

# Coventry City Council

## Health Impact Assessment Supplementary Planning Document (SPD)

### Regulation 12(a) Report of Consultation and Consultation Statement

August 2018

## **Introduction**

This report sets out the consultation that took place in the lead up to and during public consultation of the Coventry Draft Health Impact Assessment Supplementary Planning Document (in this document referred to as the Draft SPD) from 12 February 2018 to 23 March 2018. It reviews the consultation responses received, the number of representations made and a summary of the main issues raised by the representors.

This document has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires that Local Authorities set out the persons the local planning authority consulted when preparing the supplementary planning document, a summary of the main issues raised with the consultation responses, and how those issues have been addressed. Once adopted, the Health Impact Assessment Supplementary Planning Document will form part of the council's Local Plan.

## **Background**

The Health Impact Assessment Supplementary Planning Document has been prepared to provide technical guidance and support to Policy HW1 of the new Local Plan and the delivery of Health Impact Assessments. This will help deliver one of the overall objectives of the Plan which is to help improve the health and wellbeing of Coventry people.

The Health Impact Assessment Supplementary Planning Document is aimed at individuals and organisations involved in submitting a planning application as well as those involved in the determination and enforcement of planning applications, for all relevant developments (residential, commercial and mixed developments). By way of summary, the SPD is structured around a detailed template to support the delivery of a HIA for relevant development proposals. It takes users on a step by step process through a range of key health and wellbeing considerations relative to new developments, having regard to matters of build quality, design, relationship with the natural environment and links to transport and active travel.

## **Public Consultation**

The Draft Health Impact Assessment SPD was approved for public consultation by the Council's Cabinet Member on 30 January 2018. Public Consultation was held from 12 February 2018 to 23 March 2018. Notification of the Draft SPD consultation was emailed to:

- Statutory Consultees including adjoining Local Authorities; and
- Local Plan database contacts including individuals, developers and community groups.

Hard copies of the Draft SPD were made available in the customer contact centre and Council House in the city centre. The consultation was posted on the council's Facebook and Twitter account as well as appearing on the main council webpages.

Comments were requested via email to [ldf@coventry.gov.uk](mailto:ldf@coventry.gov.uk). An email address and contact telephone number was provided on all the consultation material and the website for those who wanted to ask questions and seek further information.

## Summary of Response to the Consultation

The Council received a total of 7 responses via email and post to the consultation as well as a range of informal comments and suggestions made through email, stakeholder meetings and consultation drop in events. A summary of the representations made, details of the respondent and the proposed action in response to the representations are set out in the table below.

**Table 1: Summary of Consultation Responses**

Representation	Council Response
Concern that there is no definition of 'home' in section 4.2.	Amend text for clarification to say: "For the purposes of this SPD a home, mentioned in c) (i) above, refers to a dwelling that comes under C3(a), C3(b), C3(c) classes of use and Sui Generis (for example, a student accommodation block consisting of 150 bedrooms would meet the threshold for a HIA, regardless of the layout)."
Unclear as to what the consequences of submitting an incomplete HIA or one omitting key points (section 5 of "6.1 Carrying out a HIA").	Add additional text and amend wording to say: "If a HIA has omitted key points or if it does not receive a Grade A or B through this assessment, this will be communicated with the applicant and Coventry City Council may request that the applicant carries out the HIA again or resubmits the HIA with the required extra information as necessary. If these issues remain and the HIA does not meet these required standards for an application over the threshold described for policy HW1 (see section 4.2), it may be refused."
This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area and reduce flood risk.	The SPD has been developed to support existing policy rather than to create new policy and the adopted Local plan already has reference to policy for Green Infrastructure (Policy GE1) and accessibility to green space for new developments (Policy H3: Provision of New Housing). Furthermore, the "Considerations and possible health impacts of planning" on the draft HIA SPD refers to these policies. Category 3 of the 'Considerations and possible impacts on health' table in the draft HIA SPD has a considerations column. The following text will be added to this section: "Maximising green

