

Brentwood Borough Council

Local Development Plan (LDP): Health Impact Assessment (HIA) (Draft)

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Executive Summary:

Following the completion January 2018 Site Selection Regulation 18 Consultation, the Brentwood Planning Policy Team, continue working on the emerging Local Development Plan policies and supporting evidence base in preparation for the Pre-Submission stage of the planning process. During this time it was determined that the LDP would benefit from a Health Impact Assessment (HIA) to ensure that the policies are robust as possible. The purpose of this report is to describe the steps and actions taken as a result of the HIA.

The purpose of a HIA is to:

- Identify the potential health consequences of a proposal on a specific population and/or community; and
- Maximise the positive health benefits and minimise potential adverse effects on health and inequalities

The Assessment found that there were a number of policies from the 2016 LDP which had a positive impact on health, but also identified where there were information gaps (modifications required), and the need for new policies. The HIA of the LDP has helped to demonstrate at a local level the impacts that development can have on health and wellbeing, and where there are opportunities to enhance health gains and mitigate against negative impacts. This in turn has led to the recommendation to further embed HIA in the planning process. **The HIA is a live document and regular updates will be made as required.**

1.0 Introduction:

The natural and built environments play a vital role in the health and wellbeing of the community. The benefits of planning for sustainable and healthy communities can have a positive effect on both established and developing communities which can last for generations. Good planning can result in safer communities, by reducing opportunities for criminal behaviour and stronger community cohesion, improved design and healthier living spaces, assist with reducing risk of obesity, and improving the communities overall physical and mental health. The challenge is determining how to provide sufficient homes for an ever-growing population whilst promoting health and wellbeing.

One means of influencing and promoting health and wellbeing through development is to ensure that the Local Development Plan is sufficiently robust to maximise health gains and where there is a risk of negative impacts, to mitigate against this. Undertaking a Health Impact Assessment (HIA) on Brentwood's emerging Local Development Plan (LDP) to make the LDP more robust. The HIA of the Local Development Plan has resulted in revision and improvements to the policies, inclusion of a Health and Wellbeing Strategic policy, and requirements for major development to submit a HIA along with other supporting documents for consideration at the pre-application stage.

1.1 Purpose of this report:

Following the completion January 2018 Site Selection Regulation 18 Consultation, the Brentwood Planning Policy Team, continue working on the emerging Local Development Plan policies and supporting evidence base in preparation for the Pre-Submission stage of the planning process. During this time it was determined that the LDP would benefit from a HIA to ensure that the policies are robust as possible. The purpose of this report is to describe the steps and actions taken. This report outlines the following:

- A brief description of the Brentwood Local Development Plan (LDP)

- What a Health Impact Assessment (HIA) is
- The process followed in undertaking the HIA
- Finding and actions taken as a result of the assessment
- Additional recommendations

1.2 What is the Brentwood Local Development Plan?

Brentwood Borough Council has been preparing a new Local Plan, a key part of the Brentwood's development plan. The Plan sets out a long-term vision for how the Borough should be developed over the next 15 years and the Council's strategy and policies for achieving that vision. The Plan proposes land allocations for development and planning policies to guide decisions on the location, scale and type of development and changes in the way land and buildings are used.

1.3 Vision:

“Bearing testimony to its market town origins, Brentwood will continue to thrive as a place of commerce and enterprise, strengthened by our proposals to protect existing employment sites, and enhance and develop new sites of economic opportunity, with good connectivity to wider markets.

Brentwood will continue to be a desirable, liveable place to live and visit, providing the ‘best of both worlds’ where the benefits of urban living can be enjoyed; the bustling high street can continue to thrive and provide opportunities for entertainment and culture; and where the surrounding countryside and numerous Country Parks will continue to provide havens to wildlife as well as beautiful and historic locations to explore.

We are a ‘Borough of Villages’ and we will continue to maintain our village character, ensuring development respects and enhances these environmental qualities that give Brentwood its distinctive character. We will encourage this through landscape-led development, where new development

responds to a 'design and build' with nature approach, firming embedding high quality green infrastructure through the public realm to create a seamless transition to our surrounding countryside."

The vision is underpinned by three overarching driving factors:

1. Meeting the Borough priorities as set out in the Corporate Plan – 'A Vision for Brentwood';
2. The Challenges and Opportunities which inform how the borough should better manage development and change; and
3. Meeting Brentwood's housing needs

1.4 Strategic Objectives and Policies:

The 2016 iteration of the LDP consisted of a number of Strategic Objectives which the policies within the Plan aimed to support. These Strategic Objectives were revised from 13 Strategic Objectives to 4 Strategic Objectives. These policies are split into two types – spatial and development management policies. The new Strategic Objectives within the Publication LDP are:

1. SO1: Managing Growth
2. SO2: Deliver a Healthy and Resilient Built Environment
3. SO3: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities; and
4. SO4: Deliver Beautiful, Clean and a Functional Natural Environment

Under each of these Strategic Objectives are a number of policies which will be used to inform planning application decisions. Each of these policies have been evaluated from a Health and Wellbeing perspective, which is described in greater details throughout this report. Appendix 1 includes a table of the evaluation of each of the policies for the 2016 LDP (Draft Local Plan) and 2018 LDP (Publication Local Plan). As changes are

made to the LDP throughout the process, this table will be updated to reflect any changes made from a Health and Wellbeing perspective.

