



London Borough of Richmond upon Thames

Local Plan

Publication Local Plan

Health Impact Assessment

December 2016

Health Impact Assessment of the LBRuT Publication Local Plan

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1 Introduction

- 1.1 This document sets out the Health Impact Assessment (HIA) of the London Borough of Richmond upon Thames (LBRuT) Publication version of the Local Plan ('the Plan'). There is no statutory duty to undertake a HIA but it is considered best practice and reflects the Council's commitment to improving health in the borough.
- 1.2 Health Impact Assessment (HIA) is a process for assessing the health and wellbeing impacts (mental, physical and social) of a proposed development, a plan or policy or an initiative. This HIA aims to identify positive and negative health and wellbeing impacts that may arise from the policies and proposals in the Plan and it suggests measures for mitigating negative outcomes and enhancing positive outcomes. HIA is also useful in highlighting health inequalities.
- 1.3 HIA looks at health in its broadest sense using the wider determinants of health as a framework. The broad determinants of health are identified by the London Healthy Urban Development Unit (HUDU) as:
 - Housing quality and design
 - Access to healthcare services and other social infrastructure
 - Access to open space and nature
 - Air quality, noise and neighbourhood amenity
 - Accessibility and active travel
 - Crime reduction and community safety
 - Access to healthy food
 - Access to work and training
 - Social cohesion and lifetime neighbourhoods
 - Minimising the use of resources
 - Climate change
- 1.4 They are shown graphically in Figure 1 below:

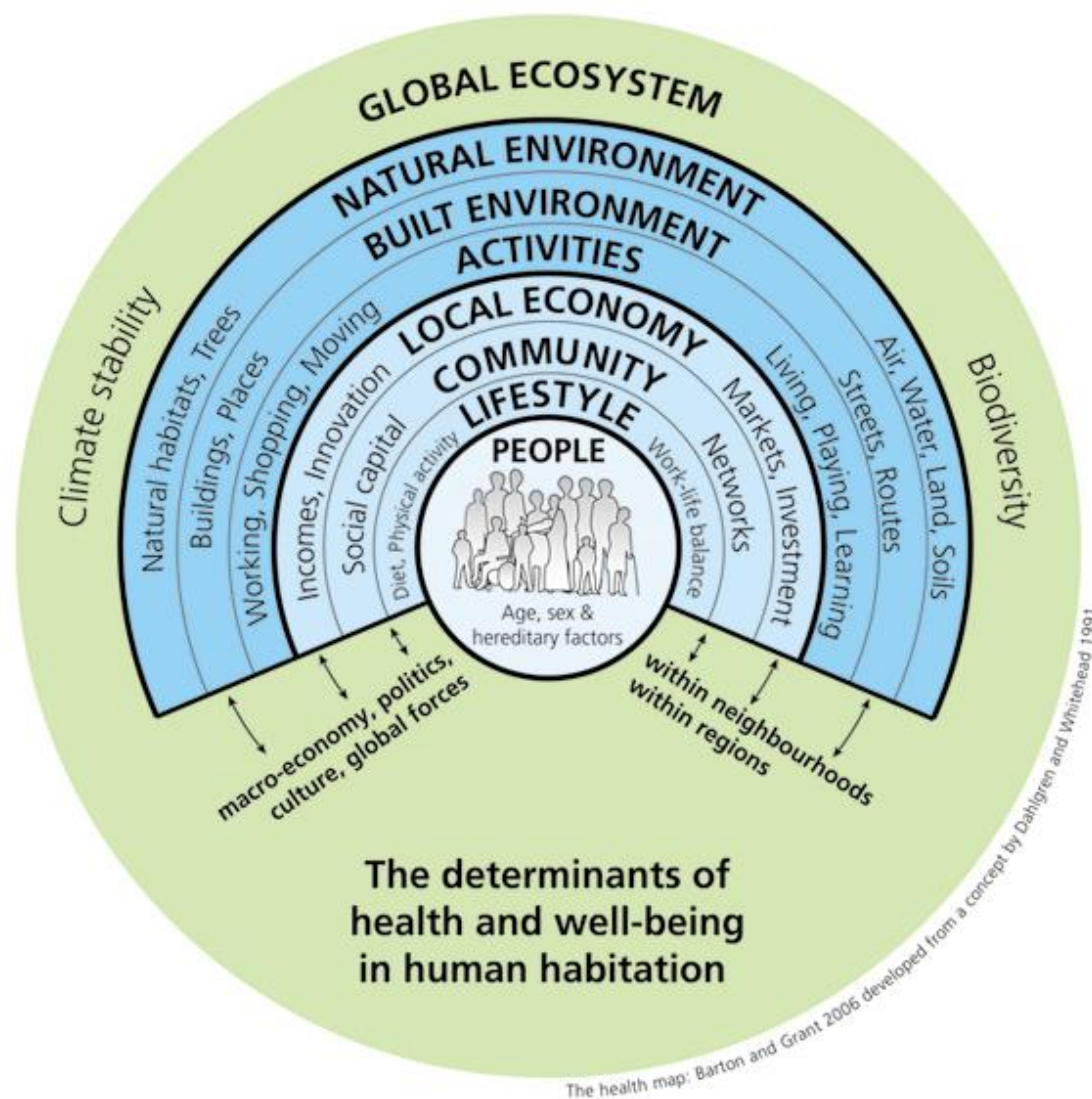


Figure 1: determinants of health and wellbeing

2 Methodology

The five key steps in undertaking a HIA are¹:

- 2.1 **Screening** - This step involves deciding whether a HIA needs to be completed and the form it should take, i.e. rapid or in-depth.
- 2.2 **Scoping** - This step involves establishing the terms of reference and agreed plan for the health impact assessment.
- 2.3 **Assessment** - This is the most important step in the HIA process which involves gathering information and completing an appraisal of the potential nature, size, likelihood and distribution of the health impacts of the local plan policies. It also provides an opportunity to

¹ Wales Health Impact Assessment Support Unit (WHIASU) Guide: www.wales.nhs.uk/sites3/Documents/522/improvinghealthenglish.pdf

suggest possible ways of maximising the health benefits and minimising the risks, particularly to the least healthy or most disadvantaged population groups.

- 2.4 **Reporting** – collating and presenting the information gathered at the assessment stage.
- 2.5 **Monitoring and evaluation of the process** – assessing how effective the health impact assessment process is in influencing decisions within the Council.

3 Policy Context

- 3.1 The Local Plan follows the principles set out in the National Planning Policy Framework (NPPF). At the heart of the NPPF is a presumption in favour of sustainable development which is embedded in the Local Plan. The NPPF (Section 8) sets the framework for how the planning system contributes to creating healthy communities and this shapes the approach taken in the updated Local Plan.
- 3.2 The London Plan provides a strong policy framework for integrating health and spatial planning. It seeks to improve health and address health inequalities by requiring new developments to be designed, constructed and managed in ways that improve health and promote healthy lifestyles to reduce health inequalities (Policy 3.2).

4 Local Plan

- 4.1 The Local Plan will provide the strategic planning framework for the borough, guiding development over the next 15 years. The Local Plan plays a key role in facilitating the creation of healthy environments and planning policies can therefore have a long-term impact on residents' health and well-being. The Spatial Strategy seeks to ensure that development results in patterns of land uses and facilities that make the healthy choice the most convenient and attractive option for residents, helping them to lead healthier lives.
- 4.2 The updated Local Plan is a review and consolidation of all existing policies in the Core Strategy and Development Management Plan to bring the policies in line with national and regional policy and reflect the most up to date evidence. The Publication Plan takes forward 45 borough-wide development policies. In addition, the Plan takes forward the specific allocations for 28 sites, which are considered to assist with the delivery of the Spatial Strategy and to ensure sufficient land is allocated to help meeting present and future needs for housing, employment, retail, social infrastructure and leisure facilities. The Twickenham Area Action Plan (adopted in July 2013) remains in place and will not be superseded by the new Local Plan.

