



# CONSULTATION STATEMENT

## Health Impact Assessment

### Supplementary Planning Document



## **1 Background**

1.1.1 The Health Impact Assessment (HIA) Supplementary Planning Document (SPD) was produced to help maximise the health benefits of a development and minimise the potential harms, whilst maintaining a focus on reducing inequalities. The SPD also provides further guidance in respect of Harlow Local Development Plan (HLDP) Policy L4, Health and Wellbeing, which supports the use of an HIA for certain types of development.

## **2 Town and Country Planning Regulations**

2.1.1 The SPD was produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant regulations relating to the consultation process are set out below.

- Regulation 12:
  - a) Requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated into the SPD.
  - b) Requires the Council to publish the documents for a minimum 4 week consultation, specify the date when responses should be received and identify the address to which responses should be sent.
- Regulation 35:

Requires the council to make documents available by taking the following steps;

  - a) Make the document available at the principle office and other places within the area that the Council considers appropriate;
  - b) Publish the document on the Council's website.

## **3 Consultation and Responses Received**

3.1.1 The consultation period started on 25 August 2023 and closed at 5pm on 6 October 2023.

3.1.2 The Council complied with the legislative requirements for consulting on an SPD, as well as the requirements set out in the Council's adopted Statement of Community Involvement.

3.1.3 This included:

- Notifications being sent to people, organisations and businesses who have either recorded an interest in SPDs or are statutory consultees (see Appendix A) as well as agents that have submitted a planning application in the past 5 years;
- A notice being published in the local newspaper (see Appendix B);
- Posts about the consultation being made on the Council's social media channels;
- Hard copy of the SPD being available at the Civic Centre
- An online version being available on the Council's website

3.1.4 In total, 8 people, organisations or companies responded to the consultation. From these responses, 45 points were extracted which are detailed, along with a Council response to each, in Appendix C. A summary of the main issues raised during the consultation which required amendments to the draft SPD are as follows:

- Section 2 was updated to include reference to the TCPA Healthy Homes Campaign, the Hertfordshire and West Essex Integrated Care Partnership (HWE ICP) Integrated Care Strategy, the 2023 King's Fund Report and the updated National Planning Policy Framework 2023.
- Section 4 was updated to be clear on what the recommendations should include and that a balance between recommendations will need to be struck. The different population groups vulnerable to health inequalities and the different types of HIA was also included.
- Various criteria in the checklist were updated in reference to green and blue infrastructure, sustainable transport and health.

## 4 Appendix A Consultees

The following statutory organisations, groups and charities were notified about the consultation on the draft Health Impact Assessment (HIA) SPD. These are in addition to individuals and companies who were notified.

Affinity Water	Highways England
Anglian Water	Historic England
British Telecom/Openreach	Home Builders Federation
Canal and River Trust	Hunsdon Parish Council
Chelmsford City Council	Lee Valley Water
Department for Education	Little Hadham Parish Council
East Hertfordshire District Council	Matching Parish Council
East of England Ambulance Service	National Grid
Eastwick and Gilston Parish Council	Natural England
Environment Agency	Nazeing Parish Council
Epping Forest District Council	Network Rail
Epping Upland Parish Council	NHS England
Essex County Council	North Weald Parish Council
Essex County Fire and Rescue Service	Pear Tree Mead Academy
Essex Police	Princess Alexandra Hospital NHS Trust
Fawbert & Barnard's Primary School	Robert Halfon MP
Harlow Alliance Party	Roydon Parish Council
Harlow and District Sports Trust	Sawbridgeworth Town Council
Harlow College	Sheering Parish Council
Harlow Council Officers and Councillors	Sport England
Harlow Ethnic Minority Umbrella	Thames Water
Harlow Fields School and College	Theatre Trust
Hertfordshire County Council	UK Power Networks
	Hertfordshire and West Essex ICB

## 5 Appendix B Press Notice

### **DRAFT HEALTH IMPACT ASSESSMENT (HIA) SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

Harlow Council is consulting on the Draft Health Impact Assessment (HIA) Supplementary Planning Document (SPD). An SPD expands upon policy and provides further detailed advice or guidance on policies set out in the Harlow Local Development Plan.

The purpose of the Health Impact Assessment SPD is to provide further guidance in respect of Harlow Local Development Plan Policy L4 Health and Wellbeing which supports the use of HIAs for certain types of developments. The SPD sets out a breakdown of the HIA procedure and provides a checklist to be completed at an early stage of the planning process to help understand the impact of the development and to inform discussions with the Development Management team and Public Health team.

The SPD, once adopted, will inform relevant pre-application discussions and will be a material consideration in the determination of planning applications.

**We are now seeking your views on the Draft Health Impact Assessment SPD.** The most efficient way to provide comments is by emailing [myharlow@harlow.gov.uk](mailto:myharlow@harlow.gov.uk) but you can also write to us at Forward Planning, Harlow Council, Civic Centre, The Water Gardens, Harlow, CM20 1WG.

The consultation starts on **25 August 2023 and closes at 5pm on 6 October 2023**. Comments received after this date may not be accepted.

The Draft Health Impact Assessment SPD can also be viewed online at [www.harlow.gov.uk/spd](http://www.harlow.gov.uk/spd), or in the Civic Centre during normal opening hours. If you are unable to access the document, please contact us and we can send you a hard copy.

By responding, you give consent to the Council to hold & process your personal data in accordance with the Data Protection Act and the General Data Protection Regulation. Your name, organisation & comments may be available for others to view at the Council offices & on the Council website. The Health Impact Assessment SPD has been prepared in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).



