

**From** Director of Public Health : Dr Kay W Eilbert

I would like to offer comments on the Merton Sites and Policies plan. The comments are offered at the end of the consultation process due to the recent move of public health to local government.

Both the core strategy and these policies show some awareness of the influence of the built environment on health. About 70 -80 percent of what creates health comes from the interaction of factors outside health care services, including education and work/income, as well as the built environment – housing and our high streets, for example. The figure below sets out this relationship, showing that we are born with our biology/genetic inheritance and this interacts with our families and communities to influence our lifestyle choices. These are influenced by the opportunities to which we have access during our lives, especially education and work, which in turn are influenced by the wider socio-economic and political environment.



It would be good to reference the framework and its relationship to the policies set out in this plan. This plan seems to provide some advance in terms of health on the core strategy, which deals mainly with health care. These development management policies do go further by recognising the importance of the built environment. For example, work, open space, and sustainable transport are seen as adding value in themselves although without reference to their influence on health and well being. The plan makes mention of a requirement to undertake health impact assessment on planning proposals, which would contribute to a better understanding of the relationship between the built environment and health, among other things.

Specific comments:

Food and drink - Fast food outlets will be supported under certain conditions, as long as there is not an over-concentration. The definition seems to be not more than 3 in a parade of 10. It would be good to provide more specifics in this definition; for example, would this include a parade of shops opposite one that already has three. Further there

is mention of allowing FFOs at the edge of town centres. I would be concerned that this encroaches on residential areas.

There seems to be an interest in Fast food outlets, but not in controlling betting shops, payday loans and alcohol outlets, all of which have well researched evidence of negative impacts on health and wellbeing. I understand that other levers such as licensing in the case of alcohol can also be used to control the spread of these types of outlets.

I am concerned that classes of retail outlets seem to be protected, even though they may harm health; for example corner stores that are able to survive only by selling alcohol. I too can see the value of corner stores for a number of reasons but we might want to think about rebalancing viability and vitality of centres with a concern for the health of our residents.

I am concerned that retail outlets such as banks can change to betting shops with no further authorisation from government planners. This is something that needs to be watched as there is clear evidence that not only betting shops but also fast food, alcohol and payday loan outlets target deprived areas such as the east of Merton.

Health and wellbeing need to be considered in every decision the Council makes. Health is a resource, along with economic opportunities that contribute to the overall wellbeing of our residents.

Dr Kay W Eilbert

Director of Public Health

T. 0208 545 4836

M. 07792672283

London Borough of Merton  
3rd Floor, Merton Civic Centre  
London Road, Morden  
Surrey SM4 5DX

Email: [Kay.eilbert@merton.gov.uk](mailto:Kay.eilbert@merton.gov.uk)

Merton Council - Putting You First