

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

**Health Impact Assessment Review 2019: Report
responding to Proposed Main Modifications to Local Plan**

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Health Impact Assessment Review 2019: Report Responding to Proposed Modifications to Local Plan

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Health Impact Assessment Review 2019: Report Responding to Proposed Main Modifications to Local Plan (April 2020)



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1.0 Introduction

1.1 Context

In 2018, the submission version of Havering's Local Plan began its examination process by HM Planning Inspectorate. The Local Plan for Havering guides future growth and development within the borough over the next 15 years, until 2031, setting out the Council's vision and strategy, and the policies that are needed to deliver them. The Plan indicates the broad locations in Havering for future housing, employment, retail, leisure, transport, community services and other types of development.

An accompanying Health Impact Assessment (HIA) of the Local Plan was undertaken in order to promote health and wellbeing through development. The HIA approach recognises that where we live, how we travel, and how we gain access to green space or leisure activities can all have a significant impact on health and wellbeing (Appendix 1 provides a brief description of these wider determinants of health). HIA provides an opportunity to ensure that the potential impacts on health and wellbeing, particularly where there may be inequalities in outcomes for marginalised or disadvantaged groups, are addressed from the outset and mitigated where possible. The purpose of the HIA was to ensure that the Local Plan was sufficiently robust to maximise health gains and, where there is a risk of negative impact, to mitigate against this where possible.

The HIA of the Local Plan resulted in a raft of policies being revised, new guidance being drafted and a proposed new policy that requires developers of all major developments to undertake their own HIA pre-application. The Examination hearings looked upon this new policy favourably and is being supported in its implementation through training and the development of a series of templates to assist developers in conducting a HIA commensurate with the scale of their development application.

1.2 Purpose of this Report

As the purpose of a HIA is to inform decision-making, it is good practice to assess and re-assess the impacts of a policy throughout its lifetime, continuing to monitor and evaluate how the HIA has informed and/or influenced decision-making¹. The Planning Inspectorate Examination process has resulted in a number of modifications to Havering's Local Plan. Therefore, the purpose of this report is to review these modifications to ascertain the health impacts of the modifications and/or whether they significantly alter the findings of the previous Health Impact Assessment.

The table given in Appendix 2 outlines the health impact assessment of the modifications, lists the recommendations from this assessment and identifies the mitigation measures that are already in place within the Local Plan. A summary of these health impacts, according to the 11 themes (from the HUDU Rapid HIA tool previously used for the original HIA) is given in section 2.3 of this report.

2.0 Health Impact Assessment Review Process

2.1 Schedule of Proposed Modifications

This HIA Review has been conducted on the "Draft Schedule of Proposed Modifications to the Havering Local Plan following the Examination in Public Hearing sessions in October 2018 and May 2019". The schedule sets out the

¹ Wales Health Impact Assessment Support Unit: Health Impact Assessment: A Practical Guide
https://whiasu.publichealthnetwork.cymru/files/1415/0710/5107/HIA_Tool_Kit_V2_WEB.pdf

proposed main modifications to the text of a policy included in the 2018 Submission Version of the Local Plan and/or the supporting text providing reasoned justification for that policy. The modifications have arisen as a result of:

- the Regulation 19 consultation in Autumn 2017
- the submission of the Local Plan to the Secretary of State in March 2018; and
- the Examination in Public hearing sessions in October 2018 and May 2019

2.2 Appraisal of the Main Modifications

Each main modification identified in the schedule was reviewed with the following questions in mind:

- Using the HUDU Rapid HIA Tool as a framework, do any of those questions apply to the modification?
- Does the proposed modification significantly alter the policy's impact on health and wellbeing?
- What are the likely positive or negative impacts of the modification?
- Are further mitigation measures required in response to identified negative impacts?

2.3 Key Findings

For the most part, the proposed main modifications clarified or added further detail to the policies proposed in the original submission. Therefore, many of the health impacts had already been considered as part of the original Health Impact Assessment. Appendix 2 lists the main modifications which were considered to require additional assessment. The key findings were in relation to the following areas:

i) *Housing quality and design*

Whilst increasing the density of new homes within a small area can increase the capacity for meeting housing need, it may impact negatively on provision of green and open space, which in turn can impact negatively on mental health and wellbeing. In addition, consideration of tall buildings near the station adds potential for increase access to employment opportunities and travel. However this may impact negatively on light within homes, and increase exposure to poor air quality. Despite these potential negative impacts as a result of the proposed modifications, the context and structure of the Local Plan itself aims to mitigate for these impacts through the use of policies on good design and making the most of the available development space.

