

Croydon Local Plan: Strategic Policies Partial Review and Detailed Policies and Proposals

Health Impact Assessment

May 2016

1. Introduction

- 1.1. The link between planning and public health is well established. Planning can have a significant impact on the health and wellbeing of communities because many aspects of planning can influence the social determinants of health. People's health is affected by the nature of their physical environment; living in poor housing, in a deprived neighbourhood with a lack of access to green spaces impacts negatively on physical and mental health¹. Planning can support the creation of healthy communities and environments through good design, promoting active travel and physical activity and providing access to facilities and services and high quality open spaces.
- 1.2. This document is the Health Impact Assessment (HIA) for the Croydon Local Plan: Strategic Policies- Partial Review and the Croydon Local Plan: Detailed Policies and Proposals. The HIA has been undertaken to inform the Proposed Submission version of both Local Plans.
- 1.3. The overall vision for moving Public Health into local authorities was to put health and wellbeing at the heart of everything they do, thereby helping people to lead healthier lives, both mentally and physically². This means: Including health in all policies so that each decision seeks the most health benefit for the investment and asking key questions such as "What will this do for the health and wellbeing of the population?"³
- 1.4. In 2015 the Place Department and Croydon Public Health began to identify ways they could work together to build relationships and embed health and wellbeing into the planning process. A number of options were considered and an agreement was made that a HIA would be undertaken on the emerging Local Plan documents.

2. Purpose of Health Impact Assessments

- 2.1. A HIA is a combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population⁴.
- 2.2. Undertaking a HIA ensures that health and wellbeing are being properly considered in planning policies and proposals. HIAs can be done at any stage in the development process, but are best done at the earliest stage possible⁵.
- 2.3. Three types of HIAs can be undertaken⁶:
 - A 'desktop' assessment which draws on existing knowledge and evidence, often using published checklists which provide a broad overview of potential health impacts.
 - A 'rapid' assessment which involves a more focused investigation of health impacts and recommending mitigation and enhancement measures.
 - A 'full' assessment which involves comprehensive analysis of all potential health and wellbeing impacts, which may include quantitative and qualitative information, data from health needs assessments, reviews of the evidence base and community engagement.

¹ Fair Society, Healthy Lives: The Marmot Review (2010)

² Department of Health (2011) Public Health in Local Government

³ Department of Health (2011) Public Health in Local Government

⁴ European Centre for Health Policy, WHO Regional Office for Europe, Gothenburg Consensus Paper (1999)

⁵ The London Healthy Urban Development Unit (HUDU)

⁶ The Mayor of London's Social Infrastructure Supplementary Planning Guidance (May 2015)

- 2.4. A rapid HIA has been jointly undertaken by Spatial Planning and Public Health with the purpose of identifying:
1. Opportunities to improve the health and wellbeing of all segments of the population through planning policies; and
 2. How the prevention of ill health and improvements to health and wellbeing can be actively embedded into the Local Plan.

3. Public Health context

- 3.1. The Marmot Review (Fair Society, Healthy Lives) published in 2010 confirmed that individual health is influenced by wider determinants such as income, education, local environmental quality and employment (determinants of health). The review set out the following six policy objectives for reducing health inequalities:
1. Give every child the best start in life
 2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
 3. Create fair employment and good work for all
 4. Ensure healthy standard of living for all
 5. Create and develop healthy and sustainable places and communities
 6. Strengthen the role and impact of ill-health prevention
- 3.2. Croydon, like many other boroughs, has a number of health inequalities. The key facts and statistics surrounding some of these local health issues are highlighted in the [2015 Annual Public Health report](#).

