

Portsmouth Local Plan 2038

Health and Wellbeing



BACKGROUND PAPER

2021

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1. Introduction

- 1.1 This background paper has been prepared to support the Portsmouth Local Plan (2039) and should be read alongside the Joint Strategic Needs Assessment (JSNA)¹. Rather than replicate the content of the JSNA, the purpose of this background paper is to consider how the Local Plan can be used as a tool to address the health challenges it identifies.
- 1.2 The paper focuses on the needs of Portsmouth's residents with regards to physical health and mental wellbeing as opposed to clinical health. The demand for clinical health facilities and services such as GP practices, health centres, dentists, hospitals and ambulance provision will be addressed through the Infrastructure Delivery Plan, which is currently being prepared in consultation with health service providers and other key parties. Public health on the other hand takes a population level approach to improving health, preventing disease and tackling health inequalities².
- 1.3 After setting out the context for planning for health, the paper goes onto discuss key themes that the Local Plan will need to address, including healthy homes, active travel, clean air, transport and accessibility, social infrastructure and healthy environments. The last section of the paper will set out the Council's approach to considering these matters within policy development through application of a Health Impact Assessment (HIA). This will include the considerations of the HIA and process followed.

¹ Joint Strategic Needs Assessment webpage: <https://www.portsmouth.gov.uk/ext/health-and-care/health/joint-strategic-needs-assessment>

² NHS England define the term health inequality as: unfair and avoidable differences in health across the population, and between different groups within society. Health inequalities arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and how we think, feel and act, and this shapes our mental health, physical health and wellbeing.

2. Policy and Guidance

2.1 National policy and guidance

National Planning Policy Framework

- 2.1.1 Paragraph 8 of the National Planning Policy Framework (NPPF) discusses the three dimensions of sustainable development and the roles that the planning system plays to achieve this; an economic role, a social role and an environmental role. The social role is said to support strong, vibrant and healthy communities with development that reflects the community's needs and supports its health, social and cultural well-being. However, the social role should not be undertaken in isolation, but should be sought alongside the economic and environmental roles.
- 2.1.2 Section 8 of the NPPF discusses the role of planning policies and decisions in promoting healthy and safe communities. Paragraphs 91 and 92 require that policies and decisions address identified local health needs, and that local health and wellbeing strategies are taken into account.
- 2.1.3 As well as the explicit links between health and planning, the NPPF also requires consideration of a number of wider factors which are known to impact on health. The importance of access to high quality open space and opportunities for sport and recreation are discussed in paragraphs 96 to 101. The NPPF identifies the role such facilities play in contributing to the health and well-being of communities and as such Local Plans are required to protect and provide for open space, sport and recreation facilities.
- 2.1.4 Paragraph 104 requires that planning policies should provide for high quality walking and cycling networks and supporting facilities, whilst paragraph 181 discusses the importance of improving air quality and mitigating impacts from bad air quality through means such as traffic and travel management, and green infrastructure provision and enhancement.
- 2.1.5 Section 12 of the framework discusses the importance of achieving well-designed places. In particular the Framework encourages the use of tools to assess and improve design and gives specific reference to 'Building for Life' principles.

Planning Practice Guidance

- 2.1.6 Policy provided by the NPPF is expanded upon by Planning Practice Guidance (PPG) which notes that local planning authorities should ensure that health, wellbeing and health infrastructure are considered in local and neighbourhood plans and in planning decision making. The guidance goes on to discuss the links between built and natural environments as determinants of health and wellbeing. Planning should aim to promote

healthy communities which are places that are good to grow up and grow old in, through support of healthy behaviours and reductions in health inequalities³.

- 2.1.7 The PPG on Health and Wellbeing discusses a range of issues and solutions that could be considered through the plan-making and decision-making process, in respect of health and healthcare infrastructure. These include achieving healthy and inclusive communities, healthy food environments, and supporting safe communities to promote reductions in health inequality.
- 2.1.8 The PPG has been revised to encourage Local planning authorities and planning applicants to have regard to the ways in which planning can influence the built environment to improve health and wellbeing. For example, with respect to reducing obesity and excess weight in local communities, paragraph 004 of the PPG on Health and Wellbeing suggests ways in which the proliferation of uses detrimental to health could be addressed, including restricting growth of new fast food outlets.