The new LDP framework was informed by the revised NPPF (2018), which has the principals of healthy, inclusive, and sustainable developments embedded throughout the Framework. The revised LDP Framework is illustrated below in Figure 1.

Figure 1: LDP Framework

Insert to show: LDP Figure 1.1 (Document Structure)

1.5 National Planning Policy Framework (NPPF, 2018)

The Local Development Plan must be consistent with the National Planning Policy Framework (NPPF). The NPPF recognises that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The recent update to the NPPF (2018) has made it clear their priorities in ensuring Plans are developed in such as way that they promote health and wellbeing as outlined in Chapter 8, para 91-95.

2.0 What is a Health Impact Assessment (HIA)?

A Health Impact Assessment (HIA) is a practical approach that seeks to assess how a proposal will impact on a person's or communities health. HIA is typically used to assess the likely significant specific health impacts and allow an assessment of the overall health impacts of proposals be that a strategy or specific development. Health is affected by a number of determinants including, but not limited to, transport, housing, education, environment and economic activities. The analysis using HIA results in recommendations that can inform developers and decision-makers.

2.1 The purpose of a HIA is to:

- Identify the potential health consequences of a proposal on a specific population and/or community; and
- Maximise the positive health benefits and minimise potential adverse effects on health and inequalities

There are a number of HIA tools available. These tools all follow a similar process which include:

1. Screening: identify whether or not an HIA would be useful;
2. Scoping: planning the HIA;
3. Assessment: identifying groups / populations affected and quantifying health impacts;
4. Recommendations: suggesting practical actions to promote positive health and minimise negative effects;
5. Reporting: presenting the results from the HIA; and
6. Monitoring and evaluating: determining the HIA's impact on the decision and health status.

3. Health Impact Assessment Process

3.1 Screening:

The screening stage considers the need for and type of HIA required

3.2 Establishing the need for an HIA:

While there are no statutory requirements to undertake an HIA when preparing a Local Plan, national and regional policies and local strategy all recognise the important

connections between planning and the health and wellbeing of communities, and led to the decision to proceed with an HIA:

National Planning Policy Framework (2018) para 91 states:

“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a. Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mix-used developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- b. Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas; and*
- c. Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling”*

Planning Practice Guidance states:

“Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making. Public health organisations, health service organisations, commissioners and providers, and local communities should

use this guidance to help them work effectively with local planning authorities in order to promote healthy communities and support appropriate health infrastructure.”

Essex Design Guide:

“The health and wellbeing theme was established to recognise how the positive characteristics and qualities of an environment can help people to achieve and experience better quality lifestyles.”

Brentwood’s Health and Well-being Strategy:

“Growing from a market town to the diverse economy it is today, future development should capitalise on this evolution ensuring not only a balance of diverse employment opportunities for all - adapting to a changing economic context - but that vibrant hubs of economic and social-cultural activity evolve to provide attractive, connected, walkable, lively and stimulating destinations that provide the necessary facilities, recreation opportunities and services required to sustain healthy communities.”

3.3 Selecting an HIA Approach:

There are three main types of HIA:

1. Prospective HIA – at the start of the development of a project proposal, or plan
2. Concurrent HIA – runs alongside the implementation of the project (or policy)
3. Retrospective HIA – assesses the effect of an existing project or policy and can be used as an evaluation tool. Retrospective assessments can also be made of unexpected events, as a way of learning lessons for future similar events.

Within any of the above, HIA can take one of the three different forms, depending on the focus and the time and resources available:

1. Desktop HIA – encompasses a small number of participants around the table using existing knowledge and evidence to assess a proposal, policy, or plan.
2. Rapid HIA – establishing a small steering group and often uses the approach of a participatory stakeholder workshop. This typically involves a brief investigation of health impacts, including a short literature review of quantitative and qualitative evidence and the gathering of knowledge and further evidence from a number of local stakeholders.
3. Comprehensive HIA – in-depth analysis, with extensive literature searches and collection of primary data.

Often, however, a HIA fits in between two of these categories as the approach taken will be determined by the nature of the proposal, the timescales involved and the human, organisational and financial resources available to undertaking the process.

The Planning Policy Team decided to undertake a Desktop HIA of the Local Development Plan because:

- The Council wanted to ensure compliance with the new NPPF (2018) and PPG which highlights the importance of including elements of health and wellbeing throughout the policies within a Local Plan as well as the commitments made by the Essex Planning Officers Association (EPOA) regarding HIA.
- There was existing knowledge and evidence to inform the HIA.
- The need to take into account a number of underpinning policies within a short time frame made workshops impractical and the planned wider consultation of the Local Development Plan as required under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2018.

4. Health Impact Assessment

4.1 Scoping:

This step defines the scope and scale of the HIA. Table 1 below highlights the steps involved and the Councils approach.

