



Brentwood Local Development Plan

# Health Impact Assessment (HIA)

Version 2

*January 2019*

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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 Plan policies and supporting evidence base in preparation for the Regulation 19 Pre-Submission stage of the planning process. During this time it was determined that the Local Plan 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 Local Plan 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 Local Plan 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. 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 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 Local Plan to make the Plan more robust. The HIA of the Local 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 Plan policies and supporting evidence base in preparation for the Regulation 19 Pre-Submission stage of the planning process. During this time, it was determined that the Local Plan 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 Plan (LP)
- 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 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 Borough 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, where the surrounding countryside and numerous Country Parks will continue to provide havens to wildlife, as well as beautiful and historic locations to be explored.*

*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, firmly 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 LP 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 Sustainably
2. SO2: Deliver a Healthy and Resilient Built Environment
3. SO3: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for All; and
4. SO4: Deliver Beautiful, Biodiverse, 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 2018/19 LP (Pre-Submission Local Plan). As changes are made to the Local Plan throughout the process, this table will be updated to reflect any changes made from a Health and Wellbeing perspective.

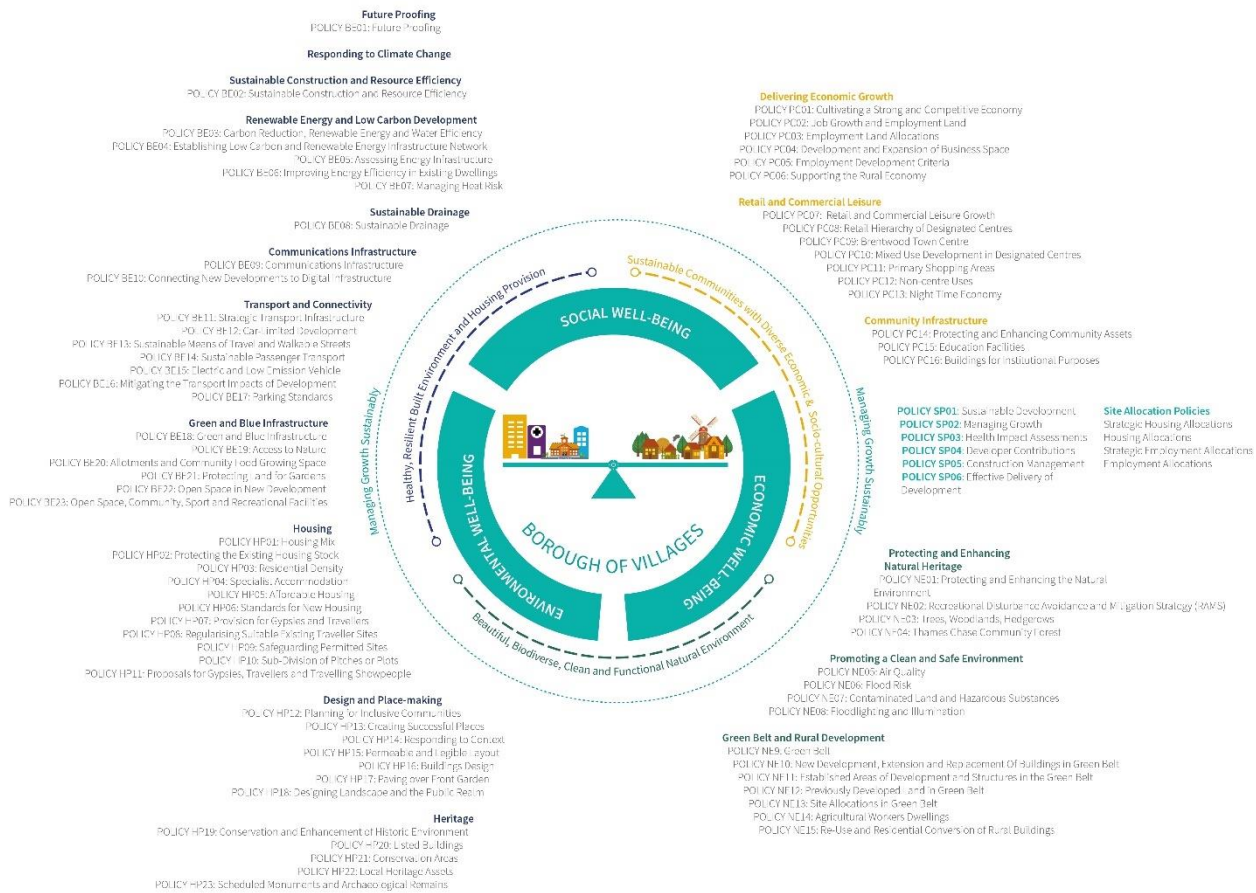
The new Local Plan framework was informed by the revised NPPF (2018), which has the principals of healthy, inclusive, and sustainable developments embedded throughout the Framework. The revised Local Plan Framework is illustrated below in Figure 1.