Health and Social Care Act 2012

- 2.1.9 The Health and Social Care Act 2012 brought about the most wide-ranging reforms to the NHS since it was founded in 1948. Under the Act, Portsmouth City Council as an upper tier local authority assumed the duty to improve public health and reduce health inequalities, principally led by the Public Health Team. This shift in responsibilities towards local authorities recognised that together with public health, local authorities have powers to shape the environments in which people live; a key determinant of health outcomes.

The Portsmouth City Council Public Health Team aim to:

- prevent ill-health and prolong life, through a coordinated effort with partners both inside and outside the council
- increase healthy life expectancy for our population, with a focus on improving the health for poorest fastest.

- 2.1.10 With the introduction of the Act, local authorities have responsibility for planning, design, commissioning and delivery of services responding to a wide range of health needs and priorities. Portsmouth City Council's (PCC) Wellbeing Service provides a universal service to support quitting smoking, achieving a healthy weight and consuming alcohol within safe limits. Public Health also commission local sexual health services, substance misuse

³ Online National Planning Practice Guidance *Health and Wellbeing*
<https://www.gov.uk/guidance/health-and-wellbeing>

services and NHS health checks. These Locally Commissioned Services support the joint vision for everyone in Portsmouth to be enabled to live healthy and independent lives. They are preventative services which aim to help Local Authorities and Clinical Commissioning Groups avoid the need for high cost primary care and reduce demand on secondary and tertiary care.

- 2.1.11 Health and Wellbeing boards were established under the Health and Social Care Act 2012 to act as a forum in which key leaders from the local health and care system could work together to improve the health and wellbeing of their local population. They have a statutory duty, with clinical commissioning groups (CCGs), to produce a [joint strategic needs assessment](#) and a joint health and wellbeing [strategy](#) for their local population.

2.2 Regional policy and guidance

Portsmouth Health and Wellbeing Strategy 2018- 2021

- 2.2.1 The Council has a Health and Wellbeing Strategy⁴ which identifies priorities for the Council based on evidence with the overriding aim to reduce health inequalities by improving outcomes for those in the worst position fastest.
- 2.2.2 The Strategy draws links between health and wellbeing and wider social, cultural, socio-economic, environmental and lifestyle factors, noting that improving health and wellbeing is key to unlocking the potential of the city and securing prosperity. The overarching vision of improving healthy life expectancy and reducing inequality is addressed through four themes:
- Support physical good health
 - Support social, emotional and mental health
 - Make improvements for marginalised groups fastest
 - Improve access to health and social care support in the community
- 2.2.3 Work on the next iteration of the strategy is due to commence shortly and updates will be published on the Council's website.

Health and Wellbeing in the Local Plan

- 2.2.4 The adopted Portsmouth Plan contains policy PCS14 'A Healthy City', which addresses the role that the environment in which people live plays on health and wellbeing outcomes. The supporting text lists a number of ways in which the Portsmouth Plan can contribute towards improving health and summarises some of the key health and wellbeing issues that the city faces.

⁴ Portsmouth City Council (2018), *Health and Wellbeing Strategy*
<https://www.portsmouth.gov.uk/services/health-and-care/health/joint-strategic-needs-assessment/>

2.2.5 The overarching aim of policy PCS14, which has been reproduced in Figure 5, is to create a healthy city, and in doing so improve the health and wellbeing of Portsmouth's residents.