4. Planning context

- 4.1. National, regional and local planning policy sets the context for considering health and wellbeing in the planning process and undertaking a HIA on the Local Plan:
- Paragraph 69 of the National Planning Policy Framework (NPPF) states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.
 - The National Planning Practice Guidance (NPPG) states that local planning authorities should ensure that health and wellbeing and health infrastructure are considered in local and neighbourhood plans and in planning decision making.
 - Policy 3.2 of the London Plan: Improving health and addressing health inequalities states the Mayor will take account of the potential impact of development proposals on health and health inequalities within London. It also states that the impact of major development proposals on health and wellbeing of communities should be considered, for example through the use of HIAs and that boroughs should monitor policies and interventions for their impact on reducing health inequalities.
 - The Croydon Local Plan: Strategic Policies (adopted in April 2013) states in Policy SP5.2 Health and Wellbeing that the Council and its partners will create and safeguard opportunities for healthy, fulfilling and active lifestyles by working in partnership with the health authorities to improve health in Croydon. It also states that it will ensure new developments provide opportunity for healthy living by encouraging cycling and walking, good housing design, sufficient open space and opportunity for recreation and sound safety standards.

5. Health Impact Assessment Scoping Report

5.1. To begin the joint working between Spatial Planning and Croydon Public Health on the HIA, a [Scoping Report](#) was produced and was consulted on alongside the Preferred and Alternative Options in 2015. The Scoping Report set out the following:

- The reasons for undertaking the HIA
- The objectives of the HIA
- The proposed methodology, including who would be consulted and how the HIA would be evaluated
- The health determinants to be used to assess policies against

6. Policy Screening

6.1. Following the consultation on the Preferred and Alternative Options and on the Scoping Report, the methodology and health determinants were finalised.

6.2. The policies in the Croydon Local Plan: Strategic Policies- Partial Review and the Croydon Local Plan: Detailed Policies were screened against the following questions to identify whether a Rapid HIA would be undertaken on them:

1. Will the policy have a direct impact on health, mental health and wellbeing?
2. Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?
3. Will the policy affect an individual's ability to improve their own health and wellbeing?
4. Will there be a change in demand for or access to health and social care services?

The screening exercise identified a HIA was required on the following policies:

Croydon Local Plan: Strategic Policies- Partial Review
SP2 Homes
SP5 Community Facilities
SP6 Environment and Climate Change
SP7 Green Grid
Croydon Local Plan: Detailed Policies and Proposals
DM1 Housing choice for sustainable communities
DM3 Residential care and nursing homes
DM5 Development in Croydon Metropolitan Centre, District and Local Centres
DM6 Development in Neighbourhood Centres
DM7 Development in Shopping Parades
DM9 Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial Locations
DM10 Design and character
DM18 Providing and protecting community facilities
DM19 Protecting Public Houses
DM21 Sustainable Design and Construction
DM24 Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces
DM27 Promoting sustainable travel and reducing congestion

7. HIA Workshop

7.1. In May 2016, the Rapid HIA took place in the form of a workshop. Attendees for the workshop were from a range of organisations and worked together with the Local Plan policy authors to assess each policy.

7.2. The following stakeholders were invited to attend:

- Spatial Planning
- Croydon Public Health
- Officers from the Council’s Pollution, Community Partnerships, Licensing and Regeneration teams
- Croydon Clinical Commissioning Group
- NHS Property Services
- NHS England
- NHS Croydon Health Services Trust
- NHS London Healthy Urban Development Unit
- Transport for London
- Healthwatch Croydon
- CVA
- Age UK

7.3. The workshop was in two parts. For the first part of the workshop, attendees were asked to identify impacts on health and wellbeing and impacts on stakeholders and vulnerable groups identified using the following prompts:

- Can you identify positive and negative impacts on the health and wellbeing of the general population?
- Can you identify positive and negative impacts on the health and wellbeing of specific stakeholder/population groups?

7.4. The second part of the workshop then looked to identify recommendations for improving health and wellbeing through the Local Plan using the following prompts:

- Improving health and wellbeing in identified stakeholder groups
- Prevention of ill health
- Mitigation of negative impacts on health and wellbeing
- Revisions to wording in the Local Plan

8. Assessment and Recommendations

8.1. The tables below set out the findings of the Rapid HIA for each of the policies and sets out the recommendations to be taken forward by policy authors.