Table 1: Scoping – Steps and Approach

| Steps | What's involved | Councils Approach |
|-------------------------------|--|---|
| Purpose | Establishing the terms of reference, roles and responsibilities and agreed plan for the HIA | Roles and responsibilities were agreed |
| Timescales | Establishing the decision-making timescales of the proposal to ensure the HIA can have an opportunity to inform decisions. | HIA was produced alongside the review of the LDP policies in preparation for Regulation 19. |
| Geographical Boundaries | Understanding of the geographical boundaries of the HIA. | Brentwood Borough |
| Resources | Clear understanding of the financial and time resources available for the purpose of carrying out the study | Due to limited financial resources and availability of in-house knowledge, resources were limited to Officers time. |
| Internal and External Support | Refers to the commissioning of the HIA to external resources for those studies which are more in-depth. | Inter-department resources were utilised and well as assistance from Essex County Council. |
| Type of Assessment | Identifying which of the three assessment types – Desktop, Rapid, | Given time and resource constraints, as well as the level |

| | | |
|-------|--|--|
| Steps | What's involved | Councils Approach |
| | or Comprehensive – is most suitable given the purpose, timescales and resources available. | of detail required a Desktop approach was deemed most appropriate. |

5. Appraisal:

This stage is focused on information gathering about the potential nature, size, likelihood and distribution of the proposal’s health impacts. It also provides an opportunity to suggest possible ways of maximising the health benefits and minimising the risks, particularly to those whose health may be most vulnerable or the most disadvantaged population groups. It also provides an opportunity to identify and suggest actions that might address ‘gaps’ in the proposal or plan.

5.1 Summary of Evidence used to inform Brentwood’s Local Development Plan:

Table 2 below outlines the various key pieces of evidence used to help form the policies within the LDP.

Table 2: LDP Evidence Base

| Category | Title | Date Published |
|-------------|-------------------------------------|----------------|
| Economy | Economic Futures 2013-2033 | January 2018 |
| | Retail and Commercial Leisure Study | December 2014 |
| | Heart of Essex Economic Futures | June 2012 |
| | Employment Land Review | September 2010 |
| Environment | Green Belt Assessment: | October 2018 |

| Category | Title | Date Published |
|----------------------|---|----------------|
| | Parts 1-3 | |
| | Landscape Review | October 2018 |
| | Green Infrastructure Strategy | September 2015 |
| | Habitats Regulations Assessment | January 2018 |
| | Surface Water Management Plan for Brentwood Borough | January 2015 |
| | Renewable Energy Study | April 2014 |
| | Local Wildlife Sites Review | December 2012 |
| | Mid Essex Landscape Character Assessment | September 2006 |
| Housing & Demography | Strategic Housing Market Assessment (SHMA) Part I | October 2018 |
| | Strategic Housing Market Assessment (SHMA) Part II – Objectively Assessed Need for Affordable Housing | June 2016 |
| | Greater Essex Demographic Forecast 2012-2037 (Phase 7) | May 2015 |
| | Heart of Essex Housing Growth Scenarios | June 2012 |
| | Strategic Housing Land Availability Assessment (SHLAA) | October 2011 |
| | Brentwood Gypsy and | October 2017 |

| Category | Title | Date Published |
|------------------------------------|---|------------------|
| | Traveller Accommodation Assessment | |
| | Viability Assessment | October 2018 |
| Site Assessment | Site Assessment Methodology and Summary of Outcomes | January 2018 |
| | Housing and Employment Land Availability Assessment (HELAA) | October 2018 |
| Transport | Transport Assessment | October 2018 |
| Leisure, Recreation & Town Centres | Open Space, Sport and Leisure Needs Assessment | August 2016 |
| | Play Pitch Strategy (PPS) | October 2018 |
| | Golf Course Needs Assessment | October 2018 |
| | Brentwood Borough Council Leisure Strategy | (In development) |
| | Brentwood Town Centre Regeneration Strategy | May 2010 |
| | Hotel & Visitor Accommodation Futures Study | April 2008 |

5.2 Brentwood Population Health Profile:

5.2.1 Geographic Characteristics of Brentwood:

Brentwood Borough is located in the south-west of Essex and east of Greater London. The Borough is approximately 15,300 hectares. The Borough is centred on the market town of Brentwood, which is surrounded by some suburban areas and villages set

amongst the Essex countryside. The Borough is only 20 miles from Central London with strong transport links, including the current development of Crossrail, into London. The Borough is 89% green belt, giving the community ample access to open green space. The cost of a house in Brentwood cost an average £320,000 which is £100,000 higher than the average house price within England. Despite this, approximately 80% of the population own their own home. Brentwood is one of the most affluent areas in England, within the least deprived 10% of the country.

Figure 2: Geographic Characteristics of Brentwood:

Insert to show:

- Location within Essex
- Size of Borough
- proximity to London
- affluent vs deprivation

5.2.2 Brentwood's Population Profile:

The population of Brentwood in 2011 was 73,601 (Census), of which approximately 70% live within Brentwood Town. The 2014 mid-year population estimates show's that this has increased to 75,600. A large portion of the population are retired with an aging population trend projected to continue. The proportion of the population from black and minority ethnic groups in the borough is well below average for the Eastern region and England. The largest non-white minority ethnic group is made up of Asian origins.