The modification proposed for Policy 11 in relation to provision of sites for gypsy and traveller communities is consistent with national planning policy and reflects the Gypsy and Traveller Accommodation Assessment Update Report (July 2019).

ii) *Access to healthcare services and other social infrastructure*

Provision of suitable social infrastructure particularly to meet educational needs can impact positively on overall wellbeing by providing children with the best start in life. The modifications proposed include additional provision of a 3-form entry primary school to meet the needs of the residents of the substantial new housing development in the area. However, it is recommended that as part of the development process for this school that it is designed with consideration for restricting access to the school by cars/other vehicles to improve air quality around the school.

iii) *Access to open space and nature*

The HIA supports the proposed modification for Policy 10 that developments on garden and backland sites will be supported when they do not result in significant adverse impacts on green infrastructure and biodiversity that cannot be effectively mitigated. It is important to maintain access to green and open space for both physical and mental health and wellbeing and so preservation of these spaces is welcomed. However, there remains to be a clear definition of 'significant adverse impact'.

iv) *Air quality, noise and neighbourhood amenity*

The addition of the word 'unacceptable' in Policy 6 relating to adverse impacts of development, gives greater opportunities to build developments to meet housing needs. Such development may have a negative impact, but those impacts may be deemed acceptable by key stakeholders. It is recommended that full and frank consultation is conducted where negative impacts are identified to test the acceptability by key stakeholders.

v) *Accessibility and active travel*

The Havering Local Plan's Strategic Objectives now includes reference to supporting greater use of the River Thames for passenger and freight transport. Whilst opening up the river for passenger use may positively impact on health and wellbeing in terms of an alternative route to work and access to leisure, it is recommended that developers consider how the passenger embarkation points will be made as accessible to all as possible. In addition, increased passenger and freight transport on the river may have negative impacts on the biodiversity of the area, which already includes a Site of Special Scientific Interest (SSSI) in the Rainham Marshes area.

vi) *Crime reduction and community safety*

None of the modifications appeared to have any additional impact (positively or negatively) on crime reduction and community safety aspects.

vii) *Access to healthy food*

The HIA supports the modification in Policy 12 limiting the overconcentration of uses within a town centre – there are no additional positive or negative impacts of this modification.

viii) *Access to Work and Training*

The proposed main modifications which focus on developers ensuring a mix of uses, particularly in the strategic development areas, have the potential for positive impacts on health and wellbeing in terms of employment opportunities, and business opportunities for a range of sizes of enterprises. It is recommended that developers consider provision of affordable workspaces of a range of sizes, and lengths of lease to encourage innovation through start-up businesses as well as smaller enterprises. The limits set on percentage of affordable workspace have reduced through the modifications from 20% to 10% but it is recognised this has been agreed as a reasonable figure through negotiation.

ix) *Social cohesion and lifetime neighbourhoods*

Provision in the modifications to the Local Plan for industrial sites offers an opportunity for employment, hopefully in the longer term with a successful business endeavour.

x) *Minimising the use of resources*

The HIA supports the modification in Policy 3 regarding returning vacant units to active use, which will assist in meeting housing need. Providing a home is a fundamental determinant of a person's health and wellbeing and so re-purposing vacant units to new homes will assist in providing homes for those in need.

xi) *Climate Change*

Efficient use vacant properties, and encouraging use of the River Thames for freight and passenger transport could potentially impact positively and negatively on climate change. Whilst the removal of freight from key transport routes through the borough may reduce levels of pollution, it will be necessary to carefully consider the impact of the increased river traffic on air quality and biodiversity in the region and its ultimate impact on climate change.

3.0 Recommendations and Existing Mitigation Measures

The findings from this Health Impact Assessment review of the main modifications do not significantly alter the original findings.

However, for the purposes of rigour, the health impact assessment of the modifications included a process to identify whether any further recommendations could be made. Where these were made, the Local Plan was examined to ascertain whether mitigation measures were already in place respond to these recommendations.

