



**IRISH HEART
FOUNDATION**
Fighting Heart Disease & Stroke

Irish Heart Foundation

**Submission on the
*Wicklow County Development
Plan 2016-22***

February 2016





About the Irish Heart Foundation

The Irish Heart Foundation is the national charity dedicated to fighting heart disease and stroke. Today in Ireland more people die from heart and stroke-related illnesses than from any other cause of death. Against this background we work to bring hope, relief and a better future to families all over Ireland. We give vital patient support through our Heart & Stroke helpline and we provide high quality public information for all.

We support pioneering medical research, campaign for improved patient care, and promote positive public health strategies. We work in hospitals, schools and workplaces to support, educate and train people to save lives. As a charity we are dependent on the generosity of the public to continue our vital good work. You can fund our work by making a donation, give of your time to volunteer or learn the skills needed to save a life through our courses.

SUBMISSION TO WICKLOW COUNTY COUNCIL

Draft Wicklow Development Plan 2016-2022

February 2016

The Irish Heart Foundation (IHF) welcomes the opportunity to input into this second consultation on the Wicklow Development Plan. Following the IHF's initial submission in December 2014, this submission will focus on three core elements: including a specific 'promotion of healthy environments' objective in the Development Plan; introducing restrictions on fast food outlets in close proximity to schools (no-fry zones¹); and the provision of allotments.

The IHF is focused on how the Development Plan could be used to improve the public health of people living in Wicklow and in particular to ensure that children and young people are healthy and active. Having reviewed the 'Draft Wicklow County Development Plan 2016 – 2022' (Draft Plan) provided for this consultation the IHF:

1. Welcomes the inclusion of a no-fry zone adjacent to schools (RT 17) and recommends that the proposed exclusion zone around schools be widened to 1km. The IHF further recommends that maps showing the exclusion zones around each school be provided with the final Development Plan.
2. Welcomes the support for allotments (CD44) as a means of providing better access to healthy food.
3. Recommends the inclusion of 'Promotion of healthy environments' as the 12th goal of the Development Plan (2.3 Vision and Goals).

¹ IHF uses the terminology 'no-fry zone' to exclusion zones for fast food/takeaways close to schools.

1. No-fry zones (RT17)

The IHF welcomes the inclusion of a no-fry zone adjacent to schools (RT 17) and recommends that the proposed exclusion zone around schools be widened to 1km. The IHF further recommends that maps showing the exclusion zones around each school be provided with the final Development Plan.

Draft Plan - RT17 (p.123)

Conscious of the fact that planning has an important role to play in promoting and facilitating active and healthy living patterns for local communities, the following criteria will be taken into account in the assessment of development proposals for fast food/takeaway outlets, including those with a drive through facility:

- Exclude any new fast-food outlets which offer foods that are high in fat, salt or sugar from being built or from operating within 400m of the gates or site boundary of schools, parks or playgrounds, excluding premises zoned town centre;
- Fast food outlets/takeaways with proposed drive through facilities will generally only be acceptable within Major Town Centres or District Centres and will be assessed on a case-by-case basis;..

The IHF supports this effort by Wicklow County Council to use its authority for land zoning and land use to limit access to fast food and the promotion of unhealthy foods in the vicinity of schools.

Health organisations and the public are increasingly concerned about the impact on children of the number of fast food outlets located in close proximity to schools. The need for action to protect Irish children is strong. Prevalence of obesity in Ireland has increased significantly in the last two decades. Depending on the cut-off points used, there has been a two-to-fourfold increase in obesity in Irish children aged 8–12 years since 1990.² Between 1990 and 2011, obesity rose from 8% to 26% in men, and from 13% to 21% in women.³ The Growing Up in Ireland study shows that social inequalities increase the risk of overweight and obesity from an early age. At 9 years of age, children from disadvantaged areas are much more likely to be obese.⁴

² O'Neill JL, McCarthy SN, Burke SJ et al (2007). Prevalence of overweight and obesity in Irish schoolchildren, using four different definitions. *Eur J Clin Nutr*:61(6);743-51.

³ Irish Universities Nutrition Alliance (IUNA) (2011). National Adult Nutrition Survey.

⁴ Layte, R. and McCrory, C. (2011) *Growing up in Ireland - Overweight and obesity among 9-year olds*. Dublin: The Stationary Office.

