



Greggs Bakery / Twickenham

Health Impact Assessment



The Greggs Bakery, Twickenham Health Impact Assessment

Trium Environmental Consulting LLP
69-85 Tabernacle Street
London
EC2A 4BD
+44 (0) 20 3887 7118
hello@triumenv.co.uk
www.triumenvironmental.co.uk

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1. INTRODUCTION

- 1.1 This Health Impact Assessment (HIA) has been prepared on behalf of London Square (hereinafter referred to as the 'Applicant'), who is seeking detailed planning permission for the demolition of existing buildings and redevelopment of an area of land located within the London Borough of Richmond Upon Thames (the LBRuT). The site is referred to as Greggs Bakery, and is located off Gould Road, Twickenham, TW2 6RT ('the site') (see Figure 1).

Figure 1 The Site – Planning Application Red Line Boundary



The Proposed Development

Quantum of Development

- 1.2 Detailed planning permission is being sought for the re-development of the site which will comprise the demolition of the existing warehouses and buildings on-site (with the retention of a single dwelling at Gould Road) and the construction of a residential-led (Use Class C3) development, which also provides an element of commercial floorspace (Use Class B1), landscaped areas, with associated parking and highways works, and other works associated with the development (hereinafter referred to as the 'Proposed Development').

- 1.3 The buildings proposed will provide a total of 116 residential units, comprising 51 townhouses (5 x two bed; 35 x three bed; and 11 x four bedroomed townhouses) and 65 apartments (32 x one bed; 30 x two bed; and 3 x three bedroomed apartments), along with 175m² Gross Internal Area (GIA) of commercial floorspace. A total of 117 car parking spaces and one public car park space will be provided.

Expected Population

- 1.4 The proposed residential mix is outlined in Table 1 below:

Table 1 Proposed Development Residential Unit Mix

Unity Type	Private Residential	Shared Ownership	Affordable Rent	Total
1 bed	19	13	0	32
2 bed	19	15	1	35
3 bed	24	6	8	38
4 bed	11	0	0	11
TOTAL	73	34	9	116

- 1.5 The Proposed Development comprises up to 37% affordable housing, subject to viability, with 29% Shared Ownership Residential and 8% Affordable Rent. The area schedules submitted in support of the planning application for the Proposed Development indicate that the greatest proportion of affordable housing (including both shared ownership and affordable rent units) is within 2-bed units, followed by 1-bed units.
- 1.6 The population breakdown expected to result from this residential mix (as per the 2018 Greater London Authority's (GLA's) Population Yield Calculator), is outlined in Table 2 below.

Table 2 Proposed Development Population Breakdown (GLA Population Yield Calculator)

Age	Population Distribution*
0-3	28.3
4-10	29.3
11-15	14.3
16-17	6.0
18-64	207.4
65+	4.9
TOTAL	290.2

- 1.7 Further to the above, the LBRuT provides its own child yield calculator within Appendix 1 of its Planning Obligations Supplementary Planning Document¹, which calculates the child yield as follows:

Table 3 LBRuT Child Yield Calculations

Age	Population Distribution*
0-4	41.02
5-10	45.74
11-15	21.36
TOTAL	108.1

*Note that the Richmond Planning Obligations SPD child yield breakdown comprises different age brackets from those detailed within the GLA Calculator above, and the breakdown within the table has therefore been adjusted accordingly

- 1.8 When using the LBRuT's child yield (0-15 years) and the GLA's population yield (16-65+ years), the total population yield for the Proposed Development is **326.4**. This total calculated population yield, using a combination of the GLA and LBRuT calculators, has been used consistently in this HIA.

¹ London Borough of Richmond upon Thames, (2014); Planning Obligations Supplementary Planning Document

General Arrangement

- 1.9 The proposed use classes are provided within seven different buildings/building typologies: A to F. The layout of these are depicted in Figure 2 below.
- 1.10 Moving through the site, from Edwin Road to the south to the River Crane to the north, the buildings gradually increase in height; the residential ‘mews house’ style buildings closest to Edwin Road are generally 2 storeys in height, the residential apartments nearer the north of the site range from 1+ through to 5 storeys in height. The office space proposed is provided within a two-storey office building fronting Edwin Road. Figure 3 below provides an indication of building heights across the site.

Figure 2 Proposed Development – Building Layouts

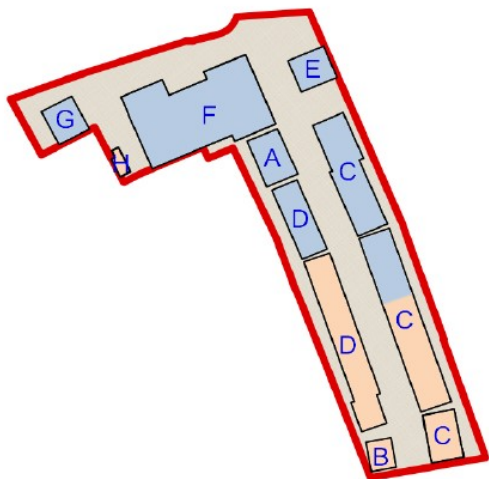
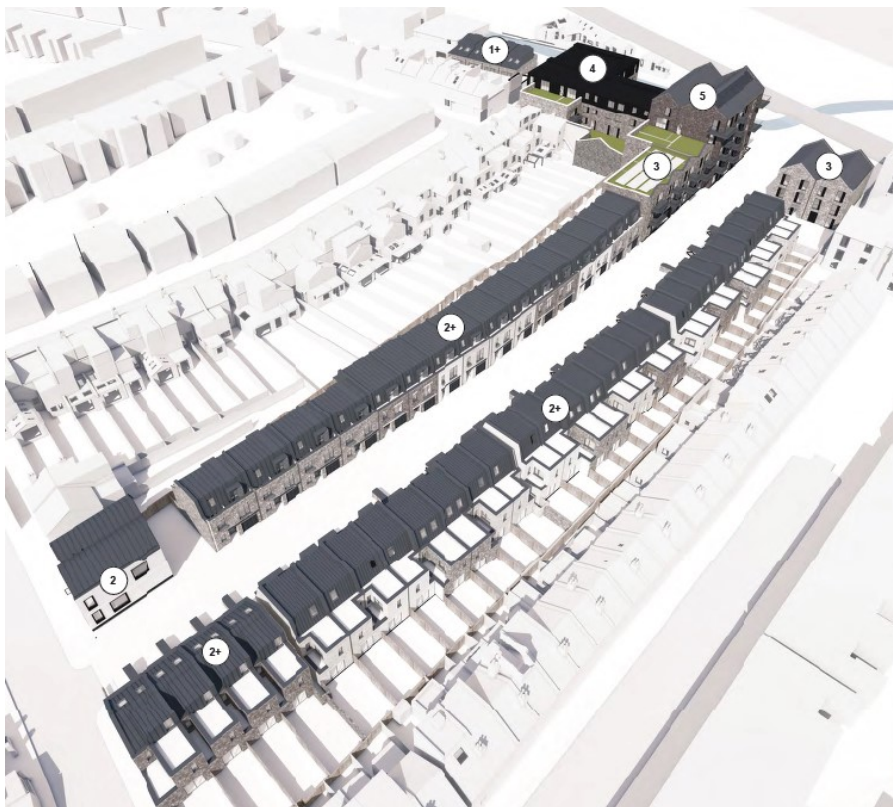


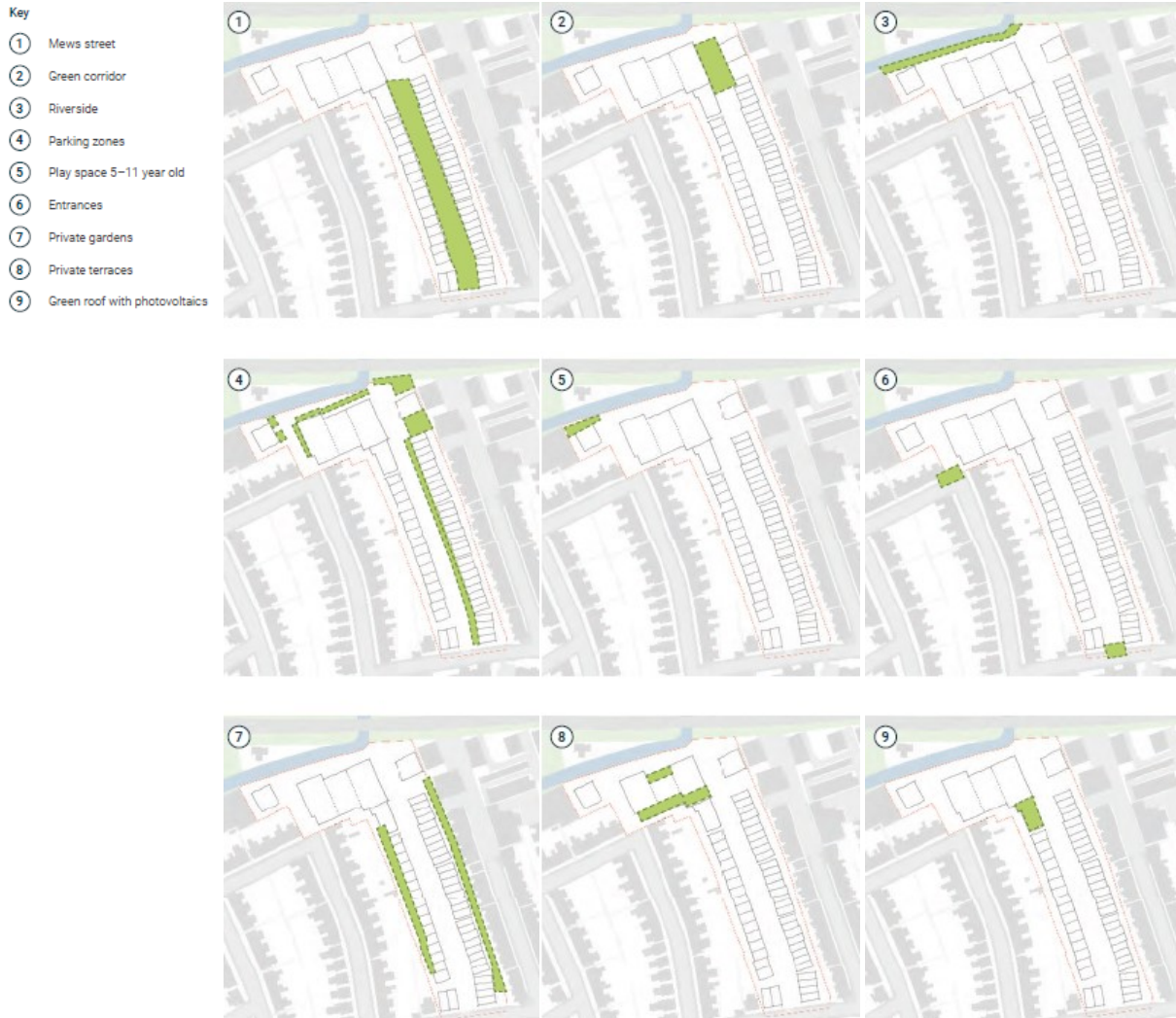
Figure 3 Proposed Development – Building Heights



Landscape

1.11 The landscape has been divided into a number of distinct character areas, presented within Figure 4 below.

Figure 4 Landscaping Character Areas



1.12 Every home along the mews street has a rear garden consisting of a mixture of patio lawn, planting and timber fencing. All three-bedroom houses have a minimum of 17 sqm private amenity space. For the apartment buildings and smaller two-bedroom houses amenity has been maximised with terraces and balconies ensuring every apartment has a private amenity space either equal to or above the London Plan minimum requirements.

1.13 In addition to the private amenity building F benefits from a number of small communal roof terraces that can be enjoyed by those living in the building.

1.14 Public amenity space consists of benches along an elevated timber platform and designated play area for children aged under 5 years old (410m²).

Overview of this HIA

- 1.15** In accordance with the requirements of The London Plan² Policy 3.2(c) (and consideration of the Draft 2018 London Plan³) and Policy LP30 of LBRuT's Local Plan⁴, a HIA has been undertaken to help define and address any health issues in a systematic way. The methodology, baseline health context and health impact assessment are presented in this report.
- 1.16** In preparing this HIA, reference has been made to a number of data sources (these are referenced as relevant throughout this HIA) and to other standalone reports submitted as part of this planning application as relevant.

2. LEGISLATION AND PLANNING POLICY

- 2.1** A comprehensive review of relevant health related legislation and national, regional and local planning policy is provided in **Appendix A** of this HIA. The following legislative and planning policy documents are considered most relevant:
- The Localism Act 2011⁵;
 - The Health and Social Care Act 2012⁶;
 - The National Planning Policy Framework (NPPF) 2019⁷;
 - Planning Practice Guidance (PPG) (2014)⁸;
 - Fair Society, Healthy Lives (the Marmot Review) (2010)⁹;
 - Healthy Lives, Healthy People: our strategy for public health in England (2010)¹⁰;
 - NHS England's Challenging Health Inequalities Report (2016)¹¹;
 - The London Plan – The Spatial Development Strategy for London, Consolidated with Alterations Since 2011 (2016);
 - The Draft New London Plan – The Spatial Development Strategy for Greater London, Draft for Public Consultation (2018);
 - The Greater London Authority's London Health Inequalities Strategy September 2018 (2018)¹²;
 - Greater London Authority's Social Infrastructure Supplementary Planning Document (2015)¹³;
 - Joint Strategic Needs Assessment (JSNA) for Richmond (online database)¹⁴;
 - The Richmond Story, Joint Strategic Needs Assessment and Annual Report of the Director of Public Health 2017/2018, (2017);¹⁵
 - London Borough of Richmond upon Thames Joint Health and Wellbeing Strategy 2016-21 (2016)¹⁶; and
 - London Borough of Richmond upon Thames Local Plan (2018).

² Greater London Authority, (2016); The London Plan – The Spatial Development Strategy for London, Consolidated with Alterations Since 2011

³ Greater London Authority, (2018); The London Plan The Spatial Development Strategy for Greater London Draft for Public Consultation with Minor changes by the Mayor 2018. GLA.

⁴ London Borough of Richmond Upon Thames, (2018); Local Plan.

⁵ Her Majesty's Stationery Office, (2011); Localism Act 2011

⁶ Her Majesty's Stationery Office, (2012); Health and Social Care Act 2012

⁷ Department for Communities and Local Government, (2019); National Planning Policy Framework

⁸ Department for Communities and Local Government, (2014); Planning Practice Guidance

⁹ University College London, (2012); Fair Society, Healthy Lives (the Marmot Review) 2010

¹⁰ Department of Health, (2010); Healthy Lives, Healthy People: Our strategy for public health in England

¹¹ NHS England, (2016); Challenging Health Inequalities Report – Support for CCGs

¹² Greater London Authority, (2018); London Health Inequalities Strategy 2018

¹³ Greater London Authority, (2015); Social Infrastructure SPD

¹⁴ London Borough of Richmond upon Thames, (2016); Joint Strategic Needs Assessment online database. Accessible online: <https://www.datarich.info/richmond-story/>

¹⁵ London Borough of Richmond upon Thames (2017); The Richmond Story 2017/2018 – Joint Strategic Needs Assessment and Annual Report of the Director of Public Health.

¹⁶ London Borough of Richmond upon Thames, (2016); Joint Health and Wellbeing Strategy 2016-21

3. METHODOLOGY

- 3.1** This HIA has been prepared in line with Policy 3.2(c) of The London Plan:
“The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA).”
- 3.2** This is endorsed in the local level through Policy LP 30 Health and Wellbeing of the LBRuT Local Plan which states that “...B.1. A Health Impact Assessment must be submitted with all major development proposals.” and “8.3.12 A HIA should assess the health impacts of a development, identifying mitigation measures for any potential negative impacts as well as measures for enhancing any potential positive impacts”.
- 3.3** The methodology for preparing this HIA is predominantly derived from the NHS Healthy Urban Development Unit (HUDU) (2017) Rapid Health Impact Assessment Tool¹⁷ and the NHS HUDU Healthy Urban Planning Checklist (2017)¹⁸.
- 3.4** The Rapid HIA Tool was designed to assess the likely health impacts of development plans and proposals. The Rapid HIA Tool is partly based on the World Health Organisation (WHO) publication by Hugh Barton and Catherine Tsourou, Healthy Urban Planning (2000)¹⁹. This publication places emphasis on the importance of considering health and quality of life in urban planning, and refocusing urban planners on making health objectives central to the decision-making process.
- 3.5** The Rapid HIA Tool helps to identify determinants of health likely to be influenced by a specific development proposal. ‘Determinants of health’ are factors that have the most significant influence on the health of a population. The Rapid HIA Tool identifies the following 11 key determinants of health:
1. Housing Quality and Design;
 2. Access to Healthcare Services and other Social Infrastructure;
 3. Access to Open Space and Nature;
 4. Air Quality, Noise and Neighborhood Amenity;
 5. Accessibility and Active Travel;
 6. Crime Reduction and Community Safety;
 7. Access to Healthy Food;
 8. Access to Work and Training;
 9. Social Cohesion and Lifetime Neighborhoods;
 10. Minimising the Use of Resources; and
 11. Climate Change.
- 3.6** As per the Mayor of London’s Social Infrastructure SPD²⁰ this HIA is a ‘Rapid HIA’, which is one of three types of HIA. This Rapid HIA is a *“more resource intensive process, involving a more focused investigation of health impacts and recommending mitigation and enhancement measures”*¹⁸. A ‘Desktop HIA’ and a ‘Full HIA’ are the other two types of HIA. A Desktop HIA is a simplified HIA which draws on existing knowledge and evidence to complete the assessment. A Full HIA involves comprehensive analysis of all potential health and wellbeing impacts and includes qualitative feedback from local residents and other stakeholders. For the site, a Rapid HIA is the most appropriate form of HIA. It provides sufficient information on the health baseline of the site and surrounding area to allow for a systematic consideration of the likely health implications of the Proposed Development. It is also considered to be proportionate to the Proposed Development in question and provides for opportunities to suggest mitigation and enhancement measures as appropriate to the findings of the HIA.