## 1.5 National Planning Policy Framework (NPPF, 2018)

The Local 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 a way that they promote health and wellbeing as outlined in Chapter 8, para 91-95.

Figure 1: Local Plan Framework

(Source: Brentwood Local Development Plan)



## 2. 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 Health Impact Assessment

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:*

*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;*

*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*

*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 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 Local Plan 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	Due to limited financial resources and availability of in-house knowledge,

Steps	What's involved	Councils Approach
	available for the purpose of carrying out the study	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, or Comprehensive – is most suitable given the purpose, timescales and resources available.	Given time and resource constraints, as well as the level 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 Local Plan.

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: Parts 1-3	October 2018
	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

Category	Title	Date Published
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 Traveller Accommodation Assessment	October 2017
	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

Category	Title	Date Published
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

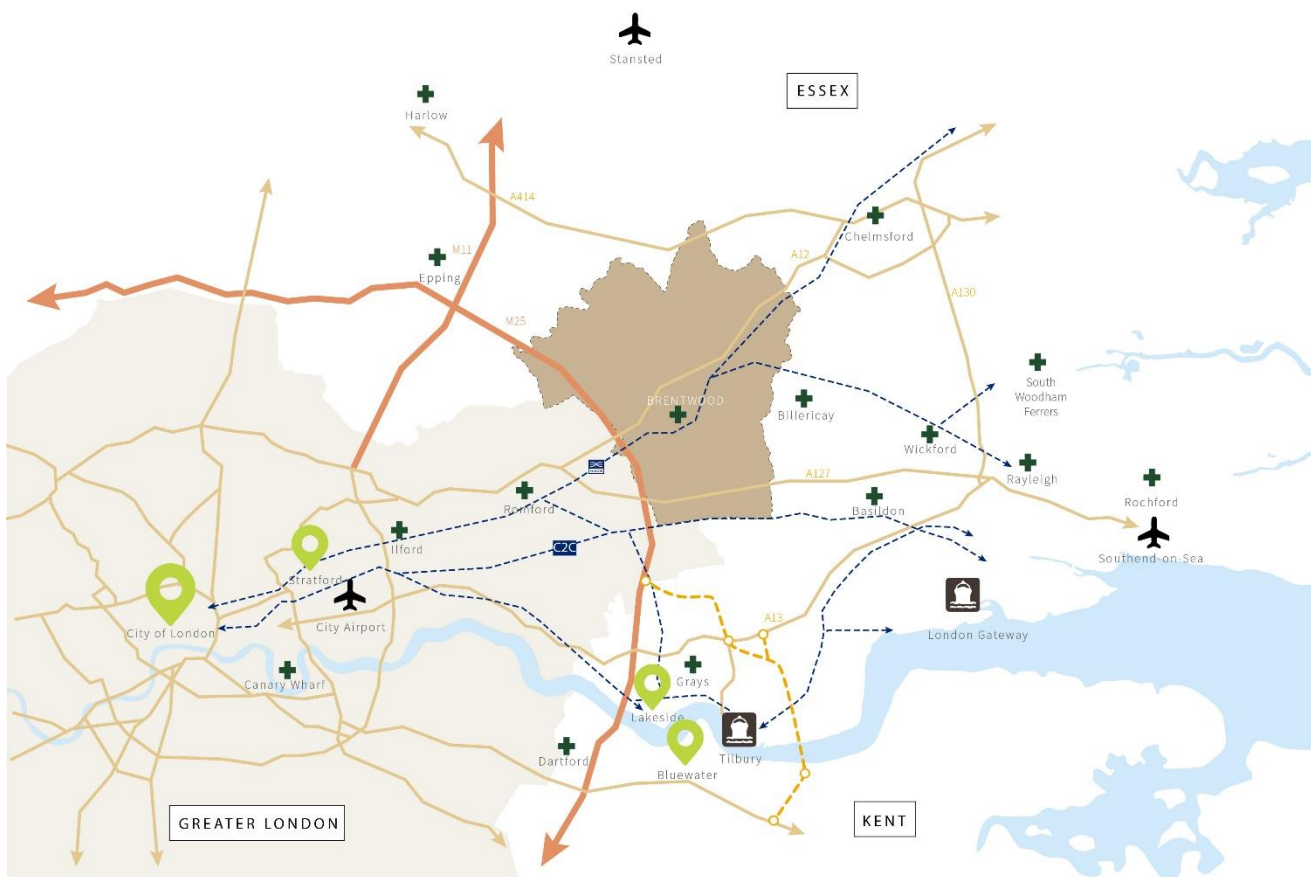
Brentwood Borough is located in the south-west of Essex and east of Greater London. The Borough is approximately 15,300 hectares. The Borough is centred on the market town of Brentwood, which is surrounded by some suburban areas and villages set amongst the Essex countryside. The Borough is only 20 miles 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**