- 4.3 Following an informal scoping consultation throughout January 2016, a statutory public consultation on the pre-publication version of the Local Plan took place between 8 July and 19 August 2016. 101 responses were received and these were taken into account in the development of the publication version of the Plan. The publication version of the Plan is subject to a 6 week public consultation from 4 January until 15 February 2017.
- 4.4 Once the consultation on the Plan closes, the HIA, including all consultation responses, will be submitted alongside the Plan as a supporting document. Adoption of the Plan is anticipated to be in early 2018.

5 HIA Step 1: Screening

- 5.1 The built and natural environment are an important determinant of health (see figure 1), and the Local Plan will play a key role in shaping the built and natural environment across the borough. Therefore it is considered that the Plan will have an important impact on people's health and wellbeing and it is therefore essential that an HIA is carried out.
- 5.2 A number of policies have been identified as being particularly relevant to the determinants of health and wellbeing, including:
- **Housing quality and design** – Policy LP 34 New Housing; Policy LP 35 Housing Mix and Standards; Policy LP 36 Affordable Housing; Policy LP 37 Housing Needs of Different Groups
 - **Access to healthcare services and other social infrastructure** – Policy LP 28 Social and Community Infrastructure; Policy LP 29 Education and Training; Policy LP 30 Health and Wellbeing; Policy LP 31 Public Open Space, Play Space, Sport and Recreation
 - **Access to open space and nature** – Policy LP 12 Green Infrastructure; Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space; Policy LP 14 Other Open Land of Townscape Importance; Policy LP 15 Biodiversity; Policy LP 16 Trees, Woodlands and Landscape; Policy LP 31 Public Open Space, Play Space, Sport and Recreation
 - **Air quality, noise and neighbourhood amenity** – Policy LP 8 Amenity and Living Conditions; Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination; Policy LP 22 Sustainable Design and Construction; Policy LP 44 Facilitating Sustainable Travel Choices

- **Accessibility and active travel** – Policy LP 1 Local Character and Design Quality; Policy LP25 Development in Centres; Policy LP27 Local Shops, Services and Public Houses; Policy LP 44 Facilitating Sustainable Travel Choices
- **Crime reduction and community safety** – Policy LP 28 Social and Community Infrastructure
- **Access to healthy food** – Policy LP 30 Health and Wellbeing; Policy LP 32 Allotments and food growing spaces; Policy LP27 Local Shops, Services and Public Houses
- **Access to work and training** – Policy LP25 Development in Centres; Policy LP 29 Education and Training; Policy LP 40 Employment and local economy; Policy LP 41 Offices; Policy LP 42 Industrial Land and Business Parks
- **Social cohesion and lifetime neighbourhoods** – Policy LP 28 Social and Community Infrastructure; Policy LP 30 Health and Wellbeing
- **Minimising the use of resources** – Policy LP 20 Climate Change Adaptation Policy; Policy LP 22 Sustainable Design and Construction; Policy LP 23 Water Resources and Infrastructure
- **Climate change** – Policy LP 20 Climate Change Adaptation Policy; LP 22 Sustainable Design and Construction

5.3 Given that the Local Plan sets out a positive vision for the future development of the borough, aiming to protect the interests of those who live, work and visit the borough, it is anticipated that the health and wellbeing impacts of the policies will be largely positive.

6 HIA Step 2: Scoping

Timescales

6.1 This HIA is an update of the first HIA which was undertaken for the Pre-Publication version of the Local Plan (July 2016). This is the HIA for the Publication Plan which is subject to six weeks consultation between 4 January and 15 February 2017. After the final public consultation, the Plan will be submitted to the Secretary of State and subject to Examination in Public later in 2017.

Geographical boundaries

6.2 The HIA focuses on the whole of the London Borough of Richmond upon Thames.

Stakeholders

- 6.3 A Steering Group has not been established in undertaking this HIA. The draft Local Plan has been subject to consultation, including engagement with health bodies as part of the ongoing Duty to Cooperate.

Scale

- 6.4 Due to time and resource availability, a rapid HIA has been undertaken.

Focus

- 6.5 Evidence (presented below) suggests that the main health and wellbeing issues in the borough include the ageing population, an emerging childhood obesity issue, health inequalities, impacts associated with high air pollution and pressure on health infrastructure.
- 6.6 Based on the identified health issues in the borough, vulnerable groups have been identified as being older people, children and those living in areas of relative deprivation.
- 6.7 The HIA therefore focuses particularly on these areas.

7 HIA Step 3 and 4: Assessment and reporting

- 7.1 This is the most important step in the HIA process which involves gathering information and completing an appraisal of the potential nature, size, likelihood and distribution of the health impacts of the Local Plan policies. It also provides an opportunity to suggest possible ways of maximising the health benefits and minimising the risks, particularly to the least healthy or most disadvantaged population groups.
- 7.2 The HUDU Rapid Health Impact Assessment Matrix (**Appendix 1**) has been completed to identify the possible scale of the health impacts resulting from the policies within the Local Plan and an assessment of whether these are likely to be positive or negative. The matrix is categorised by the 11 determinants of health listed in Section 1 above, focusing on impacts that are directly or indirectly influenced by planning decisions and the built environment.
- 7.3 The following has been provided:
- A profile of the borough informed by evidence set out in various documents including the Council's Joint Strategic Needs Assessment (JSNA) and the Local Plan Revised Sustainability

Appraisal Scoping Report and Sustainability Appraisal of the
Publication Local Plan;

- An assessment of the potential health impacts, informed by knowledge of the wider determinants of health and an understanding of how these factors affect people's health and well-being;
- A summary of the impact of the policies on the health issues that have been identified to be of importance in the borough;
- Recommendations for enhancing potential positive effects and mitigating potential negative effects of the policies within the Local Plan.

7.1 Borough profile

Population

- 7.4 The 2011 Census indicated that there were 187,000 people living in the borough, an increase of 8.5% since 2001. The population of Richmond is made up of 48.7% men and 51.3% women.

General health

- 7.5 Richmond has a much better rate of people reporting to be in very good health at 57%, than either London (49%) or England (47%). The proportion of the people in the borough self-reporting as in either bad health or very bad health was 3% compared to 5% in London and 6% in England.
- 7.6 The 2011 Census data show that 11.5% of the borough's population felt that their day to day activities were limited either a lot or a little by their health, which compares to 14.1% in Greater London and 16% in England.

Age

- 7.7 13.5% of the population of Richmond borough are older people aged 65+ (compared to an average of 11% across London); by 2025 it is anticipated that there will be an additional 8,400 people over the age of 65. Over the next 5 to 10 years, there will be significant numbers of people moving into the 75+ age bracket which is likely to lead to an increase in demand on services. 2.1% of the population are aged 85 and over.
- 7.8 In addition, Richmond has a significantly lower percentage of people aged 20-24 (4.9%) compared to London (7.7%) and 25-29 (6.5% in Richmond compared with 10% in London).

Isolated older people

- 7.9 16% of over 65s live alone in Richmond compared with 9% London-wide. Richmond also has the highest proportion of people aged over 75 and living alone in London (51% v 35% London-wide) and there are increasing numbers of older people living at home with multiple long term conditions (physical and mental) such as dementia.

Life expectancy

- 7.10 Borough residents have amongst the highest life expectancy at birth in the UK but there is a life expectancy gap of about 6 years and 4 years for men and women respectively between the best and worst deprivation decile scores.
- 7.11 Women experience longer life expectancy than men, so by the time people are aged 85 years and over there are more than twice as many women as men.