¹⁷ NHS Healthy Urban Development Unit, (2017) Rapid Health Impact Assessment Tool

¹⁸ NHS Healthy Urban Development Unit, (2017); Healthy Urban Planning Checklist

¹⁹ World Health Organisation, (2000); Healthy Urban Planning (ISBN: 113515936X)

²⁰ Greater London Authority, (2015); Mayor of London’s Social Infrastructure Supplementary Planning Document

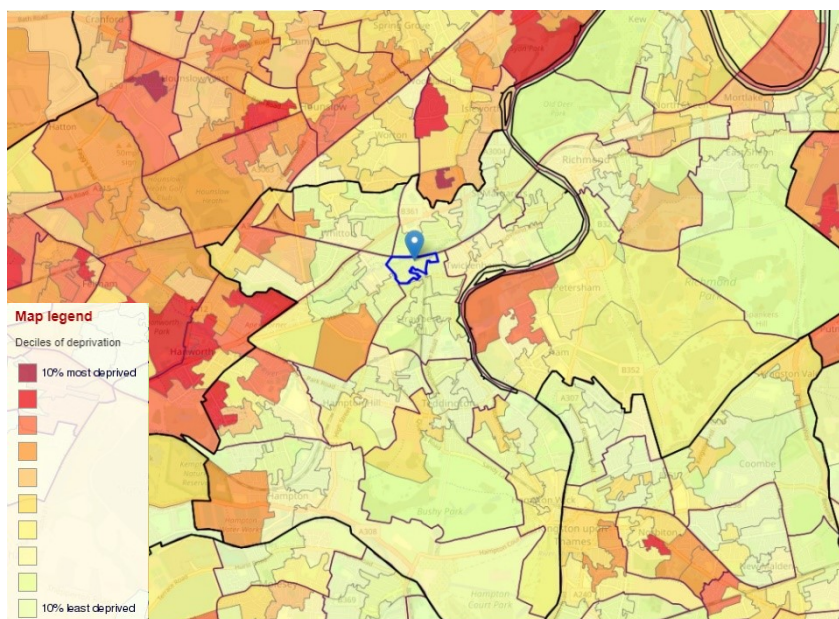
- 3.7** Rapid HIA are predominantly qualitative rather than quantitative assessments, due to the wide and diverse range of health determinants that need to be assessed. As detailed in the Rapid HIA Tool, impacts on health determinants have been categorised as:
- Positive (+ve);
 - Negative (-ve);
 - Neutral (=); and
 - Uncertain (?).
- 3.8** Following on from the assessment of impacts of the Proposed Development on the key determinants of health, advice has been provided on measures to enhance health and wellbeing through the opportunities associated with the redevelopment of the site, and where necessary, to mitigate any potentially negative impacts.

4. BASELINE REVIEW

Introduction

- 4.1 The site is located within the LBRuT, within London, England. The LBRuT is made up of 18 wards, with the site located in the South Twickenham Ward.
- 4.2 The LBRuT has an estimated resident population of 195,700 and is the 5th smallest borough in London.
- 4.3 The population density within the LBRuT is 34.7 persons per hectare and the adult population comprises 63.6% of the total resident population²¹.
- 4.4 86% of the LBRuT population is from a white ethnic population. This compares with the white population of 59.8% for the whole London region, and 85.6% for England²².
- 4.5 The LBRuT is one of the least deprived district / unitary authorities in England²³, and the health of people living within the borough is mostly better than that compared with the England average. The only health indicator not considered to be 'better' or 'similar' to the England average is the diabetes diagnosis indicator, which is 55.5% for the LBRuT, compared with the England wide 78.0% (i.e. worse than England wide).
- 4.6 Life expectancy at birth is at 85.7 years for women, and 82.3 years for men which is higher than the average ages for both women (83.1 years) and men (79.6 years) within England.
- 4.7 Figure 5 below details the differences in deprivation within the borough based on national comparisons, using quintiles of the IMD 2015, shown by lower super output area (LSOA)²⁴.

Figure 5 Differences in Deprivation within the LBRuT



- 4.8 The following sections of this HIA set out the baseline context in respect of health and wellbeing considerations. The baseline context is presented in terms of the 11 key determinants of health, as defined by the Rapid HIA Tool.

²¹ This data has been sourced from 2011 Census data and 2016 population projections. London Datastore, 2018, Land Area and Population density, Ward and Borough. Accessed online 12.02.2019 [url: <https://data.london.gov.uk/dataset/land-area-and-population-density-ward-and-borough>]

²² DataRich, 2018, JSNA Richmond. Accessed online 12.02.2019 [url: <https://www.datarich.info/richmond-story/>]

²³ Public Health England (2019); Local Authority Health Profiles, Richmond upon Thames. Accessed online 12.02.2019. [url: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/6/par/E12000007/ati/102/are/E09000027>]

²⁴ A Lower Super Output Area (LSOA) is an area designed to improve the reporting of small area statistics. It is a geographical area made of roughly 1,500 residents and 650 households

Health Determinant 1: Housing Quality and Design

- 4.9** The NHS HUDU Planning for Health (2017) states that *“Access to decent and adequate housing is critically important for health and wellbeing, especially for the very young and very old. Environmental factors, overcrowding and sanitation in buildings as well as unhealthy urban spaces have been widely recognised as causing illness since urban planning was formally introduced. Post-construction management can also have an impact on community welfare, cohesion and mental wellbeing.”*
- 4.10** Around 16% of homes in London are recorded as being below the official Decent Homes standard²⁵. The proportion of homes in London failing to meet this standard has however fallen from 37% in 2006 to 16% in 2016. The proportion of homes below this standard has fallen slightly faster in London than in the rest of England since 2006, and in recent years, significant improvement has been made across all tenures. The private rented sector (PRS) still has the worst conditions, with 24% of homes below the standard in 2015, compared to 12% of owner-occupied homes and 15% of social housing.
- 4.11** The LBRuT Joint Strategic Needs Assessment (JSNA) (2016)²⁶ outlines that nationally, more families with children are living in the PRS as owning a home becomes increasingly challenging to afford. The LBRuT has the highest priced private rent levels in outer London. Ending a tenancy from the private rent sector is the number one reason for homelessness in Richmond and was responsible of 41% of acceptances in 2014/15.
- 4.12** In 2018 the Mayor of London, Sadiq Khan, published the London Housing Strategy²⁷, within which “Policy 5.1: Well-designed, Safe and Good Quality Homes” establishes a common set of housing design standards across all tenures in London. These standards include improving quality and safety of new homes, existing homes and improving energy efficiency. The standards are also outlined within the draft new London Plan²⁸ and the GLA’s Housing Supplementary Planning Guidance revised (SPG)²⁹.
- 4.13** As stated in the GLA’s Housing SPG, one of the key goals is *“to improve standards for the quality and design of housing, making sure that homes meet the needs of a changing population throughout their lives, and are built to the highest environmental standards”*. Additionally, The London Plan includes Policy 3.5 ‘Quality and Design of Housing Developments’, which details that *“...housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment...”*.
- 4.14** House prices in London are 74% higher than England as a whole³⁰. According to the LBRuT’s Housing Strategy, 64% of residents live in owner-occupied housing, with 14% living in social rented council housing and 22% living in privately rented housing.
- 4.15** The LBRuT’s Local Plan (2018) includes Policy LP 35: ‘Housing Mix and Standards’. This policy has the objective of providing family sized accommodation that provide adequate external space and amenity spaces for all new dwellings. The documentation provides clear specifications which relate to specialist and multiple occupancy housing. These requirements set basic development parameters preventing poor design features such as insufficient space for number of occupiers, lack of private amenity space for occupants in line with the Mayors strategy outlined within Policy D4: Housing Quality and Standards of the draft new London Plan.
- 4.16** The LBRuT Local Plan: Policy LP 36: ‘Affordable Housing’ states that the council expects an affordable housing a tenure mix split of 80% of the affordable housing provision for rent and 20% of

²⁵ Greater London Authority, (2018); Housing in London: 2018

²⁶ London Borough of Richmond upon Thames, (2016); Joint Strategic Needs Assessment (JSNA) Newsletter Issue 18 “Housing” (2016)

²⁷ Greater London Authority (2018); London Housing Strategy

²⁸ Greater London Authority, (2017); The draft new London Plan – The Spatial Development Strategy for London.

²⁹ Greater London Authority, (2017); Housing Supplementary Planning Guidance

³⁰ Greater London Authority, (2016); The London Plan – The Spatial Development Strategy for London Consolidated with Alterations since 2011

the affordable housing provision for intermediate housing. This is slightly different to that of the current London Plan which states that “a target of 60 per cent of new affordable housing should be for social/affordable renting, especially for families, and that 40 per cent should be for the range of intermediate housing products”.

- 4.17** In summary, the LBRuT have recognised throughout their policy the need for a suitable stock and mix of high-quality housing that reflects local needs in locations with good transport links. The Local Plan outlines that LBRuT will pursue all opportunities to maximise affordable housing across the borough through a range of measures, including providing more choice in the different types of affordable housing and different levels of affordability.

Health Determinant 2: Access to Healthcare Services and other Social Infrastructure

Health

Health Synopsis

Children's Health

- 4.19** The NHS HUDU Planning for Health (2017) states that “*Strong, vibrant, sustainable and cohesive communities require good quality, accessible public services and infrastructure. Access to social infrastructure and other services is a key component of Lifetime Neighbourhoods. Encouraging the use of local services is influenced by accessibility, in terms of transport and access into a building, and the range and quality of services offered. Access to good quality health and social care, education (primary, secondary and post-19) and community facilities has a direct positive effect on human health. Opportunities for the community to participate in the planning of these services has the potential to impact positively on mental health and wellbeing and can lead to greater community cohesion.*”
- 4.20** Approximately 21.7% of Year 6 children (within LBRuT primary schools) are considered obese, which is better than the average for England (34.3%)³¹.
- 4.21** The LBRuT hospital admissions for alcohol-specific conditions for individuals under the age of 18 years old was identified as 42 admissions per 100,000 population, which equates to 31.3 under 18s in total (between 2015/16 and 2017/18). This is similar to the England average of 32.9 admissions in 100,000 population³⁴.
- 4.22** The conception rate for under-18s (per 1,000 females aged between 15-17) is better than the national average: 10.4 within the LBRuT compared to 18.81 nationally³⁴.

Adult Health

- 4.23** 12.2% of adults living within the LBRuT are current smokers, which is a lower percentage of smokers than the national average of 14.7%. The percentage of women declared to be a smoker at the time of child delivery is 3.9% at the local (LBRuT) level (i.e. 82 women), which is low when compared to the national (England) average of 10.8%³⁴.
- 4.24** The number of mothers who breastfed their babies within the first 48 hours of delivery was counted at 1,522, however no proportion of the population could be determined for data quality reasons, and as such cannot be compared with the national average.
- 4.25** The percentage of physically fit adults is greater within the LBRuT (72.8%) when compared to the national average (66.0%). Additionally, the percentage of adults within excess weight (51.4%) is lower than the national average (61.3%)³⁴.
- 4.26** The percentage of people hospitalised (emergency) for self-harm (129.1 per 100,000 people) and alcohol-related harm (525 per 100,000 people), the percentage of hip fractures recorded in people aged 65 and over (534 per 100,000), the number of recorded tuberculosis (TB) incidences over a three year average (6 per 100,000 people), and diabetes incidences (3.8% of people) is better than the national average (185.5 people and 570 people per 100,000 people, 578 people per 100,000 people, and 9 persons per 100,000, and 6.7% people respectively). Additionally, the percentage of people with cancer diagnosed at an early stage is slightly higher than that of the national average (55.6% in the LBRuT compared with the national average of 52.6%)³⁴.
- 4.27** New Sexually Transmitted Infections (STIs) (excluding Chlamydia in <25s) in the LBRuT (840 per

³¹ Public Health England, (2018); Public Health England data, accessed online: 14/02/2019 [URL: <https://fingertips.phe.org.uk>]

100,000 people) is similar to the national average (794 people per 100,000 respectively).

Access to Healthcare

Primary Healthcare

- 4.28** Primary health care is the first point of contact for health care for the majority of people and is mostly provided by general practitioners (GPs), however pharmacists, opticians and dentists also provide primary health care services.
- 4.29** Clinical Commissioning Groups (CCGs) were created following the commencement of the Health and Social Care Act in 2012³², which replaced Primary Care Trusts on 1 April 2013. There are a total of 211 CCGs within England, and each GP practice is now part of a CCG. The site lies within the NHS Richmond CCG.
- 4.30** According to the most up to date (September 2017) data, there are 109 full-time equivalent (FTE) GPs in the NHS Richmond CCG³³, which equates to approximately 1,795 patients per GP.
- 4.31** According to the NHS digital website, there are 31 GP surgeries located within the NHS Richmond CCG. There are seven GP surgeries within a one-mile radius from the site³⁴, which are detailed in Table 3. The HUDU provides a benchmark of 1,800 patients per FTE GP³⁵. Using this benchmark, five of the GP surgeries (The Green Surgery, Cross Deep Surgery and Medical Centre, Jubilee Surgery and Crane Park Surgery) have a lower number of patients than the benchmarked number of patients per FTE GP (i.e. the GPs are not seeing more patients than suggested by the benchmark). The remaining GP two surgeries are above the benchmark number of patients (i.e. have more patients than 1,800). All GPs are currently accepting new patients.

Table 4 GP Surgeries within 1 Mile of the Site

Name of Practice	Distance from Site	Number of Registered Patients	Accepting New Patients?	Active GPs	GP FTEs	Number of Patients per GP FTE
The Green Surgery	0.3 miles	8,971	Yes	8	8	1,122
Staines Road Medical Centre	0.4 miles	3,179	Yes	1	1	3,179
Cross Deep Surgery & Medical Centre	0.5 miles	10,935	Yes	8	8 ³⁶	1,367
The Acorn Group Practice	0.6 miles	8,625	Yes	4	2.8 ³⁷	2,157
The York Medical Practice	0.7 miles	12,201	Yes	9	3.44	3,547
Jubilee Surgery	1.0 miles	5,813	Yes	4	4	1,454
Crane Park Surgery	1.0 miles	3,532	Yes	3	2.7 ³⁸	1,309

Notes
 Where information on the working hours of doctors was not available, it was assumed that all doctors worked a full-time role.
 The York Medical Centre website notes that 9 doctors (rather than the 8 listed on the NHS listing) are active at the practice.
 As such, the values included reflect the additional doctor present.

³² Her Majesty's Stationery Office, (2012); Health and Social Care Act 2012

³³ NHS Digital, (September 2017); GP Primary Care Workforce - Electronic Staff Record. Accessed online 04.02.2019 [URL: <http://content.digital.nhs.uk/workforce>]

³⁴ NHS Choices, (2019); NHS Services Search. Accessed online 11.02.2019 [URL: <http://www.nhs.uk/service-search/GP/>]

³⁵ NHS London Healthy Urban Development Unit, 2007

³⁶ The York Medical Practice, Doctors, <http://www.yorkpractice.co.uk/staff1.aspx?t=1> Accessed online 11.02.2019

³⁷ Jubilee Surgery, Doctors, accessed online 11.02.2019 <http://www.jubileesurgerywhitton.nhs.uk/doctors.56162.htm>

³⁸ Crane Park Surgery, Surgery Opening Hours, <http://www.craneparksurgery.co.uk/opening-hours>, Accessed online 11.02.2019

- 4.32** There is one NHS dental practice available within 1-mile walking distance of the site: Dhiman Dental Surgery, which is located 0.7 miles from the site. According to the Dhiman Dental website, there are four practicing dentists and they were not accepting new NHS patients at the time of writing. There is also one orthodontic practice (The Orthodontic Practice) within 0.7 miles of the site.
- 4.33** Most people will need to pay for NHS dental treatment. There are certain groups of people who are entitled to free treatment, including:
- Those under the age of 18;
 - Those under the age of 19 and in full-time education;
 - Pregnant women, or those who have had a baby within 12 months before treatment starts;
 - Those staying in an NHS hospital, with a hospital NHS dentist carrying out treatment (however payment for dentures or bridges may be required);
 - Those included in an award of Income Support, income-based Jobseeker's Allowance, income-related Employment and Support Allowance or Pension Credit guarantee credit or Universal credit;
 - Those under the age of 20 and a dependent of someone receiving low income benefits;
 - Those named on, or entitled to, a valid NHS tax credit exemption certificate; and
 - Those named on a valid HC2 certificate.
- 4.34** There are three NHS dental charge bands, which are as follows (note: correct at the time of writing)³⁹:
- **Band 1: £21.60** covers an examination, diagnosis and advice. If necessary, it also includes X-rays, a scale and polish and planning for further treatment.
 - **Band 2: £59.10** covers all treatment covered by Band 1, plus additional treatment, such as fillings, root canal treatment and removing teeth (extractions).
 - **Band 3: £256.50** covers all treatment covered by Bands 1 and 2, plus more complex procedures, such as crowns, dentures and bridges.
- 4.35** There are several chemists/pharmacies near the site. The closest pharmacy is the Maple Leaf Pharmacy and Clinic, located approximately 250m south of the site, and the Day Lewis Pharmacy, located approximately 800m to the east of the site.
- 4.36** The closest opticians to the site includes Robert Firth Ophthalmic Opticians, approximately 0.3 miles from the site, the Optical Gallery and Boots Opticians, both of which are located approximately 0.6 miles east of the site. Eye-tests, like dental treatment, incur costs for the majority of people. Those exempt from these charges include those:
- Aged 60 or over;
 - Registered blind or partially sighted;
 - Diagnosed with diabetes or glaucoma;
 - Aged 40 or over and have a close relative (parent, sibling or child) with a history of glaucoma;
 - At risk of glaucoma (as advised by an eye doctor);
 - Aged under 16, or aged 16/17/18 and in full-time education;
 - Eligible for an NHS complex lens voucher;
 - A prisoner on leave from prison; and
 - Receiving low-income benefits.
- 4.37** The average cost of an eye test is approximately £25 (note: price taken from the Boots Optician eye

³⁹ NHS, (2019); Who is entitled to free NHS dental treatment in England. Accessed Online 11.02.2019 [https://www.nhs.uk/common-health-questions/dental-health/who-is-entitled-to-free-nhs-dental-treatment-in-england/]

test website)⁴⁰.