Key Recommendations Arising from Assessment of Modifications	Mitigation Measures Already in Place
To ensure the Local Plan continues to be consistent with national planning policy and any updates to the London Plan	The Local Plan will be reviewed regularly in line with national and local policy updates.
That should increased river freight and passenger transport use be realised, housing development and social infrastructure ensures good accessibility to the river amenities and for leisure opportunities	The Local Plan already contains policies on Air Quality (Policy 33), Managing Pollution (Policy 34) and Nature Conservation (Policy 30) which will mitigate any potential negative impacts
Priority for new or re-provisioned homes under Council control are allocated according to highest need.	<p>Havering Council's housing allocations policy has been designed to give real help to people in housing need.</p> <p>Policy 7- Residential design and amenity- sets out clear guidelines for quality of development and development standards including access to amenity spaces.</p>
Tall, or high density structures endeavour to maintain accessibility to green and open space through good design and effective use of urban planting	<p>Policy 34- Managing Pollution- The Council will support development proposals that:</p> <ul style="list-style-type: none"> i. Do not unduly impact upon amenity, human health and safety and the natural environment by noise, dust, odour and light pollution, vibration and land contamination <p>The Councils Environmental Health Team are consulted on planning applications and conditions are placed on applicants regarding mitigating noise pollution. There are also building regulations in place.</p> <p>The forthcoming Romford masterplan this will provide further guidance on tall buildings. A design review panel has been set up and it is expected that major applications will be referred to this panel.</p>
Mitigation for the adverse impact of noise, poor air quality and high density accommodation is recommended as central to any development application to minimise the impact on health and wellbeing	The Local Plan already contains policies on Air Quality (Policy 33), Managing Pollution (Policy 34) and Nature Conservation (Policy 30) which will mitigate any potential negative impacts
That HIA of this Local Plan is updated regularly in line with demographic, political or climate changes	The Local Plan will be reviewed regularly.

4.0 Future Monitoring and evaluation

This HIA reviewed the main modifications proposed for the Submission version of Local Plan. It is anticipated that, once the final plan has been adopted, it will be subject to future review within the context of other external pressures, such as changes in local demography, politics (leadership, EU Exit etc.) or climate change. As per best practice, the HIA will be monitored and evaluated to assess how it has continued to inform and influence decision-making within the Council. It will be reviewed either on a regular basis over the lifetime of the plan (every 3-5 years) and/or when there are definitive changes made on an ad hoc basis.

Appendix 1: Wider determinants of health, and the impact of the built environment on health

Figure 1 below reproduces Dahlgren and Whitehead's representation of the wider determinants of health. It illustrates the many factors that interact to influence health status.

Whilst we are powerless to alter such central factors as our age, sex and genetically inherited propensity to disease, the interaction between our individual characteristics and the environment in which we live, not just our immediate surroundings but also the socio-political and cultural environment, is key to determining health.

Figure 1. The Wider Determinants of Health Model



People living in areas of deprivation, with potentially poor housing conditions, overcrowding, high levels of unemployment, on low incomes, and poor education, live significantly shorter lives than their more affluent counterparts. For example, in England, a person in the quintile of lowest deprivation can expect to live around 7 years longer than a person in the quintile of highest deprivation. The environmental aspects of the local place also interplay with the social conditions; large networks of streets or estates can impact on our ability to access green and open spaces, important not just for physical activity, but for our mental health and wellbeing too. The design and density of housing, access to shops, supermarkets, leisure facilities and other retailers can affect the quality of our diet and lifestyle, including how we build and maintain our social relationships. Also, how we travel through our environments, whether there are traffic calming measures, safe places for children to play and the impact of traffic pollution on our air quality are important factors.