Figure 2.1: Extract from Policy PCS14 of the Portsmouth Plan⁵

PCS14 A Healthy City
<p>The council will work to create a healthy city and improve the health and wellbeing of its residents by:</p> <ul style="list-style-type: none">• Working with partners to tackle health inequalities within the city and reduce the gap in life expectancy between the lowest (Charles Dickens (73.9 years)) and the highest (Drayton & Farlington (80.7 years)) wards;• Reducing obesity levels in the city and improving physical and mental health by increasing the opportunities for formal and informal exercise through providing open play space, recreation and sport and leisure facilities and making it easier to walk and cycle in Portsmouth;• Working with partners to promote healthy lifestyle choices;• Improving air quality in the city through implementing the councils Air Quality and Air Pollution SPD and Air Quality Action Plan;• Improving access by public transport to Queen Alexandra Hospital and ensuring new healthcare facilities are easily accessible by all transport modes;• Maintaining a good distribution of healthcare facilities across the city including allocating sites when necessary;• Supporting appropriate proposals for new or improvements to existing healthcare facilities including the community hospital at St Mary's, the provision of a surgery in Cosham and a new GP surgery in the Hilsea/ Copnor area;• Requesting Health Impact Assessments from major new development proposals.

⁵ Portsmouth City Council (2012) *The Portsmouth Plan: Portsmouth's Core Strategy*

3. Planning and Public Health

3.1 Links between public health and planning

- 3.1.1 There have been long established links between planning and public health. In the 19th century, cities were characterised by poor quality slum housing, which saw people living in overcrowded conditions that provided poor quality of living. Outbreaks of disease were common and life expectancy was low. The government passed a number of laws aimed at improving public health and improving the living and working environment for people. The health and well-being challenges faced by society today are no less intricate, with increasing incidences of mortality related to inactivity, obesogenic food environments, poor air quality, limited access to greenspace and climate change.
- 3.1.2 It is increasingly understood that the causes of poor health do not arise by chance and cannot be explained by genetics alone. Barton and Grant (2006)⁶ building on work by Whitehead and Dahlgren (1991)⁷ created a 'health map' which aims to aid understanding of the interactions and relationships between people, their quality of life and their local and global environment (Figure 3.1). The model provides a useful framework for considering the wider impacts of development as well as framing the wider determinants of health.

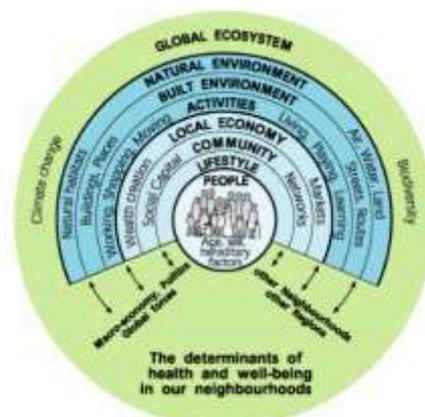


Figure 3.1: A health map for the human habitat⁶

- 3.1.3 Furthermore, health is not consistent across the population and there are often stark inequalities which can occur across the health profiles of population groups even over small areas. Such health inequalities are often linked with a variety of characteristics in a population including, but not limited to, socio-economic status and deprivation; protected characteristic like race, age or sex; vulnerable groups like migrants, rough sleepers and the homeless; as well as local geography (rural, urban or coastal). The evidence

⁶ Barton. H and Grant. M (2006) A Health Map for the Local Human Habitat, *Journal for the Royal Society for the Promotion of Public Health*, 126 (6)

⁷ Whitehead. M and Dahlgren. C (1991) What Can We Do About Inequalities in Health, *The Lancet*, 338.

suggests that those living in the most deprived areas are those who face the worst health inequalities.

3.1.4 It is now recognised that the built environment can have a significant impact on health and health inequality. As Figure 3.1 highlights, it encompasses many of the wider determinants on health and wellbeing such as peoples' activities, communities, economies and lifestyles. Expanding on this, in 2014 the Planning Healthy Weight Environments project, led by the Town and Country Planning Association and supported by Public Health England, developed 'Six Healthy Weight Environment elements'. These six elements illustrate a range of interventions for new development, or existing communities that can help to create environments to support healthier lifestyles through how a place is designed and what it provides.

3.1.5 The six elements are summarised as: Movement and access; Open spaces, play and recreation; Healthy food; Neighbourhood spaces and social infrastructure; Buildings; and Local economy. Figure 3.2⁸ below details the components of the six elements of healthy weight environments. As shown in the diagram many of the elements of healthy weight environments are beneficial for wider elements of health and wellbeing, in addition to tackling excess weight.