	<p>infrastructure in urban environments (including green roof systems and gardens and green walls)". In the positive effects column - "Green walls can provide insulation or shading and cooling"; and "Green infrastructure can reduce flood risk".</p>
<p>Incorporate features which are beneficial to wildlife in the development.</p>	<p>Category 3 of the 'Considerations and possible impacts on health' table on the draft HIA SPD states "There may be opportunities to integrate play spaces with other related health and environmental programmes such as food growing and increasing biodiversity" in the positive effects.</p>
<p>Enhancing the character and local distinctiveness of the surrounding natural and built environment with good design.</p>	<p>Comment is noted, however matters of design will be covered by other SPD, most notably the Council's forthcoming Urban Extensions Design Guidance and wider Residential Design Guidance SPD.</p>
<p>Strategic Environmental Assessment/Habitats Regulations Assessment to be considered on the SPD.</p>	<p>This SPD is not new policy, but provides guidance to allow the adopted policy (HW1) to be delivered effectively and consistently. The overarching policy was subject to a HRA and SEA.</p>
<p>Planning Legislation and national planning policy does not require HIAs to be submitted by developers with their planning applications. The City Council's requirement for HIA (Local Plan policy HW1) goes beyond national requirements and there is no explicit reference that applicants should prepare and submit HIAs.</p>	<p>These responses are relating to the principle of Policy HW1 (Health Impact Assessments), which has been dealt with by the process of developing, consulting, examining and adopting the Coventry Local Plan. This SPD is not setting new policy, but provides guidance to allow the adopted policy (HW1) to be delivered effectively and consistently. This consultation is on the draft HIA SPD, not Policy HW1. We are not able to deal with issues of principle at this stage.</p>
<p>The option to screen the requirement for an HIA as suggested in the SPD is welcomed.</p>	<p>CCC notes these comments.</p>
<p>There is limited national guidance on assessing and mitigating against the health impacts of a development and the proposed SPD is therefore welcomed as a source of information and the principles are supported.</p>	<p>CCC notes these comments.</p>
<p>It would be helpful and provide clarity to developers if the document explained whether the 'Healthy Development Template' (Appendix B) is to be superseded once Birmingham City</p>	<p>The Birmingham City Council Health Impacts Toolkit is still in development. It is only upon completion and adoption of this toolkit by Birmingham that Coventry will be able to make a definitive decision as to whether or not the</p>

<p>Council's Health Impacts Toolkit has been completed.</p>	<p>Birmingham Toolkit will supersede the Healthy Development Template shown in the draft HIA SPD. The exact content of the Birmingham Health Impacts Toolkit upon adoption and regional policy and guidance will inform this decision. Notwithstanding, the 'Coventry Healthy Development Template' has been developed with the draft Birmingham template in mind and is broadly consistent.</p>
<p>Policy HW1 requires a HIA or HIA Screening Report. The SPD doesn't provide a template for either of these documents and it is not clear whether the HIA is the same as the 'Healthy Development Template' or something different.</p> <p>Policy HW1 doesn't require a 'Healthy Development Template' to be completed and submitted with planning applications and therefore the SPD appears to be introducing an additional requirement beyond HIA/HIA Screening, clarity is needed as to whether or not the Healthy Development Template needs to be submitted as an extra piece of work to the HIA.</p>	<p>Chapter 6.1 of the HIA SPD advises that there is no set methodology for carrying out a HIA and goes on to describe the common stages. It recommends that the Healthy Developments Template (from Chapter 5) is used for the screening stage and to help structure and guide a full HIA</p> <p>CCC note that the wording could be clearer and will amend accordingly.</p> <p>The completion of the Healthy Development Template is recommended by Coventry City Council and put forward as guidance to support the delivery of a HIA screening report and full HIA in accordance with Policy HW1. It therefore helps to provide a consistent and transparent platform from which to meet the requirements of policy HW1 - it is not duplication or an additional policy requirement. Notwithstanding, if a developer chose to set out their HIA in a different way, yet still met the requirements, it would still be acceptable.</p>
<p>Title suggested for table in paragraph 5.2 along with page numbers.</p>	<p>Both added to the draft HIA SPD.</p>
<p>Some criteria listed at Appendix B are highly subjective and so it is unlikely to lead to an objective analysis.</p>	<p>Additional wording has been added to chapter 5.1 (which gives guidance on completing the Healthy Development unit).</p>
<p>It will not always be clear how many of the Criteria in the Template will be met at the time of submitting the planning application. A different template should be considered for outline applications than for full/reserved matters applications, or at least recognising explicitly in the template that there will be differences in the information available depending on the type of application.</p>	<p>Additional wording is added to part 1 of Para 5.1 to say "If the Healthy Development Template is completed in the very early stages of a proposed development, it may not always be clear how some of the criteria in the Template are going to be met. If this is the case, the 'Details/evidence' column should be used to record this information."</p> <p>Coventry City Council would not want to make the process too onerous or complex for applicants by having more than one template.</p>