*(Source: Brentwood Borough Profile)*

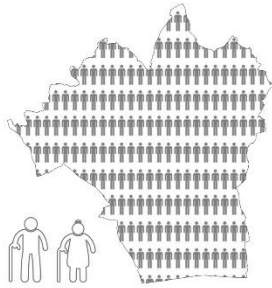


## 5.2.2 Brentwood's Population Profile

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 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**

*(Source: Brentwood Borough Profile)*



The borough’s population is over 73,600 with a significant retired population - an ageing population trend projected to continue



The health of people in Brentwood is generally better than the England average. Deprivation is lower than average, however about 10.8% children live in poverty. Life expectancy for both men and women is higher than the England average. Local health priorities include improving the health of older people, increasing vaccination coverage, and reducing cardiovascular disease by reducing the prevalence of obesity



ONS data 2015/2016 indicates an economic activity rate of 79%, slightly lower than the regional rate of 80.1% but higher than the GB rate of 77.9%. Notably the number of self-employed persons was at 12.5% which was significantly above East of England (10.7%) and GB (10.3%) averages. Long-term unemployed rates were less than both regional and national averages

### 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**

*(Source: Brentwood Borough Profile)*



The current housing stock is largely made up of detached and semi-detached houses with less small unit accommodation



The higher average salaries in London and the south-east have resulted in higher house prices, making affordability a pressing issue in Brentwood