Figure 3.2: Six elements of healthy weight environments

3.1.6 The Marmot report of 2010 “Fair Society, Healthy Lives”⁹ stated that there must be prioritisation of policies that both reduce health inequalities and mitigate climate by improving active travel across the social gradient,

⁸ Ross, A and Change, M (2014), *Planning Healthy Weight Environments*, Town and Country Planning Association

⁹ Fair Society, Healthy Lives. URL: <https://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>

improving the availability of good quality open and free spaces across the social gradient, improving the food environment in local areas across the social gradient and improving energy efficiency of housing across the social gradient. It is also suggested that planning, transport, housing, environmental and health systems should be fully integrated to address the social determinants of health in each locality. Ten years on from that review, an update was published in 2020 by the Institute of Health Equity¹⁰ which highlighted a sobering picture for health equity in England, including a stalling in improvements to life expectancy, an increasing health gap between the wealthiest and poorest parts of the country, and that people are spending more of their lives in poor health. It highlighted that the original recommendations made in 2010 are still relevant, and increasingly so in many cases.

- 3.1.7 The NHS London Healthy Urban Development Unit has developed a Healthy Urban Planning Checklist¹¹ which is broken down into four themes covering the areas that planning influences and that can be used for assessing the possible health impact of development proposals.
- 3.1.8 Consideration has also been given to how specific elements of the built environment can impact on health and wellbeing. Public Health England has produced guidance on how principles of 'healthy high streets'¹² can be applied to create healthy places in an urban setting. The guidance notes that air and noise pollution, perceptions of safety and social factors that affect states of mind can lead to loss of quality of life and poorer health outcomes. Healthy Streets also have numerous co-benefits for physical health, mental health and social cohesion. The application of the principles of healthy high streets can be expanded beyond high streets, as many of the issues that the principles seek to address are seen in a range of settings within urban areas. For example Transport for London use the Healthy Streets Approach as a tool to assess how inclusive a street is and how much people choose to walk, cycle and use public transport.

¹⁰ <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

¹¹ London Healthy Urban Development Unit (2017) *Healthy Urban Planning Checklist- third edition*, <https://www.healthyurbandevlopment.nhs.uk/wp-content/uploads/2017/05/Healthy-Urban-Planning-Checklist-3rd-edition-April-2017.pdf>

¹² Public Health England (2018), *Healthy High Streets: Good place-making in an urban setting*, <https://www.gov.uk/government/publications/healthy-high-streets-good-place-making-in-an-urban-setting>

4. A Picture of Health and Wellbeing in Portsmouth

4.1 Public health data sources

- 4.1.1 The context for this paper relies on a variety of data sources for topics relating to public health. There are two key sources in particular which offer valuable insights for planning for health.
- 4.1.2 The *Joint Strategic Needs Assessment*¹³ (JSNA) has been formulated by the Council and provides information on the health and wellbeing in the city. The JSNA process provides a comprehensive picture of the needs of the local population and is used to inform commissioning of health, wellbeing and social care services to reduce health inequalities and achieve better health outcomes. As such, the findings of the JSNA are used to directly inform the *Portsmouth Health and Wellbeing Strategy* as well as strategic plans developed by other bodies such as the *Safer Portsmouth Partnership* and *Children's Trust Board*. The most recent full JSNA was completed in 2016 though there have been more recent updates to certain sections. Work on a new online JSNA continues with the aim for completion in 2021 and this paper will be updated as and when this is complete. Updates can also be found on the website.
- 4.1.3 The findings of the JSNA have been supplemented by information from the Public Health England local authority health profiles¹⁴. These are an online resource that is updated regularly with data collated from a variety of sources on various health matters. The profiles are updated regularly and help to ensure that the most up-to-date health data for the city's inhabitants is utilised in the work underpinning the Local Plan.