Croydon Local Plan: Strategic Policies- Partial Review

Policy SP2: Homes

Positive impacts on health and wellbeing

- Provision of housing and affordable housing to meet the need prevents overcrowding and ensures access to quality housing.
- Preferred option for development on brownfield sites maintains protection for open spaces which offer opportunity for physical activity, social interaction and community cohesion.

Negative impacts on health and wellbeing

- No control over standard of housing delivered through expanded permitted development rights for space standards, quality of accommodation and access to communal or private amenity spaces can lead to overcrowding, impacts on mental health and health impacts of living in accommodation previously used for other uses (retail, office, industrial and warehousing).
- If the character of an area has changed due to increased growth or greater density of development, this could result in some groups losing connection with an area, particularly those with learning difficulties, looked after children and those in residential care.

Recommendations

- Supporting text should make reference to health and wellbeing, particularly the impacts of poor quality housing.
- Policy should look for opportunities to reference the Council's Landlord Licensing scheme which seeks to provide quality accommodation in the private rental sector.
- A separate HIA should be undertaken on housing policies in the Local Plan to assess who is moving into proposed developments to be able to assess future impacts on health services and to look at how developments and new homes can support vulnerable groups.

Policy SP3: Employment

Positive impacts on health and wellbeing

- Protection for employment uses provides opportunities for employment, training and apprenticeships at a local level, which is particularly important for those who cannot afford to travel to remain in employment.

Negative impacts on health and wellbeing

- Supporting residential development on the fringes of industrial areas could result in residential developments that are isolated from other residential areas or from services. This could result in social isolation, lack of community cohesion and poor access to health services or retail.

Recommendations

- Supporting text should make reference to health and wellbeing.
- Policy should ensure that any redevelopment for residential on the fringes or within industrial estates will be connected to existing residential areas. They should have access to appropriate services and mixed use developments could be supported to ensure this.

Policy SP6: Environment and Climate Change

Positive impacts on health and wellbeing

- Insulation aids in keeping people warm, which could particularly affect older persons and could prevent excess winter deaths.
- Insulation prevents excess noise: low level noise pollution negatively impacts on mental health.
- Addressing poor quality ventilation can improve respiratory health problems, particularly for children and older persons.

Negative impacts on health and wellbeing

None identified

Recommendations

- Supporting text should make reference to health and wellbeing.
- The Local Plan should stay up to date on the CCG's steering group looking at issues of poor ventilation.
- Only half of the borough is within a smoke-free zone- the Local Plan could promote the extension of smoke free zone to take account of the impact of wood burning on health.

Policy SP7: Green Grid

Positive impacts on health and wellbeing

- Creation of a multi-functional network of open spaces ensures that different groups are able to use open spaces for uses such as physical activity, recreation, interaction with others.
- Access to open space can be therapeutic for those with poor mental health or substance misuse issues.
- Encouragement of food growing offers growth of local, healthy food and provides therapeutic activities.

Negative impacts on health and wellbeing

- The de-designation of some open spaces does not take account of whether an area is deficient in open space. This could mean some groups may no longer have access to open space for physical activity or for interaction with others which is a particular issue for those who cannot afford to travel or those with mobility problems.

Recommendations

- Supporting text should make reference to health and wellbeing, particular access to open spaces which are accessible for all and provide affordable places for physical activity.
- When assessing the potential loss of open spaces an assessment should be made as to whether the area is already deficient in open space.
- Suitability of areas for food growing should be assessed to ensure opportunities are safe and have been assessed for pollutants or land contamination, particularly if close to industrial areas.
- An assessment should be made as to whether any of the green chain networks could be used to link with cycle routes to encourage access to open space and physical activity.