Deprivation

- 7.12 According to the English Indices of Multiple Deprivation 2015, there are pockets of relative deprivation in the wards of Hampton North, Heathfield and Barnes. One small area, in the ward of Hampton North in the far south west of the borough, falls into the second 20% most deprived small areas in England.
- 7.13 The wards of Whitton, Heathfield and Hampton North have higher proportions of people who have identified as being in very bad health – up to 1.13% of the population in Heathfield and Hampton North. This corresponds with deprivation in the borough - both of these wards include some of the very few small pockets of deprivation in the borough and this reinforces the link between ill health and deprivation whereby those living in areas of deprivation more likely to suffer from long term health conditions.

Obesity

- 7.14 Evidence suggests there is an emerging obesity issue in the borough. In reception year, 18.1% of children are overweight or obese and in Year 6 the prevalence rises to 24.4%. 45% of adults (approximately 65,000) are estimated to be obese or overweight.

Ethnicity

- 7.15 Diversity in the borough has increased since 2001. The 2011 census indicates that 71.44% of the borough's residents are of white British ethnicity (compared to 78.72% in 2001). 14% of Richmond residents are from Black and Minority Ethnic (BME) groups, lower than 40.2% across London as a whole.

- 7.16 There are variations in ethnic diversity between Richmond's wards. In particular, Heathfield and Whitton wards have higher proportions of BME populations, mainly from Asian groups. Different ethnic groups have different needs in terms of health and social care services and other types of community infrastructure.

Employment

- 7.17 The number of people in employment in Richmond is comparatively high with 69.8% of the population aged 16-74 economically active and in some form of paid employment, compared to 62.1% in England as a whole. Unemployment is low at just 3%. The percentage of self-employed people remains high at just under 15% compared to 9.8% for England.

Education

- 7.18 There are 10 secondary schools, 44 primary schools and two special schools. The standards achieved by pupils in Richmond's primary and secondary schools and academies are above the national average. The population of the borough is generally well educated, with a well-qualified workforce.

Health infrastructure

- 7.19 There are 28 GP Practices across the borough with over 204,000 registered patients. There is pressure on health facilities with some shortfall in GP floorspace in each of the four commissioning clusters in the borough and a need for greater provision of pharmacy services.

Open space

- 7.20 In total there are 200 sites identified in the Borough as open space provision. This is an equivalent of 527 hectares across the Borough and over 83% of these are assessed as being of a high quality. Despite the generally good provision, some areas of open space deficiency exist at Upper Richmond Road West, between Park Road / Uxbridge Road Hampton Hill, Fulwell, South Twickenham, parts of St Margaret's and parts of Whitton.

Housing

- 7.21 The borough has a large owner occupied sector with nearly 64% of households owning their home either outright (29.8%) or with a mortgage (33.8%). Owner occupation has however declined since 2001, most likely as a reflection of the increasing issue of affordability as well as the increase in the size of the private rented sector. Average house prices in the area are much higher (£681,964 according to Land Registry, September 2016) than the National

Average (£234,250). This makes it difficult for people to afford to buy homes.

- 7.22 The private rented sector has increased from nearly 17% of households in 2001 to housing nearly 22% of households in 2011. Housing association properties housed 12.6% of households in the borough in 2011 and Richmond still has the fourth smallest social housing sector in Greater London in which to address housing need.

Air quality

- 7.23 The whole Borough was declared an Air Quality Management Area in 2000, as air pollution was found to exceed Government limits for nitrogen dioxide (NO₂) and PM₁₀ dust particles. The borough's pollution monitors indicate that the long term pollution trend for these has not varied much since then. The worst affected areas are all at locations near to busy roads.

7.2 Health impacts

- 7.24 Evidence demonstrates that the health and wellbeing issues in the borough are:

Ageing population

- The increasingly ageing population will require additional services and facilities to support its well-being.
- The high levels of older people living alone mean that more services will be required closer to home.
- The number of people with physical long term conditions and with mental health conditions (including dementia) is expected to increase in line with the population increase. Also, the proportion of people with multiple long term conditions is expected to increase by an estimated 50% over the next ten years.
- A higher than average percentage of people die in winter months (excess winter deaths) in Richmond (21%) compared with the England average (19%). This equates to 75 additional deaths per year.

Childhood obesity

- There is an emerging issue with childhood obesity in the borough. Approximately 1,500 primary school aged children are obese, with prevalence increasing from 6.5% in reception to 13% in year 6. In this age group in 1984, obesity was about 0.9% nationally. When considering those in the obese and overweight category together,

this applies to 18.1% children in reception year, rising to 24.4% in Year 6.

Health inequalities

- There is a life expectancy gap of about 6 years and 4 years for men and women respectively between the best and worst deprivation decile scores, mainly due to coronary heart disease, chronic obstructive pulmonary disease and cancers.
- Eleven Lower Super Output Areas with nearly 18,000 (9%) residents including some of the estimated 3,900 children living in poverty have levels of deprivation that are above average for England (Index of Multiple Deprivation, 2010).
- There are higher levels of poor health in areas of deprivation. There are pockets of local deprivation in the wards of Hampton North, Heathfield and Barnes.
- There is wide variation between schools in the numbers of children eligible for free school meals and a gap in educational attainment.

Risks associated with high air pollution

- Air pollution is high in the borough and The Borough has been designated an 'Air Quality Management Area' (AQMA) for both nitrogen dioxide (NO₂) and PM₁₀.
- Air pollution can play a role in many chronic conditions such as asthma, heart disease, cancer and neurological changes linked to dementia.
- The main source of pollution is the large volume of road and air traffic so communities near busy roads are more at risk of negative effects.

Pressure on health infrastructure

- There is pressure on health facilities across the borough with some shortfall in GP floorspace in each of the four commissioning clusters in the borough.
- With a projected increase in population size, population density will increase. This will result in an increasing demand for statutory services, including health and social care.
- A more ethnically diverse population will have implications for health promotion and service planning, particularly awareness programmes for screening, and conditions such as diabetes and circulatory disease

- Richmond CCG's priority is for provision of more health services based in the community rather than hospitals, closer to where people live.

7.25 A variation on the HUDU Rapid Health Impact Assessment Matrix has been completed as a method of identifying how the Local Plan policies are likely to impact on the identified health issues affecting the borough. **Refer to Appendix 1.** It may be useful to refer to the matrix before reading the reporting section below.

7.26 The matrix shows that the policies in the Local Plan will, overall, have a very positive impact on health and wellbeing of residents and communities in the borough. All of the wider determinants of health are addressed in some way by the policies within the Plan.

7.3 Reporting

7.26 Below is a summary of the impact of the policies on the health issues that have been specifically identified to be of importance in the borough.

Ageing population

7.27 A number of policies are considered to impact positively on the needs of the ageing population.

7.28 The design of the built environment is important for helping people to move around easily and this is particularly important for the older population who may experience mobility difficulties or mental health conditions such as dementia. **LP1** states that the public realm should be designed to be safe and accessible for all ages and levels of disabilities. **LP30** emphasises that a high quality and accessible urban environment, including environments that are dementia-friendly with more seating opportunities and access to public toilets, will enable the older population to remain independent and active for longer. This approach is considered to reduce the need for extensive adaptations to buildings.

7.29 **LP28** stresses the importance of access for all to social infrastructure facilities, including health facilities, and **LP30** states that existing health facilities should be retained where these continue to meet, or can be adapted to meet, residents' needs. Easy access to health facilities will be beneficial for the older population, particularly given the increasing proportion of older people living at home with multiple health conditions. This is supported by Richmond CCG's priority for provision of more health services based in the community, closer to where people live. Access to wider social infrastructure and local community facilities such as leisure facilities and shops will encourage opportunities for social interaction and

active living for older people which will help to reduce feelings of isolation.