Secondary Healthcare

- 4.38** Secondary health care is often referred to as ‘hospital and community care’ and can include planned (elective care) e.g. an operation, and emergency treatment. The closest secondary health care provider to the site is West Middlesex University Hospital, located approximately 3.1km to the north of the site. West Middlesex University Hospital offers a range of local services including Accident and Emergency Services, an Urgent Care Centre, Intensive Care unit, as well as a number of other medical services. The hospital services are provided by the Chelsea and Westminster Hospital NHS Foundation Trust.
- 4.39** The LBRuT provides a wide range of Health and Social Care services. These services include, but are not limited to:
- **Help for adults**, including safeguarding vulnerable adults e.g. the elderly, and those suffering from domestic abuse;
 - **Children and family care**, including information on child protection, services for families with children and young people aged 0 to 25 with special educational needs and/or disabilities, information on children’s centres;
 - **Safeguarding children**, including information relating to the Single Point of Access team, the services they offer and how to get in contact;
 - **Adoption**, the LBRuT is part of the South West London Adoption Consortium, with the consortium website outlining information on eligibility and application details;
 - **Fostering**, including training and support, finance and payments, the ‘Richmond Fostering Community’ and resources for new foster carers; and
 - **Domestic violence**, including helps lines, and online resources for training adults in social care.
- 4.40** The LBRuT provide further details on services available to residents within the borough on the LBRuT and West London Alliance Care Place webpage⁴¹.

Education

Primary Schools

- 4.41** All primary schools within a 1.6 mile radius of the site have been reviewed with regard to current pupil enrolment and capacity, in order to determine whether there is a surplus or deficit of pupil spaces within primary schools in close proximity to the site. A 1.6 mile radius has been chosen to define the catchment area, as walking up to 1.6 miles is the dominant mode of getting to school for Primary School age children⁴² (approximately 51% primary school children walk to school).
- 4.42** Information relating to the schools has been obtained online from the Department of Education (DoE)⁴³. For the purpose of this HIA, only community schools and free schools without religious restrictions have been included in the analysis and 5% buffer of spare capacity has been assumed in line with relevant guidance⁴⁴.
- 4.43** As detailed by the Department of Education (DoE)¹⁰, there are 14 schools offering primary education

⁴⁰ Boots, 2019, Book an eye test. Accessed online 11.02.2019 [url: <https://www.boots.com/opticians/eyetest>]

⁴¹ London Borough of Richmond upon Thames, (2019); Care Place. Accessed online 11.02.2019 [URL: <https://www.careplace.org.uk/Categories/26>]

⁴² Department for Transport, (2017); National Travel Survey 2017: Factsheets. Accessed online 11.02.2019 (url: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729524/nts-factsheets.pdf)

⁴³ Department for Education, (2019); Get Information About Schools. Accessed online 8.02.2019 [URL: <https://get-information-schools.service.gov.uk/>]

⁴⁴ Audit Commission, (1996); Trading Places, The Supply and Allocation of School Places. London: HMSO.

within a 1.6 mile radius of the site, which are detailed within Table 5. As well as the details of the primary schools within this radius, the number of pupils and capacity of each school has been provided, where information is available, and the surplus capacity detailed.

Table 5 Primary Schools and Capacity

School	Borough	Capacity (Number of Pupils)	Number of Pupils on Roll	Pupil Surplus/Deficit Number	Pupil Surplus/Deficit Number at 95% Capacity
Ivybridge Primary School	Hounslow	472	301	171	148
Orleans Primary School	Richmond upon Thames	472	463	9	0
Stanley Primary School	Richmond upon Thames	936	797	139	93
Trafalgar Junior School	Richmond upon Thames	349	347	2	0
Trafalgar Infant School	Richmond upon Thames	270	265	5	0
Chase Bridge Primary School	Richmond upon Thames	630	666	-36	-36
Twickenham Primary Academy	Richmond upon Thames	420	125	295	274
Nelson Primary School	Richmond upon Thames	622	454	168	137
Worple Primary School	Hounslow	239	229	10	0
Hampton Hill Junior School	Richmond upon Thames	364	359	5	0
Heathfield Junior School	Richmond upon Thames	480	414	66	42
Heathfield Infant School	Richmond upon Thames	474	419	55	32
Meadlands Primary School	Richmond upon Thames	210	242	-32	-32
Chatsworth Primary School	Hounslow	738	733	5	0
Total		6676	5814	862	658

4.44 Chase Bridge Primary School and Meadlands Primary School are currently oversubscribed, while the remaining schools all have some available capacity, with the greatest capacity currently available at Ivybridge Primary School, Stanley Primary School, Twickenham Primary Academy and Nelson Primary School.

Secondary Schools

4.45 An appropriate catchment area for secondary schools is a 4.6km radius from the site, which is derived from the average trip distance to secondary schools in London (Department for Transport, 2016) and reflects that older children will travel further to go to secondary school than those of primary school age.

4.46 Table 6 presents the results of the secondary school review and the remaining pupil capacity.

Table 6 Secondary Schools and Capacity

School	Borough	Capacity (Number of Pupils)	Number of Pupils on Roll	Pupil Surplus/Deficit Number	Pupil Surplus/Deficit Number at 95% Capacity
The Heathland School	Hounslow	1,679	1,796	-117	-117
West Thames College*	Hounslow	Unknown	Unknown	Unknown	Unknown
Richmond-upon-Thames College*	Richmond upon Thames	Unknown	Unknown	Unknown	Unknown
Lampton Academy	Hounslow	1,500	1,521	-21	-21
The Tiffin Girls' School	Kingston upon Thames	1,001	1,113	-112	-112
Springwest Academy	Hounslow	1,414	877	537	467
Isleworth and Syon School for Boys	Hounslow	979	1,027	-48	-48
Teddington School	Richmond upon Thames	1,350	1,283	67	0
Waldegrave School	Richmond upon Thames	1,246	1,339	-93	-93
Orleans Park School	Richmond upon Thames	1,260	1,224	36	0
Grey Court School	Richmond upon Thames	1,398	1,339	59	0
Heston Community School	Hounslow	1,395	1,219	176	107
Kingsley Academy	Hounslow	1,000	787	213	163
The Kingston Academy	Kingston upon Thames	1,180	518	662	603
Turing House School	Richmond upon Thames	1,050	326	724	672
Logic Studio School	Hounslow	300	212	88	73
The Richmond upon Thames School	Richmond upon Thames	750	124	626	589
Hampton High	Richmond upon Thames	Unknown	638	Unknown	Unknown
Twickenham School	Richmond upon Thames	Unknown	567	Unknown	Unknown
Bolder Academy	Hounslow	1260	Unknown	Unknown	Unknown
Total		18762	15910	2,797	2,283
Notes					
* Schools offering sixth form					

4.47 Based on the most up-to-date information available, for the schools detailed within Table 3 of this HIA, located within 4.6km (2.8 miles) of the site, there is a total surplus of 2,797 secondary school pupil places. With all of the schools at 95% occupancy, there is a total surplus of 2,283 secondary school pupil places.

Other Social Infrastructure and Community Facilities

- 4.48** There are a wide range of community facilities available to residents within the LBRuT. The LBRuT manages several community facilities, including libraries, sport and fitness facilities, and community halls.
- 4.49** There are 14 libraries within the LBRuT, with the closest library to the site is the Twickenham Library, which is located approximately 950m to the east of the site.
- 4.50** The site is located within 1.1km of the Twickenham Museum, which displays historical information relating to the riverside settlements along the River Thames, within the LBRuT. While not managed by the LBR, access to the museum is free to access.
- 4.51** The Whitton Sports and Fitness Centre is an LBRuT managed facility and is approximately 1.5km to the west of the site along Percy Road Whitton. Other gyms situated closer to the site include pilates and yoga studios, a martial arts studio, and the more traditional style Anytime Fitness gym. These gyms and studios are all located within 800m of the site, with the Anytime Fitness gym located adjacent to the Twickenham Train Station.
- 4.52** The LBRuT also offer a 'Richmond Card' which gives card holders exclusive deals from local and independent businesses. The card covers a range of offers, from home and leisure, to health, culture and fitness. The card is free for residents of the borough and is available for residents over 17 years of age.
- 4.53** The LBRuT have a number of social media platforms (including Facebook and Twitter) which provide updates relevant to the community. Recent posts relate to organised group Health Walks, the naming of a new footbridge, and community events (such as the Church Street Valentine Fair).
- 4.54** The nearest Youth Club, 'Heatham House', is located approximately 770m to the east of the site, and adjacent (to the north) of the Twickenham Railway Station. This youth club is for young people aged between 11 and 19 and offers a wide range of activities.

Health Determinant 3: Access to Open Space and Nature

- 4.56** As detailed in the NHS HUDU Planning for Health (2017): access to open space and nature relates to *“Providing secure, convenient and attractive open/green space can lead to more physical activity and reduce levels of heart disease, strokes and other ill-health problems that are associated with both sedentary occupations and stressful lifestyles. There is growing evidence that access to parks and open spaces and nature can help to maintain or improve mental health. The patterns of physical activity established in childhood are perceived to be a key determinant of adult behaviour; a growing number of children are missing out on regular exercise, and an increasing number of children are being diagnosed as obese. Access to play spaces, community or sport facilities such as sport pitches can encourage physical activity. There is a strong correlation between the quality of open space and the frequency of use for physical activity, social interaction or relaxation.”*
- 4.57** Physical activity has been in decline since the 1960s; we are over 20% less active now than in the 1960’s and are predicted to be 35% less active by 2030. Currently, only 21% of boys and 16% of girls meet the UK Chief Medical Officers’ guideline of 60 minutes of physical activity per day. In adults, 67% of men and 55% of women are meeting the recommendations⁴⁵.
- 4.58** In 2016/17 in the United Kingdom 26% of the population were classified as obese. It is estimated that the proportion of people classified as obese in England could rise to 48% of men and 43% of women by 2030. In 2016 the percentage of children presenting as obese in Year 6 (10-11 year olds) was 23.6% in London, 20% of adults in London were identified as obese⁴⁶.
- 4.59** Over half the population in the LBRuT are estimated to be obese and overweight, and 1 in 6 adults are identified as physically inactive⁴⁷. Approximately 21.7% of Year 6 children (within LBRuT primary schools) are considered obese, which is better than the average for England (34.3%).
- 4.60** The LBRuT have produced a Joint Health and Wellbeing Strategy (2016-21)⁴⁸ with the aim of promoting health and active lifestyles within both adults and young people. Richmond Council also promote active lifestyles with events for all ages. These include but are not limited to:
- The promotion of positive conditions and places for children, young people and families to grow, learn, work and play and be safe;
 - The organisation of tournaments for school age children;
 - London Youth Games is Europe's largest annual youth sporting event where the 33 London boroughs compete against each other in over 30 different sports, including sports for young people with disabilities.
 - Ensuring accessible parks and open spaces; and
 - Creating healthy workspaces.
- 4.61** The Adult JSNA 2016-2018 states that *“programmes often reach people who may have limited funds to access physical activity provision where costs are prohibitive, and who may be more comfortable doing things in a social and less formal sports venue.”*
- 4.62** With regards to open space and nature, almost 57% of the total area of the LBRuT is open space, which equates to approximately 3,350ha⁴⁹. This includes land that is not currently accessible by the public but which could become accessible upon improvement. On average 59.2% of households within the LBRuT have access to open space.

⁴⁵ British Heart Foundation, (2015); Physical Activity Statistics 2015.

⁴⁶ NHS Digital, (2018); Statistics on Obesity, Physical Activity and Diet, England: 2018

⁴⁷ London Borough of Richmond upon Thames, (2015); JSNA Newsletters – Healthy Lifestyle Newsletter (2015). Accessed Online 08.02.2019 [URL: <https://www.datarich.info/jsna-news/>]

⁴⁸ London Borough of Richmond upon Thames, (2016); Joint Health and Wellbeing Strategy 2016-21

⁴⁹ London Data Store (2013); Access to Public Open Space and Nature by Ward. Accessed online 07.02.2019 [URL: <https://data.london.gov.uk/dataset/access-public-open-space-and-nature-ward>]

- 4.63** LBRuT is famous for its open space with 125 parks and open space locations which comprise over 500 hectares of formal parks, sports grounds, playgrounds and nature conservation sites for residents to enjoy.
- 4.64** 26.7% of the South Twickenham Ward is comprised of open space⁵⁰, which is defined as all open spaces including water, private playing fields, railway embankments, and agriculture. In general, access to regional parks, metropolitan parks, local pocket parks and district parks within the South Twickenham Ward (where the site is located) of the LBRuT is deficient⁵¹ with only 1.4% of homes having good access to all four open spaces. This predominantly arises due to the lack of access to District Parks⁵² (of which 97.4% of homes lack access to) and Local, Small or Pocket Parks (of which 43.3% of homes lack access to). 100% of households within the South Twickenham Ward have access to Regional and Metropolitan Parks. 98% of homes within the South Twickenham ward have good access to nature. The borough as a whole contains a high proportion of Neighbourhood Equipped Area of Play (NEAP), Local Equipped Area of Play (LEAP) or Local Area of Play (LAP) play areas.
- 4.65** Crane Park, located in close proximity to the north-west of the site, and is a designated Local Nature Reserve. The walking distance to Crane Park is approximately 320m and takes under 5 minutes to walk. Twickenham Green is located approximately 250m south of the site ('as the crow flies') and provides cricket ground and green space; the actual walking distance to this Green is approximately 320m, which is within the maximum Play and Informal Recreation SPG distance of 400m.
- 4.66** Craneford Way Recreational Park is located approximately 800m (walking distance) away from the site and can be reached in under 9 minutes along the riverside walk.
- 4.67** Kneller Gardens is located approximately 330m north west of the site which provides two mini football pitches, one full sized football pitch, four tennis courts, table tennis, basketball court, play equipment for under 13s as well as older children and outdoor gym equipment. The actual walking distance to these gardens is approximately 480m which is over the maximum Play and Informal Recreation SPG distance of 400m.
- 4.68** The River Thames and Tidal Tributaries (SINC designated as of Metropolitan Importance) is located within 1km of the site.
- 4.69** The LBRuT have identified⁵³ allotments as an important component of open space as they offer a diverse range of benefits for people, communities and environments. Allotments help build healthier communities and promote healthy living as they contribute to physical and mental wellbeing as they encourage physical activity and outdoor exercise and production of fruit and vegetables. The nearest allotments to the site are the March Farm allotments, located approximately 200m to the north-east of the site.

⁵⁰ London Ward Profiles, (2014); Accessed Online 14/02/2019 [URL: <https://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles-html/>]

⁵¹ Areas of deficiency in access to nature are defined as built-up areas more than one kilometre actual walking distance from an accessible Metropolitan or Borough Site of Interest for Nature Conservation (SINC).