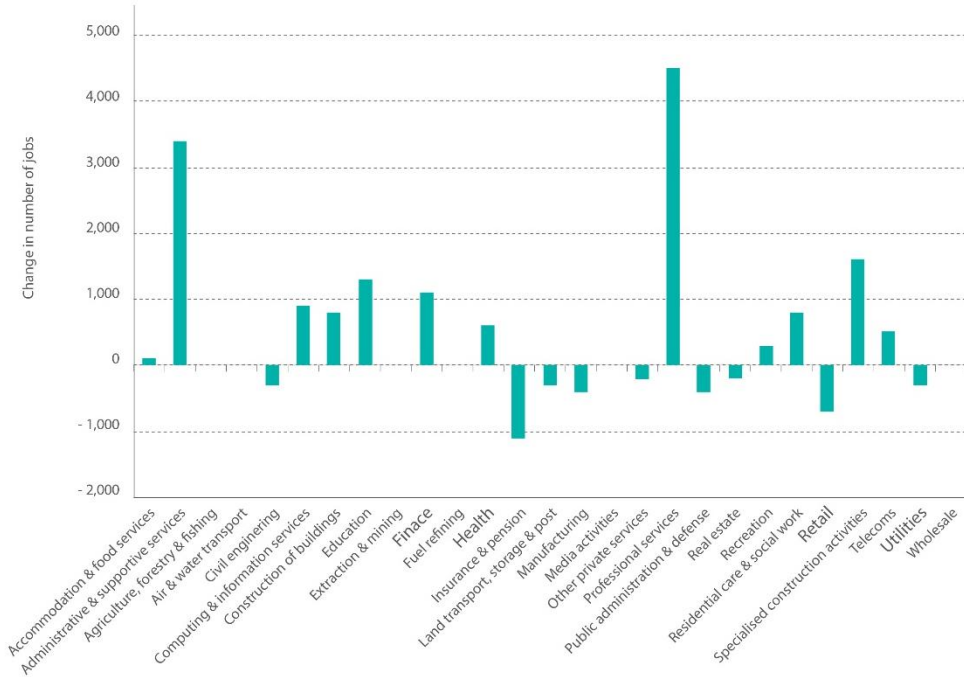
## 5.2.4 Brentwood Economy

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 Absolute Change in Employment Sector**

(Source: Reproduced from Economic Futures)



### 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%.

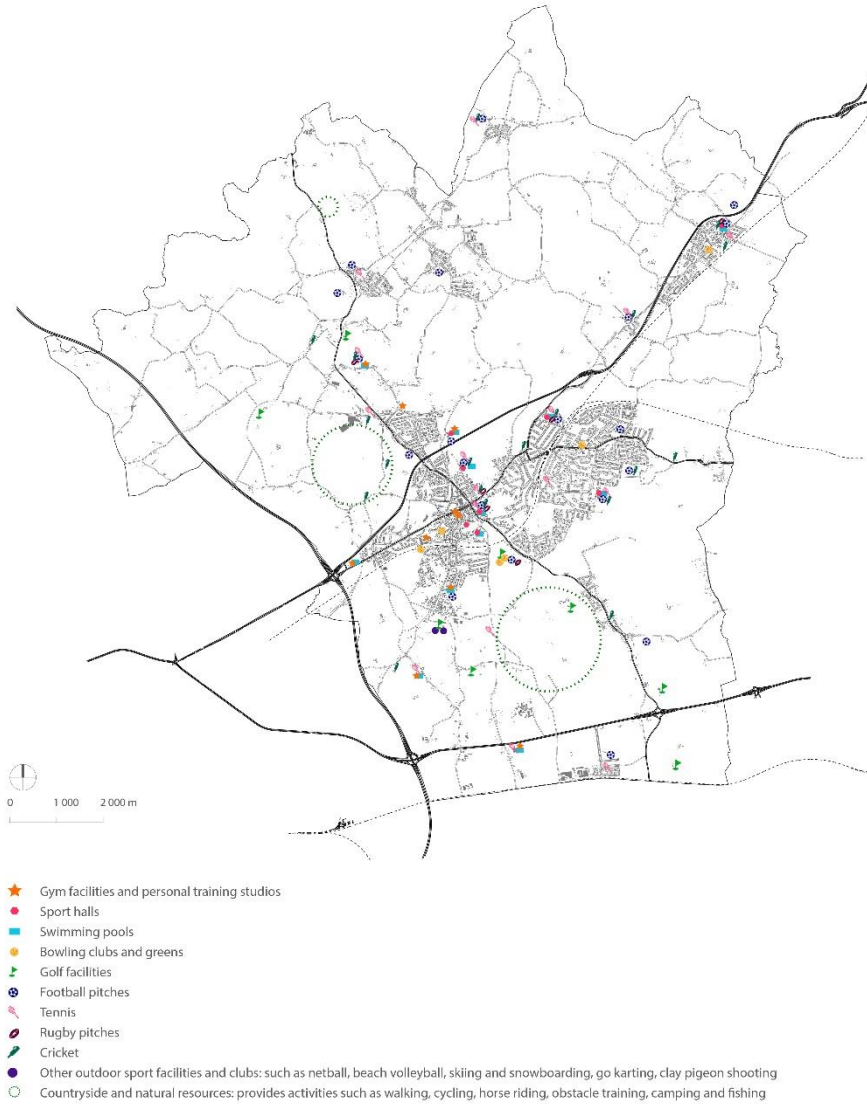
The Public Health England definition for physical activity states that people should participate in 150 minutes or equivalent of at least moderate intensity activity per week. Based on this definition 21.8% of adults within Brentwood are doing enough physical activity to benefit their health (i.e. three 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**