## 6 Appendix C Consultation Responses

Name	Response	Council Response (changes in bold)
<p>Capital Space Ltd – Pete Boam</p> <p>Email – 25/08/2023</p>	<p>My first comment is that to the extent the preparation and implementation of a Health Impact Assessment carries an expense to the developer. The LPA should be clear and concise about what is required from the developer by way of initial design, commitment to build and to maintain in the future. The additional costs imposed by the HIA will have a negative effect on the viability of any scheme and may cause it not to proceed.</p>	<p>The Harlow Local Development Plan, which was adopted in December 2020, sets out that a Health Impact Assessment (HIA) may be required alongside a planning application; the development thresholds that require an HIA are set out in the Council's Validation Checklist. Therefore, under adopted policy, an HIA is required for certain developments and this should be taken into consideration when submitting a planning application.</p> <p>The recommendations that are set out in an HIA may impinge on other areas of the proposed development. A balance will need to be struck between the conflicting recommendations and worked through to an acceptable conclusion.</p> <p><b>Section 4.2 will be updated to make it clear that a balance between recommendations will need to be struck.</b></p>
<p>Capital Space Ltd – Pete Boam</p> <p>Email – 25/08/2023</p>	<p>Para 3.1.1 explains that the Harlow population has grown by 13.9% since 2011, i.e. since we opened for business. This does help to explain why we are continually over-subscribed with applicants. Surveys frequently illustrate that people who are gainfully employed in an intellectually stimulating occupation enjoy a better standard of general health than those that are not. They also possess more self-confidence and are less likely to become a financial burden on the state. Our aim is to grow our business to enable more of the residents of Harlow to work locally for themselves or for a growing local business. In this regard the presence of the current Greenway Business Centre is a force for good. A larger and improved centre will be capable of doing even more.</p>	<p>Noted.</p>
<p>Capital Space Ltd – Pete Boam</p>	<p>Para 4 explains a Health Impact Assessment but then the check list concentrates on residential developments. There should be a greater awareness of the benefits that a well thought out employment area could create.</p>	<p>The Health Impact Assessment (HIA) Checklist in Appendix A has been adapted from the Essex Health and Sport England Active Design Principles Integrated Impact Assessment Checklist and although there is a</p>

Name	Response	Council Response (changes in bold)
Email – 25/08/2023		focus on residential development, the checklist does include criteria which focus on the health and wellbeing of employment uses as well as other uses. If a criteria is not applicable for the proposal, this should be made clear in the comment section as to why.
Capital Space Ltd – Pete Boam  Email – 25/08/2023	Para 4.2.6 requires the final HIA to be submitted with the planning application. A formal planning application is the start of the process, not the end. Once an application has been registered the LPA sends out consultations and advertises the application. This process can produce contributions that lead to amendments, some minor and some major. Occasionally the whole application has to be withdrawn so that it can be re-submitted in a modified form. It is not realistic for the original HIA to remain in a fixed state and then for it to be a factor in the eventual decision about whether or not to grant planning permission by a committee or by the Secretary of State. There is also the potential for section 106 negotiations and CIL processes to influence the content of an HIA.	A completed Health Impact Assessment (HIA) Checklist will inform discussions at pre-application stage. Feedback will then be provided to identify any issues at an early stage and outline the scope of the final HIA report that will be submitted with the planning application.  The recommendations will identify whether these should be done through a Section 106 agreement and will be before Section 106 discussions.  <b>Section 4.2 will be updated to ensure it is clear what the recommendations should include.</b>
National Highways – Shamsul Hoque  Email – 31/08/2023	We have reviewed the submitted draft Health Impact Assessment (HIA) Supplementary Planning Document (SPD). The purpose of the HIA is to provide further guidance in respect of Harlow Local Development Plan Policy L4 Health and Wellbeing, which supports the use of the HIAs for certain type of development. The SPD sets out a breakdown of the health impact assessment procedure and provides a checklist to be completed at an early stage of the planning process to help understand the impact of the development and to inform discussions with the Development Management team and Public Health team. Consequently, statements set out in this draft Health Impact Assessment SPD are unlikely to have any impact on the operation of the trunk road.  Therefore, National Highways offers no comment.	Noted.
Natural England – Sharon Jenkins	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Noted.

Name	Response	Council Response (changes in bold)
Email – 15/09/2023	<p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>	
Sports England – Roy Warren  Email – 15/09/2023	<p>Support is offered for the Council advocating to use the HIA checklist in Appendix A. As set out in the SPD, the checklist has been adapted from the Integrated Impact Assessment Checklist that has recently been prepared by Essex County Council in consultation with Sport England. The checklist includes questions that relate to the Sport England’s Active Design <a href="https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</a> principles which are intended to help ensure that opportunities to encourage physical activity in the design of new development are fully considered and therefore goes further than more conventional HIA checklists. The use of this checklist would be consistent with Policy L4 of the adopted Local Plan which explicitly expects applicants to have regard to the Active Design principles and Government policy in paragraph 92 of the NPPF which advises planning policies and decisions to enable and support healthy lifestyles.</p>	Noted.
Hertfordshire County Council Public Health Team – Irina Davis  Email - 2/10/2023	<p><b>Impacts of a proposal on different population groups</b></p> <p>The SPD lacks guidance on the importance and how to identify impacts on different population groups as a result of the development.</p> <p>HIA aims to reduce health inequalities by informing policy makers of the potential health impacts of a proposal on different population groups and, where appropriate, recommending changes to enable a more equitable distribution of impacts.</p> <p>All stages and methods of the HIA should consider the implications for health inequalities. For example, a profile of the population should assess how the vulnerable sections of a population are adversely affected by the policy. Priorities and recommendations of the HIA should aim at ‘levelling up’, i.e.</p>	<p><b>The SPD will be updated to include a section on different population groups and the importance of how the Health Impact Assessment (HIA) should aim to improve the health status of the population groups vulnerable to health inequalities.</b></p>

Name	Response	Council Response (changes in bold)
	<p>raising the health status of the least healthy population groups to that of the healthiest.</p> <p>Health inequalities are defined as: "... the unjust and avoidable differences in people's health across the population and between specific population groups... Health inequalities go against the principles of social justice because they are avoidable. They do not occur randomly or by chance. They are socially determined by circumstances largely beyond an individual's control. These circumstances disadvantage people and limit their chance to live longer, healthier lives".</p> <p>Population groups who are particularly vulnerable to health inequalities include: children and young people, older adults, people with disabilities, people from lower socio-economic groups and people with long term illnesses. See below for a detailed list of vulnerable population groups.</p> <p>The groups listed below have been identified as more susceptible to poorer health and wellbeing outcomes (health inequalities) and therefore it is important to consider them in a HIA Screening and appraisal. In a HIA, the groups identified as more sensitive to potential impacts will depend on the characteristics of the local population, the context, and nature of the proposal itself.</p> <p>This list is just a guide and is not exhaustive. It may be appropriate to focus on groups that have multiple disadvantages. Please also note that terminology can change over time.</p> <p>Sex / Gender related groups</p> <ul style="list-style-type: none"> <li>• Female</li> <li>• Male</li> <li>• Transgender</li> <li>• Other (please specify)</li> </ul> <p>Age related groups (could specify age range for special consideration)</p> <ul style="list-style-type: none"> <li>• Children and young people</li> <li>• Early years (including pregnancy and first year of life)</li> <li>• General adult population</li> <li>• Older people</li> </ul>	