Croydon Local Plan: Detailed Policies and Proposals

Policy DM1: Housing Choice for Sustainable Communities

Positive impacts on health and wellbeing

- People can access housing they require, preventing overcrowding and ensures quality housing, particularly for families and larger households.

Negative impacts on health and wellbeing

None identified

Recommendations

- Supporting text should make reference to health and wellbeing.

Policy DM3: Residential Care and Nursing Homes

Positive impacts on health and wellbeing

- Ensures that new care homes are meeting an identified need and providing necessary services.
- Restriction on care homes spaces could increase the number of people being supported to remain at home.

Negative impacts on health and wellbeing

- Restricting the overall supply could prevent state of the art care homes in the future.
- If the policy results in lack of bed spaces within care homes this could result in inappropriate admissions and long stays within hospitals which can increase risk of disease and infections, with a greater risk for older persons and those with severe disabilities.
- NHS does not work on a borough basis so policy could result in Croydon's residents being negatively affected if NHS allocations become on a first come first served basis for places in a reduced number of care homes.

Recommendations

- Supporting text should make reference to health and wellbeing.
- Policy should ensure that Croydon is effectively working with other boroughs and the NHS to address any cross-boundary issues. There is a need to identify a patients' original destination to work with NHS to ensure Croydon's residents are prioritised.

DM4: Development in Croydon Metropolitan Centre, District and Local Centres

Positive impacts on health and wellbeing

- The control of number of takeaways within frontages reduces accessibility of unhealthy food which can assist with reducing obesity, particularly for children and young people.
- Access to retail and services within centres means access to services locally and also encourages walking and cycling.
- Provision of community facilities within frontages allows for provision of services for learning or training and for access to healthcare.

Negative impacts on health and wellbeing

- The loss of small and local shops which are not within a designated centre or frontage could reduce access to services and community cohesion whilst increasing social isolation as facilities

no longer accessible by walking and cycling. This could be a similar issue for facilities and services within major developments which may not be encouraged as they are not in sequentially preferable locations.

- No control for other uses such as betting shops and guarantee that uses which are not within A5 but still sell food are offering healthy food as alternatives.

Recommendations

- Supporting text should make reference to health and wellbeing, particular control of certain uses such takeaways.
- Identify whether small or isolated local services which are outside of a designated centres or frontages require protection.
- Work with the Flood Flagship programme to encourages food offerings which are healthier or encourage A5 uses to offer healthier options, use healthier oils or less salt.

DM5: Development in Neighbourhood Centres

Positive impacts on health and wellbeing

- Improving social cohesion, reducing social isolation and improving mental health with creation of a network of community facilities which give people the opportunity to meet people in their community.
- Ensures access to services which are local and encourages walking and cycling.

Negative impacts on health and wellbeing

None identified

Recommendations

- Supporting text should make reference to health and wellbeing.
- Croydon CCG and NHS England should be contacted around the development of Neighbourhood Centres to identify whether additional facilities are required in these areas.

DM6: Development in Shopping Parades

Positive impacts on health and wellbeing

- Provision for spaces of B1/D1 uses within shopping parades can provide opportunities for learning spaces, training opportunities or apprenticeships which would be particularly important for younger people who may be living in overcrowded housing and so do not have this space available to them elsewhere.
- Control of takeaways limits access to unhealthy foods which are linked to obesity and supports provision of healthy food options.

Negative impacts on health and wellbeing

None identified

Recommendations

- Supporting text should make reference to health and wellbeing.
- Local Plan should assess whether there are any areas in the borough where there is clustering of takeaways or the proximity to schools which should be controlled.
- The policy could link to the Food Flagship Programme which encourages healthy catering.

DM9: Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial Locations

Positive impacts on health and wellbeing

- Redevelopment of industrial estates provide opportunities for health improvement, particularly amongst certain groups such as men or lower income groups to address their health problems if there is provision made for open space or healthy eating options.
- Provides opportunities for employment, training and apprenticeships.