⁵² London Data Store (2013); Access to Public Open Space and Nature by Ward. Accessed online 07.02.2019 [URL: <https://data.london.gov.uk/dataset/access-public-open-space-and-nature-ward>]

⁵³ LBRUT (2018) London Borough of Richmond - Adopted Local Plan

Health Determinant 4: Air Quality, Noise and Neighbourhood Amenity

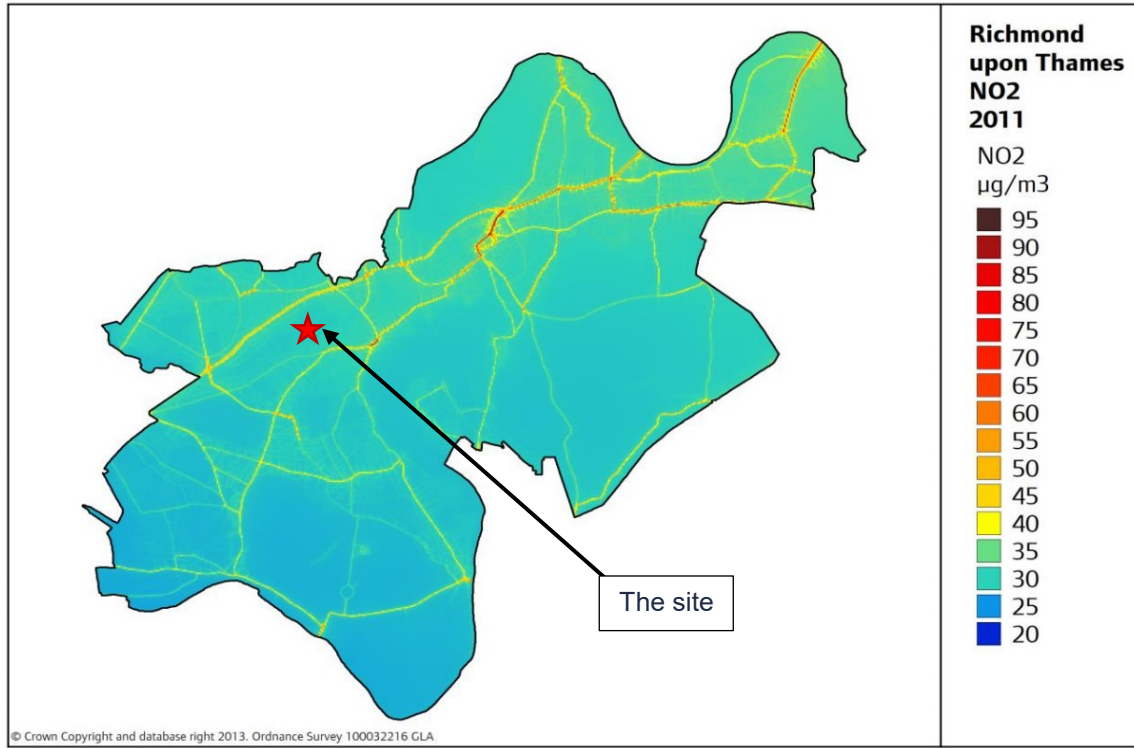
- 4.70** The NHS HUDU Planning for Health (2017), states that “*The quality of the local environment can have a significant impact on physical and mental health. Pollution caused by construction, traffic and commercial activity can result in poor air quality, noise nuisance and vibration. Poor air quality is linked to incidence of chronic lung disease (chronic bronchitis or emphysema) and heart conditions and asthma levels of among children. Noise pollution can have a detrimental impact on health resulting in sleep disturbance, cardiovascular and psycho-physiological effects. Good design and the separation of land uses can lessen noise impacts.*”
- 4.71** Two of the main environmental factors affecting neighbourhood amenity are noise and air quality, which are covered in this health determinant section.
- 4.72** Air Quality is an important public health issue, particularly in London, where it was estimated by the Greater London Authority (GLA) that there were over 9,000 deaths attributable to long-term exposure to small particles and nitrogen dioxide (noting that there is some overlap in the numbers of deaths)⁵⁴.
- 4.73** In December 2000, the LBRuT designated an Air Quality Management Area (AQMA) across the whole Borough for nitrogen dioxide (NO₂) and particulate matter (PM), specifically PM₁₀. For carbon monoxide, benzene, 1,3-butadiene, lead and sulphur dioxide there is not a significant risk of the objectives being exceeded in the LBRuT.
- 4.74** The LBRuT routinely monitor the following pollutants: NO₂; PM₁₀; Ozone (O₃); and PM_{2.5}. The LBRuT currently have three continuous air quality monitoring sites, two static sites in Barnes (Castlenau, SW13 (roadside); and Wetlands, SW13 (urban background)) and one mobile site currently near the new Richmond College development, on the A316, near Egerton Road, TW2 7SP. The three Richmond operated sites are part of the King’s London Air Quality Network, as is the site at the National Physical Laboratory (NPL) which is also part of the government’s UK Automatic Urban and Rural Network (AURN).
- 4.75** The Council had a network of 64 diffusion tube ‘non-automatic’ monitoring sites across the LBRuT in 2017. Three of the diffusion tubes sites are triplicate and co-located with all 3 automatic monitoring sites.
- 4.76** The national air quality objectives and European Directive limit and target values for the protection of human health identify 40 µg/m³ as the annual mean objective for NO₂ concentrations, 40 µg/m³ for PM₁₀ concentrations and 25 µg/m³ for PM_{2.5} concentrations.
- 4.77** The data for 2017 identifies that the annual mean concentration of NO₂ was recorded at 31 µg/m³, 21 µg/m³ and 37 µg/m³ at the Castelnau, Wetlands and mobile air quality continuous monitoring sites respectively. This is a general downward trend from the annual concentrations recorded in 2011: 39 µg/m³, 29 µg/m³ and 37 µg/m³ respectively. 2011, 2015 and 2017 saw slightly lower levels but overall at most sites across the borough there is no significant trend either upwards or downwards; levels of NO₂ have remained fairly static. Euro VI/6 vehicle emissions standards have not delivered the forecast reductions in NO₂ levels in real world driving conditions that were predicted. The sale of diesel cars has seen a significant reduction over the last 18 months but the rental market for diesels remains buoyant and the number of vehicles on the road has continued to increase; this has hindered reductions in NO₂⁵⁵.
- 4.78** Figure 6 and 7 below represents the 2011 annual mean concentrations of NO₂ and PM₁₀ in LBRuT respectively. Note that this data is not as up-to-date as the information presented within the paragraph

⁵⁴ Kings College London, 2015, Understanding the Health Impacts of Air Pollution in London. Accessed online 11.01.2019 [url: https://www.london.gov.uk/sites/default/files/hiainlondon_kingsreport_14072015_final.pdf]

⁵⁵ London Borough of Richmond upon Thames, (2018); Annual Status Report for 2017.

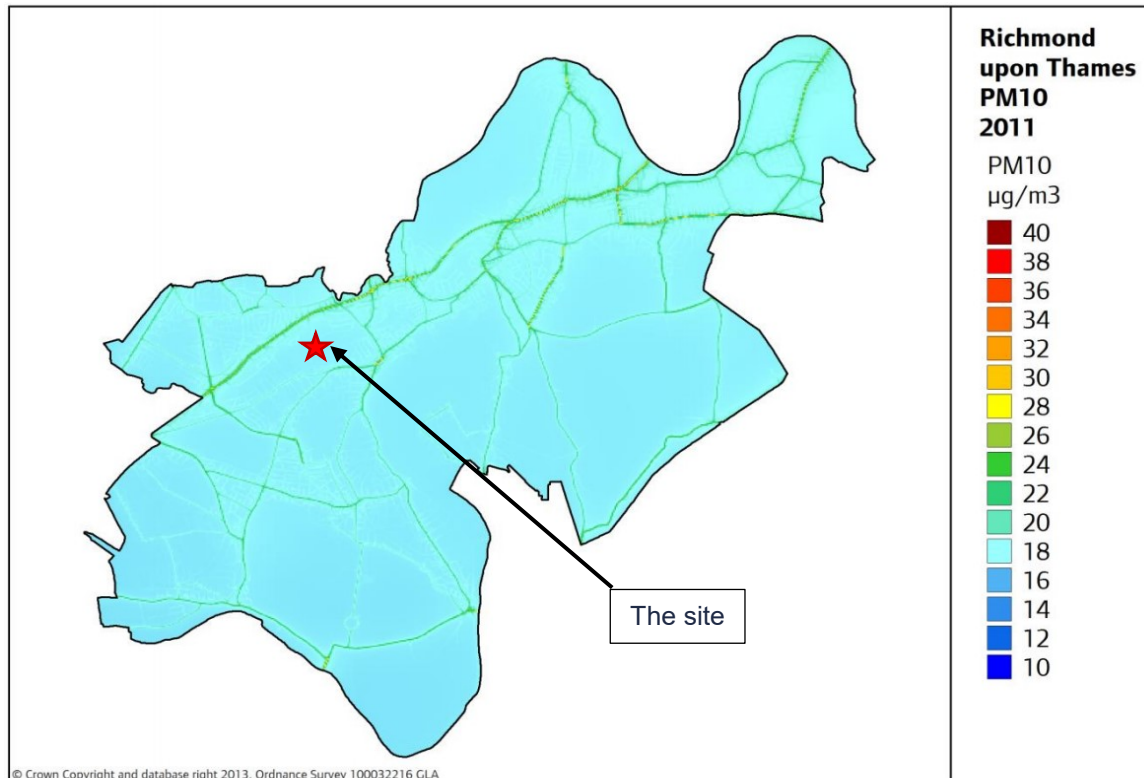
above, as the source has not been updated since 2012, however the figures provide a good visual for air quality within the borough, and identify that the concentrations of key pollutants are highest along the main artery roads in the borough⁵⁶.

Figure 6 Annual Mean Concentration of NO₂ in the LBRuT in 2011



Source: Greater London Authority, (2012); Air Quality in Richmond: A Guide for Public Health Professionals

Figure 7 Annual Mean Concentration of PM₁₀ in the LBRuT in 2011



⁵⁶ Greater London Authority, (2012); Air Quality in Richmond: A Guide for Public Health Professionals

Source: Greater London Authority, (2012); Air Quality in Richmond: A Guide for Public Health Professionals

- 4.79** At the London level, research from WideNoise, an app allowing users to make decibel level readings on the go, has identified that the average noise level across London is 66dB (from an average of over 4,000 readings across London). The quietest borough, the London Borough of Tower Hamlets, has an average volume of 53.3 dB, and the London Borough of Islington, with a recorded average volume of 77.2 dB is the noisiest recorded borough. LBRuT has an average volume of 65.2 dB.
- 4.80** With regards to noise at the site level, Paragon Acoustic Consultants⁵⁷ have undertaken background noise surveys and prepared subsequent reports outlining the background noise environment likely to exist in the vicinity of the site and the environmental noise assessment of the Proposed Development. The reports have identified that there are a number of existing sources of environmental noise in the vicinity of the site, including air craft noise from the nearby London Heathrow Airport, and the railway lines to the north of the site.
- 4.81** Noise emanating from vehicular road traffic was deemed to provide a contribution to the ambient noise climate proximal to the nearest affected residential premises. The overall noise comprises both individual “event” type emissions from vehicles passing along local roads, and also continuous low frequency “rumble” due to middle distance traffic flows.
- 4.82** Indoor ambient noise levels for dwellings are set out in British Standard 8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings, and identifies the following ambient indoor noise levels:
- Living Room: 35 dB $L_{Aeq, 16hour}$;
 - Dining Room/Area: 40 dB $L_{Aeq, 16hour}$; and
 - Bedroom: 35 dB $L_{Aeq, 16hour}$.
- 4.83** For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB $L_{Aeq,T}$, with an upper guideline value of 55 dB $L_{Aeq,T}$ which would be acceptable in noisier environments.

⁵⁷ Paragon Acoustic Consultants, (2019); Environmental Noise Survey and Plant Noise Limits, prepared in support of the Greggs Factory planning application.

Health Determinant 5: Accessibility and Active Travel

- 4.84** The NHS HUDU Planning for Health (2017) states that *“Convenient access to a range of services and facilities minimises the need to travel and provides greater opportunities for social interaction. Buildings and spaces that are easily accessible and safe also encourage all groups, including older people and people with a disability, to use them. Discouraging car use and providing opportunities for walking and cycling can increase physical activity and help prevent chronic diseases, reduce risk of premature death and improve mental health.”*
- 4.85** The site is bound to the north by the River Crane, to the east and west by residential areas, and to the south by Edwin Road.
- 4.86** The site has a TfL Public Transport Accessibility Level (PTAL) rating of 2 (poor), with the most southern part of the site being classified with a rating of 3 (moderate). Strawberry Hill railway station and Twickenham railway station, which are both located within Travelcard Zone 5 and served by regular trains to Waterloo, are located approximately 850m south of the site and 920m north east of the site respectively.
- 4.87** There are several bus stops located along The Green (A305) which is serviced by 26 buses per hour in each direction. The closest bus stop to the site is bus stop ‘GC’, located approximately 280m to the south of the site outside Twickenham Green. The 110, 490 and H22 bus service serves this bus stop.
- 4.88** Existing pedestrian and cycle facilities and routes are provided in the local area in all directions. Richmond Park is located 3km to the east of the site offering path ways around the park for running, cycling and walking. The River Thames and Tidal Tributaries (SINC designated as of Metropolitan Importance) is located within 1km of the site. A walking path is provided along the River Thames, which facilities walking and cycling activities alongside the river, which promotes a more active lifestyle and better mental health and wellbeing.
- 4.89** As discussed above, there are also closer parks and gardens in proximity to the site: Crane Park, is approximately 320m to the site; Twickenham Green is located approximately 320m walking distance from the site; Craneford Way Recreational Park is located approximately 800m (walking distance) away from the site; and Kneller Gardens is located approximately 480m walking distance to the north west of the site.

Health Determinant 6: Crime Reduction and Community Safety

- 4.91** The NHS HUDU Planning for Health (2017) states that *“Thoughtful planning and urban design that promotes natural surveillance and social interaction can help to reduce crime and the ‘fear of crime’, both of which impacts on the mental wellbeing of residents. As well as the immediate physical and psychological impact of being a victim of crime, people can also suffer indirect long-term health consequences including disability, victimisation and isolation because of fear. Community engagement in development proposals can lessen fears and concerns.”*
- 4.92** Crimes involving violence and sexual offences at local (LBRuT) level is recorded at 16.21 per 1,000 population, which is below the Metropolitan Police Force area’s 25.33 crimes per 1,000 population⁵⁸. Drug crime in the LBRuT is lower when compared to other boroughs, with 1.70 drug crimes recorded per 1,000 people, compared to the Metropolitan Police Force average of 4.02⁵⁹.
- 4.93** The most up to date crime statistics (June 2017, taken from the Metropolitan Police Service - Public Attitude Survey Q13 “To what extent are you worried about crime in this area?”⁶⁰), identify that 22% of residents in the LBRuT are ‘worried to some extent’ about crime in the area. Compared to the metropolitan police area as a whole, the LBRuT is doing better than the Greater London area (with the MPS at 31%).
- 4.94** The LBRuT have a ‘Community Safety’ section on their website, which provides links to community safety websites, relevant community safety contacts and a link to Richmond’s Community Safety Partnership.
- 4.95** The Richmond upon Thames Community Safety Partnership works with a number of relevant stakeholders within the LBRuT to make Richmond a safe place to live, work, learn and visit – for all people. The Community Safety Partnership is responsible for implementing the Richmond Community Safety Partnership’s Community Plan 2017-2021, which aims to: create safer neighbourhoods, reduce adult offending and re-offending, tackle violence against women and girls, keep children and young people safe, and stand together to tackle hate crime, radicalisation and extremism.
- 4.96** With regards to domestic violence, the LBRuT website provides a comprehensive list of helplines and other resources who can provide assistance. One example is the ‘One Stop Shop’, run by Refuge (a registered charity), who operate weekly at St John the Divine Church Hall, Kew Road and provide support and assistance to sufferers of domestic violence.

⁵⁸ Police.co.uk, (2019); Compare your area. Accessed online 11.02.2019 [URL: https://www.police.uk/metropolitan/E05000529/performance/compare-your-area/violent-crime/?section=msg_comparison#msg_comparison]

⁵⁹ Police.co.uk, (2019); Compare your area. Accessed online 11.02.2019 [URL: https://www.police.uk/metropolitan/E05000529/performance/compare-your-area/drugs/?section=msg_comparison#msg_comparison]

⁶⁰ London Datastore, (2017); Recorded Crime: Force-Level Summaries & Associated Data. Excel Spreadsheet ‘MPS Figure Jul17’ accessed online 11.02.2019 [URL: https://data.london.gov.uk/dataset/recorded_crime_associated]

Health Determinant 7: Access to Healthy Food

- 4.97** As detailed in the NHS HUDU Planning for Health (2017); *“Access to healthy and nutritious food can improve diet and prevent chronic diseases related to obesity. People on low incomes, including young families, older people are the least able to eat well because of lack of access to nutritious food. They are more likely to have access to food that is high in salt, oil, energy-dense fat and sugar. Opportunities to grow and purchase local healthy food and limiting concentrations of hot food takeaways can change eating behaviour and improve physical and mental health.”*
- 4.98** The closest convenience store to the site is the Sainsburys local located 250m to the south, there is also a Tesco Express Supermarket, located approximately 330m to south east. These stores sell a wide range of fresh and frozen food, and have fast food choices, which include healthy ranges such as salads and sandwiches. Twickenham Farmers Market is located in Holly Road Car Park every Saturday, approximately 800m to the south-east of the site. This market sells a wide variety of fresh food.
- 4.99** There are limited ‘fast food’ chains within close proximity to the site with the closest being Parma Pizza Twickenham located approximately 515m south east of the site. Further east of the site there is a Burger King (910m), KFC (940m) and ‘Sea Fresh’ Fish and Chip Shop (950m). There are a number of restaurants, including ‘Ask Italian’ located approximately 250m south of the site. ‘TW2 Bar and Grill and Restaurant’, ‘The Taste of Raj’ and ‘Green Spice’ are located approximately 260m to the south west of the site.
- 4.100** The LBRuT’s Borough’s Open Space Assessment identified an unmet demand for allotments and where appropriate the provision of new allotments or other food growing space will be supported alongside the provision of other private and public open spaces.
- 4.101** There are currently 24 allotment sites in the LBRuT⁶¹ which provide over 2000 plots within the borough; the closest allotment to the site is the Briar Road Allotment located 400m to the west of the site and Heath Gardens allotment, which is located approximately 450m southeast of the site. Allotments promote a healthy lifestyle, whilst not only providing a space to grow fresh fruit and vegetables, they also provide a space for outdoor activity. Around 30 minutes of gardening on an allotment can burn approximately 150 calories, which is similar to doing low impact aerobics.
- 4.102** In 2015/16, Richmond Foodbank provided 1,783 three-day emergency food supplies for people in crisis⁶². There are four foodbanks located within the LBRuT. Schools, churches, businesses and individuals donate non-perishable foods to a foodbank, food is then sorted by volunteers and distributed to those in need. People in need are identified by professionals e.g. doctors, health visitors, social workers and the police, and are issued with a foodbank voucher, which is then exchanged for three days emergency food at a foodbank centre.
- 4.103** The four aforementioned foodbanks located in the LBRuT are part of The Trussell Trust’s network of 428 UK-wide foodbanks.