Figure 3: Brentwood's Population Profile:

Insert to show:

- Current population of Brentwood
- Age profile and life expectancy

- Ethnicity

5.2.3 Typical Household for Brentwood:

There are just over 32,000 homes in Brentwood Borough. The main property type is detached and semi-detached houses, which at almost 63% total stock is higher than the national level (53%). The main property size of stock is 3-bedrooms (25%) and 4-bedroom homes (23%). House prices in the borough are very high. This can cause issues preventing people from buying homes with entry level housing often too expensive for many newly forming households and the need for a significant deposit.

There is an established Gypsy and Traveller community in Brentwood. Local Planning Authorities must identify the need for pitches through a Gypsy and Traveller Accommodation Assessment (GTAA) to ensure this need is met. According to the Brentwood GTAA Need Summary during the period of the Local Plan, the borough will need to provide an additional 11 pitches, which the borough is planning to provide.

Figure 4: Brentwood Housing Stock

Insert to show:

- Typical housing stock
- Typical household profile
 - Comparison to the rest of Essex
- Home ownership vs rented accommodation
 - Comparison to the rest of Essex
- Average cost of a home vs average rent
- Travellers Population

5.2.4 Brentwood Economy:

Brentwood Borough has a successful local economy, providing over 30,000 jobs. Banking and finance are the main business sector followed by distribution/hotel/restaurants and public service. Office employment areas are mainly in Brentwood town centre, Brentwood station and Warley Business Park. Despite the Borough's rural character employment in agriculture is below the national average, as is manufacturing. Three quarters of the Borough population is of working age. This proportion has fallen over time as the population ages. There continues to be a rise in the number of people of working age in the Borough, but a disproportionate rise in the number of older people.

Brentwood has four rail stations – Ingatestone, Shenfield, and Brentwood stations on the Great Eastern Main line to London Liverpool Street, and West Horndon station on the London Fenchurch Street to Southend. Shenfield is also one of the future Crossrail stations. The borough is also well connected by a number of major roads such as the M25, A127, A12, and A13. There is a very high car ownership compared to the national average.

Figure 5: Brentwood Economy

Insert to show:

- Employment vs unemployment rate
- Average gross income per household
- Car ownership (and number of cars per household)
- Child poverty

5.2.5 Brentwood Health and Fitness Profile:

The health of people in Brentwood is varied compared with the England average, however life expectancy for both men and women is higher to the England average. According to Public Health England (2017), the key factors of Brentwood residents are:

- At year 6, the number of children classed as obese was 14.0%, which is lower than the regional figure of 17.9% and below the national average of 20%.
- Estimated levels of adult excess weight and smoking are lower than the regional and national averages.
- Death caused by CVD for under 75's is 53.2%, compared to the England average of 73.5%.
- Percentage of 16-64 year olds in employment is 72.3%, lower than the regional of 77.2% and national average of 74.4%.
- GCSE attainment is 69.3%, above the national average of 57.8%.

The Public Health England definition for physical activity states that people should participate in 150 minutes or equivalent of at least moderate intensity activity per week. Based on this definition 21.8% of adults within Brentwood are doing enough physical activity to benefit their health (i.e. three times or more times per week), the second highest in the county and above the national average of 17.6%.

Table 3: Physical Active vs Inactive rates

| Rate | Brentwood | Essex | England |
|------------|-----------|-------|---------|
| % Active | 67.6% | 61.6% | 61.8% |
| % Inactive | 25.1% | 26.3% | 25.7% |

Figure 6: Brentwood's Fitness Profile

Insert to show:

- Percentage of those involved in a sport
- Most popular sports within Brentwood
- Percentage of those participating in 30 minutes of physical activity at least once a week or more

5.3 Assessment of Policies:

Applying the Wales Health Impact Assessment tool, the Local Development Plan and all the underpinning policies were assessed according to the chapters found within the LDP framework:

- Spatial Strategy – Vision and Strategic Objectives;
- Managing Growth;
- The Built Environment;
- Sustainable, Healthy and Prosperous Community;
- Natural Environment; and
- Site Allocations

The Health Impact Assessment table found in appendix 1 is organised based on the chapters found within the 2018 emerging LDP Framework, as identified in section 1.4 of this report

The policies were assessed based on the following key:

Table 4: Coding System Use

| Description | Symbol |
|---|--------|
| Those policies that make a significant contribution to the overall health and wellbeing community | (++) |
| Those policies that make a positive contribution to the overall health and wellbeing of the community | (+) |
| Those policies which do not affect health and wellbeing – neither positive or negative | (N) |
| Those policies which have a minor negative impact on health and wellbeing which should be considered for review | (-) |
| Those policies which have significant negative impact on the health and wellbeing of the community and require review | (--) |

Details outlining the impacts of the draft LDP policies on health and wellbeing can be found in appendix 1. At the time this assessment was being conducted the Brentwood Planning Policy team were updating policies in preparation for a Regulation 19th Pre-Submission Consultation of the Local Development Plan. The 2016 Draft Local Plan and previous consultation responses were used to assist in informing the development of the Health Impact Assessment. In addition to changes being made to existing policies, new policies were identified. These new policies are identified as such within the table found in appendix 1.

