

# Health Impact Assessment Note (2018)





- 1.1 In July 2017, a Health Impact Assessment (HIA) was undertaken for the draft Core Strategy and Development Plan (CSDP). The purpose of the HIA was to consider the potential health impacts of the plan and make recommendations on how the plan could be improved to have more positive health impacts.
- 1.2 The HIA concluded that the CSDP is likely to have a positive impact on the health and wellbeing of the local population, however, it did make a number of recommendations for how these health impacts could be optimised.
- 1.3 Due to time constraints, it was not possible to take into account the recommendations of the HIA, prior to the publication of the CSDP for consultation in August 2017. However, when preparing the Publication Draft CSDP, the recommendations of the HIA have been taken into consideration and amendments made where possible.
- 1.4 The purpose of this note, is to highlight how the CSDP has been updated to reflect the recommendations of the HIA and where amendments have not been made, explain the justification for this. The table below sets out identifies the 15 recommendations made through the HIA and how the Council has responded to these.

**Table 1: Changes to the CSDP to reflect HIA Recommendations**

<b>HIA Recommendation</b>	<b>Changes to the Plan</b>
<b>Recommendation 1:</b> Plans to improve the night time economy should take account of the potential for cumulative impact licensing policies in the City. (Policy SS4 Central Area Policy)	None. The CSDP cannot have any influence over the licensing process. The plan could potentially seek to restrict the number of public houses (Use Class A4) within a particular area, but evidence to adopt such an approach is not available. In addition, such a policy would be contrary to Paragraph 70 of the NPPF which indicates that policies should guard against the unnecessary loss of valued facilities and services (including public houses) and seeks to direct main town centre uses to designated centres, such as the city centre.
<b>Recommendation 2:</b> Supporting the development of public houses should be considered alongside the council's role to reduce the impact of alcohol harms across the city and the Statement of Licensing Policy. (Policy HWS2: Protection and delivery of community, social and cultural facilities)	None. The CSDP cannot have any influence over the licensing process. The plan could potentially seek to restrict the number of public houses (Use Class A4) within a particular area, but evidence to adopt such an approach is not available. In addition, such a policy would be contrary to Paragraph 70 of the NPPF which indicates that policies should guard against the unnecessary loss of valued facilities and services (including public houses) and seeks to direct main town centre uses to designated centres, such as the city centre.
<b>Recommendation 3:</b> Consider a) working with outlets to make the healthier choice	With regard to recommendation a), this is beyond the remit of the CSDP which is a development plan.

<p>the easier choice, and b) a population-level (cumulative impact) policy that takes into account risks to the health of children and young people by outlets sited close to schools. (Policy EP12: Hot Food Takeaways)</p>	<p>Policy HWS1 (now SP7) already indicated that the council will manage the location/number, and access to, unhealthy eating outlets. Policy EP12 (now VC4) expands upon this by seeking to restrict the number of hot food takeaways within designated centres, but is primarily focused on protecting the vitality and viability of centres, rather than seeking to restrict access for health reasons.</p> <p>It was originally intended to set out further detail within a Hot Food Takeaway SPD, however following the recommendations of the HIA and representations made on the draft CSDP, Policy VC3 has been amended to restrict the proportion of hot food takeaways in certain areas based on their health impacts. Further justification is provided with the Public Health evidence report and within the Compliance Statement.</p>
<p><b>Recommendation 4:</b> Consider adopting and using criteria for non-obesogenic and healthy, sustainable environments such as promoting active travel and making the healthy choice the easier choice. (Policy EP2: Primary Employment Areas; Policy EP3: Key Employment Areas; Policy EP4: Other employment sites; Policy EP5: Policy New employment areas)</p>	<p>Policies EP2, EP3 and EP4 (now EG1, 2 and 3) seek to safeguard existing employment sites for business and general industrial use (Use Classes B1, B2 and B8). Policies within the Connecting the City chapter seek to focus development close to public transport links to enhance opportunities for walking and cycling. When read as a whole, it is considered that the CSDP already addressed this recommendation.</p>
<p><b>Recommendation 5:</b> In the consideration of each proposal, all attempts should be made to making the healthy choice the easier choice. (Policy EP8: Designated Centres)</p>	<p>Policy EP8 (now VC1) seeks to direct proposals for main town centre uses to designated centres, which is consistent with the NPPF. Policies SP7 and VC4 seek to restrict access to unhealthy eating outlets.</p>
<p><b>Recommendation 6:</b> Consider undertaking a Health Impact Assessment for each separate proposal prior to development. (Policy EP9: Retail Hierarchy; Policy E1: Urban Design; Policy E17: Quality of Life and Amenity; Policy WM8: Land Instability and Minerals Legacy; Policy SA1: Vaux Strategic Allocation; Policy SA2: South Sunderland Growth Area)</p>	<p>The policy requirements of the CSDP must be proportionate. The Council can therefore only realistically ask for a Health Impact Assessment to be undertaken for proposals that are of such a scale that they are likely to have significant health impacts. Policy SP7 has been amended to require a Health Impact Assessment to be submitted in support all development which requires an Environmental Impact Assessment, in addition to residential schemes for 100 dwellings or more.</p>
<p><b>Recommendation 7:</b> Consider criteria for acceptable marketing e.g. promotion of healthy habits and preventing the advertising of potentially harmful products such as alcohol and fast food near schools and places young people gather. (Policy E3:</p>	<p>The CSDP is unable to influence to content of marketing materials. Paragraph 67 of the NPPF indicates that planning policies relating to advertisements should only be to control them in the interests of amenity and public safety. This would therefore be beyond the scope of the CSDP.</p>