Appendix 2: Appraisal of Main Modifications

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
MM2	10	Strategic Objectives Para 3.2.1	Section 3 : Strategic Objectives Add new criterion to paragraph 3.2.1 as follows : <u>xxii. Support greater use of the River Thames for freight and passenger transport</u> and renumber the final criterion as xxiii	<ul style="list-style-type: none"> • Accessibility and active travel • Climate Change • Air quality, noise and neighbourhood amenity 	Supporting greater use of Thames for freight and passenger transport could have a positive impact on accessibility to public transport.	However, the negative impact might be in terms of increase in air and water pollution by boats and impact on local biodiversity.	Planners/developers to consider: <ul style="list-style-type: none"> • Importance of and way to mitigate for impact of increased river traffic. 	The Local Plan already contains policies on Air Quality (Policy 33), Managing Pollution (Policy 34) and Nature Conservation (Policy 30) which will mitigate any potential negative impacts
MM3	16	Policy 1	Over the plan period the Council will support the delivery of over 6,000 ^{5,300} ⁽²⁾ new high quality homes <u>within the Romford Strategic Development Area</u> in well managed residential and mixed use schemes that provide attractive places to live and which are well integrated with the existing community.	<ul style="list-style-type: none"> • Housing quality and design • Access to work and training • Accessibility and active travel • Air quality, noise and neighbourhood amenity 	Increasing the number of new homes to be available within the RSDA from 5,300 to 6,000 will have potential positive impacts on meeting housing needs. Developing within the Romford area will likely increase access to transport connections for employment purposes and access to leisure	Increasing the density of new homes within a small area may impact negatively on provision of green and open space, which in turn can impact negatively on mental health and wellbeing.	It is recommended that priority for new homes on Council housing registers be given to those with the greatest need. Good design of high density housing will contribute to mitigating against potential overcrowding. It is recommended that the design incorporates features of urban	Havering Council's housing allocations policy has been designed to give real help to people in housing need. Policy 7- Residential design and amenity- sets out clear

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					and entertainment opportunities.		planting to maintain a sense of access to green and open space.	guidelines for quality of development and development standards including access to amenity spaces.
MM3	16	Policy 1	Social Infrastructure: <u>A 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. A further 6FE need for primary school places beyond the first five years</u> xxiii. xxvi. <u>A 6/8FE secondary school in the second phase of the Plan period (5-10 years);</u>	<ul style="list-style-type: none"> • Access to healthcare services and other social infrastructure • Access to work and training • Accessibility and active travel • Air quality, noise and neighbourhood amenity 	Provision of suitable education establishments can have an overall positive impact on health and wellbeing through creating opportunities to improve education and gain better employment. Cross-referencing to other design and development policies in the plan will contribute to ensuring the school is as health promoting as possible.	Air pollution, noise, dust impacts need to be mitigated for during the construction phase of the school.	Planners/developers to consider: <ul style="list-style-type: none"> • Ensuring the school is accessible by means of active transport • Design the school with restricted access by vehicles, with exception for those whose needs demand car access to school 	Policy 23 Transport Connections contains the requirement for a travel plans for certain developments. There are officers in the Council Transport Planning team who work with schools to promote the benefits of active travel to and supporting the development, delivery and monitoring of school, travel plans as

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								referenced in section 10 of the Plan.
MM3	16	Policy 1	<u>To achieve a vibrant and thriving Town Centre there will need to be a mix of uses throughout the Romford Strategic Development Area (RSDA). It is envisaged that this will include residential, retail, commercial, leisure and arts uses. It is intended that the preferred locations for these different uses within the Town Centre will be identified through the ongoing master planning process for Romford. To facilitate delivery of these uses, the design of the ground floor of a mixed use development within RSDA should have a minimum floor-to-floor height of 4.5 3.5m to allow flexibility for future changes and adaptability over time. This is a recommended dimension for floor-to-floor height, as the floor-to-ceiling height in retail or commercial development will depend on individual occupier fit out</u>	<ul style="list-style-type: none"> • Social cohesion and lifetime neighbourhoods • Access to healthy food • Access to healthcare services and other social infrastructure • Access to work and training • Accessibility and active travel • Air quality, noise and neighbourhood amenity 	Potential for increased opportunities for employment and access to leisure opportunities can have positive impacts particularly on mental health and wellbeing.	Depending on the uses, there may be increased noise affecting the local residents.	None	<p>Policy 34- Managing Pollution- The Council will support development proposals that:</p> <p>i. Do not unduly impact upon amenity, human health and safety and the natural environment by noise, dust, odour and light pollution, vibration and land contamination</p> <p>The Councils Environmental Health Team are consulted on planning applications and conditions are placed on applicants regarding mitigating noise pollution.</p>