4.2 Key health and wellbeing issues for Portsmouth

- 4.2.1 Each year a snapshot of the health and wellbeing is provided by the Joint Strategic Needs Assessment (JSNA) which is informed by Public Health England's local authority health profiles. The data published at the end of 2019 identified numerous areas in Portsmouth which are significantly worse than the England average:
- Smoking prevalence in adults and smoking related deaths
 - Percentage smoking during pregnancy
 - Excess weight in adults
 - Hospital stays for self-harm
 - Male life expectancy at birth
 - Female life expectancy at birth
 - Numbers killed and seriously injured on roads

¹³ Portsmouth City Council, NHS Portsmouth Clinical Commissioning Group, Joint Strategic Needs Assessment <https://www.portsmouth.gov.uk/services/health-and-care/health/joint-strategic-needs-assessment/>

¹⁴ Public Health England (2019), *Health Profiles* <https://fingertips.phe.org.uk/profile/health-profiles>

- Suicide rate
- Premature deaths from cardiovascular diseases
- Premature deaths from cancers
- Percentage of children in low income families
- New STI diagnoses rate

4.2.2 Of those listed above, the health issues in Table 4.1 are considered to be most directly related to the built environment, and can be improved through good planning and design.

Table 4.1: Key health issues with a relationship to the design of the built environment (from Public Health England local authority profiles which summarise data from a variety of sources).

Health issue and date of most recent data	England average	Portsmouth average	Planning mechanism(s) for improvement
Excess weight in adults (2018-19)	62.3% of adults overweight or obese	66.5% of adults overweight or obese	Physical activity through active travel and open spaces
Numbers killed and seriously injured on roads (2015-2017)	40.8 persons per 100,000 population	51.9 persons per 100,000 population	Signage, reduced speed limits, road layout, active travel
Premature (under 75) deaths from cardiovascular diseases (2016-2018)	71.7 per 100,000 population	85.1 per 100,000 population	Improved air quality; physical activity; reduced social isolation
Premature (under 75) deaths from cancers (2016-2018)	132.3 per 100,000 population	151.1 per 100,000 population	Improved air quality; physical activity
Fuel Poverty (2018)	10.8% of population	10.3% of population	Improved thermal insulation, greater use of domestic renewable technology
Utilisation of outdoor space for exercise/health (2015-16)	17.9% of population	16.2% of the population	Improved access to open space, improved connections between spaces

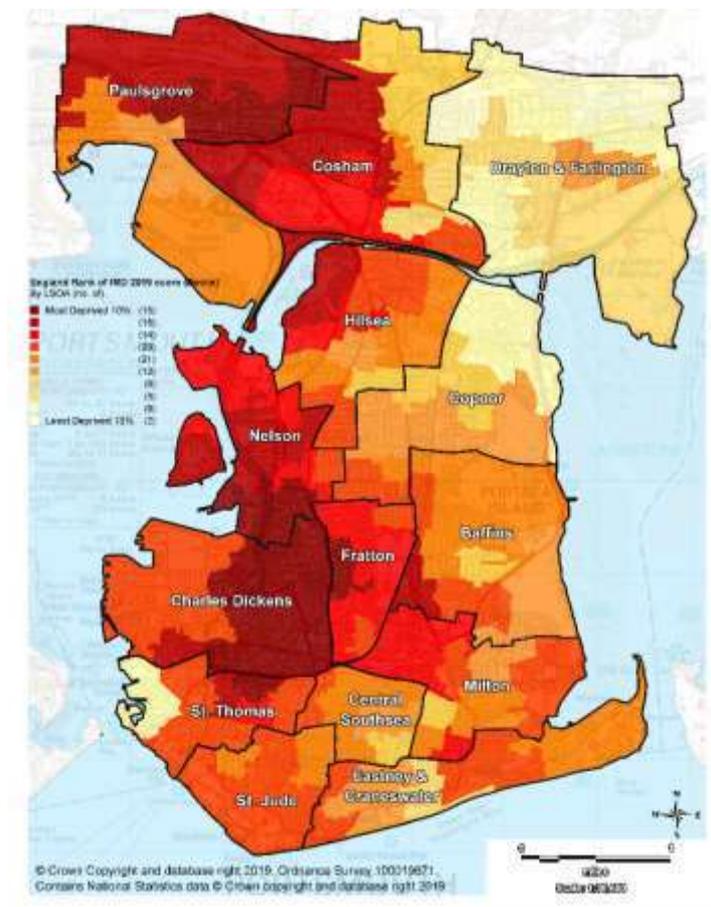
4.2.3 Despite the recent data identifying these specific areas for concern, generally people in Portsmouth have reported to have good levels of health. The 2011 Census asked people to assess whether their current health was very good, good, fair, bad or very bad. 5.0% of people in Portsmouth reported their health to be bad or very bad, this compared to 5.5% across England. However, despite Portsmouth as a whole self-reporting to be in better health than the England average, there are clear health inequalities¹⁵ when looking at the neighbourhood scale within the city leading to a more complex picture. 8.3% of residents in Charles Dickens ward described their health as bad or