<b>Rate</b>	<b>Brentwood</b>	<b>Essex</b>	<b>England</b>
<b>% Active</b>	67.6%	61.6%	61.8%
<b>% Inactive</b>	25.1%	26.3%	25.7%

**Figure 6: Brentwood's Sport Facilities**

(Source: Brentwood Borough Profile)



## 5.3 Assessment of Policies

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

- Managing Growth;
- Resilient Built Environment;
- Housing Provision;

- 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 2018/19 Pre-Submission Local Plan Framework, as identified in section 1.4 of this report.

The policies were assessed based on the following key:

**Table 4: Coding System Use**

<b>Description</b>	<b>Symbol</b>
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 Local Plan policies on health and wellbeing can be found in appendix 1. This is the second HIA review of the Local Plan policies. The previous HIA was conducted to identify changes needed to the policies from the

2016 draft Local Plan (Regulation 18) to the up dated Regulation 19 Pre-Submission Local 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 made to existing policies and 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 Local Plan. 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 2018/19 Local Plan, 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 Plan:

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

## 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 Local Plan Framework was restructured to ensure Health and Wellbeing, Inclusive Developments, Environmental Protection, and Sustainable Developments



were a cross-cutting theme throughout the Local Plan and in line with the revised NPPF (2018);

- The 2016 Local Plan 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; and
- Specific policies related to health and wellbeing were included in the Local Plan to strengthen the importance of health and wellbeing throughout the Plan.

It is important to note that the Local Plan 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 Local Plan. Some of the key changes made to the Local Plan were:

- Embedding health and wellbeing throughout the Local Plan;
- Restructuring the Local Plan 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 Local Plan policies to ensure health and wellbeing is embedded throughout the Local Plan, the following additional recommendations / actions will be carried out:

- Inclusion of a Health Impact Assessment policy in the Local Plan 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

voluntary prepare a HIA to ensure all potential health impacts have been considered. Minor changes to the Health Impact Assessment policy may be required following the Regulation 19 Pre-Submission consultation, as the Essex Planning Officer Association (EPOA) is currently in the process of updating the HIA Guidance Note which is expected to come into effect in December 2018 / January 2019. 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 Local Plan 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 following the completion of Regulation 19 Pre-Submission stage, depending on any modification required prior to submission, and again following any modification required by the Planning Inspector following the Examination in Public (EiP); and
- Review of the HIA in 5 years at the same time as the review of the Local Plan, 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 Local Plan 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 Plan (LP) has shown, the undertaking of the HIA has not only identified and addressed areas where there were policy gaps in the LP, 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 Local Plan 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 Local Plan 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 Local Plan 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 Local Plan 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 Local Plan will be reflected in a further update of the HIA prior to adoption of the Local Plan.

