

Tendring DC LP Examination 2021

Matter 5 – Healthy Places

5.1 Improving Health and Wellbeing (policy HP1)

The Tendring DC LP examination hearing statement on this matter provides some of the context and background for the policy requirements of Policy HP1 in respect of HIA.

[TDC Hearing Statement - Matter 5 - Healthy Places \(tendringdc.gov.uk\)](https://www.tendringdc.gov.uk)

This statement relates that TDC added a requirement for HIA to cover proposals for commercial development of 1,000+sqm, requested through Essex County Council (ECC) representations. This request was made to ensure consistency of approach with other Essex LPAs and with the approach recommended by the Essex Planning Officers' Association (EPOA) HIA guidance.

Importantly, HIA is the established and recognised means of providing a comprehensive and systematic process for assessing health and wellbeing impacts from new development proposals. HIA ensures that [the wider determinants of health](#) can be factored into the assessment process, including socio-economic, lifestyle and other considerations.

The HIA process is recognised and endorsed by Government as a recommended vehicle for the above purpose of assessing health and wellbeing impacts.

As the HIA best practice guidance publication led by Public Health England (PHE) [Health Impact Assessment in Spatial Planning](#) states, 'Local authorities are encouraged to adopt policies that require an HIA to be carried out for certain types of developments in their local plan or spatial development processes'. TDC has followed this best practice approach by applying the EPOA HIA Guidance and the recommendation of ECC as the organisation with lead responsibility for public health within Essex on this matter.

In Essex, this process is supported by comprehensive guidance in the form of the [updated EPOA HIA](#) guidance (now hosted on the [Essex Design Guide website](#) pages) originally developed and [introduced in 2008](#).

The development and agreement of the EPOA HIA guidance was carried out using a programme of collaborative joint working with all Essex local authorities, with the specialist input of Public Health professionals and extensive engagement with Essex-wide planning practitioners. This was undertaken to establish a consistent, evidence based and rigorous approach and methodology for HIA to support the planning process across all Essex LPAs.

The 2008 HIA guidance provided an agreed approach towards the thresholds and triggers for when HIA will be required to support planning proposals across Essex. This had regard to ensuring a proportionate approach is taken to the type of HIA work required and to be carried out for different types and scales of development proposals, according to the merits of each, on a case by case basis.

It is important to recognise that this means that a full HIA process will not be required for all development proposals arising within TDC area that meet the proposed thresholds of Policy HP1.

In this way, it is contended that the use of the thresholds for scales / types of development proposed by TDC is not unduly onerous or disproportionate as a screening process will take place to determine the extent and detail/complexity of HIA required.

HIA provides a means of assessing the negative as well as the positive impacts of development proposals, with the aims of

- Identifying, recognising and maximising positive benefits (e.g. job creation, contributions to local economies)
- Avoiding, minimising or mitigating negative impacts (e.g. through redesign of proposals or through compensatory measures)
- Identifying unintended consequences and impacts of development proposals on health and wellbeing that may not have been identified through other means processes or assessments

These assessments illustrate how the process seeks to provide a more systematic and comprehensive approach to assessing impacts more fully, with regard to the wider determinants of health, as introduced above. Accordingly, carrying out HIA need not be seen as onerous or a burden but instead to:

- Inform the planning process (assisting the decision-maker and others, such as communities with an interest in commenting on proposals) about positive and beneficial considerations weighing in favour of development proposals; and
- Help applicants and developers to improve and refine their proposals and to help them navigate their way through the planning process to a successful outcome

In setting thresholds and triggers for HIA, the PHE document [Health Impact Assessment in Spatial Planning](#) advises an evidence based approach towards Local Plan HIA policies:

‘Planning policies and SPDs can introduce triggers that require an HIA to be submitted as part of a planning application where evidence demonstrates the development impacts can be expected to be significant on sensitive receptors’.

The evidence on the population characteristics for Tendring DC supports an approach that recognises the sensitivity of the local population to health impacts (including socio-economic deprivation, an increasingly aging population, obesity levels etc.) as was stated at the hearing session on Matter 5 and raised by the CCG.