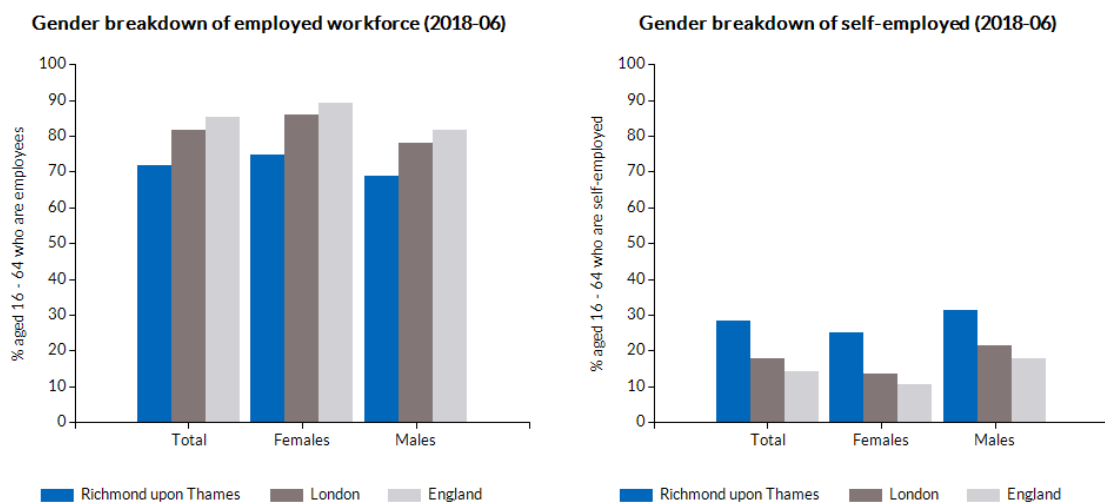
⁶¹ Richmond.Gov, (2018); Allotment Locations. Accessed online 08.02.2018 [URL: https://www.richmond.gov.uk/services/parks_and_open_spaces/allotments/allotment_locations]

⁶² JSNA Richmond (2018) The Richmond Story 2017/18 Annual Report of the Director of Public Health

Health Determinant 8: Access to Work and Training

- 4.104** The NHS HUDU Planning for Health (2017) states that “*Employment and income is a key determinant of health and wellbeing. Unemployment generally leads to poverty, illness and a reduction in personal and social esteem. Work aids recovery from physical and mental illnesses.*”
- 4.105** The LBRuT was rated as a borough with a slightly above average population engaged in economic activity at 78.8% (an average of employed and self-employed workforces – see Figure 8). When compared with the London average, in which 78.3% of the population is engaged in economic activities⁶³. The site is in an LSOA ranked 29,263 out of 32,844 LSOAs in England; where 1 is the most deprived LSOA. This is amongst the 10% least deprived neighbourhoods in the country⁶⁴.
- 4.106** The borough is highly qualified (as per 2011 data), with 53% of the population with Level 4 qualifications and above, and only 10.6% of the population with no qualifications (above Level 4). This places LBRuT as the third best borough within London in terms of qualifications. The LBRuT is also highly active in terms of volunteerism, with 40% of residents engaged in some form of volunteering activities.
- 4.107** Within the LBRuT, 74.9% of females and 68.7% of males are engaged in active employment (excluding self-employment), both of these are lower than their corresponding values for both London and England, as shown in Figure 8 below. Although, the percentage of those who are self-employed and engaged in active employment (28.3%) is greater than the corresponding value for both London and England. Of this, the gender breakdown of self-employed workers is at 25.1% of females and 31.3% of males.

Figure 8 Gender Breakdown of Employed and Self-Employed Workforce



- 4.108** The LBRuT provides community learning opportunities for adults within the borough, which are managed by the Richmond Community Learning Partnership. The LBRuT also provides links to adult education services and English as a foreign language classes, as run through the Richmond and Hillcroft Adult Community College.
- 4.109** Work experience opportunities are provided by the LBRuT for those aged between 14 and 19 years, as well as work related and learning opportunities, which are managed by the Kingston and Richmond Education Business Partnership.

⁶³ Data Rich, 2018, Economic Activity and Employment. Accessed online 11.02.2019 [url: <https://www.datarich.info/economy-and-employment/>]

⁶⁴ DCLG, (2015); Indices of Deprivation 2015 explorer – viewing Index of Multiple Deprivation IMD. Accessed online 12.02.2019 [url: <http://dclgapps.communities.gov.uk/imd/idmap.html>]

Health Determinant 9: Social Cohesion and Lifetime Neighbourhoods

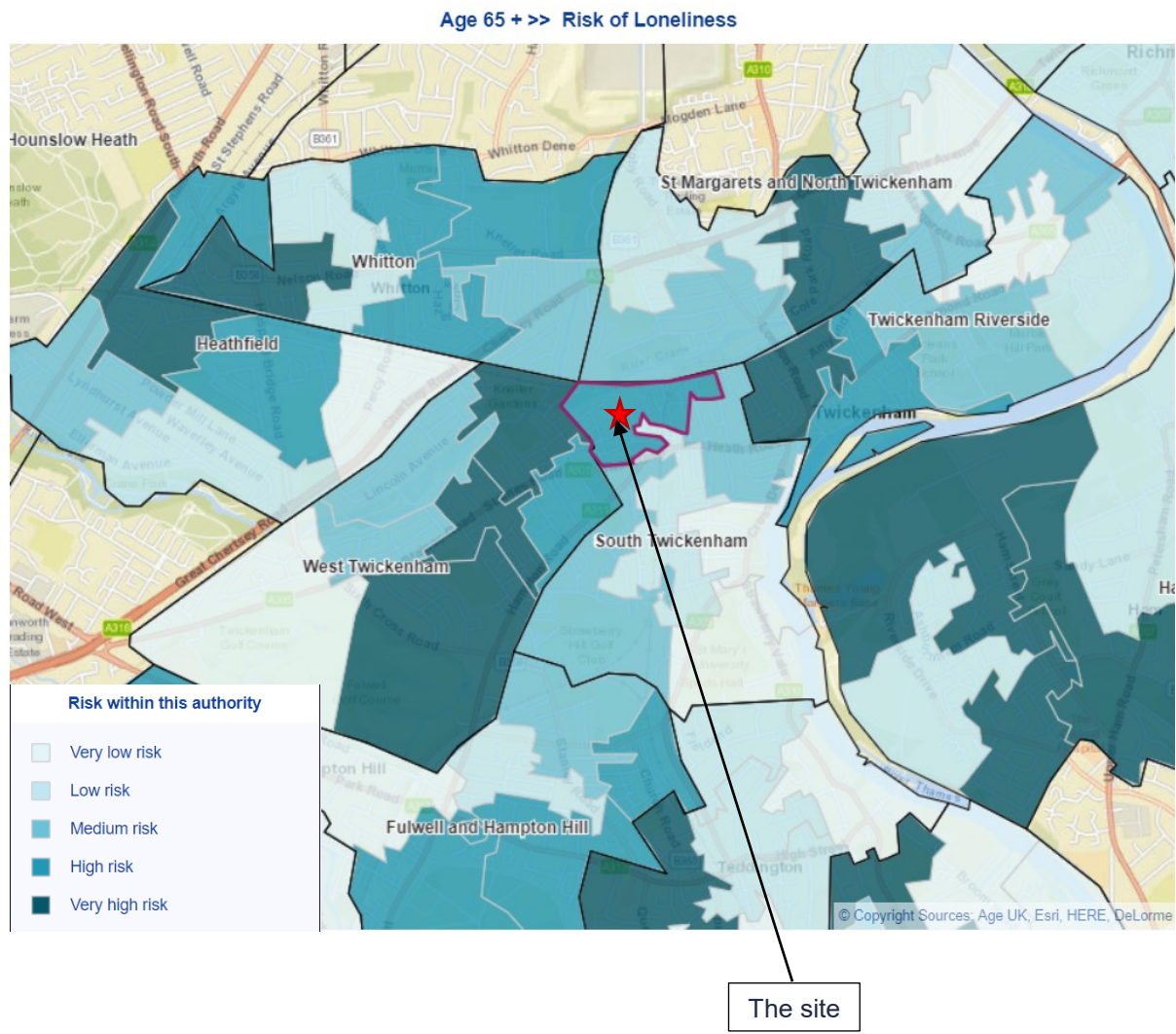
- 4.110** The NHS HUDU Planning for Health (2017), states that, *“Friendship and supportive networks in a community can help to reduce depression and levels of chronic illness as well as speed recovery after illness and improve wellbeing. Fragmentation of social structures can lead to communities demarcated by socio-economic status, age and/or ethnicity, which can lead to isolation, insecurity and a lack of cohesion. Voluntary and community groups, properly supported, can help to build up networks for people who are isolated and disconnected, and to provide meaningful interaction to improve mental wellbeing. Lifetime Neighbourhoods places the design criteria of Lifetime Homes into a wider context. It encourages planners to help create environments that people of all ages and abilities can access and enjoy, and to facilitate communities that people can participate in, interact and feel safe.”*
- 4.111** As stated earlier, there are a number of community groups available to local residents. The groups range in targeted age and interest, from youth clubs, to community garden networks and community groups aimed at keeping the local people of Richmond safe. The wide range of local groups available provides the foundations for a strong, diverse and cohesive community network.
- 4.112** In addition to these community groups, there are a number of religious groups located within the LBRuT. The 2011 census identified that the three largest religions / beliefs in the LBRuT were Christianity (55.3%), no religion (28.4%), and Muslim (3.3%). Other religions present include Jewish, Sikh and ‘other’, though in low numbers.
- 4.113** Of the 203 Local Authorities within the UK, Richmond ranked 29th for the lowest overall wellbeing inequality. This indicates that the distribution of wellbeing is relatively equal throughout the local area⁶⁵. According to the Subjective Personal Well-Being (Happiness) surveys⁶⁶, the LBRuT has a ‘Life Satisfaction’ score (of 7.73) similar to that of the UK, which had a score of 7.69 out of 10, and a happiness score of 7.57 (compared with 7.52 for the UK). The LBRuT also has a ‘worthwhile’⁶⁷ score of 7.76 which is lower than the 7.88 for the UK, and an anxiety score of 3.38, which is higher than the 2.89 of the wider UK.
- 4.114** Particular groups of people are at greater risk of loneliness and isolation, including older people, people living alone, those with disabilities and poor health, minority groups and carers. The Richmond JSNA has identified that within the LBRuT, carers, those with sensory disability, older people with lower incomes, those identifying as lesbian, gay and bisexual and older people living alone are at greater risk of loneliness and isolation.
- 4.115** The LBRuT has the highest proportion of older people (over 75) living alone within London. Additionally, 15.4% of the population within the LBRuT are people aged over 65 years, and the number of older people living alone is expected to increase. It is expected that the risk of isolation and loneliness is expected to increase within the LBRuT as a whole, and the risk surrounding the site is considered to be very high, as shown on Figure 9 below.
- 4.116** Noting that a large proportion of social care users are older people, a survey of local social care service users identified that the amount of social contact experienced was lower than they would like.
- 4.117** The LBRuT manages the Richmond Care and Support platform, which provides a number of resources to provide a number of support services. This includes options for getting out and about, and includes information on lunch clubs, day trips, local events and day and social centres, which assist in increasing connections amongst residents of the LBRuT.

⁶⁵ What Works Wellbeing, 2017, Measuring wellbeing inequality in Britain. Accessed online 12.02.2019 [url: <https://whatworkswellbeing.org/product/measuring-wellbeing-inequality-in-britain/>]

⁶⁶ London Datastore, (2014); Subjective Personal Well-Being (Happiness), Borough. London Borough Profiles 2011-2014 (Excel Spreadsheet). Accessed Online 07.11.2017 [URL: <https://data.london.gov.uk/dataset/subjective-personal-well-being-borough>]

⁶⁷ The ‘worthwhile’ score measures to what extent the participants feel that the things they do in their life are worthwhile.

Figure 9 Risk of Loneliness for Persons Aged 65 Years and Older.



Health Determinant 10: Minimising the Use of Resources

- 4.118** The NHS HUDU Planning for Health (2017) states that, *“Reducing or minimising waste including disposal, processes for construction as well as encouraging recycling at all levels can improve human health directly and indirectly by minimising environmental impact, such as air pollution.”*
- 4.119** The LBRuT is one of six boroughs in the West London Waste Plan⁶⁸, along with the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, and the Old Oak and Park Royal Development Corporate (OPDC). Together the 6 boroughs and the OPDC have developed the West London Waste Plan (DPD), which sets out the waste management targets for the individual boroughs and allocates sites suitable for waste handling and management across all of the six boroughs.
- 4.120** At 40.5% in 2015/16, the LBRuT ranked 7th highest for recycling rate from households of all 32 of the London boroughs. The average recycling rate across the London boroughs was 32.5%, with Bexley recording the highest recycling rates of 52%⁶⁹. The average recycling rate for London was lower than the average rate for England, which was 45.2%⁷⁰.
- 4.121** LBRuT are working to improve their recycling rates, the Richmond upon Thames Local Plan includes Policy LP 24 ‘Waste Management’ which is to ensure *“that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste as close as possible to where it is produced”*.
- 4.122** LBRuT are seeking to indirectly reduce air pollution via the provision of new residential electric vehicle (EV) charging points. EVs have no tailpipe emissions of CO₂ or the air pollutants which have a detrimental effect on human health. The LBRuT published their Electric Vehicle Recharging Strategy⁷¹ in November 2016, which outlines that way in which the borough is planning to increase charging facilities for EV usage over the next 10 years.

⁶⁸ West London Waste Plan (2015); Joint Waste Plan for the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and Old Oak and Park Royal Development Corporate

⁶⁹ Richmond Gov, (2017); Richmond performance tool – Percentage of household waste sent for reuse, recycling and composting

⁷⁰ DEFRA (2018); UK Statistics on Waste

⁷¹ London Borough of Richmond upon Thames, (2016); Electric Vehicle Recharging Strategy 2016-2026.

Health Determinant 11: Climate Change

- 4.123** The NHS HUDU Planning for Health (2017) states that *“Planning is at the forefront of both trying to reduce carbon emissions and to adapt urban environments to cope with higher temperatures, more uncertain rainfall, and more extreme weather events and their impacts such as flooding. Poorly designed homes can lead to fuel poverty in winter and overheating in summer contributing to excess winter and summer deaths. Developments that take advantage of sunlight, tree planting and accessible green/brown roofs also have the potential to contribute towards the mental wellbeing of residents.”*
- 4.124** According to the GLA Housing in London, there were 335,201 households living with fuel poverty in 2015, which equates to 10.1% off all households in England⁷².
- 4.125** UKCP18⁷³ gives ‘probabilistic projections’⁷⁴ for a number of atmospheric variables. UKCP18 projections consider the local climate effects arising from four different emissions scenarios. Probabilistic projections give a range of possible climate change outcomes and their relative likelihoods i.e. unlikely, likely or very likely ranging across 10th to 90th percentiles. The RCP6.0 emissions scenario has been used (with the 50th percentile data), as it represents the most reasonable emissions scenario with regards to climate policy, land use and technological development.
- 4.126** Future UKCP18 climate change projection data for the 2080s (covering the years 2070 – 2099) has been reviewed in relation to the London area, this is in order to determine the likely climatic conditions in the areas surrounding the Proposed Development in the future. Note that the 2080s (which cover the years 2070 – 2099) have been reviewed, as the indicative lifespan of building structures is 50 years⁷⁵, and therefore the 2080s (covering the years 2070 – 2099) have been identified as the most likely ‘end-years’ of new development, and therefore present a worst-case scenario when considering impacts on new development from climate change.
- 4.127** A review of the key climatic variables within the UKCP18 projections (for the London area) has identified that:
- By the 2080s, the mean average air temperature is projected to increase by +2.94 °C annually, to 13.39 °C. The mean daily maximum temperature is projected to increase by +3.1°C, and the mean daily minimum temperature is projected to increase by +2.89°C.
 - Annual average precipitation is due to decrease by 0.53%, with a +16.23% increase in the winter average precipitation, and a -26.31% decrease in the summer average precipitation. The autumn and spring averages have small decreases of between 5.1 and 5.25%.
 - Wind annual average wind speed (measured in meters per second (m s⁻¹)) is projected to marginally decrease in speed in the 2080s, by -0.065m s⁻¹; and
 - Total cloud cover is projected to decrease annually by 6.22%, this decrease in total percentage cloud cover is most prevalent in the summer average, where the summer average is due to decrease in the 2080s by 15.21%. There is projected to be a marginal increase (of 0.93%) in the average winter cloud cover.