¹⁵ Health inequality can be defined as the avoidable and often unfair differences in health across a population arising from differences in the conditions in which we are born, grow, live, work and age. More information can be found here: <https://www.england.nhs.uk/ltphimenu/definitions-for-health-inequalities/>

very bad for example, whereas only 3.4% of residents in Central Southsea described their health in the same way.

- 4.2.4 The picture of inequalities in health and wellbeing outcomes in Portsmouth is visible through a number of published data. It can also be seen to have a relationship with other socio-economic indicators such as the Index of Multiple Deprivation (IMD). The IMD is a standardised measure of inequality mapped for the entire country, it incorporates 37 metrics, including health related data, to give a measure of overall deprivation experienced by people living in a particular area.
- 4.2.5 The most recent IMD data has been mapped in Figure 4.1. In Portsmouth it shows that there are a couple of clear pockets of deprivation which score within the top 10% most deprived areas in the country. These are located around the city centre, as well as around Paulsgrove on the mainland.

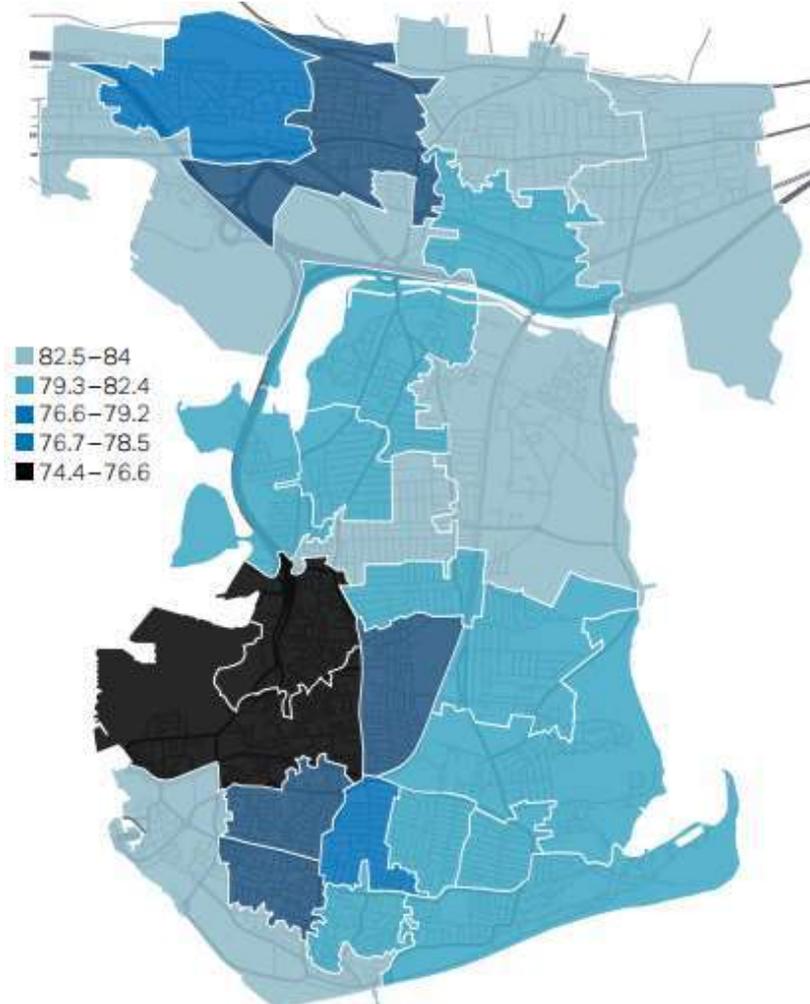
Figure 4.1: Portsmouth Index of Multiple Deprivation Score, 2019