Name	Response	Council Response (changes in bold)
	<p>Income related groups</p> <ul style="list-style-type: none"> <li>• Economically inactive</li> <li>• People on low income</li> <li>• People who are unable to work due to ill health</li> </ul> <p>Groups at higher risk of discrimination or other social disadvantage</p> <ul style="list-style-type: none"> <li>• Black and minority ethnic groups (please specify)</li> <li>• Carers</li> <li>• Ex-offenders</li> <li>• Gypsies and Travellers</li> <li>• Homeless</li> <li>• Language / culture (please specify)</li> <li>• Lesbian, gay and bisexual people</li> <li>• Looked after children</li> <li>• People seeking asylum</li> <li>• People with long term health conditions</li> <li>• People with mental health conditions</li> <li>• People with physical, sensory or learning disabilities / difficulties</li> <li>• Refugee groups</li> <li>• Religious groups (please specify)</li> <li>• Lone parent families</li> <li>• Veterans</li> </ul> <p>Geographical groups and / or settings</p> <ul style="list-style-type: none"> <li>• People in key settings: workplaces / schools / hospitals / care homes / prisons</li> <li>• People living in areas which exhibit poor economic and / or health indicators</li> <li>• People living in isolated or over-populated areas</li> <li>• People unable to access services and facilities, including people in institutions such as mental health hospitals</li> </ul>	
Hertfordshire County Council Public Health	<p><b>Breakdown of HIA Procedure</b></p> <p><b>Stage 1: Screening</b></p>	<p><b>Section 4.2 will be amended to include the Health Impact Assessment (HIA) thresholds.</b></p> <p><b>Paragraph 4.2.3 will be amended to state that major developments that are not required to produce an</b></p>

Name	Response	Council Response (changes in bold)
<p>Team – Irina Davis</p> <p>Email - 2/10/2023</p>	<p>It will be helpful to outline the Council's Validation Checklist's thresholds for HIA in this section for clarity:</p> <ul style="list-style-type: none"> <li>• 50 or more dwellings.</li> <li>• 999m2 or more (any use class); or</li> <li>• C2 use class</li> </ul> <p>Setting out thresholds usually deletes the need for the screening stage of the HIA. However, there needs to be more clarity as the SPD also refers to the good practice of screening any proposal to understand if there will be any impacts. Does this mean a proposal for a minor development must also submit a screening exercise? If so, which template/checklist should the developer use? It is unreasonable to ask the developer to complete a lengthy 15-page Appendix A for the minor development.</p>	<p><b>HIA will need to complete the HGGT Sustainability Guidance &amp; Checklist early in the planning process.</b></p>
<p>Hertfordshire County Council Public Health Team – Irina Davis</p> <p>Email - 2/10/2023</p>	<p><b>Stage 2: Scoping</b></p> <p>It is not clear whether Appendix A is used for screening or scoping stages of the HIA. It refers to it at both stages. Furthermore, there is confusion as to whether the Appendix A should be submitted at the pre-application stage or alongside a planning application. Is it used as an HIA or just a scoping exercise to select relevant topics that should be covered by an HIA report when submitting the planning application?</p> <p>The types of HIA and the level of detail for different size of development is not set in the SPD document. For example, the development of 50 units or more will be subject to HIA. It does not state what type of HIA is required for the development of 50 units, or large proposals, i.e. 300 units or more. The SPD does not provide guidance or templates on the level of detail and information to be included in HIA reports based on the size of the development.</p> <p>There are differing types of HIA from desktop reviews through to comprehensive, full assessments. There is no national agreement as to which projects require which type of HIA. This SPD document may have set out expectations of the types of HIA to be conducted for different sizes of development (see below):</p> <p><b>Types of HIA</b></p>	<p>The SPD states that the screening stage considers whether or not there is a need to carry out a Health Impact Assessment (HIA) for a planning application and the scoping stage uses the checklist in Appendix A to inform discussions at the pre-application stage and may also form the basis of the assessment and report itself. <b>A simplified flow chart on the HIA and planning process will be included.</b></p> <p><b>The SPD will be updated to include the types of HIA to be conducted following a scoping process.</b></p>

Name	Response	Council Response (changes in bold)
	<p>Desktop - these are short reviews that can be completed in hours to days. There may be some small group engagement and data is from easily accessed sources. References should be made to local health strategies and policies.</p> <p>Rapid - these are more detailed reviews that may take days to weeks. They are more detailed, require a more through engagement process and usually a literature review is included. As above, references should be made to local health strategies and policies. A steering group may be set up to support this type of HIA.</p> <p>Full/ comprehensive - very detailed reviews that may last months. A full literature reviews usually support the evidence base. Often, they include longer consultation with multiple engagement events and may include data collection from new sources to further support the evidence base rather than using simply using existing sources. A steering group would be set up to support this type of HIA.</p>	
<p>Hertfordshire County Council Public Health Team – Irina Davis</p> <p>Email - 2/10/2023</p>	<p><b>Stage 5: Monitoring and Evaluating</b></p> <p>It is unclear who will be responsible for monitoring whether the recommendations of the HIA report were implemented. It is recommended for the developer to prepare and include a Statement of Influence on a Proposal in the HIA report.</p> <p>Once the proposal has been finalised, a Statement of Influence is written to record how the HIA has influenced both the decision-making process and outcomes. The statement involves a comparison of the HIA’s recommendations with the final proposal, commentary on how the HIA influenced the decision-making process and any budget changes. This statement provides important evidence regarding the effectiveness of HIA and is a milestone in the evaluation process.</p>	<p>The Council will undertake monitoring of HIAs without the addition of a Statement of Influence.</p>
<p>Harlow Civic Society</p> <p>6/10/2023 - Email</p>	<p>Harlow Civic Society is a supporter of the Town and Country Planning Association’s (TCPA) Healthy Homes Campaign and welcome this Health Impact Assessment SPD.</p> <p>As the HIA states, Health is about much more than absence of disease or infirmity. It is about every factor that contributes positively to physical, mental and social wellbeing. The built and natural environments are important determinants of health and shape health inequalities.</p>	<p>Noted.</p>