⁷²GLA, 2018, Fuel Poverty Action Plan for London Accessed Online 06.11.2017 [url: https://www.london.gov.uk/sites/default/files/appendix_b_fuel_poverty_action_plan.pdf]

⁷³ UK Climate Projections (UKCP18). Accessed Online 13.02.2019 [URL: <http://ukclimateprojections.metoffice.gov.uk/>]

⁷⁴ Probabilistic projections give a range of possible climate change outcomes and their relative likelihoods i.e. unlikely, likely or very likely ranging across 10th to 90th percentiles.

⁷⁵ British Standard BS EN 1990:2002, (2002); Eurocode – Basis of Structural Design

5. Health Impact Assessment

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
1. Housing Quality and Design				
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?	Yes	<p>Although the Lifetime Homes assessment criteria are no longer in existence, all aspects and areas of the Proposed Development have still been designed to meet these pre-existing requirements.</p> <p>The proposals are also fully compliant with the Building Regulations Part M requirements, including Parts M(2) and M(3), which are a London Plan requirement, with particular reference for all adaptable wheelchair user units.</p> <p>In addition to meeting Building Regulations requirements, the Proposed Development has been cross checked against all Mayoral SPG guidance to ensure a compliant and inclusive development.</p>	+ve	N/A
Does the proposal address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?	Yes	<p>The Proposed Development does not include any 'Extra Care Housing' or 'Sheltered Housing', however the Proposed Development does cater for the needs of older people, details as follows:</p> <ul style="list-style-type: none"> • 12 of the residential units have been identified as Wheelchair M4(3) units in accordance with the requirement of a 10% provision. 6 of these are three bedroom houses along the mews street; the other 6 are apartment units at a variety of floor levels. • All accessible apartments at first floor and above are served by two lifts. These units are designed specifically for ease of use for visually impaired, ambulant disabled and wheelchair bound residents, and provide a balanced mix of unit sizes and tenure; • Where residents may wish to use stairs, all staircases have been designed with handrails, to provide support; • The layouts of the 'accessible apartments' and mews houses have been designed to be fully Building Regulation compliant and accessible by wheelchair users. This includes but is not limited to, the building's approach, level access, corridor widths, turning circles, passenger lifts, stairs, balustrades and handrails, and refuge points; • A well designed car park, which comprises of 10% spaces being disabled access car parking spaces; 	+ve	N/A

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		<ul style="list-style-type: none"> Surface textures have been considered with both wheelchair users and guide dogs in mind; Selected apartments have direct level access to the podium at 1st floor suitable for disabled users. 		
Does the proposal include homes that can be adapted to support independent living for older and disabled people?	Yes	Please see above.	+ve	N/A
Does the proposal promote good design through layout and orientation, meeting internal space standards?	Yes	<p>All apartments and mews houses have been developed with layout and orientation in mind, and have been designed to meet internal space standards, for example:</p> <ul style="list-style-type: none"> Ensuring all home have an appropriate amenity space has been a key part of the design development process. All 3 bedroom houses will have a minimum of 17m² private amenity space which is private and secure. For the apartment buildings (A, E & F) and smaller two bedroom houses (G) amenity has been maximised with terraces and balconies ensuring that every apartment has a private amenity space either equal to or above the London Plan minimum requirements. The use of discrete lighting along Mews Street to prevent nuisance to residents with front facing windows. Dual aspect homes for enhanced outlook and daylighting and to avoid direct overlooking of habitable rooms. The proposal will create a new residential street with terrace houses in keeping with the surrounding context and will involve boundary treatment to avoid overlooking at ground floor. Privacy and overlooking has been a key consideration throughout the design process. In order to mitigate potential overlooking and loss of privacy, terrace houses have minimal windows on upper floors which will have opaque finish ensuring overlook is mitigated. These rooms will serve as a bedroom or bathroom, where a bedroom is situated in 	+ve	N/A

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		this location larger second windows which do not face Norcutt road will be implemented.		
Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?	Yes	<p>The Proposed Development includes a range of housing types, sizes and tenure mixes.</p> <p>The Proposed Development comprises a total of 116 residential units, which include 32 x 1 bed apartments, 30 x 2 bed apartments, 3 x 3 bed apartments, 5 x 2 bed townhouses, 35 x 3 bed townhouses and 11 x 4 bed townhouses.</p> <p>37% of the total number of habitable rooms will be affordable accommodation. The affordable housing will be provided within 1-, 2- and 3-bed units. The 3-bed unit provision will be within both apartments and townhouses.</p> <p>This 37% provision affordable housing is consistent with the recent (August 2017) Mayor of London's Affordable Housing SPG⁷⁶, which sets the threshold of 35% of habitable rooms as affordable provision</p>	+ve	N/A
Does the proposal contain homes that are highly energy efficient (e.g. a high SAP rating)?	Yes	<p>SAP calculations, undertaken by Decso, have been carried out for 65 apartments and 51 houses and 2 storey B1 commercial unit in the Proposed Development and the results have been area weighted averaged.</p> <p>The results identify that 'be lean' energy reduction measures have been achieved via careful design of the façade and building envelope (there has been a drive to limit the proportion of glazing in order to mitigate solar gains in the summer) and the application of low energy lighting.</p> <p>It has been estimated a 36% carbon saving over Part L 2013⁷⁷ will be achieved through 'be clean' measures for the Proposed Development.</p> <p>The measures implemented into the design of the Proposed Development, such as energy efficient measures alone and then further reductions are achieved through use of air source heat pumps and PV's to beat the 35% improvement target. The Proposed Development therefore exceeds the 35% reduction over Part L 2013 target for the residential and commercial elements of the Proposed Development.</p> <p>Therefore, the Proposed Development contains homes that are energy efficient.</p>	+ve	N/A
2. Access to Healthcare Services and Other Social Infrastructure				
Does the proposal retain or re-provide existing social infrastructure?	No	The site currently stands as a single industrial unit previously occupied by Greggs Bakery. The bakery buildings include offices, sheds, production buildings and hardstanding. Two tall silos are prominently located towards the	N/A	N/A

⁷⁶ Greater London Authority, (2017); Mayor of London's Homes for Londoners Affordable Housing and Viability Supplementary Planning Guidance 2017

⁷⁷ HM Government, (2016); The Building Regulations 2010. Approved Document L1A: Conservation of fuel and power in new dwellings (2013 edition with 2016 amendments). ISBN: 978 1 85946 510

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		<p>Edwin Road entrance. The Proposed Development will provide a small amount of B1 Use Class space, which will generate employment.</p> <p>No social infrastructure (i.e. health space, education, community, play space) etc. is currently provided on-site, as such there is no existing social infrastructure to retain or re provide as part of the Proposed Development.</p>		
Does the proposal assess the impact on healthcare services?	Yes	<p>This HIA has been undertaken to help define and address any health issues in a systematic way, including the impact of the Proposed Development on healthcare services. The methodology, baseline health context and health impact assessment are presented in this report.</p> <p>As previously discussed, the Proposed Development is expected generate a population of approximately 326.4 people. This is based on the provision of 37% affordable housing, and on the residential unit mix for social / affordable housing as identified in Section 1.</p> <p>Typically, in term of healthcare services, consideration is given to the availability of GPs and dentists to serve an incoming resident population.</p> <p>The baseline research suggests that there is capacity within the local GPs to take on additional patients, with four of the seven surgeries operating with lower patient numbers per FTE GP than the HUDU benchmark. Additionally, all of the GPs within a 1-mile radius of the site are accepting new patients (including those that currently have greater patient numbers per FTE GP). According to the HUDU standards, the incoming community (with a projected population of 326.4), would require 0.18 GP FTE</p> <p>There is one NHS dental practice available within 1 mile walking distance of the site: Dhiman Dental Surgery, which is located just approximately 0.7 miles from the site. As the NHS Choices database did not identify the number of practicing dentists at the surgery, a review of the Dhiman Dental website was undertaken. This identified that there are four practicing dentists at the surgery. Additionally, this surgery is not accepting new NHS patients at the time of writing. It is possible that the Proposed Development will increase the pressure on available dental services, and that incoming residents will need to travel further than 1 mile to find a facility accepting new NHS patients. The capacity of dentists, pharmacies and opticians cannot be assessed in the same manner as GPs as people can choose to attend dental practices/opticians/pharmacies at their own discretion and are not limited to being close to their home. By contrast, in the case of NHS GPs, residents must register with a GP within the catchment area of where they live. As such, the impacts on local dentists, opticians and pharmacies are considered neutral.</p> <p>The Proposed Development does not provide new health facilities within the Proposed Development.</p>	<p>-ve Minor Adverse (effect on GPs)</p> <p>= Neutral effect on dentist capacity</p>	N/A
Does the proposal include the provision, or	No	The Proposed Development does not provide a dedicated healthcare facility.	N/A	N/A

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
replacement of a healthcare facility and does the facility meet NHS requirements?		There is no existing healthcare provision to retain or re provide as part of the Proposed Development.		
Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g. schools, social care and community facilities?	Yes	<p>In terms of schools, there are 14 schools offering primary education within a 1.6-mile radius of the site; this is the recognised catchment area for walk distance to a school by a primary school aged pupil. As demonstrated within the baseline, there is existing capacity within the local primary schools.</p> <p>Secondary schools in the local area (4.6km radius from the site which is the recognised travel to school distance for secondary school aged pupils, of which there are 19 schools) have surplus capacity.</p> <p>The incoming community will include 45.74 primary school pupils, as discussed in the population distribution in Section 1. These incoming pupils are not likely to have a significant impact on the available capacity of the local primary schools.</p> <p>The incoming community will include 27.36 secondary school pupils. These incoming pupils are expected to be served by the existing spare capacity of the local secondary schools.</p> <p>In terms of social care, the LBRuT offers a wide range of services, including care for the elderly, and help lines for those currently a victim of domestic abuse.</p> <p>In terms of community facilities, a number of community centres are located in the LBRuT which offer a wide range of activities and events, including libraries, sport and fitness facilities and community halls. The LBRuT also offer a 'Richmond Card' which gives card holders exclusive deals from local and independent businesses. The card covers a range of offers, from home and leisure, to health, culture and fitnesses.</p> <p>There are 14 libraries within the LBRuT, with Twickenham Library the closest library to the site, and which is located approximately 950m to the east of the site.</p> <p>There are also a number of gyms in proximity to the site (within 800m), which offer fitness opportunities and organised classes. Additionally, the Whitton Sports and Fitness Centre, an LBRuT managed facility, is located approximately 1.5km to the west of the site.</p> <p>The nearest Youth Club, 'Heatham House', is located approximately 770m to the east of the site. This youth club is for young people aged between 11 and 19 (or up to 25 for those with special educational need) and offers a wide range of activities for young people.</p> <p>The site is considered to be well served for community facilities.</p>	<p>= Neutral effect on primary and secondary schools</p> <p>= Neutral effect on social care or community facilities</p>	
Does the proposal explore opportunities for shared	Yes	Whilst the Proposed Development does not include provision for community uses or the co-location of services, the landscaping strategy provides usable		

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
community use and co-location of services?		publicly accessible areas. Communal roof terraces are also provided within Building F, which help to encourage the sense of community.	-ve	N/A
Does the proposal contribute to meeting primary, secondary and post 19 education needs?	No	The Proposed Development does not provide any education provision. As discussed above, the incoming community is not likely to have a significant impact on the available capacity of the local primary or secondary schools.	N/A	N/A
3. Access to Open Space and Nature				
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	Yes	<p>The LBRuT comprises plentiful open spaces, of which the site is located in close proximity to. In accordance with the requirements of regional and local planning policy, the Proposed Development provides for:</p> <ul style="list-style-type: none"> • New public realm with landscaping and riverside walk; • Podium and roof level external amenity space is provided which is only accessible by residents. The podium will include hard and soft landscaped environments that are fully accessible. These will comprise of raised timber seating, planting and tree canopy; • Public amenity space consists of benches along an elevated timber platform and designated play area for children 5-11; • A timber boardwalk with benches will path a riverfront walk way will be created along the River Crane, utilising the natural asset and the surrounding green characters as a viewing platform for residents; and • The site will include a green corridor which will comprise planted boarders and trees bordering the pathway. 	+ve	N/A
Does the proposal provide a range of play spaces for children and young people?	Yes	<p>All mews houses are provided with private gardens, and thus private play spaces for children and young people. The Proposed Development also accommodates children's playspace in the play garden and roof terraces, provided as part of the landscaping strategy, which are overlooked by the residential frontages creating passively surveyed space and promoting an active environment. Play opportunities are provided for 0-5-year olds. 5-12+ play is accommodated in the surrounding area.</p> <p>Natural play features such as logs, stumps, mounds, boulders and stepping stones will be dotted throughout the play garden.</p>	=Neutral	N/A

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		<p>Using the LBRuT child yield calculator, alongside the GLA guideline for total play space, the total playspace required for the site is 1,080m², 410m² of which should be allocated to under 5 year olds. The Proposed Development provides 410m² playspace for 0-5 year olds, whilst 5-12+ playscape is accommodated in the surrounding area. Crane Park and Twickenham Green, located approximately 250m and 320m (walking distance) from the site respectively, are within the 400m Play and Informal Recreation SPG distance, and are thus suitable for 5-11 year olds. There are further parks within 800m of the site (suitable for 12+ year olds, as per the Play and Informal Recreation SPG distance). These include, in addition to the above, Craneford Way Recreation Park and Kneller Gardens.</p> <p>In addition to the above, all mews houses will be provided with a minimum of 17m² private open space, in the form of garden to the rear of the property.</p>		
Does the proposal provide links between open and natural spaces and the public realm?	Yes	The Proposed Development site to the south of the River Crane, and as such provides a natural link between the open spaces provided within the landscaping strategy, with natural spaces.	+ve	N/A
Are the open and natural spaces welcoming and safe and accessible for all?	Yes	<p>A high quality public realm is proposed that is well designed and which caters for all, both in terms of varied uses and spaces for play, relaxing, outdoor seating and leisure pursuits as well as accessibility.</p> <p>The public realm will be accessible to all as part of an inclusive design philosophy. Users with disabilities are not segregated and are able to move through the public realm and the buildings. They will use the same entrance, corridors and rooms as everyone else without detour</p> <p>Lighting will be embedded within the landscape throughout the Proposed Development. The proposed lighting highlights the boardwalk and green corridor enhancing them making them more welcoming and safer in the evening. More discrete lighting will be used along the Mews Street to prevent nuisance to residents with front facing windows.</p> <p>The public realm has a good level of surveillance from the proposed residential, this will include site wide, a CCTV system installed at main points of entry to the site and each apartment block to enhance safety.</p>	+ve	N/A
Does the proposal set out how new open space will be managed and maintained?	Yes	The soft landscape strategy is a key element of the Proposed Development therefore careful consideration has been given to the feasibility of planting in order to best ensure the success of the landscaping strategy. Planting of appropriate size and type is chosen depending on available space, available sunlight, exposure, amenity value and ease of maintenance.	+ve	N/A

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		<p>The landscaped elements of the Proposed Development have been designed to be practical, low-maintenance and robust.</p> <p>As part of the estate-wide management strategy, there will be a landscape maintenance team and cleaning team who will maintain the external areas of the development, on a regular basis.</p> <p>The soft landscape will be manually watered at agreed intervals through the year and will be controlled and regulated by the maintenance team throughout the year to maintain plant health.</p>		
4. Air Quality, Noise and Neighbourhood Amenity				
Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	Yes	<p>During construction works associated with the Proposed Development, standard management controls will be in place to minimise construction impacts from dust, noise, vibration and odours. These standard measures have been included within a Construction Environmental Management Plan (CEMP), which has been prepared and will be submitted in support of the planning application. Measures include, but are not limited to:</p> <ul style="list-style-type: none"> • Measures to minimise noise, dust and vibration levels e.g. the dampening down of hard surfaces will reduce the dispersal of dust generated during construction activities; • The site will be registered to the Considerate Constructors Scheme (CCS) - one of the Applicant's commitments commits all live construction sites registered with CCS to achieve a minimum score of 38 points in each site audit; • Any site person receiving a concern or complaint from adjacent properties or passing pedestrians shall refer the matter immediately to the site manager, who will record the fact and refer the matter to the management team who will subsequently carry out an investigation. • The site will follow best practice measures in accordance with GLA guidance for air quality, which will be agreed with the LBRuT prior to the commencement of demolition and construction works as appropriate; • The prohibition of any unauthorised burning of material on-site; • Use of dust-suppressed tools for all operations; • Ensuring that all construction plant and equipment is maintained in good working order and not left running when not in use; and • Vibration monitoring following British Standard 5228:2009 Part 2. 	= Neutral Effect	Preparation of a CEMP (as a pre-commencement condition)