- 4.2.6 The differing IMD scores for different areas of Portsmouth have a correlation with patterns of health outcomes in different parts of the city. This is demonstrated in Figure 4.2, which shows that those living in the most deprived areas have, on average, poorer health outcomes and shorter lifespans than those living in the least deprived ward. Indeed those living in

the most deprived parts of the city on average can expect to live more than five years less than those in the least deprived. The trends evident across the city would appear to reflect the key findings of the Marmot review of 2010, which established that an individual's health can be influenced by their own actions as well as the environmental and socio-economic context in which they dwell¹⁶.

Figure 4.2: Average life expectancy at birth for wards in the city.

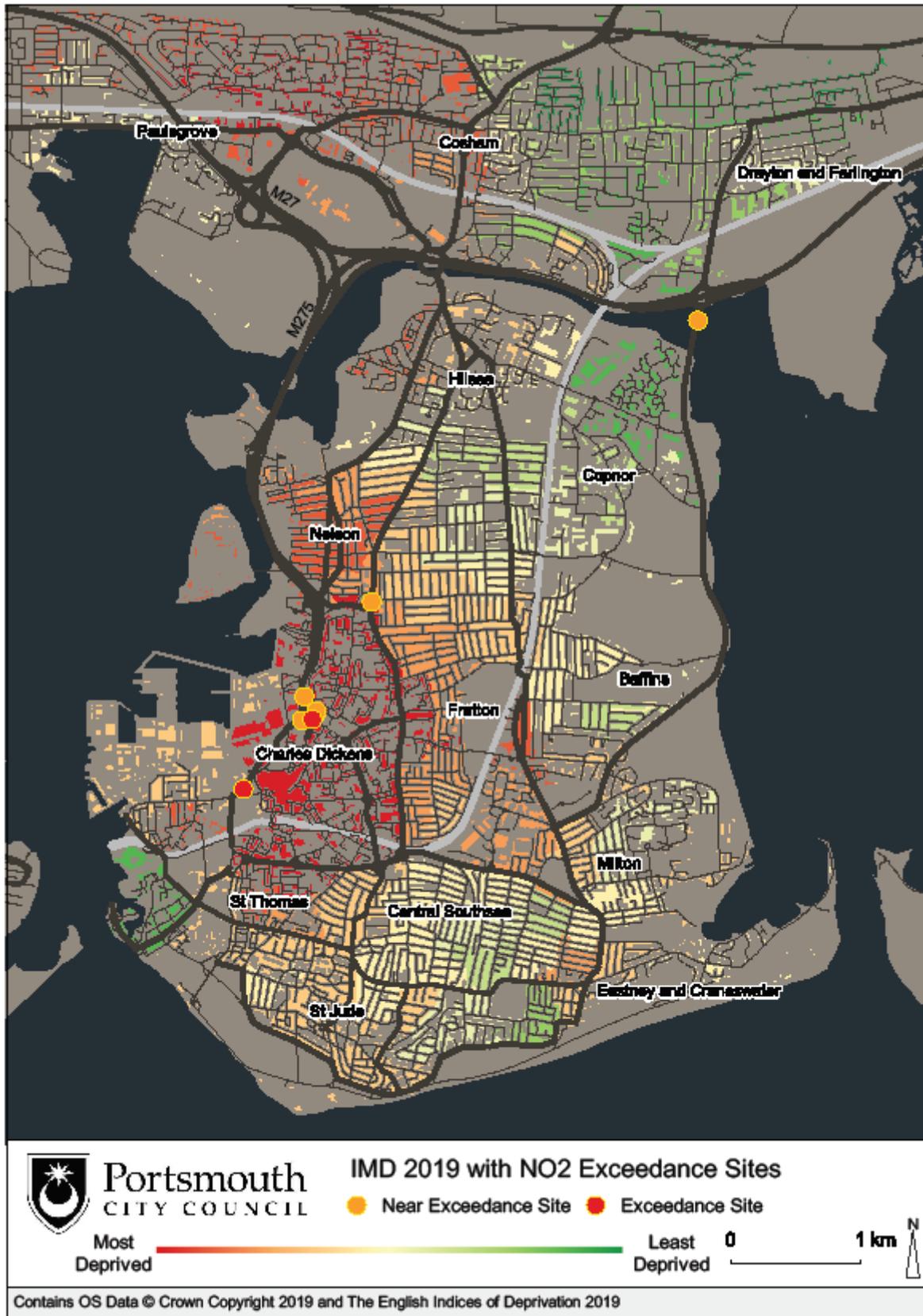


Sources: ONS annual death extract via PCMD, HSCIC & ONS Mid-2013 to mid-2015 (pooled) Population Estimate for MSOAs. © Crown Copyright and database right 2017. Ordnance Survey 100019671. Contains National Statistics data © Crown copyright and database right 2017.

4.2.7 Furthermore, those areas of the city that are most deprived tend to also be located in closest proximity to areas of poor air quality as is highlighted in Figure 4.3.

¹⁶ Marmot. M et al (2010), *Fair society, healthy lives: Strategic review of health inequalities in England post-2010*, <http://www.instituteofhealthequity.org/resources-reports/fair-society-healthy-lives-the-marmot-review>

Figure 4.3: Indices of Multiple Deprivation mapped against exceedances in NO2 emissions in Portsmouth.



4.2.8 Air pollution from a variety of sources can cause and worsen health effects in all individuals, particularly society's most vulnerable populations. Long-term exposure to air pollution has been linked to chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. Short-term increases in levels of air pollution is associated with a range of health impacts, including lung function, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality. For the first time in 2020, air quality was legally recognised as a contributing factor in the death of an individual in the UK.