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			<u>requirements. Commercial buildings, given their likely increased service requirements will generally require a minimum floor-to-ceiling height of 3.5m to 4m to achieve appropriate ceiling heights.</u>					There are also building regulations in place.
MM3	16	Policy 1	<u>New Paragraph 6.1.31 Tall buildings may be acceptable in the vicinity of the station subject to high quality design and strong public realm propositions at ground level. Proposals for tall buildings within the Conservation Area and north of the railway line along south street are inappropriate. The heights of proposed new buildings in this area will need to respond positively to the historic context. Elsewhere in the town centre the height of proposed buildings should respond to local character and context, and make a positive contribution to the skyline in Romford town centre.</u>	<ul style="list-style-type: none"> • Social cohesion and lifetime neighbourhoods • Housing quality and design 	Increased accessibility to public transport for those living in the vicinity of the station may enable greater access to employment opportunities	Residential space in the middle of a town near a station may increase exposure to noise and air pollution; tall buildings may restrict the light for other nearby residences or access to natural light for employees of local commercial and retail spaces	Developers to consider: <ul style="list-style-type: none"> • what materials need to be used to minimise noise for residents of these buildings • good design of tall buildings in the context of their impact on existing amenities 	Policy 34- Managing Pollution- The Council will support development proposals that: <ol style="list-style-type: none"> Do not unduly impact upon amenity, human health and safety and the natural environment by noise, dust, odour and light pollution, vibration and land contamination The Councils Environmental Health Team are consulted on planning

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								<p>applications and conditions are placed on applicants regarding mitigating noise pollution. There are also building regulations in place.</p> <p>The forthcoming Romford masterplan this will provide further guidance on tall buildings. A design review panel has been set up and it is expected that major applications will be referred to this panel.</p>
MM5	22	Policy 2	Insert a new fifth paragraph in the policy as follows : <u>To achieve a vibrant and thriving area there will need to</u>	<ul style="list-style-type: none"> Social cohesion and lifetime neighbourhoods 	Potential for increased opportunities for employment and access to leisure	None identified	Planners/developers to consider: <ul style="list-style-type: none"> Provision of affordable 	Policy 21 Affordable Workspace- sets out the position

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			<u>be a mix of uses throughout the Rainham and Beam Park Strategic Development Area It is envisaged that this will include retail, commercial, leisure and arts uses.</u>	<ul style="list-style-type: none"> Access to healthy food Access to healthcare services and other social infrastructure Access to work and training 	opportunities can have positive impacts particularly on mental health and wellbeing		workspaces for local business <ul style="list-style-type: none"> Whether local procurement arrangements could provide employment opportunities for local residents 	on affordable workspaces in mixed use developments. Council's economic development team work with procurement services to ensure there are opportunities for local companies to be involved in the procurement of goods and services.
MM5	22	Policy 2	<u>Take account of and positively respond to the various listed buildings and their settings;</u>	<ul style="list-style-type: none"> Social cohesion and lifetime neighbourhoods 	Maintaining the cultural character and identity of a place may have a positive impact on wellbeing through sense of belonging, history and heritage. It has the opportunity to enhance social cohesion through celebration of cultural heritage.	None identified	None	N/A
MM6	27	Policy 3	Section 7: Successful Places to Live	<ul style="list-style-type: none"> Access to healthcare services 	The addition of the qualification to return	Potential for overcrowding if small	Developers to consider whether	Policy 7-

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			v. 2,790 homes on small sites across borough. 1,500 homes on small sites across the borough <u>and through vacant units returning to use.</u>	and other social infrastructure <ul style="list-style-type: none"> • Social cohesion and lifetime neighbourhoods 	vacant units to use has a positive impact on efficient use of resources. Provision of homes for people in need will meet their basic health and wellbeing needs.	sites are overdeveloped.	development on small sites meets all standards for provision of space requirements and maintaining adequate access to green and open space	Residential design and amenity- sets out clear guidelines for quality of development and development standards including access to amenity spaces.
MM6	27	Policy 3	<u>ix) Supporting residential development proposals around stations where it is compatible with the character of the local area. Major development proposals around stations will be subject to design review</u>	<ul style="list-style-type: none"> • Access to work and training • Accessibility and active travel • Air quality, noise and neighbourhood amenity 	Potential for easy access to employment opportunities and leisure opportunities.	Homes near stations may be subject to increased levels of noise and air pollution, both of which can impact negatively on health and wellbeing.	Developers to consider how best to integrate noise-reducing building materials. Consideration should be given in the design of the homes to the pollution sources and ways to mitigate this through good design.	Policy 34- Managing Contamination The Councils Environmental Health Team are consulted on planning applications and conditions are placed on applicants regarding mitigating pollution. There are also building regulations in place.