Name	Response	Council Response (changes in bold)
	<p>We have reviewed the HIA against the TCPA Healthy Homes principles of:</p> <ul style="list-style-type: none"> <li>Fire Safety</li> <li>Liveable Space</li> <li>Inclusive, accessible and adaptable</li> <li>Access to natural light</li> <li>Safety from Crime</li> <li>Climate resilient</li> <li>Prevent air pollution</li> <li>Limit light and noise pollution</li> <li>Thermal comfort.</li> </ul> <p>And believe that all these areas are covered in some form and that the HIA is broader in scope also covering the wider physical and social infrastructure.</p> <p>We find that the HIA checklist is comprehensive, detailed, and wide ranging. When implemented we believe it can make an important contribution to the development of places that will be 'healthy' in its widest sense.</p>	
<p>Harlow Civic Society 6/10/2023 - Email</p>	<p>We suggest that reference could be made to the TCPA Healthy Homes campaign as evidence of national recognition of the need to extend current planning guidance and legislation to encompass a broader view of how our homes and places impact our health. We note that the Healthy Homes amendments to the Levelling Up and Regeneration Bill have recently been passed in the House of Lords and are due to be considered by the House of Commons from October 17th.</p>	<p><b>Chapter 2 will be updated to include reference to the TCPA Healthy Homes Campaign.</b></p>
<p>Harlow Civic Society 6/10/2023 - Email</p>	<p>The HIA SPD refers to other checklists and documents that developments need to take account of, including the HGGT Sustainability Checklist and the HGGT, Essex and Harlow Design Guides and believe there are overlaps with other documents. We suggest that consideration could be given to produce a combined and rationalised guide and checklist, though we recognise that not all such documents will apply to all developments. This could provide additional clarity about the complete scope of what developments must consider and make</p>	<p>Noted. The Council will consider future rationalisation of documents but at present the design guides and checklists perform other functions that the HIA does not, such as detailed design considerations and climate change mitigation. An HIA is also only required for certain sized developments, so the other documents are still applicable to small scale schemes.</p>

Name	Response	Council Response (changes in bold)
	it easier to review planning applications and monitor developments against these planning standards.	
Canal River Trust – Anne Denby 6/10/2023 - Email	The river Stort offers significant opportunity for existing/future residents of Harlow to utilise this space to support healthy and active lifestyles. The inclusion of criteria within the HIA on provision of /access to green, blue, and open spaces and which require applicants/developers to consider linkages to existing networks and enhancing green and blue infrastructure to support healthy living, physical activity and for nature are therefore considered to be positive. However, it would be beneficial to identify the river Stort as significant Green/blue infrastructure within the document, such as within Para 3.5.2, so that applicants/developers are aware of it, the benefits it offers, and ensure they consider it within their proposals at the earliest opportunity.	Noted. <b>Paragraph 3.5.2 will be updated to include reference to the river Stort as an example of significant green/blue infrastructure.</b>
Canal River Trust – Anne Denby 6/10/2023 - Email	<p>Environmental sustainability: The water flowing through our waterways contains enough thermal energy to produce approximately 640MW of energy. We consider that heating and cooling schemes can be delivered without any adverse impact on biodiversity. The potential use of water from our network for heating or cooling buildings could be identified as a renewable energy technology within the SPD. Applicants/Developers should be encouraged to discuss the options in relation to this and any commercial agreements that would be required with the Canal &amp; River Trust at the earliest opportunity.</p> <p>The Trust also recognise the value of using our canals and rivers for drainage facilities and the potential for surface water drainage to the river should also be clearly outlined within the SPD. Any surface water discharge to the waterway would require prior consent from the Canal &amp; River Trust. The Trust would require full details of any proposed discharge and any appropriate mitigation measures to ensure there would be no adverse impact to water quality or structural integrity of the waterway. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted, they will usually be subject to completion of a commercial agreement.</p>	<b>Criteria 8.5 and 8.6 will be updated to give examples of renewable energy sources, including the use of water for heating and cooling buildings.</b>
Canal River Trust – Anne Denby 6/10/2023 - Email	Biodiversity: Mandatory Biodiversity Net Gain will be introduced into the planning system in 2024 and the Defra Biodiversity Metric will require that planning applications that include land within the site boundary that is within 10m of a canal or river are supported by an assessment of the baseline condition of the watercourse. Paragraph 10.1.3, figure 10-1 and table 10-1 of the Biodiversity Metric 4.0 User Guide explain these requirements. It is the Trust's understanding	Noted.