- 7.30 LP28 also encourages co-location of facilities, and LP27 seeks to maintain local shops and services within walking distance of where people live. This is outlined in the Plan's Spatial Strategy which seeks to reinforce the traditional village based structure, ensuring a range of housing, local shops and services as well as employment are available at the most local level possible. These approaches will promote easy access to community facilities, reducing the need to travel and therefore assisting those with mobility difficulties.
- 7.31 Similarly, LP25 seeks to guide development to the areas of the borough that are most accessible by public transport and LP44 seeks to make improvements to the accessibility of transport facilities and interchange arrangements. Older people tend to be more dependent on public transport and they may experience mobility difficulties, therefore these policies which ensure shops and services are easily accessible by public transport are considered to benefit the older population.
- 7.32 Policy LP22 seeks to achieve the highest standards of sustainable design and construction. More energy efficient homes will lead to warmer homes in the winter and cooler homes in the summer. Older people are more vulnerable to temperature extremes so this policy may be beneficial in addressing the identified issue of excess winter deaths in the borough.
- 7.33 Housing policies also consider the need of the older population. LP35 seeks to ensure that homes are accessible, adaptable or wheelchair-friendly meeting the higher optional Building Regulations and also recognises that some older people are seeking opportunities to downsize. Policy LP37 seeks to ensure provision of housing to meet specific community needs including sheltered housing with care support, staffed hostels, residential care homes/nursing homes and extra-care housing. Provision of adequate sheltered housing and wheelchair accessible homes will be of key importance for meeting the needs of the older population now and in the future.
- 7.34 No policies have been identified as having a negative impact on the older population.

Childhood obesity

- 7.35 Some key policies which 1) promote increased activity levels amongst children and 2) reduce access to unhealthy foods have been identified as impacting positively on childhood obesity levels.

- 7.36 [LP12](#) seeks to protect and enhance the borough's substantial provision of green infrastructure and [LP31](#) encourages development of public open space and play space. These policies will help to promote sport and recreation and more healthy and active lifestyles amongst children and will also encourage children to play and build social networks with other children, therefore having both physical and mental health and wellbeing benefits. [LP31](#) specifically seeks to ensure provision of parks and open spaces close to homes and particularly within identified areas of deficiency, which will be beneficial for all children. This approach is reinforced in Policy [LP30](#) which recognises the value of open and natural spaces for people's physical and mental wellbeing.
- 7.37 [LP30](#) places a restriction on development of new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school. A map showing the 'restriction zones' is available. This policy will be important in restricting the availability of unhealthy foods to school children. Childhood obesity amongst school age children is a concern as evidence suggests that obese children are more likely to be obese adults and are at an increased risk of developing further health difficulties. Access to fast food takeaways detracts from the ability to adopt healthy lifestyles and undermines healthy eating initiatives that may be in place at the school. Therefore, this policy is considered to be particularly beneficial in addressing the increasing levels of childhood obesity in the borough.
- 7.38 No policies have been identified as having a negative impact on childhood obesity.

Health inequalities

- 7.39 Health inequalities are defined by the UK Government as 'inequalities in respect of life expectancy or general state of health which are wholly or partly a result of differences in respect of general health determinants.' Those living in areas of relative deprivation are more likely to have poorer health, higher levels of unemployment and potentially be living in sub-standard housing.
- 7.40 [LP29](#) seeks to secure local job and training opportunities which is considered to be particularly beneficial for unemployed residents, as it is known that unemployment can lead to reductions in personal self-esteem and increase inequalities. This policy states that where the employment opportunities generated by construction as well as the end use of the development create more than 20 FTE jobs a Local Employment Agreement will be required. [LP29](#) also supports provision of educational and training facilities which is beneficial in reducing educational inequalities, improving self-esteem and job opportunities.

- 7.41 Related to this, [LP40](#) encourages the provision of affordable and flexible workspaces such as co-working space, which may be beneficial in providing new types of employment opportunities, perhaps most attractive to the younger generation looking to enter the workforce or for those looking to start new small businesses locally. This policy requires the provision of affordable office space (less than 80% of comparable market rates) within major developments where over 1,000sqm of office floorspace is proposed.
- 7.42 [LP36](#) seeks to secure 50% affordable housing with a tenure mix of 40% housing for rent and 10% intermediate housing and this should reflect the need for larger rented family units. This policy is important in delivering sufficient affordable housing in the borough and will be beneficial for those in housing need, therefore helping to reduce inequalities. Furthermore, poor quality housing is associated with increased risk of cardiovascular diseases, respiratory diseases and depression and anxiety. [LP35](#) states that all homes, including affordable homes, should meet high design and construction standards which will be important in reducing health impacts of poor quality housing in areas of deprivation.
- 7.43 Other policies within the Local Plan seek to improve the built environment ([LP1](#)) and provide easy access to leisure, health facilities and other social infrastructure facilities ([LP28](#) and [LP30](#)). These policies encourage healthy and active lifestyles for all and increasing the quality of life and sense of wellbeing of the whole community. These approaches are an important contributor towards reducing ill health and therefore reducing the difference in mortality rates between the richest and poorest areas of the borough and also.
- 7.44 No policies have been identified as having a negative impact on health inequalities in the borough.

[Risks associated with high air pollution](#)

- 7.45 The whole of the borough has been classified an Air Quality Management Area (AQMA). Poor air quality can have long term negative impacts on health including lung and heart conditions, cancer and diabetes. [LP10](#) recognises that good air quality is vital to the health and wellbeing of the borough and states that the impact of development on air quality must be considered very carefully and minimised where possible. It addresses this by seeking financial contributions towards air quality measures where a proposed development has the potential to impact negatively on air quality.
- 7.46 In relation to pollution from buildings, policy [LP22](#) states that applicants must reduce CO2 emissions in line with the Energy Hierarchy. The borough is seeking ambitious zero carbon standards

in major residential developments from 2016 and in major commercial developments from 2019. In order to achieve zero carbon standards, the applicant must make an on-site reduction in CO2 emissions of 35% beyond Building Regulations 2013 and the remainder, to 100%, is offset by a contribution to the Council carbon offset Fund. This fund will be spent on carbon reduction measures within the borough, thereby helping to reduce air pollution.

- 7.47 A number of other policies in the Plan, as well as the overarching Spatial Strategy, seek to ensure good accessibility to public transport, local services and facilities, which should help to reduce car use and therefore contribute towards improving air quality. For example [LP44](#) encourages high trip generating development to be located in areas with good public transport and seeks to ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. [LP25](#) sets out which centres different types of development should be located within and this is largely based on their levels of accessibility, for example major development should be located in the most accessible centres (Richmond and Twickenham) with local services and facilities in the smaller centres.
- 7.47 [LP28](#) states that larger multi-use social infrastructure facilities should be located in areas of good public transport accessibility, again reducing the need to travel by car, and similarly [LP30](#) encourages development to ensure easy access to public transport in order to reduce car dependency. All of these policies seek to ensure easy access for all residents to all services, facilities and public transport. This will encourage greater levels of walking and cycling and fewer car journeys which will help to reduce air pollution.
- 7.49 One policy has been identified as having a neutral (rather than a positive) impact on air quality and that is [LP45](#) which sets out the Council's approach towards parking within new developments. On the one hand, the Council has parking standards that are in the upper limit of London Plan parking standards. This is seen as essential to minimise impacts on the local road network, street congestion and amenity in this outer London location, however this could potentially encourage higher car ownership which can cause higher air pollution which is detrimental to health. On the other hand, the policy also states that car free housing developments may be appropriate in the most accessible areas, car share facilities and car clubs are encouraged, and charging facilities for electric vehicles should be provided, all of which demonstrate the Council's awareness of and attempts to reduce the impacts of air pollution from vehicular traffic. It is noted that the parking standards will be developed and further refined for the Publication version of the Plan. Therefore, on balance, this policy is considered to have a neutral impact on air quality and its associated health impacts.

7.50 No policies have been identified as having a negative impact on air pollution. It should be noted here that the Council is opposed to expansion at Heathrow Airport because of the negative impacts on traffic, noise and air quality that will result (as set out in the Council's Community Plan and Corporate Plan as well as in the introductory section of the Local Plan).

