5% by 2043. Plan makers will be aware of the importance of providing accessible, single-story dwellings of high standards to support the independent living of this population, and will be aware of the [Guidance on housing for older and disabled people - GOV.UK \(www.gov.uk\)](#). Improving and maintaining the health of older adults is a strong social responsibility and the Chief Medical Officer's annual report 2023; Health in an aging society [Chief Medical Officer's annual report 2023: health in an ageing society - GOV.UK \(www.gov.uk\)](#) underlines the geography of older age in the UK. The report makes it clear that the increase in an aging population will be in our rural and semi-rural areas.

The NP identifies the need for local people to access affordable and social housing or downsize to smaller housing (note 73). This need is emphasised, as the plan appreciates, given the greater affordability gap within Leckhampton with Warden Hill compared to the England average (note 51). According to the 2021 census, the proportion of households socially renting within the parish was 4.3%, which is substantially lower than the England average of 17.1%<sup>9</sup>.

Plan makers will be aware of the need for residents to be able to heat their homes which can positively impact health outcomes and reduce respiratory conditions<sup>10</sup>. The NP highlights that 120 households within Leckhampton with Warden Hill were living in fuel poverty in 2017/18 (note 48). Fuel poverty has a significant negative impact on health, with an associated excess of winter deaths, increased prevalence of chronic conditions and poorer mental health outcomes<sup>10</sup>. We encourage plan makers, if not already, to familiarise themselves with the [Campaign for Healthy Homes - Town and Country Planning Association \(tcpa.org.uk\)](#), as well as the recent UKHSA report; Health Effects of Climate Change in the UK [HECC 2023 report. Chapter 2: Temperature effects on mortality in a changing climate \(publishing.service.gov.uk\)](#).

This report notes that the greatest driver of both heat and cold-related deaths in the UK is the vulnerability of older adults to extreme temperatures. Protecting older adults during cold and hot weather periods, including considering the social determinants of vulnerability, is a key lever for minimising health risks. Secondly, while cold-related health risks will continue, heat-related health risks will increase, potentially substantially. Temperatures that may cause inconvenience for most healthy adults can pose a significant health risk to individuals with chronic health conditions and older adults. Given that we can expect to spend up to 90% of our lives indoors, the design of current homes and the homes of future developments becomes a crucial enabler to good health, particularly amongst older adults.

The NP acknowledges the community's concern of flood risk due to rainfall patterns and surface water runoff from Leckhampton Hill (note 84), and outlines considerations to mitigate this. It is encouraging to see that flood risk forms a key aspect of new development proposals, as outlined in policy LWH7. Plan makers may wish to familiarise themselves, if they aren't already, with the [Guidance on flooding and health from UKHSA](#), which outlines the potential dangers to the health and wellbeing of residents from flooding, including direct and long-term health impacts. We welcome the NP's priority of managing flood risk, and the consideration of resident's desire for a strategic approach to the maintenance of flood defence systems from a wide range of future developments (note 86).



## Healthy Placemaking

Placemaking within Leckhampton with Warden Hill, as the NP appreciates, will consist of a broad range of aspects including the maintenance of local green spaces (policy LWH3) and the enhancement of local green infrastructure (policy LWH4). The link between the built environment and health is long established and neighbourhood design plays a significant role in shaping our health behaviours. Planners, developers, and designers can shape an environment to either encourage physical activity or design out the need or ability to be active. As plans for placemaking in Leckhampton with Warden Hill move forward, those creating the vision are encouraged to consider how a well-designed place will have a positive impact on both the physical and mental wellbeing of residents and visitors alike. The Office for Health Improvement and Disparities (OHID), Active Travel England and Sport England have produced an update of the Active Design guidance - [Active Design | Sport England](#). This guidance will support plan policies, structure and assist with developing master plans, pre-application discussions and support the wider public health, climate and biodiversity discussions. The [National design guide.pdf \(publishing.service.gov.uk\)](#) and the National Model Design Code and Guidance Notes for Design Codes illustrate how well-designed places that are healthy, greener, enduring and successful can be achieved in practice.

The NP highlights the desire of the community to develop landscaping, planting and biodiversity gain (note 154), rightly citing the importance of green infrastructure to maintain biodiversity and species habitats (note 156). Giving consideration to high quality green and blue infrastructure across all stages of plan making and development will support the reduction of health inequalities and build a sense of community and place. Plan makers, if they are unfamiliar, may wish to consider the Building with Nature Framework - [Planners — Building with Nature](#). The 'wellbeing standards' within the framework are of particular interest as they seek to maximise the public health impact that can be supported by such developments.

The Building with Nature accreditation - [BwN Accreditation: Benefits for Developers](#) - may also be of interest to plan makers. The accreditation pulls together multidiscipline teams, and critically raises the priority of addressing water management, biodiversity, active travel and pushing them up the agenda. This leads to better wins for people and nature and provides the focus of achieving each of the standards for the scheme. In turn this would support the protection and enhancement of existing allotments and community gardens which again provide wide ranging benefits and enrichment for both mental and physical health.

The Leckhampton with Warden Hill Plan policies are underpinned by sustainable design, net carbon zero contributions and enhancing the greenspace/biodiversity landscape that envelops the locality to create the valued landscape. In support of this, national guidance (PPG) recognises that, in relation to planning applications, Health Impact assessment (HIAs) (including rapid HIAs) may be a useful tool to identify where significant impacts on the health of local people are expected. It is acknowledged that a HIA may not be proportionate to all future applications with the plan area, but we would advocate their use as a key tool to identify and optimise the health and wellbeing impacts of planning. For further information please see [Healthy and safe communities - GOV.UK \(www.gov.uk\)](#) and [Health Impact Assessment in spatial planning \(publishing.service.gov.uk\)](#).

<sup>1</sup>[JSNA Gloucestershire Social Connections](#)

<sup>2</sup>[Glos Inform: Loneliness and social isolation in gloucestershire.pdf](#)

<sup>3</sup>[Transport in rural areas: local authority toolkit - GOV.UK \(www.gov.uk\)](#)

<sup>4</sup> [Health Impact Assessment in spatial planning - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/health-impact-assessment-in-spatial-planning)

<sup>5</sup> [Air pollution and children's health — European Environment Agency \(europa.eu\)](https://europea.eu/en/topics/air-pollution-and-childrens-health)

<sup>6</sup> [Air quality management areas in Cheltenham | Air quality and pollution | Cheltenham Borough Council](https://www.cheltenham-borough-council.gov.uk/air-quality-and-pollution/)

<sup>7</sup> [2020 Pupil Wellbeing Survey Exercise in Children and Young People](#)

<sup>8</sup> [Health matters: health and work - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/health-matters-health-and-work)

<sup>9</sup> [Build a custom area profile - Census 2021, ONS](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/build-a-custom-area-profile)

<sup>10</sup> [Glos Inform: Housing and Health](#)

If you would like to discuss any of the points raised in this letter, please do not hesitate to contact me.

Yours sincerely



Senior Planning Officer