Name	Response	Council Response (changes in bold)
	<p>that, unless exemptions apply, in these circumstances, developers will need to deliver a minimum 10% net gain in watercourse biodiversity units. Development may also affect other habitat types on land owned by the Trust, including, but not limited to, grassland, woodland, scrubland, and hedgerows.</p> <p>Ecologists working on behalf of developers should obtain, and comply with, consents from the Trust to undertake any necessary habitat condition assessments and ecological surveys on our land, consistent with our Code of Practice.</p> <p>The Trust will consider proposals from developers to deliver net gains on its land (be these watercourse units or other habitat types) on a case-by-case basis. In doing so, we will have regard to Defra's 'Sell biodiversity units as a land manager' guidance. The Trust's agreement to habitat enhancement activities being undertaken on our land will be subject to operational, management and commercial considerations.</p>	
<p>Essex County Council – Rich Cooke 6/10/2023 - Email</p>	<p><b>Section</b> - 2.8.1 (page 7)</p> <p><b>Comments</b> - The third paragraph could also refer to the Essex GI Standards, which Health, Wellbeing and Social Equity is one of the nine core principles, which also recommends the completion of HIA.</p> <p><b>Recommended changes</b> - The update included new integrated social-economic themes, new highway standards, references to SuDS, Essex Green Infrastructure Standards and new case studies.</p> <p>The completion of HIA is encouraged by the Essex GI Standards' principle on "Health, wellbeing, and social equity" in order to support local community efforts to promote active living and increase access to natural green spaces.</p> <p><b>Supporting evidence/further information</b> - The Essex Green Infrastructure Standards (2022) has been endorsed by Natural England and awarded Building with Nature Policy accreditation, 2023. It outlines nine principles and standards for the protection, enhancement, creation, and management of GI in Essex. The application of these principles and standards through development management and planning policy will ensure the delivery of multifunctional, accessible high-quality GI. Health, Wellbeing and Social Equity is one of the nice core principles and recommends a HIA is completed to assess if the GI provision meets the diversity of user groups, whose needs may vary according to age, abilities,</p>	<p><b>Paragraph 2.8.1 will be amended to include 'The update included new integrated social-economic themes, new highway standards, references to SuDS, Essex Green Infrastructure Standards and new case studies. The completion of an HIA is encouraged by the Essex GI Standards' principle on "Health, wellbeing, and social equity" in order to support local community efforts to promote active living and increase access to natural green spaces.'</b></p>

Name	Response	Council Response (changes in bold)
	interest, or cultural beliefs. This includes access to natural play for younger and older children and to ensure that areas with higher deprivation levels and lower access to green space are given the required attention.	
Essex County Council – Rich Cooke 6/10/2023 – Email	<p><b>Section – 2.9.4</b></p> <p><b>Comments</b> – The wording of the (50% / 60%) travel modeshare target implies there are sustainable modes, and non-sustainable modes. However the following sentence then mentions a hierarchy of modes</p> <p><b>Recommended changes</b> – It may be helpful to clarify this point by providing an indication of which travel modes are sustainable and which are not. For this, it is suggested that the non-sustainable modes could be explained here as travel by all single-occupancy motor vehicles, including EVs.</p> <p>This could be actioned through a wording addition by way of clarification.</p>	<b>Paragraph 2.9.4 will be amended to clarify which travel modes are sustainable and which are not.</b>
Essex County Council – Rich Cooke 6/10/2023 – Email	<p><b>Section – 3.5.2 (page 10)</b></p> <p><b>Comments</b> – It is worth noting that the GI percentage figure quoted here is for the <i>percentage coverage of GI across Harlow</i>. This figure does not distinguish what GI is accessible and not accessible.</p> <p><b>Recommended changes</b> – Wording clarification recommended accordingly (see previous text box).</p>	<b>Paragraph 3.5.2 will be amended to clarify that not all Green Infrastructure across Harlow is accessible.</b>
Essex County Council – Rich Cooke 6/10/2023 – Email	<p><b>Section – 4.2.3</b></p> <p><b>Comments</b> – Paragraph 4.2.3 states that ‘the HIA checklist may form the basis of the assessment and report itself’ but it is important to ensure that a submitted HIA is a complete report with policy context/ evidence-base and data analysis linking to the impacts identified in the checklist. This is just to clarify that developers/applicants will not just be submitting the checklist alone but along with other necessary parts to complete an HIA.</p> <p><b>Recommended changes</b> – Add further text to clarify the point in previous text box.</p> <p><b>Supporting evidence/further information</b> – This will help ensure the use of the HIA SPD and checklist guidance is better understood by applicants, developers, etc.</p>	<b>Paragraph 4.2.3 will be amended to clarify that developers/applicants will not just be submitting the checklist alone but along with other necessary parts to complete an HIA.</b>

Name	Response	Council Response (changes in bold)
<p>Essex County Council – Rich Cooke</p> <p>6/10/2023 – Email</p>	<p><b>Section</b> – Table (pg 14) first section</p> <p><b>Comments</b> – Theme heading for first section of table not included to summarise its thematic content. In terms of consistency of approach, other sections of the proposed table have retained these section headings. NB in the original table version (Essex Healthy Places checklist) this thematic heading is ‘Active and sustainable environments / Sustainable Travel’</p> <p><b>Recommended changes</b> – Addition of thematic heading for first section of table recommended (see previous text box).</p>	<p><b>Appendix A will be amended to include the thematic heading ‘Active and sustainable environments/Sustainable Travel’ to the first section of the table.</b></p>
<p>Essex County Council – Rich Cooke</p> <p>6/10/2023 – Email</p>	<p><b>Section</b> – 1.9 in table (page 16)</p> <p><b>Comments</b> – There is an opportunity within this question to help ensure streets and public spaces are green and attractive. This could include, but not be limited to, the integration of nature focused SuDS; native hedgerows, tree and shrub planting; incidental ‘play on the way’ features / trails; informal sport (outdoor gym/fitness trails); and areas for seating to stop and rest.</p> <p>Dual street furniture/seating (i.e., a bench including a planter, pop up park/parklets): The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network.</p> <p><b>Recommended changes</b> – Additional text to cover further green / natural feature considerations is recommended, along the lines suggested in previous text box.</p> <p><b>Supporting evidence/further information</b> – Urban Greening.</p> <p>Streets trees should be used alongside other additional tree planting. The Essex Forest Initiative provides opportunities for developers to work with ECC on tree planting. NPPF Paragraph 131 states “Planning policies and decisions should ensure that new streets are tree-lined, .....that appropriate measures are in place to secure the long-term maintenance of newly-planted trees...”</p> <p>The Urban Greening Factor (UGF) is a planning tool to improve the provision of Green Infrastructure (GI) particularly in urban areas. While it is voluntary, the ECC GI team strongly recommends utilisation of the UGF, and it can significantly contribute to place making, nature recovery, biodiversity enhancement, and connectivity to larger green infrastructure networks within proximity to the</p>	<p><b>Criteria 1.9 will be amended to include whether streets and spaces are also green and attractive.</b></p>