<p>Some of the criteria duplicate information that developers will submit elsewhere.</p>	<p>The Healthy Developments Template has not been designed to create extra work, but to compliment a variety of policies contained in the Coventry Local Plan that can impact the wider determinants of health. It is therefore a tool to allow existing work that supports the application process to be recorded in a single place, from a health perspective. This can include cross references to other documents and the relevant sections of them to reduce duplication.</p>
<p>Support of the HIA SPD. HIA is a method which we recommend using to systematically examine the effect that a development may have on population and human health, as well as this the use of HIA is championed by the Warwickshire Health and Wellbeing Board as a way of addressing the wider determinants of health and reducing health inequalities.</p> <p>We support the considerations which are set out within the Healthy Development Template and we would recommend that Warwickshire's District and Borough Planning Teams take a similar approach if considering adopting a HIA (or similar) SPD.</p> <p>We hope to continue to work closely with colleagues at Coventry City Council on the public health and planning agenda.</p>	<p>CCC note the comments and would be pleased for and encourage Warwickshire's District and Borough Councils to take a similar approach.</p>
<p>Overall support for the aims and policies in Chapter 2 of the Coventry Local Plan – Health and Wellbeing (Policy HW1 – Health Impact Assessments).</p>	<p>CCC note and appreciate this support.</p>
<p>Above ground Sustainable Drainage Systems create or improve natural environments, with benefits for health and wellbeing. Such interventions are supported locally by policy in the recently adopted Local Plan (see EM4 and EM5).</p>	<p>Comments noted. To support his, policies EM4 and EM5 are already referenced in Category 11 of the “Considerations and possible health impacts of planning” section of the draft HIA SPD.</p>
<p>The SuDS Design Guide will be published in support of the Sustainable Urban Extension SPD; it could be added to the list of additional documents in 4.2.</p>	<p>SuDS Design Guide added to draft HIA SPD as suggested.</p>

Policy EM5 “Sustainable Drainage Systems SuDS” could be referenced as the Incorporation of SuDS techniques into housing design can provide important health and wellbeing benefits.	EM5: Sustainable Drainage Systems SuDS added to the relevant Local Plan Policies column in category 1 of draft HIA SPD.
There is a case for the inclusion of policies DS4, EM4, EM5 in the “Relevant Local Plan Policies and Supplementary Planning Documents” column in some categories, although the inclusion of these policies in existing areas is supported.	<p>Policies DS4, EM4 and EM5 are listed in the “Relevant Local Plan Policies and Supplementary Planning Documents” column in some areas.</p> <ul style="list-style-type: none"> <li>- Policy DS4 now added to category 11 on draft HIA SPD.</li> <li>- Policies EM4 and EM5 has now been added to category 3.</li> <li>- EM5 added to category 4.</li> </ul>
Links on related guidance throughout response to be considered for inclusion into Appendix A.	Due to the number of extra documents, it is suggested that the list of additional documents is referenced in the emerging SuDS Design Guide as section 4.2 of the draft HIA SPD now refers to the emerging SuDS Design Guide.
For consistency with the Local Plan and SuDS Design Guide, we recommend changing the wording to Sustainable Drainage Systems (SuDS).	Draft HIA SPD amended.
The following statement could be added to the positive effects column: <i>Designing Sustainable Drainage Systems and other flood alleviation measures to mitigate against potential future flooding through more extreme events caused by climate change, will minimise the risk of future flooding and/or the need for costly retrofitting of drainage infrastructure or property level resilience.</i>	Draft HIA SPD amended with addition of statement.
We support the inclusion of the relevant questions in categories 3 and 11, which will encourage consideration of interventions such as Natural Flood Risk management.	Comments noted and welcomed.
There is a need to ensure that developers liaise with city health services including UHCW when using the Toolkit.	There is no statutory obligation for developers to link in with acute services when submitting a planning application, however CCC Planning team and/or Public Health team would consult with health service providers when a Planning Application is received if it is deemed relevant. Furthermore, the process for developer’s contributions for health services will be in the