Where a policy has a score 'N/A' this indicates that this policy did not exist in that version of the LDP. For the 2016 version those scored as 'N/A' were new policies which serve the purpose of filling an information gap. In the situation where 'N/A' is listed under the 2018 LDP, it indicates that this policy no longer exists, and in most cases has been included as part of a new policy.

5.4 Roles and Responsibilities

The following departments within the Council and external groups were also consulted with to ensure health and wellbeing was embedded throughout the Local Development Plan:

- Assets;
- Corporate Health & Safety;
- Community Safety;
- Community Services;
- Environmental Health;
- Finance;
- Housing;
- Planning Development Management;
- Waste/Refuse; and

- Active Brentwood.

6. Findings:

The HIA process highlighted where there were possible gaps in policies requiring either additional work / evidence to strengthen the policy and/or the creation of new policies. The assessment also helped to identify where there were no gaps and thus needed no changes. A more detailed key appraisal of finding of the policies can be found within appendix 2. The overall findings were:

- The LDP Framework was restructured to ensure Health and Wellbeing, Inclusive Developments, Environmental Protection, and Sustainable Developments were a cross-cutting theme throughout the LDP and in line with the revised NPPF (2018);
- The 2016 LDP consisted of a number of policies that had a positive score on health and wellbeing, although information gaps were identified and as a result, new policies were created, such as assessing energy infrastructure, education facilities, and three additional Dunton Hills Garden Village section.
- Specific policies related to health and wellbeing were included in the LDP to strengthen the importance of health and wellbeing throughout the Plan; and

It is important to note that the LDP policies are supported and enhanced by additional national and local policies, such as Building Regulations, Essex Design Guide, and Licensing Policy, and so on which in themselves have been developed to benefit the community. These wider policies and regulations along with the National Planning Policy Framework were not considered as part of this HIA.

In response to the findings of the HIA revisions were made to the LDP. Some of the key changes made to the LDP were:

- Embedding health and wellbeing throughout the LDP;
- Restructuring the LDP Framework so that it was aligned with the principles of sustainable development – environmental, social, and economical;
- Including a Strategic Health and Wellbeing Policy and a Health Impact Assessment Policy to highlight the importance of health and wellbeing to those wishing to develop and invest in the borough;
- Ensuring strong support for active travel through improved access to cycle and walking paths, car limited policy;
- More in-depth policies were established for Dunton Hills Garden Village, to ensure this development takes advantage of the Garden Village Principles, that design strategies are used to create a sense of place / community, limit environmental impacts, and promote a health throughout the development.

7. Recommendations:

As a result of the HIA process, in addition to changes being made the LDP policies to ensure health and wellbeing is embedded throughout the LDP, the following additional recommendations / actions will be carried out:

- Inclusion of a Health Impact Assessment policy in the LDP requiring all major developments conduct a HIA (included as part of a major application check list and required at the pre-application stage) and encouraging minor developments to voluntarily prepare a HIA to ensure all potential health impacts have been considered. Minor changes to the Promoting Health and Wellbeing policy may be required following the Regulation 19 Pre-Submission consultation, as the EPOA is currently in the process of updating the HIA Guidance Note which is expected to come into effect in December 2018. Once the updated EPOA HIA Guidance

Note has been published, if any additional recommendations and/or requirements are listed these will be updated within the LDP and HIA if needed;

- Ongoing joint working with both internal and external departments such as the Active Brentwood Board and Health and Wellbeing Board;
- Review of the HIA in 5 years at the same time as the review of the LDP, and make the necessary changes to policies in regards to improving the health and wellbeing of the community and natural environment within the borough.

8. Conclusions:

In order for the borough to meet its need in regards to housing, employment, and the associated infrastructure, development within the borough is unavoidable. One of the objectives of the LDP is to ensure that development and growth are carefully planned in order to optimise the benefits for the community and environment and to mitigate any negative impacts.

As the HIA of the Brentwood Local Development Plan (LDP) has shown, the undertaking of the HIA has not only identified and addressed areas where there were policy gaps in the LDP, it has also contributed to assurances that many of the underpinning policies and planning processes had already taken into account the relationship between planning and health, thus requiring no modifications.

The HIA of the LDP has helped to demonstrate at a local level the impacts that development can have on health and wellbeing, and where there are opportunities to enhance health gains and mitigate against negative impacts. This in turn has led to the recommendation to further embed HIA in the planning process. **The HIA is a live document and regular updates will be made as required.**

9. Next Steps:

This HIA supports the Pre-Submission version of the Brentwood LDP which is subject to public consultation (Regulation 19). Following the consultation process the Council will review and consider the consultation responses received prior to submitting the LDP to the Secretary of State for Communities and Local Government for Examination in Public (EiP) by an independent Planning Inspector. The HIA will be updated to reflect any changes made to the LDP before it is submitted to the Secretary of State.