Pressure on health infrastructure

7.51 The main organisation responsible for health infrastructure in the borough is the Richmond Clinical Commissioning Group (CCG) who, along with NHS England, plans and commissions health care services for the borough. The Local Plan supports the CCG and NHS England in protecting existing health facilities and encouraging provision of new or improved facilities appropriate to local needs. There are two key policies that are considered to positively address this health issue. LP28 seeks to ensure adequate provision of social infrastructure, including health infrastructure, and also states that development proposals for 10 or more residential units should assess the potential impacts on existing social infrastructure, including healthcare services. In addition, Policy LP30 states that existing health facilities should be retained where these continue to meet, or can be adapted to meet, residents' needs.

7.52 No policies have been identified as having a negative policy on health infrastructure.

7.4 Mitigating / enhancing health impacts

7.53 The right hand column of the HIA table in **Appendix 1** identifies mitigating / enhancing measures that could enhance positive impacts of the policies or reduce negative impacts. The policies have consistently been identified to have a positive impact on the health issues within the borough and therefore the measures in the column are generally measures for enhancing the positive impacts of the policies. It is anticipated these actions will be revisited as the Local Plan is progressed to adoption to ensure they continue to improve health outcomes.

7.54 The measures identified will not be reiterated here but are generally actions for the Council to implement through use of the policies in the planning process in collaboration with the developer or providers. These would take place as part of the planning application process. Policy LP30 requires a Health Impact Assessment to be submitted with all major development proposals which will assess health impacts of site-specific proposals as they come forward,

8 HIA Step 5: Monitoring and evaluation of the process

- 8.1 The aim of a HIA is to inform plan-making and decision-making and it is therefore useful to evaluate the extent to which the HIA has influenced development of healthy environments in borough. This will be undertaken after the adoption of the Plan (anticipated for 2018), through the Council's AMR process.

9 Conclusion

- 9.1 This HIA has demonstrated that the policies in the Local Plan are not anticipated to have any negative effects on the health and wellbeing of the borough residents. The policies provide a number of hooks and recommendations for improving the health outcomes.
- 9.2 This positive outcome is seen to be a reflection of both the increasing amount of evidence available about the inter-relationship between the environment and people's health, which mean that health considerations have been a key thread throughout all of the policies in the Plan, as well as a reflection of the high levels of collaboration that already exist between planning and public health teams at the Council.

Appendix 1: Health Impact Assessment

(L) Low
 (M) Medium
 (H) High
 (+) Positive
 (-) Negative
 (N) Neutral

Assessment criteria	Relevant Local Plan policies and discussion	Impact of policies on health and wellbeing	Recommended mitigation or enhancement actions
1 Housing quality and design			
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?	Lifetime Homes Standards have been withdrawn by Government but Policy LP35 states that 90% of all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings'. Well-designed homes will be beneficial for the health of the whole population, particularly those who require adaptable, accessible or wheelchair homes.	H+	Council to ensure the necessary standards are secured through planning conditions.
Does the proposal address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?	<p>Policy LP37 seeks to ensure provision of housing to meet specific community needs including sheltered housing with care support, staffed hostels, residential care homes/nursing homes and extra-care housing.</p> <p>Policy LP35 seeks to ensure homes are accessible, adaptable or wheelchair-friendly, in line with Building Regulations.</p> <p>Given the ageing population and increasing numbers of older people living alone, provision of adequate sheltered housing and wheelchair accessible homes will be essential in meeting the needs of occupants now and in the future, thereby helping to address this identified health issue.</p>	H+	<p>In order to be clear on the needs of older people locally, early engagement between the Council, providers and developers is beneficial.</p> <p>Council to ensure the necessary housing standards are secured through planning conditions.</p>

Assessment criteria	Relevant Local Plan policies and discussion	Impact of policies on health and wellbeing	Recommended mitigation or enhancement actions
	<p>Policy LP30 on Health and Wellbeing specifically considers the needs of older people, stressing that a high quality and accessible urban environment will enable the older population to remain independent and active for longer, thereby reducing the need for extensive adaptations to buildings.</p>		
<p>Does the proposal include homes that can be adapted to support independent living for older and disabled people?</p>	<p>Policy LP35 seeks to ensure homes are accessible, adaptable or wheelchair-friendly, in line with Building Regulations.</p> <p>Policy LP37 seeks to ensure provision of housing to meet specific community needs including extra-care housing.</p> <p>Both policies will be beneficial in providing for the increasing proportion of older residents living in the borough.</p>	H+	<p>Council to ensure the necessary standards are secured through planning conditions.</p>
<p>Does the proposal promote good design through layout and orientation, meeting internal space standards?</p>	<p>Policy LP1 seeks to ensure that development is of a high design quality including consideration of layout, siting, access inclusive design, connectivity, natural surveillance and orientation.</p> <p>Policy LP35 states that all new housing developments are required to comply with the space standards (local or national).</p> <p>Policy LP8 seeks to protect the amenity and living conditions of residents.</p> <p>All of these policies will help ensure homes have adequate living space to reduce overcrowding, and adequate daylight and ventilation to ensure healthy living environments and improve quality of life.</p>	H+	<p>Council to ensure the necessary standards are adhered to in proposals and where appropriate secured through planning conditions.</p>
<p>Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?</p>	<p>Policy LP35 seeks to ensure provision of an appropriate mix of unit sizes and types.</p> <p>Policy LP36 seeks to secure provision of affordable housing with the aim that 50% of all housing units are affordable, with a tenure mix of 40% housing for rent and 10% intermediate housing, reflecting the local need for larger rented family units.</p>	H+	<p>Early engagement between the Council, developer and Registered Provider is important in ensuring provision of affordable housing to meet local needs.</p>

Assessment criteria	Relevant Local Plan policies and discussion	Impact of policies on health and wellbeing	Recommended mitigation or enhancement actions
	Provision of a range of types and sizes of affordable housing will be beneficial for residents in housing need who may be living in areas of relative deprivation, particularly if there are families living in overcrowded or unsuitable homes. These policies will help in creating socially mixed and inclusive communities and help to reduce health inequalities.		Council to continue to rigorously evaluate viability appraisals to ensure the maximum affordable housing is secured.
Does the proposal contain homes that are highly energy efficient (eg a high SAP rating)?	Policy LP22 seeks to achieve the highest standards of sustainable design and construction including zero carbon standards for major residential schemes (and for major commercial schemes from 2019) and a 35% reduction in CO2 emissions beyond Building Regulations 2013 in all other cases. A carbon-offset fund has been implemented to enable zero carbon standards. In addition, where the 35% reduction cannot be achieved a cash-in-lieu contribution to the carbon offset fund can be made. Monies collected in the carbon offset fund will be spent on identified carbon reduction projects in the borough. More energy efficient homes will lead to lower energy costs and reduce overheating and also lead to warmer homes for residents in the winter. This will help to address the identified issue of excess winter deaths in the borough.	H+	Contributions to the carbon offset fund – both for achieving zero carbon standards and cash-in-lieu contributions against the 35% CO2 reduction target – will be sought where viable to enable to council to collect a ‘pot’ of money to be spent on carbon reduction projects in the borough. This will improve air quality and health.
2. Access to healthcare services and other social infrastructure			
Does the proposal retain or re-provide existing social infrastructure?	Policy LP28 seeks to ensure adequate provision of social infrastructure and recognises the importance of this for quality of life and residents' social and mental wellbeing. Loss of social infrastructure is resisted and the Council's approach towards re-providing social infrastructure where an existing social infrastructure use ceases has been strengthening as the policy now requires marketing. This policy will help to ensure residents have access to local services and facilities, which are important in encouraging social contact thereby ensuring that residents, particularly older residents who may be living alone, do not become isolated which can lead to ill health.	H+	This policy will be enhanced through the completion of infrastructure mapping to set out where shortfalls of particular social infrastructure exists.
Does the proposal	Policy LP28 states that development proposals for 10 or more	H+	Developers need to be