Name	Response	Council Response (changes in bold)
	development site. More information can be found within the <u>National Green Infrastructure Framework Standards</u> (2023). Note this maybe covered under the Green and Blue Infrastructure Section of HIA.	
Essex County Council – Rich Cooke 6/10/2023 – Email	<p><b>Section</b> – 2.2 in table (page 17)</p> <p><b>Comments</b> – This question could helpfully be expanded in scope to include the provision of space for secure bike storage for all buildings (including non-residential uses).</p> <p><b>Recommended changes</b> – Consider additional text to expand this requirement to cover all building uses.</p>	<b>Criteria 2.2 will be amended to include the example of space for secure bike storage.</b>
Essex County Council – Rich Cooke 6/10/2023 – Email	<p><b>Section</b> – 3.2 in table (page 18)</p> <p><b>Comments</b> – As mentioned for 1.9 and maybe as a separate question, this could seek the consideration of dual purpose street furniture/seating (e.g. a bench including a planter): The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network.</p> <p><b>Recommended changes</b> – It is recommended to consider additional text to cover further green / natural feature considerations is recommended, along the lines suggested in previous text box.</p>	<b>Criteria 3.2 will be amended to include the question as to whether the seating is dual purpose street furniture.</b>
Essex County Council – Rich Cooke 6/10/2023 – Email	<p><b>Section</b> – 3.3 in table (page 18)</p> <p><b>Comments</b> – This could also include a consideration that these routes are attractive more generally.</p> <p>Green infrastructure can be integrated along the network to enhance nature through the delivery of biodiversity net-gain, habitats, and green corridors. Therefore, ECCs GI team recommends that routes are designed to include wildlife corridors and stepping-stones GI features along sustainable transport routes such as paths, cycle, and bridleways.</p> <p>To ensure that everyone has equal access to the advantages of Green and Blue Infrastructure (GBI), it will be necessary to ensure that GBI is not concentrated in one area or on one side of a development and that the location of GBI is integrated throughout the entire development site.</p>	<b>Criteria 3.3 will be amended to include whether these routes are enhanced with Green and Blue Infrastructure.</b>

Name	Response	Council Response (changes in bold)
	<p>Does the proposal incorporate both new and existing GBI across the entire development site to guarantee there are good, open connections for everyone between urban, rural, and green infrastructure, thus expanding the network of green infrastructure?</p> <p><b>Recommended changes</b> – It is recommended to consider additional text to cover a recommendation that these routes are made more attractive, along the lines suggested in previous text box.</p>	
<p>Essex County Council – Rich Cooke 6/10/2023 – Email</p>	<p><b>Section</b> – 3.5 in table (page 19)</p> <p><b>Comments</b> – As part of the design of sports and recreation facilities this could be expanded usefully to encourage and demonstrate multipurpose and multifunctional use. For example, but not limited to providing green spaces for natural play, sport, sensory, areas that enhance biodiversity and contribute to climate change mitigation and adaptation (flood and water mitigation, shading, air quality etc.) Multifunctional spaces bring a wider spectrum of environmental, social and economic benefits to urban areas, especially for small areas of open spaces and more cost-effective way of addressing many social, wellbeing, drainage and other hard infrastructure needs.</p> <p><b>Recommended changes</b> – It is recommended to consider expanding this criterion to seek / encourage multifunctional uses.</p>	<p><b>Criteria 3.5 will be amended to include whether the proposal demonstrates multipurpose and multifunctional use.</b></p>
<p>Essex County Council – Rich Cooke 6/10/2023 – Email</p>	<p><b>Section</b> – 6.2 page 24</p> <p><b>Comments</b> – The Essex Design Guide (EDG) deals with the design of the school, but the housing developer is responsible for the environment around it, which is instead dealt with in the ECC Developers’ Guide and, for large sites, our Garden Communities Guide.</p> <p>The question regarding the provision of green spaces on educational premises is helpful and supported.</p> <p>For this, ECC recommends that the school green spaces are designed to ensure multi- purpose and multifunctional use and not just concrete grounds or sport fields. To provide green spaces for natural play, sensory, areas that enhanced biodiversity and contribute to climate change mitigation and adaptation (flood and water mitigation, shading, air quality etc.) that all together can contribute to</p>	<p><b>Criteria 6.2 will be amended to include reference to the ECC Developers’ Guide and Garden Communities Guide along with supporting text.</b></p>

Name	Response	Council Response (changes in bold)
	<p>the curriculum, for example PE, science, English, maths, outdoor learning and forest schools.</p> <p><b>Recommended changes</b> – Add reference to ECC <u>Developers’ Guide</u> and <u>Garden Communities Guide</u>.</p> <p>Add further text to expand on recommended approach to design of school green spaces – see previous text box for wording to include.</p> <p><b>Supporting evidence/further information</b> – Children and young people’s engagement with a natural play space, outdoor learning and forest school areas, (especially within school grounds) has a multitude of positive impacts on their learning and physical and emotional wellbeing.</p> <p>It will improve staff and pupil health, wellbeing, learning and chances in life. In 2021, Department for Education announced a new initiative designed to put climate change at the heart of education, young people will be empowered to take action on the environment. By 2023, teachers will have access to a model science curriculum designed to teach children about nature and their impact on the world. In addition, children will be encouraged to get involved in the natural world by schools enhancing their school grounds for biodiversity.</p>	
<p>Essex County Council – Rich Cooke 6/10/2023 – Email</p>	<p><b>Section</b> – 6.3 page 25</p> <p><b>Comments</b> – This question lacks clarity and needs updating. New schools must have entirely traffic free frontages. The wider area should be a school zone.</p> <p><b>Recommended changes</b> – This may be better as two questions but could amend to read:-</p> <p><i>Will the educational / learning premises have a traffic-free pedestrian only entrance area / frontage (not abutted by roads or car parking) and a wider car restricted pedestrian zone around it?</i></p> <p><b>Supporting evidence/further information</b> – This needs to align with page 39 of ECC Developers’ Guide (to Infrastructure Contributions) and sections 3.3 and 5.4 of Garden Communities Guide.</p>	<p><b>Criteria 6.3 will be amended to ‘Will the educational / learning premises have a traffic-free pedestrian only entrance area / frontage (not abutted by roads or car parking) and a wider car restricted pedestrian zone around it?’</b></p>
<p>Essex County Council – Rich Cooke</p>	<p><b>Section</b> – 6.7 in table (page 25)</p>	<p><b>Criteria 6.7 will be amended to include ‘Is pedestrian and cycle access to the site available from more than one direction?’</b></p>