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								Pre-application discussions are also encouraged where these issues can be discussed at an early stage.
MM6	27	Policy 3	<u>7.1.8 Due to the nature of the housing supply in the Local Plan, the Council has applied a 'stepped' approach to housing delivery over the first 10 years of the plan period. The 'stepped' approach targets are set out in Table 1.</u> (and all subsequent modifications in this section)	<ul style="list-style-type: none"> Housing quality and design 	No additional impact identified through this modification	No additional impact identified through this modification	None	N/A
MM9	32	Policy 6	The proposal does not have any <u>unacceptable</u> adverse impacts on the surrounding area and will not be likely to give rise to significantly <u>unacceptable</u> greater levels of noise and disturbance to occupiers of nearby residential properties;	<ul style="list-style-type: none"> Housing quality and design 	The addition of the word 'unacceptable' here gives greater opportunities to build developments to meet housing needs. Such development may have a negative impact, but those impacts are deemed acceptable by key stakeholders	None identified	Developers to ensure they have consulted with key stakeholders in an open and honest approach to record where potential negative impacts are deemed acceptable	Pre-application discussions are also encouraged where these issues can be discussed at an early stage

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MM9	32	Policy 6	<u>7.4.7 In 2018, the report was reviewed and reached the same conclusions listed above. Overall, an annual need for 255 owner occupier/ intermediate housing was identified. The report will continue to be reviewed every 3 years so that the Council is able to maintain an up-to-date understanding of identified need within the borough taking into account changes in demographic projection, technological and building innovations and older person's assessment of how their own housing needs are best met.</u>	<ul style="list-style-type: none"> Housing quality and design Access to healthcare services and other social infrastructure 	Assessment of their own housing needs by older people may positively affect health and wellbeing through maintaining a sense of independence and an ability to influence and control their housing provision.	No additional impacts identified	None identified	N/A
MM10	34	Policy 7	v. Adhere to the London Plan policies in regards to 'Lifetime Homes Standards' and 'Lifetime Neighbourhoods'; Addition of new paragraph in <u>7.5.4 New development in Havering should be of a high quality and offer a good quality living environment for residents. Dual aspect accommodation offers a range of benefits such as better daylight, a greater chance of direct sunlight for longer periods, natural cross</u>	<ul style="list-style-type: none"> Housing quality and design 	The new paragraph added in 7.5.4 has potential for positive impacts on health and wellbeing through standards for better daylight, ventilation, minimising pollution and offering a choice of views.	Removal of these standards might discourage developers from building homes adaptable for the future. However, this is mitigated for by the addition of the new paragraph in 7.5.4	When the Local Plan is updated in-corporate any appropriate new standard. up to	<p>Addition of the new paragraph in 7.5.4</p> <p>Local Plan update will include any appropriate new standards.</p>

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			<u>ventilation, mitigating pollution, offering a choice of views, greater flexibility and adaptability. In line with the Mayor's Housing SPG 2016 developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.</u>					
MM1 1	38	Policy 10	Proposals for residential development on garden and backland sites in Havering will be supported when they: v. <u>Do not result in significant adverse impacts on green infrastructure and biodiversity that cannot be effectively mitigated</u>	<ul style="list-style-type: none"> Access to open space and nature 	The modification has a positive impact by endeavouring to preserve access to open space and nature. This may help both physical and mental health.	None identified	None	N/A
MM1 2		Policy 11	Replacement of text for policy on gypsy and traveller sites	<ul style="list-style-type: none"> Housing quality and design Access to open space and nature 	The modification proposed ensures that the policy is consistent with national planning policy including Planning Policy for Traveller Sites(2015); and reflect the Gypsy and Traveller Accommodation	None identified	None	N/A