Following the EiP, the Council will review the Planning Inspector's report and make any necessary changes as identified through the examination process. The HIA will be revisited at this stage and any changes made to the LDP will be reflected in a further update of the HIA prior to adoption of the LDP.

Appendix 1: Health Impact Assessment of the 2016 and 2018 Local Development Plan

| Category | Policy Name | 2016 LD Policies Impact on Health | Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing | Justification for changes (if made) | Changes Impact on Health (2018) |
|---|---|-----------------------------------|---|-------------------------------------|---------------------------------|
| Spatial Vision, Strategic Objectives and Strategy | Managing Growth (new) | N/A | | | (++) |
| | Deliver a Healthy and Resilient Built Environment (new) | N/A | | | (++) |
| | Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities (new) | N/A | | | (++) |
| | Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment (new) | N/A | | | (++) |
| Managing Sustainable Growth | | | | | |
| | Sustainable Development (new) | N/A | | | (++) |
| | Managing Growth | N/A | | | (++) |
| | Construction Management | N/A | | | (+) |
| | Monitoring | N/A | | | (N) |
| Chapter 5 - The Built Environment | | | | | |
| | Housing Growth (new) | N/A | | | (N) |
| | Housing Type, Mix, Size and Tenure / Housing Mix | (++) | | | (++) |
| | Residential Density | (N) | | | (N) |

| Category | Policy Name | 2016 LD Policies Impact on Health | Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing | Justification for changes (if made) | Changes Impact on Health (2018) |
|----------|---|-----------------------------------|--|--|---------------------------------|
| | Protecting the Existing Housing Stock | N/A | | | (+) |
| | Specialist Housing / Specialist Accommodation | (+) | | | (+) |
| | Affordable Housing | (+) | | | (+) |
| | Housing Space Standards / Residential Space Standards | (N) | | | (N) |
| | Gypsy and Traveller | (N) | Consideration is needed to identify which sites have the capacity to be intensified and over what period of time, as well as identify what is the maximum density to ensure overcrowding does not occur. | The Gypsy and Traveller policy was split into five policies to address specific situations experienced within the borough. There is often a conflict between the green belt policies, the location of traveller pitches, and borough's ability to meet its need. The five policies aim to resolve this so that when a need for additional pitches is identified planning permission can be granted within a specific criteria. | N/A |
| | Provision for Gypsies and Travellers (new) | N/A | | | (N) |
| | Regulating suitable existing traveller sites (new) | N/A | | | (+) |

| Category | Policy Name | 2016 LD Policies Impact on Health | Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing | Justification for changes (if made) | Changes Impact on Health (2018) |
|----------|---|-----------------------------------|---|---|---------------------------------|
| | Proposals for Gypsies, Travellers and Travelling Showpeople Sites on Unallocated Land Outside Development Frameworks (new) | N/A | | | (N) |
| | Safeguarding permitted sites (new) | N/A | | | (N) |
| | Sub-dividing Pitches or Plots (new) | N/A | | | (+) |
| | Sustainable Construction and Efficient Resource Management | (++) | | This policy was split into two - Sustainable Construction and Efficient Resource Management, and Carbon Reduction, Renewable Energy and Water Efficiency - to allow for ease of reading and applying the policy where applicable. | (++) |
| | Carbon Reduction, Renewable Energy and Water Efficiency (new) | N/A | | | (++) |
| | Establishing Low Carbon and Renewable Energy Infrastructure Network (new) | N/A | | | (++) |
| | Assessing Energy Infrastructure (new) | N/A | | | (+) |
| | Improving Energy Efficiency Existing Dwellings (new) | N/A | | | (++) |

| Category | Policy Name | 2016 LD Policies Impact on Health | Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing | Justification for changes (if made) | Changes Impact on Health (2018) |
|----------|--|-----------------------------------|--|-------------------------------------|---------------------------------|
| | Managing Heat Risk (new) | N/A | | | (++) |
| | Sustainable Drainage | (++) | | | (++) |
| | Communications Infrastructure | (+) | | | (+) |
| | Connecting New Developments to Digital Infrastructure (new) | N/A | | | (+) |
| | Creating Successful Places (new) | N/A | | | (++) |
| | Responding to Context (new) | N/A | | | (+) |
| | Permeable and Legible Layout (new) | N/A | | | (++) |
| | Building Design | (+) | Policy could include something about using design to ensure the development of inclusive environments. | | (++) |
| | Paving Over Front Garden (new) | N/A | | | (N) |
| | Designing Landscape and the Public Realm (new) | N/A | | | (++) |
| | Open Space in New Development | (+) | | | (+) |
| | Open Space, Community, Sport and Recreational Facilities | (++) | | | (++) |
| | Green Infrastructure / Green & Blue Infrastructure | (++) | Policy name change from Green Infrastructure to Green & Blue Infrastructure | | (++) |
| | Access to Nature (new) | N/A | | | (++) |