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assess the impact on healthcare services?	<p>residential units should assess the potential impacts on existing social infrastructure, including healthcare services.</p> <p>Policy LP30 states that existing health facilities should be retained where these continue to meet, or can be adapted to meet, residents' needs.</p> <p>Both policies will help to ensure access to health services for all residents which is beneficial in preventing ill health and reducing health inequalities.</p>		guided towards liaison with Richmond CCG and NHS England to ensure needs for healthcare infrastructure are fully understood and considered.
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?	Policy LP30 states that existing health facilities should be retained where these continue to meet, or can be adapted to meet, residents' needs. This will help to ensure residents have access to health facilities which is beneficial in preventing ill health.	H+	Applicants need to work closely with the CCG and NHS England to ensure any new or upgraded facility meets NHS requirements.
Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g. schools, social care and community facilities?	<p>Policy LP28 states that development proposals for 10 or more residential units should assess the potential impacts on existing social infrastructure, and this includes schools, social care and community facilities. This policy will help to ensure all residents have access to social infrastructure which is an important factor in community health and wellbeing.</p> <p>There are other policies dealing with specific community uses including LP29 on education, LP30 on health and wellbeing and LP31 on public open space.</p>	H+	Applicants need to be guided towards liaison with the appropriate providers to ensure any proposals do not negatively impact on social infrastructure.
Does the proposal explore opportunities for shared community use and co-location of services?	Policy LP28 specifically states that new social and community infrastructure should be provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.	H+	Council and providers to work together to ensure the appropriate management arrangements and community use agreements are in place.
Does the proposal	Policy LP29 supports the provision of facilities to meet the needs for	H+	Liaison between developer,

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contribute to meeting primary, secondary and post 19 education needs?	primary and secondary school places and the Plan identifies new sites for educational use in the Site Allocations chapter. This is beneficial in reducing educational inequalities, improving self-esteem and job opportunities.		Council and Education Funding Agency will be important in meeting education needs.
3. Access to open space and nature			
Does the proposal retain and enhance existing open and natural spaces?	<p>Policy LP12 seeks to protect and enhance green infrastructure.</p> <p>Policy LP30 recognises the value of open and natural spaces for people's physical and mental wellbeing.</p> <p>The physical and mental benefits of access to green space are well documented and include reduced stress and mental illness, increased exercise and physical activity, reduced obesity, reduced anti-social behaviour, improvements in air and noise quality and reduced health inequalities, as well as numerous social and economic benefits. Therefore, these policies will have positive impacts on residents' health and wellbeing.</p>	H+	Opportunities to create new Public Open Space will generally be limited in the borough as many areas are already developed or protected open land, therefore it is important that new Public Open Space is included as part of major development proposals. This will be flagged to applicants early in the negotiation process.
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	<p>Policy LP31 seeks to maintain and improve the quality and provision of Public Open Space in the borough, particularly in areas identified as being deficient in Public Open Space.</p> <p>Policy LP30 recognises the value of open and natural spaces for people's physical and mental wellbeing.</p> <p>These policies are therefore considered to be beneficial for residents' wellbeing.</p>	H+	Opportunities to create new Public Open Space will generally be limited in the borough as many areas are already developed or protected open land, therefore it is important that new Public Open Space is included as part of major development proposals. This will be flagged to applicants early in the negotiation process.
Does the proposal provide a range of play	Policy LP31 seeks to maintain and improve children's and young people's play facilities in the borough. Developers for major	H+	Council to ensure that developers submit a child

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spaces for children and young people?	<p>applications are required to submit a child occupancy assessment in line with the Council's child yield calculator to ensure adequate provision.</p> <p>This policy will be beneficial for children's health and wellbeing as providing space for children to play and interact in a safe environment and build social networks and encourage social cohesion. It also encourages physical activity amongst children which will help to address the emerging obesity issue in the borough.</p>		occupancy assessment with applications.
Does the proposal provide links between open and natural spaces and the public realm?	Policy LP31 recognises open and natural spaces are a valuable component of social infrastructure and stresses the importance of these spaces being publicly accessible to allow integration with existing villages and neighbourhoods to encourage social cohesion and allow maximum access for sport and recreation and associated health benefits (also recognised in Policy LP30). Similarly Policy LP44 emphasises the importance of the public realm being accessible and inclusive to encourage a good walking environment.	H+	Council to ensure appropriate links between open and natural spaces and the public realm are shown on plans at application stage and subsequently implemented.
Are the open and natural spaces welcoming and safe and accessible for all?	<p>Policy LP31 states that open and natural spaces should be publicly accessible - and gated developments are not encouraged - ensuring that spaces are more welcoming and accessible.</p> <p>Policy LP1 states that the public realm should be designed to be safe and accessible for all.</p> <p>Fear of crime is detrimental to mental health, therefore ensuring that design of places promotes feelings of safety will be beneficial to health.</p>	H+	No specific enhancement actions identified. Developments to follow good design principles.
Does the proposal set out how new open space will be managed and maintained?	This is an issue to be considered outside of the Local Plan. The Planning Obligations SPD contains detailed guidance on transfer and maintenance of public realm, open space and play facilities.	N/A	Council to ensure an effective management and maintenance plan for ensuring the quality of open spaces is in place.

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4. Air quality, noise and neighbourhood amenity			
Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	<p>Policy LP10 seeks to minimise local environmental impacts of development including air pollution, noise and vibration, light pollution, odours and fumes and land contamination.</p> <p>Construction impacts can cause stress and therefore have an adverse impact on mental and physical health. This policy will therefore be beneficial in avoiding this.</p>	H+	The Council requires the submission of Construction Management Statements and must ensure that these are submitted where necessary.
Does the proposal minimise air pollution caused by traffic and energy facilities?	<p>The whole of the borough is an Air Quality Management Area (AQMA). Poor air qualities can have long term impacts on health including lung and heart conditions, cancer and diabetes and this has been identified as a specific health issue in the borough. Policy LP10 recognises that good air quality is vital to the health and wellbeing of the borough and states that the Council will seek financial contributions towards air quality measures where a proposed development is not air quality neutral or mitigation measures do not reduce the impact upon poor air quality. This policy should therefore be beneficial for health.</p> <p>Policy LP22 encourages clean energy facilities such as CHP in line with the energy hierarchy.</p>	H+	Council to ensure that the appropriate financial contributions towards air quality measures or the Council's carbon offset fund where relevant are sought through the use of Planning Obligations.
Does the proposal minimise noise pollution caused by traffic and commercial uses?	Policy LP10 recognises that noise and vibration can have a significant effect on health, quality of life, amenity, living conditions and the environment and therefore seeks a noise assessment, mitigation measures and time restrictions on activity where noise cannot be mitigated. These measures will be beneficial towards reducing negative health impacts.	H+	Council to ensure that applicants consider acoustic design at an early stage of the planning process to ensure occupiers of new and existing noise sensitive buildings are protected.
5. Accessibility and active travel			
Does the proposal prioritise and encourage walking (such as through	A number of policies in the plan encourage walking, including LP12 on green infrastructure, LP30 on health and wellbeing, LP44 on sustainable travel choices, and LP31 on public open space and play space. Other policies seek to ensure that shops (LP27) and social	H+	No specific enhancement actions identified. Developments to follow good design principles.