Name	Response	Council Response (changes in bold)
6/10/2023 – Email	<p><b>Comments</b> – This question could be added to with the following consideration: <i>Is pedestrian and cycle access to the site available from more than one direction?</i></p> <p><b>Recommended changes</b> – Consider expanding this question in line with the additional consideration outlined in previous text box.</p>	
Essex County Council – Rich Cooke 6/10/2023 – Email	<p><b>Section</b> – 8.7 in table (page 29)</p> <p><b>Comments</b> – ECC welcomes the reference within the (22) footnote to green walls and roofs. This should also be expanded to include reference to GI as the landscaping and urban greening around buildings can help improve energy efficiency of buildings.</p> <p>Another questions to consider is: <i>Does the proposed GBI contribute to reduced energy use on site contributing towards meeting zero carbon targets (i.e. creating microclimates)?</i></p> <p><b>Recommended changes</b> – It is recommended to expand this reference by adding text to include reference to GBI and its role in addressing climate change.</p>	<p><b>Criteria 8.7 will be amended to include ‘Does the proposed GBI contribute to reduced energy use on site contributing towards meeting zero carbon targets (i.e. creating microclimates)?’</b></p>
Essex County Council – Rich Cooke 6/10/2023 - Email	<p><b>Section</b> – 8.9 in table (page 29)</p> <p><b>Comments</b> – It is noted that this questions in a broader sense covers all potential forms of mitigation and adaptation to climate change impacts. However, the following additional consideration could be included: <i>‘Has the GBI been designed so it responds to impacts from climate change? i.e., does the GI/ landscaping design consider climate resilient planting?’</i></p> <p><b>Recommended changes</b> – Consider adding a point to the text so that the question incorporates the design of GBI as part of the development’s planned climate change response.</p>	<p><b>Criteria 8.9 will be amended to include ‘Has the GBI been designed so it responds to impacts from climate change? i.e., does the GI/ landscaping design consider climate resilient planting?’</b></p>
NHS Hertfordshire and West Essex ICB – Rachael Donovan	<p><i>Section 1.1 Background and Purpose</i></p> <p>It would be helpful if the draft HIA SPD was more explicit who the HIA SPD/Checklist is for, to include planning professionals, developers and planning agents, and neighbourhood groups to help embed health considerations into their Neighbourhood Plans. A simplified flow chart of the HIA/ planning process would also be helpful.</p>	<p><b>Paragraph 1.1.1 will be amended to state that the SPD is for planning professionals, developers and planning agents, and neighbourhood groups.</b></p> <p><b>A simplified flow chart of the HIA and planning process will be added.</b></p>

Name	Response	Council Response (changes in bold)
9/10/2023 - Email	The draft HIA SPD would also benefit by including a definition of health deprivation, which is referred to in the Approved Local Plan Policy L4 'Health and Wellbeing', mindful that the term 'social deprivation' is generally used in place of 'health deprivation'.	<b>Paragraph 1.1.3 will be amended to include a definition of health deprivation.</b>
NHS Hertfordshire and West Essex ICB – Rachael Donovan 9/10/2023 – Email	<i>Section 2.1 - Policy Context</i> The draft HIA SPD should refer to the September 2023 version of the National Planning Policy Framework (NPPF) which replaces the previous version of the NPPF published in July 2021.	<b>Section 2.1 will be amended to refer to the September 2023 version of the National Planning Policy Framework (NPPF).</b>
NHS Hertfordshire and West Essex ICB – Rachael Donovan 9/10/2023 – Email	<i>Section 2.2 - Local Policy</i> The Hertfordshire and West Essex Integrated Care Partnership (HWE ICP) was set up in 2022 and is a statutory joint committee established jointly by Hertfordshire County Council, Essex County Council and the HWE ICB. It comprises representation from the HWE ICB, the county councils and district and borough councils, the Police, Fire and Crime Commissioner, care providers and leads from the VCSFE Alliance.  To support improvements to the health and care outcomes and experiences of Hertfordshire and West Essex residents, the HWE ICP has produced a 10-year Integrated Care Strategy which was approved in December 2022. The Strategy includes a Delivery Plan and covers six strategic priorities. Of relevance is 'Strategic Priority 2 -supporting our communities and places to be healthy and sustainable' and 'Strategic Priority 3 - supporting our residents to maintain healthy lifestyles'.  Currently there is no reference to this joint, collaborative work and the above-mentioned strategic priorities in the draft Harlow HIA SPD.  Given the role of the Harlow Local Plan and the draft HIA SPD in providing a mechanism to improve people's health, the draft HIA SPD should include reference to the approved Integrated Care Strategy and these key priorities.  Further it would be beneficial for the draft HIA SPD to make reference to the King's Fund recent report, 'Driving better health outcomes through Integrated Care Systems – The role of district councils', July 2023. The report was	<b>A new section within Chapter 2 will be included on the Hertfordshire and West Essex Integrated Care Partnership (HWE ICP) Integrated Care Strategy and its key priorities as well as reference to the 2023 King's Fund report 'Driving better health outcomes through integrated Care Systems – the role of district councils'.</b>  <b>Section 1.1 will be amended to make reference to the connection between town planning and health.</b>