| Category | Policy Name | 2016 LD Policies Impact on Health | Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing | Justification for changes (if made) | Changes Impact on Health (2018) |
|---|--|-----------------------------------|---|-------------------------------------|---------------------------------|
| | Community Food Growing (new) | N/A | | | (+) |
| | Protecting Land for Gardens (new) | N/A | | | (N) |
| | Conservation and Enhancement of Historic Environment | (N) | | | (N) |
| | Listed Buildings | (N) | | | (N) |
| | Local List (new) | N/A | | | (++) |
| | Conservation Areas | (+) | | | (+) |
| | Scheduled Monuments and Archaeological Remains | (N) | | | (N) |
| Chapter 6 - Sustainable, Healthy and Prosperous Community | | | | | |
| | Strong and competitive Economy (new) | N/A | | | (++) |
| | Job Growth and Employment Land (new) | N/A | | | (N) |
| | Employment Land Allocation | (+) | | | (+) |
| | Development and Expansion of Business Space (new) | N/A | | | (+) |
| | Protection of Business Space (new) | N/A | | | |
| | Employment Development Criteria (new) | N/A | | | (+) |
| | Supporting the Rural Economy | (+) | | | (+) |

| Category | Policy Name | 2016 LD Policies Impact on Health | Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing | Justification for changes (if made) | Changes Impact on Health (2018) |
|----------|---|-----------------------------------|--|--|---------------------------------|
| | New Retail and Commercial Leisure Development / Retail and Commercial Leisure Growth | (+) | Poicy name changed | | (+) |
| | Retail Hierarchy and Designated Centres (new) | N/A | | | (+) |
| | Brentwood Town Centre | (+) | | | (+) |
| | Mixed Use Development in Designated Centres (new) | N/A | | | (++) |
| | Primary Shopping Areas (new) | N/A | | | (+) |
| | Non-Centres Uses (new) | N/A | | | (+) |
| | Night Time Economy (new) | N/A | | | (++) |
| | Protecting and Enhancing Community Assets (new) | N/A | | | (++) |
| | Infrastructure and Community Facilities / Securing new infrastructure and facilities | (+) | | | (+) |
| | Education Facilities (new) | N/A | | | (+) |
| | Buildings for Institutional Purposes | (+) | policy could be strengthen by including text about ensuring design and location are utilised to create an inclusive environment with the existing community. | This policy was split into two - Education Facilities (new) and Building for Institutional Purposes as recommended by ECC. | (+) |

| Category | Policy Name | 2016 LD Policies Impact on Health | Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing | Justification for changes (if made) | Changes Impact on Health (2018) |
|---------------------------------|--|-----------------------------------|--|-------------------------------------|---------------------------------|
| | Healthy Planning (new) | N/A | | | (++) |
| | Promoting Health and Wellbeing (new) | N/A | | | (++) |
| Chapter 7 - Natural Environment | | | | | |
| | Conserving and Enhancing the Natural Environment (new) | N/A | | | (+) |
| | Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (new) | N/A | | | (++) |
| | Tree, Woodlands, Hedgerows (new) | N/A | This policy has been created to merge the previous 2016 LDP policies Landscape Protection and Woodlands, and Wildlife and Nature Conservation. | | (++) |
| | Wildlife and Nature Conservation | (++) | This policy has been renamed / added into a new policy named Trees, Woodlands, Headerows. | | N/A |
| | Landscape Protection and Woodland Management | (+) | This policy has been renamed / added into a new policy named Trees, Woodlands, Hedgerows. | | N/A |
| | Thames Chase Trust Community Forest | (++) | | | (++) |
| | Green Infrastructure (new) | N/A | | | (++) |
| | Air Quality | (+) | | | (+) |
| | Flood Risk | (+) | | | (+) |

| Category | Policy Name | 2016 LD Policies Impact on Health | Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing | Justification for changes (if made) | Changes Impact on Health (2018) |
|-----------------------------|---|-----------------------------------|---|-------------------------------------|---------------------------------|
| | Contaminated Land and Hazardous Substances | (+) | | | (+) |
| | Contaminated Land and Hazardous Substances | (+) | | | (+) |
| | Green Belt | (+) | | | (+) |
| | New Development, Extension and Replacement of Buildings in Green Belt | (N) | | | (N) |
| | Established Areas of Development and Structure in the Green Belt | (N) | | | (N) |
| | Previously Developed Land in the Green Belt | (+) | | | (+) |
| | Site Allocations in Green Belt | (-) | need to include that the de-allocation of GB sites will be determined based on appropriate evidence base to ensure minimal harm to the to the natural environment and most sustainable locations for new developments | | (N) |
| | Agricultural Workers Dwellings | (N) | | | (N) |
| | Re-Use and Residential Conservation of Rural Buildings | (+) | | | (+) |
| Dunton Hills Garden Village | | | | | |

| Category | Policy Name | 2016 LD Policies Impact on Health | Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing | Justification for changes (if made) | Changes Impact on Health (2018) |
|----------|---|-----------------------------------|---|---|---------------------------------|
| | Dunton Hills Garden Village | (N) | Consider making reference to the Health and Wellbeing Policy given that the development will provide more than 50 units. Also, include some of the elements that will be considered within the Masterplanning process that will ensure a healthy community such as cycle paths, walkable neighbourhoods, design elements to improve the inclusiveness of the community. | The single policy on Dunton was considered sufficient and additional policies were identified as being needed. This policy has been spilt into three policies with the overarching themes of garden village principals, spatial design, and management specific for the Dunton Hills Garden Village. Note that these policies are also sign posted to the relevant LDP core policies. | N/A |
| | Dunton Hills Garden Village - Policy 1 (Garden Village Principals) (new) | N/A | | | (+) |
| | Dunton Hills Garden Village - Policy 2 (Spatial Design)(new) | N/A | | | (+) |
| | Dunton Hills Garden Village - Policy 3 (Management)(new) | N/A | | | (+) |

