

**LOCAL PLAN REVIEW DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS -
JANUARY TO MARCH 2022**

SUMMARY OF RESPONSES TO Q17

**Q17 - DO YOU AGREE WITH THE PROPOSED HEALTH IMPACT ASSESSMENT
POLICY? IF NOT, WHY NOT?**

A summary of the issues raised in the comments received are set out below:

Comments	NWL Officer Response
Option 3 seems reasonable.	Noted. This has been identified as the preferred option.
Both residential and non-residential development includes threshold so that only large schemes would require the initial need for a Screening Statement. Suggest that a threshold in terms of site area/floorspace is applied to the other development types on the list.	Policy to be amended to provide a threshold for residential and non-residential uses, rather than also providing a list of uses. Further work to be undertaken on the threshold for non-residential development.
The 30 dwelling threshold or 1 hectre seems a reasonable and proportionate threshold.	Noted.
HIA should be completed at the point in which it is able to have the biggest impact on the design of a development.	Policy seeks to ensure that health and well being issues are an integral part of the development process, and are considered at an early stage.
The evidence to support the suggested threshold of 30 dwellings is not clear. If the intention is to not place a burden on medium housebuilders, this low threshold is likely to catch a number of developments medium housebuilders are involved in. Would result in an increase in costs and time.	Policy seeks to limit the burden being placed on small and medium sized sites - which are detailed within the NPPF as being sites no larger than 1 hectare in size. This size has been used to inform the threshold and the policy seeks a balanced approach. It is also the intention that a HIA would only be needed if this process identifies significant health impacts and a toolkit will be available to support the screening statement process.
In the absence of clear evidence to justify a lower threshold, it is considered that a threshold of 100 dwellings or 2.5 hectares would be reasonable. For smaller and less strategic developments, health and well being matters can be addressed through existing national policy requirements.	Policy seeks to limit the burden being placed on small and medium sized sites - which are detailed within the NPPF as sites being no larger than 1 hectae in size. This size has been used to inform the threshold and the policy seeks a balanced approach. It is also the intention that a HIA would only be needed if this process identifies significant health impacts and a toolkit will be available to support the screening statement process.
For smaller scale and less strategic developments, health and wellbeing matters can be addressed through existing national policy requirements.	Local plan policy allows for evidence to be sought that demonstrates that developments incorporate health and wellbeing considerations. National policy is not considered sufficient to address this.

At Table 8.19, Option 1 should the text read EIA rather than SEA?	Noted.
Recognise that HIAs play an important role in addressing health impacts of planning decisions on communities in line with the social objective of sustainable development as set out in the NPPF.	Noted and agreed.
All developments should consider Health Impacts – Option 2 would be fine. If it proves a disincentive to development, if they do not want to consider health impacts, that is a good thing.	There are concerns that Option 2, which seeks screening assessments to accompany all planning applications, may not be disproportionate to smaller developments. The proposed would apply to all development in the district.
Who in the Council has the expertise to assess HIA's once they are submitted?	Engagement with Public Health Leicestershire is ongoing to address HIAs.
A site area/threshold should be provided for all development types.	Policy to be amended to provide a threshold for residential and non-residential uses, rather than also providing a list of uses. Further work to be undertaken on the threshold for non-residential development.
Is there any evidence to suggest that Leisure facilities/cafes have a detrimental impact on health and well-being;	Policy to be amended to provide a threshold for residential and non-residential uses, rather than also providing a list of uses. Further work to be undertaken on the threshold for non-residential development.
How do we prevent a situation where applications are designed so they fall under the threshold or developers create a conglomeration between them but, individually, they are all below the threshold.	A balance is being sought. Policy seeks to allow for screening statements to be proportionate to the type of development proposed and to reduce the likelihood of disproportionate expenses to the applicant. It is hoped that with these measures they would reduce an occurrence of the issues raised.
Agree with the principle of the approach but NHS Property Services would welcome further engagement on the proposed thresholds.	Noted.
Requirement for Screening Statements in other unspecified instances provides uncertainty. Should be replaced with clear criteria.	Noted. Specific triggers or thresholds would provide this clarity and certainty for all parties involved.
Another line could be added "...any other proposal considered by the Council to require one."	The wording suggested lacks clarity and certainty.
Use of the Healthy Placemaking screening tool can address some ambiguity.	A bespoke platform – Healthy Place Making – has been developed for Leicestershire, Leicester and Rutland and