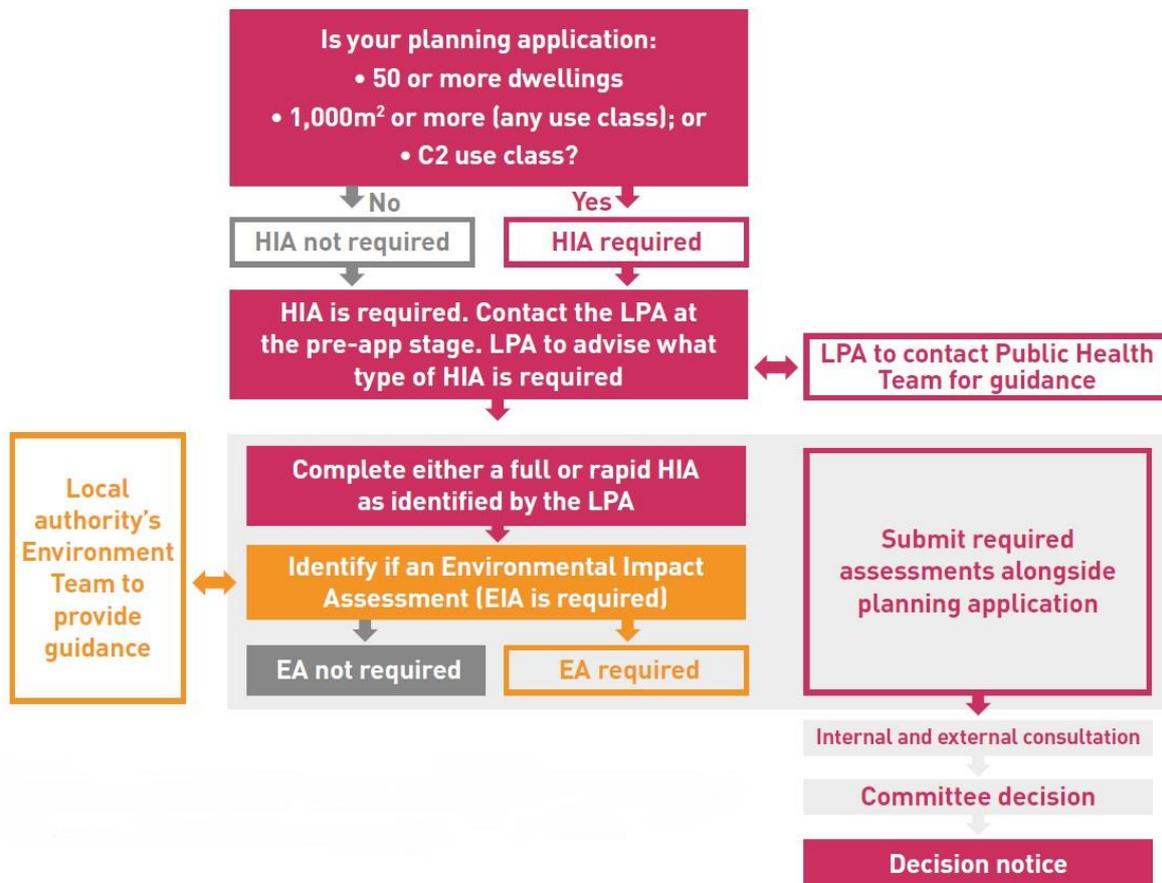
Tendring is one of the most deprived places within England (within the bottom 10% of most deprived lower tier local authorities) with the Joint Strategic Needs Assessment (JSNA) evidence showing that there are specific issues such as higher levels of excess weight in children and adults, longer travelling times to key services (3rd highest in Essex), higher numbers of adults claiming out-of-work benefits, a growing older population (9% higher than the Essex average) and higher numbers of hot food take-away density than many other areas of Essex. JSNA Tendring 2019 can be found on the Essex Open Data Platform.

These factors indicate the importance of assessing health impacts with regard to the identified sensitivity within Tendring’s demographic to avoid adverse impacts and to harness the benefits of proposals that may help address those elements of identified disadvantage.

The updated EPOA HIA guidance included as part of the Essex Design Guide, provides a useful summary of the recommended approach towards identifying HIA requirements as part of development proposals – see process diagram overleaf.

The process uses identified thresholds to trigger a screening process, that in turn is used to determine the appropriate type of HIA process (e.g. rapid or full HIA) and the scoping of matters to be covered through HIA (in much the same way as EIS scoping)

Ultimately, this ensures that a targeted, focused and proportionate approach to HIA is taken in each case



Source: Essex Design Guide HIA webpages, Process & Method section

As Annex 3 of the PHE document Health Impact Assessment in Spatial Planning shows, it is evident that differing approaches are often taken towards the setting of thresholds and triggers for planning purposes across local authorities in England (e.g. those that focus on types of uses, such as residential, industrial, food outlets or C2 uses, or those focusing on floorspace thresholds).

The thresholds to be used in each case to trigger HIA, as with that of Tendring, are informed by evidence on the local population characteristics. The identification of appropriate thresholds needs to ensure that

- These are not set so high that the impacts of many proposals are not assessed and identified; and
- These are not set at such a low level that the requirements and process are unduly onerous and disproportionate.

These considerations have been weighed and balanced with regard to the characteristic scale and nature of development likely to take place within TDC area and accordingly the thresholds 1000+sqm commercial floorspace is considered appropriate and justified.

It is also recommended that HIA for Use Class C2 should be included as part of the policy, which reflects best practice and PHE guidance.