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
Does the proposal minimise air pollution caused by traffic and energy facilities?	Yes	<p>The air quality assessment report undertaken by WSP has identified that the change in pollutant concentrations attributable to traffic emissions during the operational phase of the Proposed Development (i.e. impacts on local air quality) are negligible and not significant for all pollutants, and therefore, no mitigation is required: the impacts on annual mean NO₂ concentrations at all existing receptors are negligible; and the predicted PM₁₀ and PM_{2.5} concentrations are well below objectives.</p> <p>The Proposed Development is not air quality neutral in terms of transport emissions, as such mitigation will be required to offset the emissions. The following mitigation strategy has been proposed by the Project Transport Consultant:</p> <ul style="list-style-type: none"> • Electric car charging outlets for a minimum of 20% of the parking spaces with the potential to provide 100% (electric vehicle) EV chargers for all the parking spaces at a later stage if required; • The applicant will be providing a contribution to a new car club on Edwin Road; and • Provision of travel plan incentives such as free car club membership for the future residents. 	=Neutral	<ul style="list-style-type: none"> • Electric car charging outlets for a minimum of 20% of the parking spaces with the potential to provide 100% (electric vehicle) EV chargers for all the parking spaces at a later stage if required; • Contribution to a new car club parking space; and • Provision of Residential Travel Plan, to include incentives such as free car club membership for the future residents.
Does the proposal minimise noise pollution caused by traffic and commercial uses?	Yes	<p>The Proposed Development incorporates car parking spaces, as such there will be traffic within the Proposed Development and thus traffic-associated noise as a result of the Proposed Development. The Environmental Noise Assessment prepared by Paragon Acoustic Consultants has identified that the noise levels exceed the target noise levels presented within the baseline section above. The results from the assessment identify that the noise increases in the north of the site, which is in part as a result of the railway to the north of the site.</p> <p>The noise pollution results from rail and aircraft noise, as well as traffic-related noise. Due to the noise climate in the location of the Proposed Development it is predicted that windows will have to remain closed in order to meet with the target internal noise criteria established.</p> <p>The Proposed Development seeks to minimise noise pollution caused by traffic and commercial uses as far as possible.</p> <p>The proposals for Mews Street – a new residential street – and thoroughfares incorporate changes in orientation and paving material types. As such they favour pedestrian and non-vehicular access, with traffic flow infrequent and slow moving. This helps to minimise noise pollution from transport related noise.</p> <p>The surrounding acoustic environment was taken into account in relation to the internal layout of residential units proposed. Where possible bedrooms were</p>	=Neutral	N/A above and beyond that incorporated during the design of the proposed Development

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		<p>located on quieter facades and there are habitable spaces in units which do not overlook the railway line to the north.</p> <p>The Proposed Developments building envelope acoustic performances can in principle be maintained by suitably selected building constructions of the walls, roof, ventilation products and glazing systems.</p> <p>The commercial uses are limited to Building B, adjacent to Edwin Street. The proposals include a small amount of office space, as such it is considered that the commercial uses will not massively enhance noise pollution.</p>		
5. Accessibility and Active Travel				
Does the proposal prioritise and encourage walking (such as through shared spaces?)	Yes	<p>The Proposed Development will provide a wide range of open spaces, including riverside seating, public realm seating, habitat, children's playspace etc.</p> <p>A green corridor has been implemented in the north west corner of the site this will slow down traffic towards the river and creates a 'thoroughfare' which will encourage walking through the site.</p> <p>These shared open spaces encourage walking and outdoor activities.</p>	+ve	N/A
Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	Yes	<p>Houses have secure cycle storage within garages or in external stores. Apartments have dedicated cycle stores within each building in the form of two-tier cycle racks. The Proposed Development will provide a total of 216 residential cycle spaces.</p> <p>3 spaces (in the form of sheffield stands) are provided for short stay visitors within the landscape.</p> <p>The B1 office is provided with a secure external store comprising 8 cycle spaces.</p> <p>Thus, in total, the Proposed Development accommodates a total of 227 cycle spaces.</p>	+ve	N/A
Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	Yes	<p>The new green corridor landscaping space, creating a thoroughfare through the Proposed Development, will connect pedestrians with pavements and, consequently, walking paths.</p> <p>The River Crane, which borders the northern site boundary, is currently the focus of the 'River Crane Restoration Project'. The Proposed Development has considered the opportunity to integrate elements of the restoration strategy into the project design. Small scale improvements are currently being trialled at various locations, which are in the process of being implemented. These improvements include: the provision of a continuous, accessible link between Hounslow Heath and Twickenham Station via a long-distance footpath; the</p>	+ve	N/A

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		<p>introduction of signage and way marking for walking routes around the River Crane to form a network of leisure routes for local residents.</p> <p>These improvements seek to connect the Proposed Development even further to the public realm.</p> <p>There are no local cycle paths in proximity to the site.</p>		
Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	No	The proposals for Mews Street – a new residential street – and thoroughfares favour pedestrian and non-vehicular access, with traffic flow infrequent and slow moving. This has been achieved with changes in orientation and paving material types.	= Neutral Effect	NA
Is the proposal well connected to public transport, local services and facilities?	Yes	<p>The site has been calculated to currently have a PTAL rating of 2 (poor) at Gould Road entrance and 3 (moderate) at Edwin Road. Twickenham rail station is approximately 15 minute walk east of the site and Whitton rail station is approximately 20 minute walk to the west.</p> <p>There are several bus stops located along The Green (A305). The nearest bus stop is 'GC' which is accessed within a 5 minute walk located along The Green (A305) which is serviced by 26 buses per hour in each direction. This bus stop is serviced by the 110, 490 and H22 bus services.</p> <p>Thus, the Proposed Development will connect new residents and users of the site with public transport, however the existing PTAL rating is poor, and as such will have a neutral potential impact on the connectivity of the Proposed Development with the local transport network.</p> <p>With regards to accessibility to local conveniences, the closest convenience store to the site is the Sainsburys local located 250m to the south, there is also a Tesco Express Supermarket, located approximately 330m to south east both of which are within a 5-minute walk from the site. Waitrose and Partners is located approximately 930m east of the site and is within a 15-minute walk from the site.</p>	=Neutral	N/A
Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	Yes	<p>The Proposed Development provides 117 car parking spaces, distributed across the site as follows:</p> <ul style="list-style-type: none"> • 115 residential parking space (12 being accessible); • 1 accessible commercial parking space; and • 1 on-street car club parking space. <p>By providing only 1 commercial space and 1 car club space it encourages the office users to use sustainable and green travel. LBRuT advocates car clubs as an alternative to private motor car, promoting their integration across the council</p>	=Neutral	Implementation of the Residential Travel Plan as a pre-commencement condition

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		<p>website. The new car club bay facilitated by the Proposed Development would not be exclusively for the use of residents at the site and would thus provide a communal benefit for surrounding residential properties. The implementation of the car club bay would be agreed with the Applicant, car club provider and Local Authority as a condition of consent</p> <p>Despite the inclusion of limited commercial spaces and a car club space, these arrangements for the future residents of the site would not significantly restrict travel by private car, due to the quantity of residential car-parking spaces provided.</p> <p>The Residential Travel Plan, prepared for the planning application by WSP, identifies an appropriate package of measures aimed at promoting sustainable travel, with an emphasis on 'promoting alternatives to cars'.</p> <p>The Travel Plan will be a 'living document' requiring monitoring, regular reviews and revisions to ensure it remains relevant to the site and those using the site and provides continuous improvements for its duration. A Sustainable Travel Manager (STM) will be appointed to take responsibility for the site wide management of the plan, and for ensuring its delivery. The STM role for the site will be fulfilled by an appointed consultant or the Estate Management Company.</p> <p>A marketing strategy will be employed with the aim of increasing sustainable travel by the residents of the Proposed Development: a travel pack, detailing information on local public transport options, route maps, and information on nearby amenities and services</p>		
<p>Does the proposal allow people with mobility problems or a disability to access buildings and places?</p>	<p>Yes</p>	<p>Users of the Proposed Development will access and be guided through the building and the site, without discrimination or limitation.</p> <p>All accessible apartments at first floor and above are served by two lifts. These units are designed specifically for ease of use for visually impaired, ambulant disabled and wheelchair bound residents, and provide a balanced mix of unit sizes and tenure.</p> <p>Where residents may wish to use stairs, all staircases have been designed with handrails, to provide support.</p> <p>The layouts of the 'accessible apartments' and mews houses have been designed to be fully Building Regulation compliant and accessible by wheelchair users. This includes but is not limited to, the building's approach, level access, corridor widths, turning circles, passenger lifts, stairs, balustrades and handrails, and refuge points;</p> <p>A well designed car park has been included within the design proposals, which comprises of 10% spaces being disabled access car parking spaces.</p> <p>Surface textures have been considered with both wheelchair users and guide dogs in mind.</p>	<p>+ve</p>	<p>N/A</p>

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		Selected apartments have direct level access to the podium at 1st floor suitable for disabled users.		
6. Crime Reduction and Community Safety				
Does the proposal incorporate elements to help design out crime?	Yes	<p>The Proposed Development will enhance the character of the local area, by providing a new residential road on a currently vacant and disused site. The Proposed Development uses improve the character of the site. The landscaped aspect of the Proposed Development provides open spaces that enhance the sense of 'community'.</p> <p>The external site areas will include lighting throughout the scheme. The proposed lighting highlights the boardwalk and green corridor enhancing them to make the areas welcoming and safer in the evening.</p> <p>The tight urban grain of the new street and those nearby creates a level of comfort and safety when walking down the street, whilst also creating a sense of community.</p> <p>A CCTV system shall be installed at main points of entry to the site and each apartment block.</p>	+ve	N/A
Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	Yes	<p>As above, the Proposed Development will comprise open spaces to enhance the sense of community. Roof terraces and the communal amenity spaces provide open areas that residents can use. Communal areas such as the communal amenity roof space and the external landscaped areas can provide meeting places to help develop the future community.</p> <p>The original design of the Edwin Road frontage included pillars fronting the road. Following a review of the design, it was identified that this added to the sense of a 'gated community'. As such, the design has been revised; the pillars fronting Edwin Street have been removed, and the entrance to the Proposed Development is now more open, and provides a more public sense of space in keeping with the local area. As such the Proposed Development has been designed to avoid the 'gated community' feel, but with secure design measures incorporated (as discussed above), for residents and public users of the space to feel safe and secure when using.</p>	+ve	N/A
Does the proposal include attractive, multi-use public spaces and buildings?	Yes	The Proposed Development does not include provision for any indoor community space, however, roof terraces within Building F provide communal spaces for residents to congregate, adding a sense of 'community' to the Proposed Development. Also, publicly accessible amenity spaces are included as part of the landscaping strategy .	=Neutral	

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
Has engagement and consultation been carried out with the local community?	Yes	<p>Public consultation has occurred throughout the pre-application process and is summarised in the Statement of Community Involvement which is submitted as part of the planning application. This report demonstrates that public consultation has been undertaken and has:</p> <ul style="list-style-type: none"> • Informed local residents, businesses, councillors and other stakeholders about the redevelopment aspirations for the site. • Helped gain a full understanding of local views of the proposal and engaged with the local and wider community; and • Demonstrated how the Applicant has responded to the issues raised by the community and stakeholders. 	+ve	N/A
7. Access to Healthy Food				
Does the proposal facilitate the supply of local food, i.e. allotments, community farms and farmers' markets?	No	There are no plans for any allotments or community farms.	N/A	N/A
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	No	The Proposed Development will not provide any retail uses on site.	N/A	N/A
Does the proposal avoid contributing towards an overconcentration of hot food takeaways in the local area?	Yes	The Proposed Development will not provide any A5 retail (hot food takeaways).	+ve	N/A
8. Access to Work and Training				
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Yes	Based on the Employment Density Guide (3rd Edition, November 2015), a Small Business Workspace for 'Co-Working' would generate a density ration of 10-15 employees per m ² . The Proposed Development would therefore create in the region of 18 full time jobs and would generate local employment. The proposals will provide high quality floorspace more appropriate within the residential environment.	+ve	N/A

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
Does the proposal provide childcare facilities?	Yes	The Proposed Development will not provide any childcare facilities.	-ve	N/A
Does the proposal include managed and affordable workspace for local businesses?	Yes	The office space could be occupied by local business. However, there is no dedicated space within the Proposed Development which provides managed and affordable workspace for local businesses.	=Neutral	N/A
Does the proposal include opportunities for work for local people via local procurement arrangements?	Uncertain	Details regarding staff procurement are not known at this stage	Uncertain	N/A (at present)
9. Social Cohesion and Lifetime Neighbourhoods				
Does the proposal connect with existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	Yes	The landscaping strategy has been designed to accommodate personal and social interaction. Additionally, the change in use from a currently publicly inaccessible site, to facilitating pedestrian movement through the site along the proposed internal road towards the River Crane, encourages social interaction and interaction with nature and open spaces.	+ve	N/A
Does the proposal include a mix of uses and a range of community facilities?	Yes	The Proposed Development includes Use Classes B1 (office space) and C3 (Dwelling house). The Proposed Development includes communal areas, such as the communal amenity roof space in Buildings A and F, which is conducive to communal gatherings and encourages interaction amongst users.	+ve	N/A
Does the proposal provide opportunities for the voluntary and community sectors?	No	The Proposed Development does not provide designated opportunities for the voluntary and community sectors.	N/A	N/A
Does the proposal address the six key components of Lifetime Neighbourhoods?	Yes	The six key components of Lifetime Neighbourhoods ⁷⁸ are: <ul style="list-style-type: none"> • 1) Access; and 2) Services and Amenities The site is located within 5 minutes walking distance of existing Heath Road amenities, bus stops (along Heath Road) and green spaces and is a 15 minute walk from Twickenham station. 12 of the proposed residential units have been identified as Wheelchair units and have been	+ve	N/A

⁷⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		<p>specifically designed for those who are visually impaired, ambulant disabled and wheelchair bound.</p> <ul style="list-style-type: none"> 3) Social Networks / well-being; and 4) Residents Empowerment The Proposed Development includes communal areas, such as the communal amenity roof space in Buildings A and F, which is conducive to communal gatherings and encourages interaction, and the forming of social networks, amongst users. 5) Housing; The Proposed Development provides a range of residential units, with a mix of different unit sizes. The Proposed Development also includes affordable housing as well as market housing. 6) Built and Natural Environments The Proposed Development has a landscaping strategy which reflects the residential nature of the development and has been designed to encourage social and personal interaction. These spaces include the communal roof terraces, landscaped areas, and connectivity to the river frontages along the River Crane. <p>The Proposed Development therefore addresses the six key components of Lifetime Neighbourhoods.</p>		
10. Minimising the use of Resources				
Does the proposal make best use of existing land?	Yes	<p>The Proposed Development provides new residential units and office space on the former Gregg's bakery site. Despite the loss of industrial warehouses on-site, the site is a brownfield site which will be developed so as to be in-keeping with the local surrounding residential area.</p> <p>In addition, the Proposed Development will provide new homes to the residents of LBRuT, including the provision of new affordable homes.</p> <p>The landscaping strategy has been designed to encourage social and personal interaction and connect into the frontage of the River Crane.</p>	+ve	N/A
Does the proposal encourage recycling (including building materials)?	Yes	<p>The Proposed Development will implement a CEMP during the demolition and construction phases. This CEMP will outline construction management measures, including measures specific to waste. The CEMP will be implemented during the demolition and construction works, as a component of the Demolition and Construction Management Plan. This will include the management of wastes in accordance with the Waste Hierarchy. As part of the</p>	+ve	N/A

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		<p>hierarchy, the emphasis is firstly on waste avoidance and minimisation, and subsequently recycling, with landfill the final (and least desirable) option.</p> <p>The demolition and enabling works required prior to commencement of construction, will require the removal of the existing infrastructure and services associated with the former Gregg's bakery.</p> <p>During construction works, waste can arise from a number of activities and actions (such as the over-ordering of materials). This plan will implement a range of measures to manage and minimise the creation of waste, and encourage recycling:</p> <ul style="list-style-type: none"> • There will be no stockpiling of construction materials on site; • Construction materials will be stored appropriately, so as to prevent damage e.g. from adverse weather conditions; and • Construction materials required will be carefully quantified so as to help prevent overordering of materials. <p>Once the Proposed Development is completed and occupied, waste recycling (from operational waste arisings) will be encouraged, via the provision of waste recycling bins. This will be managed by a Refuse, Recycling and Servicing Strategy.</p>		
Does the proposal incorporate sustainable design and construction techniques?	Yes	<p>The Proposed Development will incorporate sustainable design and construction techniques.</p> <p>Both the office and residential elements of the site provide cycle parking which is compliant with local and regional parking standards, and encourages adoption of sustainable and green travel.</p> <p>In line with the above philosophy, the application of low energy lighting and passive improvements to building fabric are proposed.</p> <p>Photovoltaic cells will be installed to the roof of each townhouse, the commercial office building and the apartment block building identified on the site plan below. The provision of photovoltaic cells shown is to ensure the site wide carbon emissions improvement is maximised and the carbon offset payment is limited, whilst ensuring the GLA target is met.</p> <p>The residential apartments will be served by a centralised air source heat pump and condenser water loop connected to individual heat pumps within each apartment providing space heating, hot water generation and tempered cooling. The residential townhouses will be served by standalone air source heat pump systems, to provide space heating and hot water generation. These measures will help minimise energy consumption.</p> <p>The commercial office will be served by a variable refrigerant flow (VRF) system, providing simultaneous space heating and cooling, with mechanical ventilation with heat recovery to provide the fresh air requirements to the building. Hot water will be generated through electric point of use water heaters. LED lighting will</p>	+ve	N/A

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		<p>be installed throughout the building. PV panels will be sized and the quantity selected to contribute to the site wide reduction in carbon dioxide emissions.</p> <p>The Proposed Development has been designed to minimise CO₂ emissions associated with their operational energy consumption.</p> <p>Construction materials will be selected with sustainability in mind, with the aim to efficiently use of natural resources and consider potential environmental impacts.</p>		
11. Climate Change				
Does the proposal incorporate renewable energy?	Yes	The Proposed Development will incorporate renewable energy. PV cells will be provided to the townhouses contributing to the site wide reduction in carbon dioxide emissions of 35%.	+ve	N/A
Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, ie ventilation, shading and landscaping?	Yes	<p>The Proposed Development has been designed with passive energy reduction measures in place, and include thermal insulation, air tightness, maximising daylighting, and passive solar gain.</p> <p>The residential apartments will incorporate a centralised air source heat pump and condenser water loop, connected to individual heat pumps within each apartment. This will provide space heating, hot water generation and tempered cooling. The residential townhouses will include standalone air source heat pump systems, which will provide space heating and hot water generation.</p> <p>The commercial office space will include a variable refrigerant flow system, providing simultaneous space heating and cooling, with mechanical ventilation with heat recovery to provide the fresh air requirements to the building.</p> <p>The design has considered the impacts of varying temperatures and included measures to manage these variations within both the commercial and residential components of the Proposed Development. The inclusion of a green roof will provide some temperature control in the form of reducing the urban heat island effect.</p> <p>The Proposed Development provides new trees, the trees to be planted will allow light to penetrate and will not create extensive shadow.</p>	+ve	N/A
Does the proposal maintain or enhance biodiversity?	Yes	<p>The planting strategy will consist of shrubs, perennials and grass areas. This vegetation will provide a food source for bats and potential roosting habitat.</p> <p>The plant palette is designed with consideration of biodiversity. The species chosen will benefit bats by providing either a food source for insects or roost potential. Additionally, bat and bird boxes, as well as invertebrate hotels will be provided in the larger mature trees proposed adjacent to residential buildings.</p> <p>Additionally, a green roof on Building A has been included within the design. This will provide storm water management and create a habitat for wildlife.</p>	+ve	Delivery of mitigation measures secured through a CEMP (as a pre-commencement condition) and Landscape and Ecology Management Plan (pre—commencement condition).