Increase the exclusion zone to 1km

A body of research links over-concentration of and/or proximity to fast-food outlets and obesity.⁵ Studies also indicate that in order to buy something from a fast food outlet after school or at lunch time, it needed to be located close by (on the way to school or a short walk). The IHF believes that the effectiveness of RT17 would be further strengthened by increasing the exclusion zone from 400m to 1km (which approximately equates to a 10-minute walk).

Fast food is readily available beside Irish schools. Currently, 75% of Irish schools have at least one and almost 30% have at least five fast food outlets within 1km.⁶ In the absence of proper regulation this situation can only deteriorate further given the business value to fast food outlets of being sited near schools.

National level guidance on no-fry zones

The Chief Executive's report, which responded to our initial submission in December 2014, indicated that current guidance on no-fry zones (contained in the Ministerial guidelines on Local Area Plans, June 2013⁷) do not provide sufficient detail:

There is no further guidance from the Government on this issue, in particular what 'careful consideration' might mean, how 'appropriateness' might be assessed and what 'in the vicinity' might mean. In the absence of clear guidelines or what the Minister is suggesting, it is not known if any objectives adopted by individual Local Authorities would be legal and not discriminatory or contrary to EU laws in any way... As it is not clear what kind of controls are being suggested by the guidelines, it is not clear what 'exemptions' or 'conditions' might be appropriate

(First Chief Executive's Report, p. 116).

As referenced in the Chief Executive's report (quoted above), the planning guidance on no-fry zones for local authorities is open to broad interpretation. The IHF believes it is inappropriate to continue to address the issue of new fast food outlets beside schools on a case-by-case basis at local level, requiring parents / schools to organise to appeal planning applications. A co-ordinated, national approach to protect the health of children and young people across the country is required. To support the work of Wicklow County Council and other local authorities, the IHF is advocating for national level guidance for all local authorities on the introduction of no-fry zones adjacent to schools. Such guidance could be provided through a specific Department of Environment guideline addressing fast food outlets⁸, such as a 'Guideline for Planning Authorities on Fast Food outlets'. This

⁵ For example, see Currie, J., DellaVigna, Moretti, E. and Pathania, V. (2009) 'The Effects of Fast Food Restaurants on Obesity.' *American Association of Wine Economics* and Davis, B. and Carpenter, C. 'Proximity of Fast Food Restaurants to schools and adolescent obesity'. *American Journal of Public Health*, 99 (3), 1541-8.

⁶ Callaghan, M., Molcho, M., Nic Gabhainn, S. and Kelly, C. (2015) 'Food for thought: analysing the internal and external school food environment'. *Health Education*, 115(2), 152-170.

⁷ 'Regardless of the physical or locational context for local area plans, planning also has an important role to play in promoting and facilitating active and healthy living patterns for local communities. For example, the local area plan can promote active and healthier lifestyles by ensuring that:

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- exposure of children to the promotion of foods that are high in fat, salt or sugar is reduced such as the careful consideration of the appropriateness and or location of fast food outlets in the vicinity of schools and parks.'

⁸ See a list of current guidelines at See list of planning guidelines at:

<http://www.environ.ie/en/DevelopmentHousing/PlanningDevelopment/Planning/PlanningGuidance/>

is the means which has guided other planning issues of national importance, such as the provision of childcare facilities in new developments, through the *Guidelines for Planning Authorities – Childcare Facilities*⁹.

The IHF is aware that taking action on fast food outlets is only part of the solution, and there is a need to address the food available to students in schools, as well as the food available in shops near schools. Research by the IHF shows the high penetration of unhealthy food stuffs in Irish schools¹⁰, including a 2015 survey¹¹ of 39 post primary schools which showed that while 37% of schools offered full hot meals and 37% offered cold snacks like sandwiches, nearly 70% of schools offered hot snacks including sausage rolls, pizza slices and paninis, many of which are high in fat and salt. A quarter of schools had tuck shops and 47% had vending machines. The IHF is currently developing a Healthy Catering Award scheme to support schools to provide healthy food.

2. Allotments (CD44)

The IHF welcomes the support for allotments (CD44) as a means of providing better access to healthy food.

Draft Plan - CD44, p. 159

To facilitate the development of allotments of an appropriate scale on lands which meet the following criteria:

- Lands situated within or immediately adjacent to the edge of towns/villages;
- Lands that are easily accessible to the residents of a particular town or village;
- Where an adequate water supply can be provided;
- Where adequate road infrastructure and access exists/can be provided; and
- Where adequate parking facilities can be provided.