Assessment criteria	Relevant Local Plan policies and discussion	Impact of policies on health and wellbeing	Recommended mitigation or enhancement actions
shared spaces?)	<p>infrastructure (LP28) are located within reasonable walking distance of communities or villages.</p> <p>Greater levels of walking will improve resident's health, fitness and general wellbeing which will help to reduce obesity levels and will also help to reduce car journeys, subsequently helping to improve air quality which is an identified health issue in the borough.</p>		
Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	<p>Policy LP 44 promotes active travel such as cycling and walking and seeks to ensure that new development is designed to maximise permeability within and to the immediate vicinity of the site through the provision of safe and convenient walking and cycling routes.</p> <p>Greater levels of cycling will improve resident's health, fitness and general wellbeing which will help to reduce obesity levels and will also help to reduce car journeys, subsequently helping to improve air quality which is an identified health issue in the borough.</p>	H+	Council to ensure adequate cycle parking and storage is provided in both residential and commercial developments to encourage cycle participation. This will continue to be checked at application stage.
Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	<p>Policy LP44 states that developments should be integrated with existing local routes including footpaths, Public Rights of Way and cycle routes. New development should not compromise these existing routes. For this reason policy LP 1 does not permit gated developments.</p> <p>These policies will improve conditions for cyclists and pedestrians, ensuring that routes are safe, direct and convenient, which should encourage greater levels of cycling and walking, which is beneficial for many different aspects of people's health and wellbeing.</p>	H+	Council to ensure that all planning applications for major developments are accompanied by a Transport Assessment or Transport Statement.
Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	<p>Traffic calming is an issue to be addressed outside the Local Plan however Policy LP45 seeks to minimise the impact of car based travel on the operation of the road network and local environment and Policy LP12 on green infrastructure specifically mentions traffic calming schemes, suggesting that swales can be integrated in new developments as part of traffic calming schemes. Slower moving traffic will help to minimise road injuries.</p>	M+	Council to ensure the relevant traffic management and calming measures are including in the Transport Assessment / Statement and are implemented.

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Is the proposal well connected to public transport, local services and facilities?	<p>A number of policies in the Plan, as well as the overarching Spatial Strategy, seek to ensure good accessibility to public transport, local services and facilities. For example LP 44 encourages high trip generating development to be located in areas with good public transport and seeks to ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. LP25 sets out which centres different types of development should be located within and this is largely based on their levels of accessibility, for example major development should be located in the most accessible centres (Richmond and Twickenham) with local services and facilities in the smaller centres.</p> <p>LP28 states that larger multi-use social infrastructure facilities should be located in areas of good public transport accessibility. LP30 on health and wellbeing encourages development to ensure easy access to public transport in order to reduce car dependency.</p> <p>All of these policies seek to ensure easy access for all residents to all services, facilities and public transport. This will not only encourage greater levels of walking and cycling an fewer car journeys which will help to reduce air pollution, but will also ensure easy access to essential facilities for vulnerable and older resident thereby increasing levels of social interaction and reducing isolation.</p>	H+	A key part of the Local Plan is to ensure that facilities are accessible to local residents by sustainable methods of travel. Council to ensure that all developments demonstrate compliance with this approach.
Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	<p>Policy LP45 sets out the Council's approach towards parking within new developments.</p> <p>Parking standards research was completed in August 2016. It recommends continuing to encourage parking provision towards the upper end of the London Plan maximum car parking standards but to introduce some flexibility. It is thought that this option, in comparison to the other two options which were assessed, will 1) have a neutral impact on the health and wellbeing of the population as it does not actively encourage travel by sustainable travel modes i.e. walking, cycling and public transport, 2) have a minor negative effect on efforts to reduce car dependency and the associated environmental</p>	N	The minimum car parking standards required for any development should always be implemented to ensure additional car ownership is not encouraged.

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	<p>implications because it is not likely to reduce car journeys or car ownership or associated vehicular emissions, and 3) have a major positive impact on the conditions on the local highway network. The higher standards are seen as essential to minimise impacts on the local road network, street congestion and amenity in this outer London location, however it is recognised that this could potentially encourage higher car ownership which can cause higher air pollution which is detrimental to health.</p> <p>Policy LP45 also states that car free housing developments may be appropriate in areas with a PTAL of 5 or 6, and car share facilities and car clubs are encouraged. In addition, charging facilities for electric vehicles will have to be provided in line with the standards set out in the London Plan. It is noted that the parking standards will be developed and further refined for the Publication version of the Plan. Therefore, on balance, the Local Plan is considered to have a neutral impact on this health criterion.</p>		
Does the proposal allow people with mobility problems or a disability to access buildings and places?	Various policies within the Local Plan emphasise the importance of access for all, including those with mobility problems or a disability. LP1 states that the public realm should be designed to be safe and accessible for all ages and levels of disabilities; LP28 stresses the importance of access for all to social infrastructure facilities; LP30 encourages an inclusive development layout and a public realm that considers the needs of all, including the older population and disabled people. All of these policies will be beneficial to the health of the whole population, and particularly those with mobility difficulties.	H+	Council to ensure the appropriate levels of accessibility are secured. To be assessed on a case by case basis.
6. Crime reduction and community safety			
Does the proposal incorporate elements to help design out crime?	Policy LP1 encourages design of development to include natural surveillance which is an established method of promoting community safety. This will be beneficial for the health and wellbeing of all members of the community, and particularly those who may feel vulnerable. It is noted that new technical mandatory requirements on security in dwellings are set out in Part Q Building.	H+	Council to ensure at application stage that the appropriate elements are included to help design out crime.
Does the proposal	Policy LP1 states that gated developments will not be permitted,	H+	Council to ensure that

Assessment criteria	Relevant Local Plan policies and discussion	Impact of policies on health and wellbeing	Recommended mitigation or enhancement actions
incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	acknowledging that they can be detrimental to social inclusion connectivity and permeability. Avoiding gated developments will be beneficial to health by encouraging social inclusivity and potentially helping to reduce inequalities.		planning applications adhere to policy on gated developments.
Does the proposal include attractive, multi-use public spaces and buildings?	Policy LP28 states that social and community infrastructure should be located in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses where practicable, which helps to increase public access. This is particularly encouraged for the types of larger facilities that will be visited regularly and by a greater number of people, and they should therefore be located in the borough's centres or areas of good public transport accessibility. This will be beneficial for the wellbeing of all residents in terms of ease of access, enhanced social interaction and reduced isolation.	H+	None identified
Has engagement and consultation been carried out with the local community?	An informal scoping consultation on the rationale for review of the existing policies in the Core Strategy and DMP was carried out in January 2016. 80 responses were received and these were duly considered and used to inform the draft policies. Following that, the statutory pre-publication consultation on the draft Local Plan took place between 8th July and 19th August 2016. 101 responses were received and these have been assessed and taken into account in the production of the Publication version of the Plan. This is out for public consultation between 4 January and 15 February 2017. In addition, various meetings and discussion sessions have taken place with local community groups throughout the process. This is important in ensuring residents are included in the process.	H+	Council to continue engagement and consultation with the community as the plan progresses towards Examination in Public and adoption.
7. Access to healthy food			
Does the proposal facilitate the supply of local food, i.e. allotments, community farms and farmers' markets?	Policy LP32 seeks to protect allotments and food growing spaces, noting that these spaces offer a diverse range of benefits for people, communities and environments to build healthier communities and promote healthy living. This is reiterated in Policy LP30 Health and Wellbeing (point 4). Providing space for local food growing is important in promoting more active lifestyles, better diets and social	H+	None identified.