	<p>emerging CIL and Section 106 guidance document (also referenced in the draft HIA SPD). This is expected to be consulted upon in late 2018.</p>
<p>Consider and improve traffic limiting methods/Green schemes/Cycle schemes, promotion of walking and cycling.</p>	<p>There are several references in the draft SPD and appendices to promoting active travel and reducing car use. A prime example includes Category 5 of the SPD (e.g. Consideration inclusive design, access, orientation and streetscape during the design process can make it easier for people to access facilities using public transport, walking or cycling).</p>
<p>Consider the planting of trees along walking routes and near to roads in particular.</p>	<p>Provision of green space and trees is already suggested as a consideration, including in Category 4: Air quality, noise and neighborhood amenity.</p> <p>The planting of trees and landscaping will also feature strongly in our forthcoming design guidance.</p>
<p>Concerns of the population increase from local housing development in Coventry on the demand for acute services</p>	<p>Section 106 contributions are already requested from a development for health services. If this is to request contributions above and beyond the current expectations, then evidence to justify this would be required. It is our understanding though that existing calculation should have had regard to the projected growth expectations across the city as set out in the recently adopted Local Plan.</p> <p>Furthermore, this draft SPD does acknowledge the potential impact on health services from new developments in Category 2 on the “Considerations and possible health impacts of planning”. This includes: “Needs and demand for services” and “Capacity of existing healthcare services” as some of the considerations.</p> <p>Chapter 13 in Coventry’s Local Plan (Infrastructure Delivery, Implementation and Monitoring) identifies the processes by which the infrastructure necessary to support the level of planned development within the city would be secured and delivered. Although this links in with other areas of Coventry’s Local Plan, CCC are in the process of developing a CIL and Section 106 guidance document (also referenced in the draft HIA SPD). This is expected to be consulted upon in late 2018.</p>



<p>Concerns that an increased population from local housing population will lead to increased congestion on local roads and on UHCW site, leading to standing traffic on and around the site. It is reasonable to expect reduced air quality on and around the site as a result and anticipated increase in presentation at UHCW for respiratory related illness due to air quality</p> <p>Increased noise, dust, odour levels on and around the site from standing traffic (detrimental to patients, visitors, staff and local resident's wellbeing).</p>	<p>The draft SPD shows consideration towards using design for opportunities for walking and cycling, access to public transport, minimising the need to travel and discouraging car use, all of which can help avoid increased congestion.</p> <p>The draft SPD and associated appendices acknowledge Air Quality and mitigating actions and require the developer to record how the proposed development minimises short term (through construction) and long term air pollution caused by traffic.</p> <p>Coventry City Council will also be developing an Air Quality SPD, which will be issued for consultation in August 2018.</p>
<p>The document does not outline the size of anticipated development, however we understand that this legislation may apply for developments of 150 homes or more.</p>	<p>The draft HIA SPD (in chapter 4.2) quotes Policy HW1 from the Local Plan, whereby a HIA (or HIA Screening Report) is required for all major development proposals and chapter 4.2 repeats the threshold over which a HIA is required in Coventry.</p> <p>The draft HIA SPD also states: The Coventry Local Plan states that all developments (notwithstanding the thresholds identified for the HIA policy) will be encouraged and recommended to complete a Health Impacts Toolkit.</p>