	<p>includes the availability of a HIA Tool. It provides access to local authority data and includes a 'smart form' approach to completing an assessment, providing a methodology and prompts to consider a range of health impacts. The availability of this tool would support and facilitate the application of this Local Plan policy.</p>
<p>What if an application came in close proximity of HS2/trainline; What if an application is located to a health facility that has just closed or stopped taking patients; What if an application is close to a new AQMA?</p>	<p>Issues such as pollution, access to health and air quality would be considered as part of any screening process/health impact assessment.</p>
<p>Recognise the important role of HIAs in addressing health impacts.</p>	<p>Comments noted.</p>
<p>The substance and requirements of the HISS/HIA should be clearly set out. A SPD maybe needed to support the policy. Relevant background and issue faced by the district should be provided so the impact on these issues can be addressed.</p>	<p>The Levelling Up and Regeneration Bill: reforms to national planning policy consultation document states that authorities will no longer be able to prepare supplementary planning documents.</p> <p>The supporting text to the policy will provide an explanation of the policy requirements as well as the relevant background and issues faced by the district.</p> <p>There is also available a bespoke platform – Healthy Place Making – that has been developed for Leicestershire, Leicester and Rutland and includes the availability of a HIA Tool. It provides access to local authority data and includes a 'smart form' approach to completing an assessment, providing a methodology and prompts to consider a range of health impacts. The availability of this tool would support and facilitate the application of this Local Plan policy. Reference to this could also be made in the supporting policy text.</p>
<p>The Policy should account for the different level of information available for different planning application types, i.e. full, outline, reserved matters and recognise that corresponding HIAs will be able to provide different levels of detail.</p>	<p>It is proposed that the Screening Statement will identify whether a more comprehensive HIA will be required and the appropriate level of detailing, taking into account the nature and characteristics of the development proposed. It is the intention that a HIA would only be needed if this process identifies significant health impacts.</p>

	<p>Wording can be added to the policy supporting text to provide this clarification.</p>
<p>This policy is not necessary as the The HIA should be an integral part of the Strategic Environmental Assessment and health and well being factors should for part of other policies within the Local Plan.</p>	<p>Not all applications are subject to a Strategic Environmental Assessment. The proposed policy seeks to ensure health and wellbeing issues are addressed for all proposals that are likely to have significant health benefits.</p> <p>A specific policy would allow the plan to build upon the principles of the NPPF, contribute to the priorities of the NWL Health and Wellbeing Strategy and take into account the health status and needs of the local population.</p>
<p>Policy should just set out the development types and require a proportionate relevant HIA. Policy is unnecessarily burdensome.</p>	<p>The policy seeks to provide clarity when a HIA would be required and that it is proportionate to the nature of the development proposed.</p>
<p>Unclear why the development list includes leisure facilities and non-residential institutions.</p>	<p>A HIA is a useful tool to identify any positive health impacts of a development as well the identification of negative impacts, and giving an opportunity to provide for suitable mitigation.</p> <p>Policy to be amended to provide a threshold for residential and non-residential uses, rather than also providing a list of uses. Further work to be undertaken on the threshold for non-residential development.</p>
<p>The need for individual HIAs at a planning application stage should only be necessary when two criteria are both met: a proposal for development that is not allocated in the adopted plan and it could give rise to likely significant health impacts. The emerging policy should explain the three types of HIA and in most cases that a rapid assessment is most likely (subject to screening) for non-allocated sites.</p>	<p>It is the intention that a HIA would only be needed if the Screening process identifies significant health impacts. This would partly depend on matters such as the layout and design of a development and this would need to be addressed at the planning application stage, rather than as part of the Local Plan. Therefore this policy should apply to both allocated and unallocated sites.</p> <p>Supporting text will address the different types of HIA in more detail.</p>
<p>Unnecessary with too much red tape in place already.</p>	<p>A specific policy would allow the plan to build upon the principles of the NPPF,</p>

	<p>contribute to the priorities of the NWL Health and Wellbeing Strategy and take into account the health status and needs of the local population.</p>
<p>You should be considering the impact on air quality with every single planning application with monitoring undertaken by the Council at site for a period of several months. If monitoring identifies an issue an application should be refused.</p>	<p>The Screening Statement and HIA would cover the issues of air quality. Air quality would also be the subject of a separate local plan policy.</p>
<p>I have a problem with any policy that tries to specify what people should do with / in their lives and your ability to interfere is surely limited.</p> <p>Live in an area where 70%+ of EMA flights take off over at full power and low height. What can be done for our health and wellbeing.</p>	<p>A specific policy would allow the plan to build upon the principles of the NPPF, contribute to the priorities of the NWL Health and Wellbeing Strategy and take into account the health status and needs of the local population. The policy would apply to new development.</p>
<p>Challenging for a generic policy to consider the specific impacts of a East Midlands Airport and Donington Race Track. More work should be undertaken to reconcile policy and reality within the Assessment. Combined impacts of determinants such as Noise, traffic congestion and air pollution should be considered.</p>	<p>A Screening Statement would be required and potentially a HIA for specific development types, including non residential development. Noise, traffic pollution and air pollution would be considered as part of this process.</p> <p>However this process cannot be applied retrospectively towards existing development.</p>

**LOCAL PLAN REVIEW DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS -
JANUARY TO MARCH 2022**

SUMMARY OF RESPONSES TO Q18

Q18 - DO YOU AGREE THAT THE POLICY SHOULD ALSO INDICATE THAT AN INITIAL HEALTH IMPACT SCREENING STATEMENT COULD ALSO BE SOUGHT FOR ANY OTHER PROPOSAL CONSIDERED BY THE COUNCIL TO REQUIRE ONE? IF NOT, WHY NOT?