Allotment growing can provide access to healthy food, have wider environmental and social benefits for local people and improve the aesthetic appearance of unused land. The IHF recommends that the Development Plan also include actions to support private and public landholders to loan unused land to community groups to cultivate.

⁹ Government of Ireland (2001). Available at:

<http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownload,1601,en>.

¹⁰ Kelly, C. and NicGabhaunn, S. (2007) *Marketing of Foodstuffs in Post-Primary Schools in Ireland*. www.irishheart.ie

¹¹ Irish Heart Foundation (2015) Food provision in post primary schools. School survey, scoping exercise and pilot.

3. Specific goal of 'Healthy environments'

The IHF recommends the inclusion of 'Promotion of healthy environments' as the 12th goal of the Development Plan (2.3 Vision and Goals).

Draft Plan 2.3 Strategic goals, p. 12

Consistency; employment; transport; housing; vibrant settlements; enhance the rural area; infrastructure; communities; heritage; climate change; and quality design.

Development plans are a central means of implementing national policies in communities across Ireland. For this reason it is crucial that the Wicklow Development Plan reflects the Government's 2013 health and wellbeing framework, *Healthy Ireland 2013-25* which is seeking cross-sectoral working to achieve a healthy population. *Healthy Ireland* has made improving and protecting health a responsibility for all Government Departments, Local Authorities and all sectors of society. Under this national framework, planning authorities have a responsibility to promote healthy communities. The timeframe of the Wicklow Development Plan runs almost concurrently with the *Healthy Ireland* framework and will be one of the critical ways that the framework can be rolled out in Wicklow. In policy at local level, under the *Local Area Plans - Guidelines for Planning Authorities* issued under section 28 of the Planning and Development Act 2000-2012, there is also an onus on local authorities to incorporate a focus on active and healthy living in their communities.

In our initial submission to the Wicklow Development Plan in 2014, the IHF recommended that promotion of healthy environments / public health should be included as one of the Development Plan's strategic goals. In responding to this recommendation, the Chief Executive's report stated:

While the consideration of issues relating to health are not explicitly set out as mandatory objectives that a County Development Plan must include, the plan currently contains a number of goals and objectives which, when combined, aim to create a sustainable and healthy environment in which to live, work and visit. It is considered these goals and objectives promote healthy living from a land use perspective and it is intended the new County Development Plan will aim to strengthen these goals and objectives where possible...

While the plan may not explicitly make reference to the term public health, the overall goals and objectives of the plan in determining the shape and direction of the built and natural environment play a key role in influencing determinants of health. In the absence of specific guidance on the issue of public health and the introduction of health impact assessments it is intended that in formulating goals and objectives for the new plan that the issue of public health will be implicitly linked to the overarching goals of the plan

(First Chief Executive's Report, p. 115).

The IHF continues to believe that it is insufficient to have public health and the creation of health environments as an implicit objective within the Development Plan. Currently, the Wicklow Development contains 11 strategic goals. The IHF recommends an additional goal 'to promote a

healthy environment' be included to ensure that public health is prioritised within the Development Plan. Such an objective would ensure that the subsequent Local Area Plans will include a focus on promoting good health for local communities. Including a specific health objective would ensure that land use decisions, the planning process, etc within the draft strategy will be 'health checked'. This 'health checking' should include a commitment to invest money in infrastructure which promotes public health and reject proposals which will negatively impact the health of the community in Wicklow.

The IHF believes that given the increased emphasis on public health in national and local policy the Wicklow Development Plan should more fully recognise the wide potential for planning to improve health outcomes and to reduce health inequalities within the community. To-date the development planning process seems to have adopted a relatively narrow view of public health, primarily limited to the promotion of active travel and the provision of open spaces. The physical and built environments, including infrastructure planning, availability and accessibility of healthy foods, transport networks and the design of streets, can all affect the health and well being of individuals and communities.

The IHF recognises that the national guidance on including health priorities in development plans is relatively weak. The Chief Executive's report (p.115) also refers to the lack of guidance on public health and health impact assessment within development plans. We will continue to advocate at a national level for clear guidelines for local authorities to follow in this regard.

Conclusion

The IHF welcomes this second opportunity to comment on the development of the Wicklow Development Plan 2016 – 2022.

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The information provided in this publication was correct and accurate at the time of publication to the best of the Irish Heart Foundation's knowledge.