Appendix 2: Key Appraisal Findings

The Health Impact Assessment process was structured around the 2018 chapter structure of the LDP as outlined in section 5.3 Assessment of Policies of this report. This identified gaps in the policies, policies that have positive impacts on health, and those policies that could be further enhanced to improve health outcomes. Section 6.0 provides a brief summary of the assessment and section 7.0 outlines the actions that were taken. This appendix provides greater detail of the process undertaken.

(i) Strategic Policies:

These strategic policies were established as they apply to all development in the Borough. The Plan's vision, strategic objectives and planning policies are all underpinned by the spatial strategy. The Spatial Strategy Policies within the LDP set out the aims of the Strategy. The Strategic and Development Management Policies provide the framework for this to be delivered. It was felt that this new document structure and framework ensures that the overarching spatial strategy aims – transit-oriented growth, Developing Naturally and Sustainably and Healthy Communities – were considered throughout the LDP.

(ii) Managing Sustainable Growth

Development of any kind can have an impact on health and wellbeing. The policies found within the LDP aimed to promote healthy, inclusive, and sustainable developments. The Managing Sustainable Growth policies set out how sustainable development is to be achieved, the optimal locations to ensure accessible and sustainable growth, and what development proposals must respond to.

New policies included to ensure sustainable development is made a priority are:

- Sustainable Development;
- Managing Growth;
- Construction Management; and
- Monitoring

(iii) Planning for Healthy and Resilient Built Environment

These policies focus on how developments can be more efficient and resilient so that the borough can adapt better to changes as a result of climate change and other treats. Resilience-building strategies can be considered to be 'reactive' or 'proactive'. A reactive approach focuses on mitigating consequences, maintaining stability and the status quo, whereas a proactive approach focuses on change and adaptation and looks more towards addressing long term stresses. Both approaches are incorporated in the LDP.

There were a number of new policies established within this chapter to ensure information gaps were addressed. Some of the new policies which were established to strengthen this chapter include:

- Sustainable means of travel and walkable streets;
- Establishing Low Carbon and Renewable Energy Infrastructure Network;
- Managing Heat Risk; and
- Creating Successful Places

One policy from the 2016 LDP was strengthen from a health and wellbeing perspective, Building Design, which now includes the requirement of creating inclusive environments through design.

(iv) Sustainable, Healthy and Prosperous Community

The policies found within this chapter of the LDP consist of a wide variety of subjects including employment, mixed use developments, and educational facilities. All these types of developments can have either a positive or negative impact on a person's / community's health and wellbeing.

The previous 2016 policy, Non-Retail Uses was determined to have a negative impact on health, due to the lack of guidance on where fast food / take away restaurants could be located as well as the hours of operation deemed acceptable by the Council. The Council removed this policy and replaced it with Mixed Use Development in Designated Centres. There is now a requirement within the policy to ensure new eateries are not located within 400 meters from a school and outlines appropriate hours of operation in an effort to encourage children to develop healthier eating habits.

Several new policies were also established to strengthen the Council's commitment to developing sustainable, healthy, and prosperous communities, such as:

- Planning for Inclusive Community;
- Protecting and enhancing Community Assets; and
- Promoting Health and Wellbeing

(v) Beautiful, Biodiverse, Clean and Functional Natural Environment

Access to green space / open space can have a very positive impact on a person's health and wellbeing. Brentwood Borough is 89% green belt, which means the community has significant access to open space. All but one per-existing policies from the 2016 LDP was found to have a positive impact on health. The 2016 Site Allocations in Green Belt policy was highlighted as needing additional work / evidence to support the policy to ensure health and wellbeing was adequately considered. This update was made allowing the policy to receive a neutral score.

New policies were also identified for strengthening the protection of the borough's open spaces such as:

- Conserving and Enhancing the Natural Environment; and
- Safeguarding the Historic and Natural Heritage Landscape Character

(vi) Dunton Hills Garden Village

The 2016 LDP consisted of a single policy on Dunton Hills Garden Village (DHGV). Given the number of homes planned for this site an entire chapter was created to ensure that the spatial vision and aspirations for the development are achieved. Three aims were identified for DHGV, one of which states, *“to create a distinctive and well-designed new settlement at Dunton Hills that responds to its spatial context, and incorporates all the necessary components to achieve a healthy, liveable and self-sustaining Garden Village”*. None of the new policies were found to have a negative impact on health and wellbeing, as this principle was considered throughout the process of developing the new policies. Details on how each of these policies scored are illustrated in appendix 1.