A summary of the issues raised in the comments received are set out below:

Comments	NWL Officer Response
Approach is imprecise and will lead to inconsistencies amongst planning officer requests. Having set a threshold it would be inappropriate to introduce such an arbitrary category.	Concerns over lack of clarity are noted and agree that this approach would provide uncertainty. Therefore suggested that policy does not include this element of wording and instead only provides specific triggers/thresholds.
Concerns regarding the costs associated with implementation and monitoring and resources required to ensure its effectiveness in delivering improved health and wellbeing outcomes.	Annual monitoring of all Local Plan policies will be undertaken, to help measure their effectiveness. On health and well being, this will likely be undertaken collaboratively between planning officers as well as representatives from the Council's Health and Well Being Team and Public Health Leicestershire.
Reference is made to the benefits of the Health Impact Assessment (HIA) tool which has been developed by the Local Active Partnership.	Noted.
A policy should clearly set out the criteria to ensure clarity and transparency for all parties.	Noted
Guidance/separate SPD could be provided on what other circumstances could be as well as simpler assessments used that reflect scale of development	Still concerns over this approach in that it could still result in uncertainty for those involved in the development process. Should also note that the current government consultation (Levelling-up and Regeneration Bill), proposes SPDs can no longer be prepared and to be replaced by Supplementary Plans, which will be afforded the same weight as a Local Plan.
Recognise that national guidance allows for discretion of the local authority when preparing such policy. However a policy needs to be provide clarity and certainty as to when a screening statement would be required.	Concerns over lack of clarity are noted and agree that this approach would provide uncertainty. Therefore suggested that policy does not include this element of wording and instead only provides specific triggers/thresholds.

<p>Any HIA requirement should be specific and not include any additional screening assessment.</p>	<p>Noted. The role of the policy is to facilitate the use of a screening assessment to identify whether a full HIA is required, in order to seek a balanced and proportionate approach to the type of development proposed.</p>
<p>This approach does not appear to be justified given the guidance referred to above. A decision to request a HIA must be based on the likelihood of significant health impacts resulting from development.</p>	<p>Concerns over lack of clarity are noted and agree that this approach would provide uncertainty. Therefore suggested that policy does not include this element of wording and instead only provides specific triggers/thresholds.</p>
<p>A HIA Screening Statement should not be mandatory for all applications above the threshold – process could slow down progress on application whilst waiting response to a screening statement. Screening to be provided at discretion of the applicant.</p>	<p>Thresholds have been identified in order to avoid unreasonable burden on small and medium size development. Use of these thresholds is considered to provide a balanced approach and certainty of what is expected and to avoid delays. HIAs are considered necessary to demonstrate that health and well being has been properly considered.</p>
<p>National policy requirements could deal with smaller scale and less strategy developments. A specific policy for these types of developments would be onerous.</p> <p>Suggest that Health Impact requirements are focussed on large (100+) sites, where they would have the greatest impact.</p>	<p>Thresholds have been identified in order to avoid unreasonable burden on small and medium size development. Use of these thresholds is considered to provide a balanced approach and certainty of what is expected and to avoid delays. HIAs are considered necessary to demonstrate that health and well being has been properly considered. A screening assessment would be utilised to identify if a HIA is necessary.</p> <p>A HIA tool has been developed by LCC Public Health Team, Active Together and the local Active Partnership. This tool supports and would assist the implementation of the policy.</p>
<p>There are enough guidelines/regulations in place already and we need less bureaucracy.</p>	<p>The principle of the policy supports national policy and guidance. Allows for a balanced and proportionate approach and for local health and well being issues to be considered in the development process.</p>
<p>All development should be subject to a Screening Statement to ensure adverse physical and environmental issues.</p>	<p>Suggested that such an approach would be disproportionate in terms of the Health Impact Screening and Assessment process. The specific development types identified are considered those that are potentially going to have a greater impact on health and well being determinants.</p>

	<p>For those developments that fall below the suggested thresholds, it is the intention that a separate and more strategic Local Plan policy would seek the consideration of health and well being issues.</p>
<p>A risk that smaller developments will be deliberately built to avoid the assessment.</p>	<p>The screening assessment is not considered to be onerous given the availability of the HIA tool. Therefore questions could be raised as to how likely it would be for development to be 'designed' so as to avoid this requirement.</p>