Advertisements/Shop Fronts)	
<b>Recommendation 8:</b> Consider including a clause in the policy to specifically consider quality of life as well as amenity. (Policy E17: Quality of Life and Amenity; Policy E18: Noise-Sensitive Development; Policy WM9: Cumulative Impact)	It is considered that Policy E17 (now HS1) already adequately covers quality of life issues, in conjunction with other policies contained within the plan.
<b>Recommendation 9:</b> Any proposals should be considered in the light of the potential impact of residents living nearby. (Policy CM3: Renewable Energy)	Policies WWE1 and WWE10 already seeks to protect public amenity. Any proposals will also be expected to be read in conjunction with Policy HS1 which deals specifically with quality of life and amenity issues.
<b>Recommendation 10:</b> Consideration should be given to the potential impact of heavy road traffic on air quality and road traffic accidents. (Policy CC4: Port of Sunderland)	The policies within the wider Sustainable Transport chapter seek direct development towards sustainable locations that are well served by public transport, reducing the need to travel and encouraging a modal shift towards more sustainable transport methods. In addition, Policy HS1 will ensure that planning permission will only be granted where it does not generate unacceptable adverse impacts from emissions and traffic.
<b>Recommendation 11:</b> Proposals to provide outdoor recreation and leisure should be carefully scrutinised so that they are congruent with ecological sustainability (e.g., do not involve large scale use of synthetic/ inorganic materials) and social equity (e.g., considering whether types of recreation provide equitable access). (Policy E11: Green Belt; Policy E13: Development in the open countryside)	The impact of installing synthetic sports pitches on ecology and other environmental considerations (such as surface water run-off) needs to be carefully considered at the planning application stage. However, a balance has to be struck with regards to sports pitch provision across the city, and advice taken from the Playing Pitch Plan, together with Council officers. Whilst there may be negative environmental effects in relation to ecology and to surface permeability (which can be partly or fully addressed with supporting mitigation) there are also wider benefits that synthetic surfaces can provide, most notably in terms of reducing ongoing maintenance costs, increasing community use and better flexibility. Synthetic pitches allow for much more intensive use than grass pitches, and it is easier to adapt these pitches quickly (splitting pitches for junior match use or swapping goals to provide different sports pitch needs). In this respect, synthetic have potential to increase accessibility for all. In light of the above, no further alteration is proposed to CSDP, but concerns will be duly addressed in the Council's Playing Pitch Plan and through planning applications.
<b>Recommendation 12:</b> Consideration should	The Council will seek to update its Interim Student

<p>be given as to how the accommodation could be put to good use during non term-time. (Policy H5: Student Accommodation)</p>	<p>Accommodation Policy and adopt this as a Supplementary Planning Document. Consideration will be given to promoting more flexible use of student accommodation during non-term time as part of this update. Amendments have also been made to Policy H3 so that the layout of accommodation is designed in such a way that it is capable of being re-configured through internal alterations to meet general needs housing in the future.</p>
<p><b>Recommendation 13:</b> Consider ensuring that access to such facilities and services will be equitable and does not disproportionately favour those with higher socioeconomic status. (Policy EP13: Culture, Leisure and Tourism)</p>	<p>Policy VC1 seeks to ensure that main town centre uses (which includes leisure, entertainment facilities, intensive sport and recreation uses, arts, culture and tourism development) are located in designated centres, which will ensure that they are located in sustainable locations which are accessible by a wide range of transport modes and are accessible for all.</p>
<p><b>Recommendation 14:</b> Consider using the principles of community street audit when planning specific changes to the centre and other sites. (Policy CC3: City Centre Accessibility and Movement)</p>	<p>Community street audits may be a useful tool to use when preparing detailed development strategies and/or preparing planning applications for substantial development proposals. The Council's Planning Implementation team can potentially look into the possibility of undertaking community street audits when preparing detailed masterplans for the development of sites. Consideration could also be given to promoting the use of community street audits as part of a developer's pre-application consultation through a future update to the Statement of Community Involvement.</p>
<p><b>Recommendation 15:</b> Consider planning facilities for upcycling and facilitated freeshare in preference to disposal. (Policy WM1: Waste Management)</p>	<p>Policy WWE6 seeks to support the minimisation of waste production and encourages to the re-use and recovery of waste materials. It is considered that the policy therefore already provides a supportive approach for upcycling and facilitated freeshare in preference to disposal.</p>