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					Assessment Update report (July 2019)			
MM1 3	31	Policy 12	<p>Promoting the diversification of uses within town centres and managing the <u>overconcentration of</u> uses that can have a negative health impacts such as betting shops and fast food takeaways (refer to Policy 13);</p> <p>Addition of 'major development proposals'</p>	<ul style="list-style-type: none"> Access to healthy food 	<p>The modification clarifies that developers of major development proposals are required to consider wider local / regional primary care and other health strategies, as appropriate , and to take into account how any developments can contribute to the aims and objectives of those strategies</p> <p>'Major' development adds clarity and does not have any additional impact on health and wellbeing</p>	<p>The proposed modifications :</p> <ul style="list-style-type: none"> recognise the harmful effect of overconcentration of uses with negative health impacts 	Keep the proposed modifications	N/A
MM1 7	53	Policy 19	Requiring large scale residential proposals within Romford Town Centre to incorporate high quality flexible business space, subject to viability, and <u>progress towards meeting the identified office employment floor space requirement as</u>	<ul style="list-style-type: none"> Access to work and training 	Potential positive impact on wellbeing by enhancing the wider determinants of health ie. Employment opportunities	None identified	None	N/A

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			<u>detailed in Table 10 Local Plan monitoring framework, and in consideration of individual site characteristics not comprised in viability assessments such as configuration, servicing requirements and neighbouring uses.</u>					
MM1 7	53	Policy 19	Addition of: <u>The Council nevertheless realise the importance of addressing other strategic and local land-use requirements, in particular the pressing need for new homes. The Council will, therefore, keep under review the need for employment land as part of a managed approach in line with the requirements in the National Planning Policy Framework and the London Plan and with regard to meeting the other objectives of this Local Plan.</u>	<ul style="list-style-type: none"> Access to work and training 	Potential positive impact on wellbeing by enhancing the wider determinants of health ie. Employment opportunities	None identified	None	N/A
MM1 8	55	Policy 20	Add a new opening paragraph to the policy as follows: <u>The Council will keep under review the provision of Locally Significant Industrial Sites (LSISs) and non-designated industrial land as part of its commitment to ensuring that</u>	<ul style="list-style-type: none"> Access to work and training 	The additional paragraph adds weight to the need for employment opportunities as a significant determinant of health and wellbeing.	Increased numbers of industrial sites may reduce air quality around the site	Developers to ensure that new industrial sites mitigate for any harmful pollution as a result of their activities	The Local Plan already contains a policy on Managing Pollution (Policy 34) which will mitigate any potential

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			<u>Havering has a strong and prosperous economy.</u>		Maintaining opportunities for employment and business growth will have a likely positive impact.			negative impacts
MM19		Policy 21	The Council will promote opportunities for start-up and small and medium enterprises by expecting major commercial and mixed-use schemes to provide a minimum of 20% of its floorspace as affordable workspace support local micro and small businesses through <u>securing affordable workspace within the boroughs network of town centres, Strategic Industrial Locations and Local Significant Industrial Sites. Major commercial and mixed-use developments should provide a minimum of 20% of 10% total gross commercial floorspace as affordable workspace for a minimum of 5 years, subject to viability.</u>	<ul style="list-style-type: none"> Access to work and training 	None identified	Reduction in the percentage of affordable workspace limits opportunities for start up and small business however it is recognised that it is necessary to set a 'reasonable' level of affordable workspace and that this amendment has been negotiated and agreed. This is further explained in the additional explanatory text included in the modifications in this policy.	None	N/A
(not identified)	59	Policy 23	A new criterion to be added to the end of the policy as follows : <u>xvii. Working with partners including the port of London Authority to explore opportunities for utilising the River Thames for freight and</u>	<ul style="list-style-type: none"> Air quality, noise and neighbourhood amenity Accessibility and active travel 	Potential for positives in terms of access to alternative forms of transport and reducing congestion on roads, hence also potential for	Need to consider the impact of increased river freight and passenger transport on pollution and impact on biodiversity	Providers of new river services to conduct a health and environmental impact assessment on the boats to be	There is legislation that deals with policies for freight and passenger transport.

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			<u>passenger transport to reduce traffic congestion and support local businesses.</u>		improvements in air quality for local residents and workers	along the river corridor	used for such purposes.	The Local Plan already contains policies on Air Quality (Policy 33), Managing Pollution (Policy 34) and Nature Conservation (Policy 30) which will mitigate any potential negative impacts