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	benefits.		
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	Policy LP25 sets out the overarching approach towards the development of centres across the borough and Policy LP27 seeks to ensure residents have access to shops and service within walking distance for top-up shopping. This will be beneficial for residents in terms of access to healthy food. Policy does not specifically support provision of affordable shops.	H+	None identified. Proposals must be policy compliant.
Does the proposal avoid contributing towards an overconcentration of hot food takeaways in the local area?	Policy LP30 states that the proposals for new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school will be refused. A map showing the 'restriction zones' is available. This policy will be important in restricting the availability of unhealthy foods to school children, therefore helping to address the increasing levels of childhood obesity in the borough. In addition, Policy LP26 restricts change of use to hot food takeaways in certain areas of shopping frontages due to existing concentrations.	H+	Council to refuse applications for takeaways within identified restriction zones in line with policy.
8. Access to work and training			
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	<p>Policy LP40 seeks to retain land in employment use in order to ensure access to local employment opportunities. Criteria for development of new office and industrial space are set out in Policies LP41 and LP42.</p> <p>Policy LP29 states that the Council will promote local employment opportunities and training programmes to help reduce inequalities and support the local economy. Where the employment opportunities generated by construction as well as the end use of the development create more than 20 FTE jobs, a Local Employment Agreement, secured through a Section 106 agreement, will be required.</p> <p>Unemployment can lead to reductions in personal self esteem and increase health inequalities, therefore these policies which seek to ensure local employment will be beneficial.</p>	H+	Council to ensure the appropriate Local Employment Agreement is secured in order to ensure access to local employment and training opportunities.
Does the proposal provide childcare	Policy LP28 acknowledges that the Government's recent provision of 30 hours of free childcare for 3 and 4 year olds with working parents	H+	Council to work with service providers and

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facilities?	will intensify pressure on childcare facilities and Policy LP29 acknowledges where the key areas of under-provision of nurseries and childcare are in the borough and states that the Council will work with landowners and developers to secure sites to meet this need.		developers to ensure the adequate provision of childcare facilities.
Does the proposal include managed and affordable workspace for local businesses?	Policy LP40 encourages the provision of small units, affordable units and flexible workspace such as co-working space. In addition, the Council requires the provision of affordable office space (less than 80% of comparable market rates) within major developments where over 1,000sqm of office floorspace is proposed. This policy is considered to be particularly beneficial in providing local job opportunities, thereby reducing inequalities.	H+	Council to ensure that the appropriate Planning Obligations are agreed in order to secure provision of affordable office space.
Does the proposal include opportunities for work for local people via local procurement arrangements?	Policy LP29 promotes local employment opportunities and training programmes and seeks a Local Employment Agreement where over 20FTE jobs are generated by development. This will help to ensure local employment opportunities and help reduce inequalities.	H+	Council to ensure the appropriate Local Employment Agreement is secured in order to ensure access to local employment and training opportunities.
9. Social cohesion and lifetime neighbourhoods			
Does the proposal connect with existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	<p>Policy LP1 states that new development should be appropriately integrated with the existing area, street frontage and existing local routes. Applicants are required to demonstrate how new development relates to the existing public transport, pedestrian and cycle networks and how it fosters social inclusion. This is reiterated in Policy LP30 on health and wellbeing which encourages an inclusive development layout and public realm that considers the needs of all.</p> <p>Both of these policies are considered important in creating an inclusive and accessible public realm which will encourage social interaction. This will be beneficial in reducing inequalities and combating social isolation.</p>	H+	Council to ensure the appropriate connections are secured. To be assessed on a case by case basis.
Does the proposal include a mix of uses and a range of	Policy LP28 seeks to ensure adequate provision of community services and facilities, especially in areas where there is an identified need or shortage. Community facilities in this context include both	H+	Council to work with service providers and developers to ensure

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community facilities?	statutory facilities such as schools as well as non-statutory services such as cultural and recreational facilities, which ensures an adequate mix and range of facilities. This will be beneficial for the wellbeing of the whole community in terms of encouraging social interaction and encouraging people to lead more active and healthy lives.		adequate provision of community services and facilities.
Does the proposal provide opportunities for the voluntary and community sectors?	<p>Policy LP28 recognises the important role of the community and voluntary sectors in community cohesion and therefore seeks to protect these uses and resist their loss.</p> <p>Policy LP41 seeks to retain low cost office spaces to meet the requirements of the voluntary sector.</p> <p>Both policies will help to ensure opportunities for the community and voluntary sectors to thrive; this is recognised in being important for social wellbeing.</p>	H+	Council could enhance LP41 by producing further guidance on the criteria and requirements for low cost office spaces.
Does the proposal address the six key components of Lifetime Neighbourhoods?	The Lifetime Homes Concept has been withdrawn by Government but the individual components i.e. supporting residents to develop lifetime neighbourhoods, access, services and amenities, built and natural environments, social networks/wellbeing, and housing are addressed in detail throughout the Local Plan. Policy LP28 recognises that good quality social and community infrastructure contributes to the creation of lifetime neighbourhoods.	H+	None identified.
10. Minimising the use of resources			
Does the proposal make best use of existing land?	The whole Local Plan sets out the Council's intentions for the best use of existing land and the achievement of sustainable development. Policies throughout the Plan explain how this is to be achieved.	H+	Council to balance the different elements of sustainable development when assessing development proposals to ensure the best use of land.
Does the proposal encourage recycling	Policy LP24 states that all developments are required to provide adequate refuse and recycling storage facilities and that all major	H+	Council to ensure that refuse and recycling

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(including building materials)?	<p>developments are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials. Policy LP 22 encourages the use of recycled or secondary aggregates and the efficient use of building materials in new development.</p> <p>The West London Waste Plan addresses the wider strategy for sustainable management of waste, including recycling of construction waste, and therefore this does not need to be covered in great detail in the Local Plan.</p>		storage facilities are provided as part of development proposals, recycled material is used in construction where suitable and that site waste management plans are in place where required.
Does the proposal incorporate sustainable design and construction techniques?	Policy LP22 states that developments must achieve the highest standards of sustainable design and construction, including measures to reduce CO2 emissions (including zero carbon standards in major residential standards) and minimise water consumption. Non-residential developments must meet BREEAM Excellent standards. Sustainable design standards will help to ensure that buildings are energy efficient, warm in winter and cool in summer which will be beneficial to older residents who are more vulnerable to temperature extremes. More widely, sustainable design and construction techniques, such as zero carbon and CO2 emissions reductions, will also help to improve air quality in the borough.	H+	Council to ensure, through the planning application process, that sustainable design and construction techniques are incorporated whenever feasible.
11. Climate change			
Does the proposal incorporate renewable energy?	Policy LP22 states that applicants must reduce CO2 emissions in line with the Energy Hierarchy which includes renewable energy as the third step (after incorporating sustainable design techniques and supplying energy efficiently). Renewable technologies such as photovoltaic cells, solar panels and ground and air source heat pumps are considered appropriate in the borough. These renewable energy technologies will help to reduce air pollution, therefore combating one of the identified health issues in the borough.	H+	Council to ensure applicants submit the appropriate Energy Statements explaining how the energy requirements will be achieved.
Does the proposal ensure that buildings and public spaces are	Policy LP20 sets out the climate change adaptation policy which includes a list of options for designing buildings to be adaptable to temperature extremes, including orientation, materials, shading and	H+	Council to ensure that climate adaptation techniques are considered

Assessment criteria	Relevant Local Plan policies and discussion	Impact of policies on health and wellbeing	Recommended mitigation or enhancement actions
designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping.	urban greening amongst others. It is known that older and more vulnerable residents are at greater risk from extreme temperatures, therefore this policy will be particularly beneficial for these residents and may help to address the excess winter deaths experienced in the borough		and incorporated from the outset in any new development.
Does the proposal maintain or enhance biodiversity?	Policy LP15 seeks to protect and enhance the borough's biodiversity. Access to nature and biodiversity contributes to physical and mental wellbeing and this policy will therefore have a positive impact on health.	H+	Council to ensure that biodiversity is protected and enhanced in line with the borough-wide Biodiversity Action Plan.
Does the proposal incorporate sustainable urban drainage techniques?	Policy LP21 states that the Council encourages the use of sustainable drainage systems (SuDS) in all development proposals in order to achieve a reduction in surface water discharge to greenfield run-off rates wherever feasible. Flooding can result in risks to physical health and also mental wellbeing due to stress, so this policy which sets out measures to reduce flood risk will be beneficial to residents' health, particularly those living in areas of flood risk.	H+	Council to ensure Drainage Statements are received when required.