# Appendices

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

Chapter	Policy Number	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)	2018/19 LP Policies
Managing Growth	SP01	Sustainable Development (new)	N/A			(++)
	SP02	Managing Growth (new)	N/A			(N)
	SP03	Health Impact Assessment	N/A			(++)
	SP04	Developer Contributions	N/A			(N)
	SP05	Construction Management	N/A			(++)
	SP06	Effective Delivery of Development	N/A			(++)
		BE01	Future Proofing	N/A		

Chapter	Policy Number	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)	2018/19 LP Policies
Resilient Built Environment	BE02	Sustainable Construction and Resource Efficiency	(++)		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.	(++)
	BE03	Carbon Reduction, Renewable Energy and Water Efficiency	N/A			(++)
	BE04	Establishing Low Carbon and Renewable Energy Infrastructure Network	N/A			(++)
	BE05	Assessing Energy Infrastructure	N/A			(+)

Chapter	Policy Number	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)	2018/19 LP Policies
	BE06	Improving Energy Efficiency in Existing Dwellings	N/A			(++)
	BE07	Managing Heat Risk	N/A			(++)
	BE08	Sustainable Drainage	(++)			(++)
	BE09	Communications Infrastructure	(+)			(+)
	BE10	Connecting New Developments to Digital Infrastructure	N/A			(+)
	BE11	Strategic Transport Infrastructure	N/A			(++)
	BE12	Car-Limited Development	N/A			(++)
	BE 13	Sustainable Means of Travel and Walkable Streets	N/A			(++)
	BE14	Sustainable Passenger Transport	N/A			(+)

Chapter	Policy Number	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)	2018/19 LP Policies
	BE15	Electric and Low Emission Vehicles	N/A			(+)
	BE16	Mitigating the Transport Impacts of Development	N/A			(+)
	BE17	Parking Standards	N/A			(+)
	BE18	Green and Blue Infrastructure	(++)	Policy name change from Green Infrastructure to Green & Blue Infrastructure		(++)
	BE19	Access to Nature	N/A			(++)
	BE20	Allotment and Community Food Growing Space	N/A			(+)
	BE21	Protecting Land for Gardens	N/A			(N)
	BE22	Open Space in New Development	(+)			(+)
	BE23	Open Space, Sport and	(++)			(++)

Chapter	Policy Number	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)	2018/19 LP Policies
		Recreational Facilities				
Housing Provision	HP01	Housing Mix	(++)			(++)
	HP02	Protecting the Existing Housing Stock	N/A			(N)
	HP03	Residential Density	(N)			(N)
	HP04	Specialist Accommodation	(+)			(+)
	HP05	Affordable Housing	(+)			(+)
	HP06	Standards for New Housing	(N)			(N)



Chapter	Policy Number	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)	2018/19 LP Policies
	HP07	Provision for Gypsies and Travellers / (Previously named Gypsy and Traveller in the 2016 LP)	(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)

Chapter	Policy Number	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)	2018/19 LP Policies
	HP08	Regularising Suitable Existing Traveller Sites	N/A			(+)
	HP09	Safeguarding Permitted Sites	N/A			(N)
	HP10	Sub-Division of Pitches or Plots	N/A			(N)
	HP11	Proposals for Gypsies, Travellers and Travelling Showpeople on Windfall Sites	N/A			(N)
	HP12	Planning for Inclusive Communities	N/A			(++)
	HP13	Creating Places	N/A			(++)
	HP14	Responding to Context	N/A			(+)
	HP15	Permeable and Legible Layout	N/A			(++)
	HP16	Building Design	(+)	Policy could include something about using design to ensure the development of		(++)

Chapter	Policy Number	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)	2018/19 LP Policies
				inclusive environments.		
	HP17	Paving Over Front Gardens	N/A			(N)
	HP18	Designing Landscape and the Public Realm	N/A			(++)
	HP19	Conservation and Enhancement of Historic Environment	(N)			(N)
	HP20	Listed Buildings	(N)			(N)
	HP21	Conservation Areas	(+)			(+)
	HP22	Local Heritage Assets	N/A			(++)
	HP23	Scheduled Monuments and Archaeological Remains	(N)			(N)

Chapter	Policy Number	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)	2018/19 LP Policies
Prosperous Communities	PC01	Cultivating a Strong and Competitive Economy	N/A			(++)
	PC02	Job Growth and Employment Land	N/A			(N)
	PC03	Employment Land Allocations	(+)			(+)
	PC04	Development and Expansion of Business Space	N/A			(+)
	PC05	Employment Development Criteria	N/A			(+)
	PC06	Supporting the Rural Economy	(+)			(+)
	PC07	Retail and Commercial Leisure Growth	(+)	Policy name change		(+)
	PC08	Retail Hierarchy of Designated Centres	N/A			(+)
	PC09	Brentwood Town Centre	(+)			(+)