Negative impacts on health and wellbeing

- Dense development without provision of open space or provision of catering options limits opportunities for healthy eating, recreation or exercise- enforces health problems already experienced by those working in these areas

<p>Recommendations</p> <ul style="list-style-type: none"> Supporting text should make reference to health and wellbeing and should look at opportunities for uses which could mitigate illness and unhealthy behaviours within industrial areas.
<p>Policy DM10: Design and Character</p>
<p>Positive impacts on health and wellbeing</p> <ul style="list-style-type: none"> Generous space standards will have positive impact on mental health and for those groups who may be at home more such as older people and those who are unemployed Amenity and communal space standards have positive impacts on mental health and provide opportunity for interaction with neighbours, reducing social isolation. Re-providing these spaces will encourage people to make use of them.
<p>Negative impacts on health and wellbeing</p> <ul style="list-style-type: none"> Tall and large buildings could lead to poor quality housing or overcrowding if space standards are not generous, the size of floor plates may lead to poor daylight due to lack of windows or if sites are overdeveloped there may not be provision for open space or amenity space. Removal of minimum distances between buildings can be linked to the feeling of being overlooked or not having own private space. This can impact on mental health, feeling safe and comfortable in own home.
<p>Recommendations</p> <ul style="list-style-type: none"> Supporting text should make reference to health and wellbeing, particularly the requirement to assess the impact of tall and large buildings on health and wellbeing which can be done through a Health Impact Assessment. Policies should ensure that if buildings are closer together, this is compensated by larger rooms and taller ceilings.
<p>Policy DM18: Providing and protecting community facilities</p>
<p>Positive impacts on health and wellbeing</p> <ul style="list-style-type: none"> Provides access to services and facilities which are needed by the community. Provides opportunities for interaction with other parts of the community, preventing social isolation and increasing community cohesion.
<p>Negative impacts on health and wellbeing</p> <p>None identified</p>
<p>Recommendations</p> <ul style="list-style-type: none"> Supporting text should make reference to health and wellbeing. Policy should ensure the affordability of community facilities when being marketed to ensure groups who require the space can afford to take them on- this could be addressed by encouraging mixed use developments
<p>Policy DM19: Protecting Public Houses</p>
<p>Positive impacts on health and wellbeing</p> <ul style="list-style-type: none"> Protection of public houses in positive as loss of pubs could lead to more drinking at home which could result in excess drinking with no social benefits of the opportunities for community interaction. This could particularly impact on older adults or people with children.
<p>Negative impacts on health and wellbeing</p> <p>None identified</p>
<p>Recommendations</p> <ul style="list-style-type: none"> Supporting text should make reference to health and wellbeing Policy could encourage pubs to be taken over by community groups if no longer required as a pub, particularly if there is an identified shortage of community facilities within a particular area.
<p>Policy DM21: Sustainable Design and Construction</p>
<p>Positive impacts on health and wellbeing</p> <ul style="list-style-type: none"> Insulation aids in keeping people warm, particularly the elderly, preventing winter excess death