Name	Response	Council Response (changes in bold)
	<p>sponsored by the District Council's Network, with the key message being that District Council services across housing, planning, economic development, welfare, leisure and environmental health have the greatest influence on population health outcomes than the quality of health services.</p> <p>It is suggested that Section 2.2 makes reference to the well-established connection between town planning and health, given the role of the Local Plan and its policies to facilitate improvements to health infrastructure and provide a mechanism to improve people's health.</p>	
<p>NHS Hertfordshire and West Essex ICB – Rachael Donovan 9/10/2023 – Email</p>	<p><i>3.6 Clinical Care</i></p> <p>Paragraph 3.6.2 should be moved to Section 3.3 <i>Health Behaviour</i>.</p>	<p><b>Paragraph 3.6.2 will be moved to Section 3.3.</b></p>
<p>NHS Hertfordshire and West Essex ICB – Rachael Donovan 9/10/2023 – Email</p>	<p><i>Section 4 - Health Impact Assessment</i></p> <p>The HWE ICB and PAH welcomes the requirement at paragraph 4.2.3 for the HIA Checklist to be completed by developers and applicants as early as practicable in the planning process to inform discussions with the HWE ICB at the pre-application stage.</p> <p>As well as assessing health impacts on population groups, Stage 3 of the HIA procedure (paragraph 4.2.4) should consider the impacts on existing primary, secondary, acute, mental and community healthcare facilities and services, as well as the ambulance service arising from increased demand associated with development proposals.</p>	<p>Noted.</p> <p><b>Paragraph 4.2.4 will be amended to also consider impacts on existing primary, secondary, acute, mental and community healthcare facilities and services and ambulance services.</b></p>
<p>NHS Hertfordshire and West Essex ICB – Rachael Donovan 9/10/2023 – Email</p>	<p>Appendix A - HIA Checklist</p> <p>Within the HIA Checklist (Appendix A) engagement with health partners should refer to liaison with the NHS Hertfordshire and West Essex Integrated Care Board, which encompasses the former CCGs. The HWE ICB and system partner NHS Trusts and NHS Foundation Trust partners work together to provide comprehensive responses to planning application consultations and pre-</p>	<p><b>Appendix A will be amended from 'CCG' and 'NHS estate teams' to 'NHS Hertfordshire and West Essex Integrated Care Board (HWE ICB)'.</b></p>

Name	Response	Council Response (changes in bold)
	application engagement. As such, please delete reference to NHS Estates Teams.	
NHS Hertfordshire and West Essex ICB – Rachael Donovan 9/10/2023 – Email	Criteria 2 – 2.5. Please add <i>'Is there an appropriate (LP Policy H8) allocation/mix of affordable housing, <b>including key worker access to affordable housing</b> and if so, at what percentage.'</i>	Criteria 2.5 will be amended to <b>'Is there an appropriate (LP Policy H8) allocation/mix of affordable housing, including key worker access to affordable housing and if so, at what percentage?'</b> .
NHS Hertfordshire and West Essex ICB – Rachael Donovan 9/10/2023 – Email	Criteria 7.1 - reference to NHS Estate Teams should be removed and replaced with the NHS Hertfordshire and West Essex Integrated Care Board. Criteria 7.1 should therefore say <b>'Has the NHS Hertfordshire and West Essex Integrated Care Board been contacted, and their advice sought.'</b>	Criteria 7.1 will be amended to <b>'Has the NHS Hertfordshire and West Essex Integrated Care Board been contacted, and their advice sought?'</b>
NHS Hertfordshire and West Essex ICB – Rachael Donovan 9/10/2023 – Email	Criteria- 7.2 should be amended to read <b>'Has the proposal considered the wider impact on the capacity of local hospitals, primary care, community and mental health services, pharmacy, dentistry, ophthalmology services? Please state the engagement undertaken and signpost to the source material and the key outcomes.'</b>	Criteria 7.2 will be amended to <b>'Has the proposal considered the wider impact on the capacity of local hospitals, primary care, community and mental health services, pharmacy, dentistry, ophthalmology services? Please state the engagement undertaken and signpost to the source material and the key outcomes.'</b>
NHS Hertfordshire and West Essex ICB – Rachael Donovan 9/10/2023 – Email	Criteria - 7.5 should be amended to read <b>'Has the proposal considered the impact on the capacity of and access requirements of blue light services? Please state the engagement undertaken and signpost to the source material and the key outcomes.'</b>	Criteria 7.5 will be amended to <b>'Has the proposal considered the impact on the capacity of and access requirements of blue light services? Please state the engagement undertaken and signpost to the source material and the key outcomes.'</b>

Name	Response	Council Response (changes in bold)
<p>NHS Hertfordshire and West Essex ICB – Rachael Donovan</p> <p>9/10/2023 – Email</p>	<p>Criteria 7.6 – should be amended to read <b>‘Does the proposal provide onsite health and social care facilities? If yes, please state what these health facilities are.’</b></p>	<p>Criteria 7.6 will be amended to <b>‘Does the proposal provide onsite health and social care facilities? If yes, please state what these health facilities are.’</b></p>
<p>NHS Hertfordshire and West Essex ICB – Rachael Donovan</p> <p>9/10/2023 – Email</p>	<p>Criteria - 7.7 should be amended to read <b>‘Have funding and/ or land / premises for the above proposal(s) been agreed with the NHS? Have associated sale/ lease arrangement and terms been discussed and agreed with the NHS?’.</b></p> <p>Please note that funding secured to mitigate the impacts of a development on healthcare infrastructure and facilities may be used to increase capacity at an existing facility or service, rather than being used to provide new floorspace, which has ongoing lease and staffing cost implications for the NHS, and therefore may not be the most appropriate form of mitigation.</p>	<p>Criteria 7.7 will be amended to <b>‘Have funding and/ or land / premises for the above proposal(s) been agreed with the NHS? Have associated sale/ lease arrangement and terms been discussed and agreed with the NHS?’.</b></p>
<p>NHS Hertfordshire and West Essex ICB – Rachael Donovan</p> <p>9/10/2023 – Email</p>	<p>The requirement at item 7.11 to undertake an assessment of the impact of a proposal on existing GP and primary care provision should be expanded to include <b>secondary, acute and community and mental healthcare provision.</b> This assessment of the need for on-site provision of healthcare floorspace (criteria 7.6), will be required sooner in the HIA process, with the result of this assessment informing the decision on the most appropriate means of meeting the health service needs arising from proposed developments. Please delete ‘Please state sources used i.e. CCG direct information, NHS choices etc’ and replace with <b>‘Please state and signpost to the source material.’</b></p>	<p>Criteria 7.11 will be amended to <b>‘If no on-site facility provided, has an assessment been made of the impact this proposal will have on existing GP, primary care, secondary, acute and community and mental healthcare provision? Please state and signpost to the source material’.</b></p>