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Measures
		Considering the current use of the site, and lack of soft landscaping features within the former Gregg's bakery, the proposed landscaping measures will provide an improvement upon the existing situation.		
Does the proposal incorporate sustainable urban drainage techniques?	Yes	<p>The Proposed Development includes Sustainable Urban Drainage Systems (SUDS), in conjunction with Policy SC1, the London Plan drainage hierarchy. This will reduce surface water runoff rates.</p> <p>Permeable paving and surfaces can be seen in the SuDs strategy diagram. A total of 0.22ha of permeable surface is proposed across the ground floor as well as water retention on the first and third floor terraces.</p> <p>The green roof is neighbouring the terrace on the first floor. The green roof will provide storm water management, create a habitat for wildlife.</p>	+ve	N/A

6. Conclusions

6.1 This Rapid HIA has been prepared in line with relevant legislation, policy and guidance. A baseline review has identified information relating to the following 11 key determinants of health:

1. Housing Quality and Design;
2. Access to Healthcare Services and other Social Infrastructure;
3. Access to Open Space and Nature;
4. Air Quality, Noise and Neighborhood Amenity;
5. Accessibility and Active Travel;
6. Crime Reduction and Community Safety;
7. Access to Healthy Food;
8. Access to Work and Training;
9. Social Cohesion and Lifetime Neighborhoods;
10. Minimising the Use of Resources; and
11. Climate Change.

6.2 The health impacts relating to the above 11 health determinants have been assessed against the Proposed Development, in the context of the site location, using the 'HUDU Rapid Health Impact Assessment Matrix'. Impacts on the future residents of the Proposed Development, and the local community, have been identified and are detailed in the Assessment Matrix in Section 5 of this HIA.

6.3 The primary health benefits identified, include but are not limited to:

- The new commercial building, offering new employment opportunities (approximately 18 full-time jobs) to the site;
- The new residential units that will be available (37% of which (by habitable room) will be affordable) that comprise a range of housing types, sizes and tenure mixes;
- Well-designed accessible spaces within the Proposed Development, that cater for the needs of the disabled and elderly, as well as for the able-bodied;
- A comprehensive landscaping strategy, including private gardens to the mews houses, some private and some communal spaces for the residential apartments, streetscaped public realm areas, play space areas etc. The public realm spaces will be varied in use and will include spaces for play, relaxing, outdoor seating and leisure pursuits. Access to the River Crane will be available. The outdoor spaces will have a positive impact on health and wellbeing;
- Improvement of the current brownfield site, to provide a more cohesive space to the new and existing communities. Lighting will be embedded within the landscape throughout the Proposed Development. The proposed lighting highlights the boardwalk and green corridor enhancing them making them more welcoming and safer in the evening. The public realm has a good level of surveillance from the proposed residential, this will include site wide, a CCTV system installed at main points of entry to the site and each apartment block to enhance safety. Thus providing a safe environment for future residents of the site, and existing members of the local community;
- In total, the Proposed Development accommodates a total of 227 cycle spaces, promoting cycling for future residents and users of the Proposed Development; and
- The jobs that will be created during the construction phase, and when the Proposed Development is complete and occupied.

- 6.4** The main health impacts requiring mitigation to offset adverse effects are associated with the carparking provision and the finding that the Proposed Development is not air quality neutral in terms of traffic emissions.
- 6.5** A number of mitigation measures have been developed, with the aim of both promoting sustainable travel whilst concurrently reducing traffic related air quality emissions, these include: EV charging for a minimum of 20% of parking spaces will be provided within the Proposed Development from opening day, with the potential to convert the remaining spaces to provide EV chargers at a later date, if required; a new car club parking space will be provided on Edwin Road; and a Residential Travel Plan has been prepared, which has the aim of promoting sustainable travel for the residents of the Proposed Development. This plan includes a number of measures for promoting sustainable travel, including the employment of a marketing strategy for future residents. This plan should be secured via a pre-commencement planning condition, and monitored regularly.

Appendix A Policy and Legislation Summary

The Localism Act 2011

1. The Localism Act 2011 is an Act to “make provision about the functions and procedures of local and certain other authorities; to make provision about the functions of the Commission for Local Administration in England; to enable the recovery of financial sanctions imposed by the Court of Justice of the European Union on the United Kingdom from local and public authorities; to make provision about local government finance; to make provision about town and country planning, the Community Infrastructure Levy and the authorisation of nationally significant infrastructure projects; to make provision about social and other housing; to make provision about regeneration in London; and for connected purposes.”
2. In short, the Act enshrines the ‘neighbourhood plan’, a new layer of development plan. Neighbourhood Development Plans are initiated by communities and become part of the Local Plan and the policies contained within them are then used in the determination of planning applications. Neighbourhood Development Orders and Community Right to Build Orders allow communities to grant planning permission either in full or in outline for the types of development they want to see in their areas.

Health and Social Care Act 2012

3. “An Act to establish and make provision about a National Health Service Commissioning Board and clinical commissioning groups and to make other provision about the National Health Service in England; to make provision about public health in the United Kingdom; to make provision about regulating health and adult social care services; to make provision about public involvement in health and social care matters, scrutiny of health matters by local authorities and co-operation between local authorities and commissioners of health care services; to make provision about regulating health and social care workers; to establish and make provision about a National Institute for Health and Care Excellence; to establish and make provision about a Health and Social Care Information Centre and to make other provision about information relating to health or social care matters; to abolish certain public bodies involved in health or social care; to make other provision about health care; and for connected purposes.”
4. The Health and Social Care Act 2012 was introduced following the Health and Social Care Bill 2011 . The Act was established in order to promote and improve the NHS.

National Planning Policy Framework (2019)

5. The National Planning Policy Framework (NPPF), which was adopted in February 2019, sets out the Government’s planning policies for England and how these are expected to be applied. The NPPF provides a framework for which local people and their respective councils can produce their own local and neighbourhood plans, which are relevant to the needs and priorities of their communities.
6. The achievement of sustainable development is a key theme within the NPPF, and the three key themes to sustainable development (economics, social and environmental) are present throughout the NPPF. The NPPF states that the following objectives are required from the planning system when considering the social dimension of sustainable development: “...to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”.
7. Section 8 of the NPPF revolves around ‘Promoting Healthy and Safe Communities’. This section of the NPPF states that:

“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighborhoods and active street frontages;
- are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas; and
- enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

Planning Practice Guidance (2014)

Health and Wellbeing

8. The Planning Practice Guidance (PPG) is an online resource which collates planning guidance on various topics into one place. The PPG was launched in March 2014.
9. Of relevance to Health and Wellbeing (updated 2017), the PPG 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...”
10. The PPG provides guidance on a range of health and wellbeing issues, including: the links between health and planning, and how to effectively incorporate these into local plans, development proposals etc.; how planning can help create a healthier food environment; who the main health organisations are that a local authority should contact; how the health and well-being and health infrastructure should be considered in planning decision making; and what a healthy community is.

The London Plan – The Spatial Development Strategy for London, Consolidated with Alterations Since 2011

11. The London Plan was updated in March 2016 from the previous 2011 London Plan. The London Plan is the strategic plan for London with sets out the framework for the development of London over the next 20-25 years. Health and wellbeing is a constant theme throughout the London Plan. Policies of specific relevance to health and wellbeing include:

‘Policy 3.1 Ensuring equal life chances for all’

12. This policy aims to strengthen the already existing diversity of London, and to ensure that Londoners from all backgrounds have equal opportunities in life. The key means to achieving this aim include: includes helping people, groups or communities to find common grounds on how they can develop and sustain cohesive communities; making London more ‘age-friendly’; and understanding the key barriers to success, and individuals reaching their potential, so as to tackle these issues.

‘Policy 3.2 Improving Health and Addressing Health Inequalities’

13. This policy details that the Mayor will work in conjunction with the NHS in London, boroughs and the community and voluntary centre to improve health and reduce health inequalities. Part D of the policy states that “*New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.*”

'Policy 7.1 Lifetime Neighbourhoods'

14. As stated in Paragraph 7.4A of this policy of the London Plan:

“Three principles have been developed to help frame the concept of lifetime neighbourhoods as places where people at all stages of their lives:

- can get around – neighbourhoods which are well-connected and walkable;
- as far as possible, can have a choice of homes, accessible infrastructure and services, places to spend time and to work, with a mix of accessible and adaptable uses; and
- belong to a cohesive community which fosters diversity, social interaction and social capital.”

15. This policy advises that development should be designed with social and community infrastructure in mind, and that development should help reinforce or enhance the character, legibility permeability of the neighbourhood.

16. This policies in Chapter 7 of The London Plan provide the context within which the targets set out in other chapters of the Plan should be met.

17. Other London Plan policies relevant to the HIA include, but are not limited to: ‘Policy 3.5 Quality and Design of Housing Development’; ‘Policy 3.9 Mixed and Balanced Communities’; ‘Policy 3.16 Protection and Enhancement of Social Infrastructure’; ‘Policy 4.12 Improving Opportunities for All’; and ‘Policy 7.2 An Inclusive Environment’.

The Draft New London Plan – The Spatial Development Strategy for Greater London, Draft for Public Consultation December 2017

18. The Draft New London Plan was published for consultation in December 2017. The Examination in Public (EiP) commenced on 15 January 2019. The final Plan will take account of the comments received during the consultation process and the recommendations of the panel that conduct the Examination in Public. It is anticipated that the plan will be published and adopted in 2019. As the Plan is due to be adopted this year, the HIA has given weight to the draft policies outlined within the Plan. The key ones of which are outlined below.

Policy GG1 Building strong and inclusive communities

19. This policy puts onus on those involved in planning and development to seek to ensure that London continues to generate a wide range of economic and other opportunities that everyone is able to benefit from, as well as ensuring that good quality services, public places and open space, buildings and streets are designed well, to promote and build strong and inclusive communities.

Policy GG3 Creating a healthy city

20. This policy states that “To improve Londoners’ health and reduce health inequalities, those involved in planning and development must:

- A) Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way ...;
- B) Promote more active and healthy lifestyles for all Londoners...;
- C) Use the Healthy Streets Approach to prioritise health in all planning decisions;
- D) Assess the potential impacts of development proposals on the health and wellbeing of communities ...for example through the use of Health Impact Assessments;
- E) Plan for improved access to green spaces and the provision of new green infrastructure;

F) Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.

G) Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.”

Fair Society, Healthy Lives (the Marmot Review) (2010)

21. The Marmot Review, published in 2010, was undertaken by Prof. Sir Michael Marmot in 2008. The Review is an independent review aimed at proposing the most cost-effective evidence-based strategies for reducing health inequalities in England. The Review had four main tasks:

- *“Identify, for the health inequalities challenge facing England, the evidence most relevant to underpinning future policy and action*
- *Show how this evidence could be translated into practice*
- *Advise on possible objectives and measures, building on the experience of the current PSA target on infant mortality and life expectancy*
- *Publish a report of the Review’s work that will contribute to the development of a post- 2010 health inequalities strategy”*

22. The review states that reducing health inequalities will require action on six policy objectives:

- “Give every child the best start in life
- Enable all children young people and adults to maximise their capabilities and have control over their lives
- Create fair employment and good work for all
- Ensure healthy standard of living for all
- Create and develop healthy and sustainable places and communities
- Strengthen the role and impact of ill health prevention”

Healthy Lives, Healthy People: Our strategy for Public Health in England (2010)

23. This document focuses on public health in England, with regard to its current state, and the commitment to protecting the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest.

24. This document was produced in response to The Marmot Review, and adopts its framework for tackling the wider social determinants of health.

25. As stated in paragraph 7 of the document, “...People living in the poorest areas will, on average, die 7 years earlier than people living in richer areas and spend up to 17 more years living with poor health. They have higher rates of mental illness; of harm from alcohol, drugs and smoking; and of childhood emotional and behavioural problems. Although infectious diseases now account for only 1 in 50 deaths, rates of tuberculosis and sexually transmitted infections (STIs) are rising and pandemic flu is still a threat.”

Adult Joint Strategic Needs Assessment (JSNA) for Richmond upon Thames

26. The JSNA is a continual process of pulling together a wide range of information about the health and social care needs of people in Richmond upon Thames. JSNA projects focus on individual topics, such as particular health problems (e.g. diabetes), unhealthy lifestyles (e.g. smoking) specific communities or groups (e.g. mothers or older people), and treatments or services (e.g. maternity care).

27. The findings of JSNA work are published online through ‘The Richmond Story’, which summarises JSNA findings, newsletters, newflashes, and needs assessment reports.

28. The JSNA provides key information as a basis for the improvement of existing services and planning

of future services, with the ultimate aim of improving health and wellbeing of people in the LBRuT.

29. Needs assessment themes and topics currently available include: 'staying healthy'; 'health conditions'; 'groups & communities'; and the 'wider determinants of health'.

London Borough of Richmond upon Thames Joint Health and Wellbeing Strategy 2016-2021 (2016)

30. The LBRuT's Joint Health and Wellbeing Strategy aims to build on the achievements and aspirations of Richmond's Health and Wellbeing Board. The Strategy is split into various chapters with carefully selected actions, which will be reviewed on an annual basis: 'Start Well', which recognises what happens in early life; 'Live Well', which tackles the four main unhealthy behaviours of smoking, overconsumption of alcohol, poor diet and lack of physical activity, and poor emotional and mental wellbeing; and 'Age Well', which recognises the disparity between the number of people in the borough living longer with a diminished quality of life.

London Borough of Richmond upon Thames Local Plan July 2018 (2018)

31. The Local Plan was adopted by the LBRuT on 3 July 2018. The Council's Local Plan sets the policies and guidance for the development of the LBRuT up to 2033, and identifies where the main developments will take place, and how places within the borough will change, or be protected from change.
32. The policies set out in the Local Plan follow the approach of the presumption in favour of sustainable development and show how it is expressed locally. The Plan states that the Council will ensure that planning applications that accord with policies in the adopted Local Plan and the London Plan will be approved without delay, unless material considerations indicate otherwise.
33. The Local Plan has three inter-related themes of 'Protecting Local Character', 'A Sustainable Future' and 'Meeting People's Needs'. These three themes form the basis of the Local Plan Strategic Vision, which describes what the borough will be like in 2033.
34. With regards to the 'Protecting Local Character' theme, the Plan discusses that it has the aim of the LBRuT being the best place in London to live as a result of the quality of the built environment which considers the health of the local environment. With regards to 'Meeting People's Needs', the Plan states the following key objective: *"Encourage the creation of healthy environments and support healthy and active lifestyles, including through measures to reduce health inequalities. This includes ensuring there is an appropriate range of health facilities that meet local needs, and tackling childhood obesity by restricting access to unhealthy foods, particularly fast food takeaways, in proximity to schools."*
35. Policy LP30 Health and Wellbeing of the Local Plan discusses that for all major developments, a Health Impact Assessment must be submitted.
36. Policy LP 44 in 11.1 'Sustainable Travel Choices' promotes active travel such as cycling and walking, including easy access to public transport. Policy LP 1 in 4.1 'Local Character and Design Quality' ensures that walking and the public realm should be designed to be safe and accessible for all ages and levels of disabilities.
37. The plan discusses that housing development should consider the needs of the older population. Opportunities to enable older people to downsize is recognised in policy LP 35 in 9.2 'Housing Mix and Standards', along with higher standards for inclusive access, and new accommodation should meet identified local needs as set out in policy LP 37 in 9.4 'Housing Needs of Different Groups'

Trium Environmental Consulting LLP
69-85 Tabernacle Street
London
EC2A 4BD
+44 (0) 20 3887 7118
hello@triumenv.co.uk
www.triumenvironmental.co.uk

Project Reference: TEC0082