<p>and excess noise. Low level noise pollution can negatively impact on mental health.</p> <ul style="list-style-type: none"> Addressing poor quality ventilation can result in improvements to respiratory health problems, particularly for children and older persons
<p>Negative impacts on health and wellbeing None identified</p>
<p>Recommendations</p> <ul style="list-style-type: none"> Supporting text should make reference to health and wellbeing
<p>Policy DM24: Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces</p>
<p>Positive impacts on health and wellbeing</p> <ul style="list-style-type: none"> Protecting of Metropolitan Open Land and Local Green Spaces which are often closer to residential areas will allow access to open space which is accessible by walking and cycling. This is particularly important for children and young people, those with poor mental health, people who are isolated and those who cannot afford to use other facilities for physical activity. Open spaces provide opportunities for social interaction, physical activity and recreation.
<p>Negative impacts on health and wellbeing None identified</p>
<p>Recommendations</p> <ul style="list-style-type: none"> Supporting text should make reference to health and wellbeing
<p>Policy DM27: Promoting sustainable travel and reducing congestion</p>
<p>Positive impacts on health and wellbeing</p> <ul style="list-style-type: none"> Reducing congestion reduces pollution and improves air quality Encourages walking and cycling which increases physical activity and reduces obesity, which is a particular issue for children and young people
<p>Negative impacts on health and wellbeing None identified</p>
<p>Recommendations</p> <ul style="list-style-type: none"> Supporting text should make reference to health and wellbeing Supporting text should reference that encouraging cycling, walking and increasing use of public transport which promotes physical activity, improves mental health and reduces physical obesity

9. How has the Health Impact Assessment been taking forward in the Proposed Submission Versions of the Croydon Local Plan: Strategic Policies- Partial Review and Croydon Local Plan: Detailed Policies and Proposals?

9.1. The findings of the Health Impact Assessment were considered by policy authors for the Strategic Policies- Partial Review and the Detailed Policies during the preparation of the Proposed Submission versions of both documents. The general recommendation for embedding health and wellbeing throughout the policies was taken forward and a new policy for 'Promoting Healthy Communities' has been developed for the Detailed Policies and Proposals.

9.2. Strategic Policies- Partial Review

- Paragraph 4.19 sets out how policy SP2 can contribute to addressing the health and wellbeing impacts of poor quality housing
- Paragraph 4.35 sets out how mixed use redevelopments in industrial and employment locations should consider health and wellbeing and should look for opportunities for open space provision and improved access to community facilities and local services.

9.3. Detailed Policies and Proposals

- DM1 and DM3 set out how residential development should set out to achieve healthy and liveable communities to support the health and wellbeing of residents in line with Strategic Objective 7.
- Paragraph 5.6 sets out how the restrictions on hot food takeaways in DM5 will support access to healthier food options, tackling obesity and supporting the Council's Food Flagship Programme.
- Paragraph 5.37 sets out how restrictions on hot food takeaways in DM7 will support access to healthier food options and will restrict the opening of hot food takeaways in residential areas which are in close proximity to open spaces and schools.
- Paragraph 6.11 requires health and wellbeing to be considered during the design, construction and management of a development, setting how the provision of communal outdoor amenity space will provide opportunities for increased outdoor activity and social interaction.
- DM11.8 requires proposals for high density developments and/or developments with building separation distances less than 18m should have increased ceiling heights to improve the health and wellbeing of future occupants.
- DM17 Promoting Health Communities is a new policy which requires developments to consider health and wellbeing during the design of a development to maximise potential health gains and ensure negative impacts can be mitigated. It also requires access to open spaces, promoting active travel and physical activity, the creation of spaces for social interaction and community engagement and that pollutants are assessed and mitigated. This will be measured through Health Impact Assessments.
- Paragraph 8.6 sets out how addressing air quality through DM24 can improve health problems, particularly those associated with vulnerable groups.
- Paragraph 9.1 sets out that the protection of Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces is important for ensuring communities have access to open spaces for physical activity, recreation and play.
- Paragraph 10.1 sets out how cycling, walking and increasing use of public transport promote physical activity, improve mental health and reduce physical activity.

9.4. In conclusion, the HIA on the Croydon Local Plan- Strategic Policies and the Croydon Local Plan: Detailed Policies and Proposals identified that planning policies were having a positive impact on

health and wellbeing. It identified a number of ways in which these positive impacts can be maximised and how some of the negative impacts can be mitigated. These recommendations have been taken forward and reference to health and wellbeing has been embedded throughout the Local Plan's policies and supporting text. A new policy 'Supporting Healthy Communities' has been introduced to ensure that health and wellbeing is considered during the design of developments.