Chapter	Policy Number	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)	2018/19 LP Policies
	PC10	Mixed Use Development in Designated Centres	N/A			(++)
	PC11	Primary Shopping Areas	N/A			(+)
	PC12	Non-Centre Uses	N/A			(+)
	PC13	Night Time Economy	N/A			(++)
	PC14	Protecting and Enhancing Community Assets	N/A			(++)
	PC15	Education Facilities	N/A			(+)
	PC16	Building for Institutional Purposes	(+)	policy could be strengthened by including text about ensuring design and location are utilised to create an inclusive environment with the existing community.		(+)

Chapter	Policy Number	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)	2018/19 LP Policies
Natural Environment	NE01	Protecting and Enhancing the Natural Environment	N/A			(+)
	NE02	Recreational Disturbance and Mitigation Strategy (RAMS)	N/A			(++)
	NE03	Trees, Woodlands, Hedgerows	N/A	This policy has been created to merge the previous 2016 LDP policies Landscape Protection and Woodlands, and Wildlife and Nature Conservation		(++)
	N/A	Wildlife and Nature Conservation	(++)	This policy has been renamed / added into a new policy named Trees, Woodlands, Headerows.		N/A
	N/A	Landscape Protection and Woodland Management	(+)	This policy has been renamed / added into a new policy named Trees, Woodlands, Headerows.		N/A

Chapter	Policy Number	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)	2018/19 LP Policies
	NE04	Thames Chase Community Forest	(++)			(++)
	NE05	Air Quality	(+)			(+)
	NE06	Flood Risk	(+)			(+)
	NE07	Contaminated Land and Hazardous Substances	(+)			(+)
	NE08	Floodlighting and Illumination				
	NE09	Green Belt	(+)			(+)
	NE10	New Development, Extension and Replacement of Buildings in the Green Belt	(N)			(N)
	NE11	Established Areas of Development and Structures in the Green Belt	(N)			(N)
	NE12	Previously Developed Land in Green Belt	(+)			(+)

Chapter	Policy Number	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)	2018/19 LP Policies
	NE13	Site Allocations in the Breen 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)
	NE14	Agricultural Workers Dwellings	(N)			(N)
	NE15	Re-Use and Residential Conversion of Rural Buildings	(+)			(+)



Chapter	Policy Number	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)	2018/19 LP Policies
Site Allocations	N/A	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
	R01 (I)	Dunton Hills Garden Village Strategic Allocation	N/A			(+)

Chapter	Policy Number	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)	2018/19 LP Policies
	R01 (II)	Spatial Design of Dunton Hills Garden Village	N/A			(+)
	R01 (III)	Scheme Delivery and Legacy Management	N/A			(+)

## Appendix 2: Key Appraisal Findings

The Health Impact Assessment process was structured around the 2018/19 chapter structure of the Local Plan 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 LP 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 Local Plan.

### (ii) **Managing Growth**

Development of any kind can have an impact on health and wellbeing. The policies found within the Local Plan aimed to promote healthy, inclusive, and sustainable developments. The Managing 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; and
- Construction Management;

### (iii) **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 LP.

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 LP was strengthened from a health and wellbeing perspective, Building Design, which now includes the requirement of creating inclusive environments through design.

#### **(iv) Prosperous Community**

The policies found within this chapter of the Local Plan 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 effect 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; and
- Protecting and enhancing Community Assets;

**(v) 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 LP 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:

- Protecting and Enhancing the Natural Environment;
- Recreational Disturbance and Mitigation; and
- Trees, Woodlands, Hedgerows

**(vi) Dunton Hills Garden Village**

The 2016 Local Plan 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.

# BRENTWOOD LOCAL DEVELOPMENT PLAN

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