4.2.9 Air quality affects everyone, but these inequalities in exposure towards those living in more deprived communities are a particular issue as air pollution has the greatest impact on the most vulnerable, including the children, the elderly, those with long-term health conditions, and those living close to main roads where pollution is worst. Many of these most vulnerable people live in some of these most deprived parts of the city.

5. Preparing the new Local Plan

5.1 Engagement and consultation to date

Issues and Options Consultation (summer 2017)

- 5.1.1 As part of the Local Plan Review Issues and Options consultation, stakeholders were asked about what they considered to be the main issues relating to health, wellbeing and open space, as well as what they felt about the approach to be taken in the new local plan. Respondents were asked to comment on option HW1: "Seek to enhance health and wellbeing through new development in Portsmouth".
- 5.1.2 A range of views were expressed, however a number of respondents identified the following factors as having an impact on health and wellbeing in the city: poor air quality; lack of safe and attractive walking and cycling routes; the large number of fast food outlets; poor provision of green space in densely populated areas; lack of acknowledgement of the links between health and education.
- 5.1.3 A full summary of the responses can be found at pages 44 to 49 of the Issues and Options Summary of Responses document¹⁷. The Council's initial response stated:

"There are a large amount of interrelated issues to be considered for health, wellbeing and open space. To inform the next stages of the Plan, technical work will be prepared to address key identified issues. That includes: an air quality study to consider current and future air quality issues and the potential impacts of predicted growth; an open space study to consider the quality and quantity of open space across the city and in specific neighbourhoods; an assessment of future healthcare needs and infrastructure requirements in the Infrastructure Delivery Plan; an assessment of options for active modes of transport to promote walking and cycling; a paper on the role and opportunities for Green Infrastructure, including for nature conservation and a role in enhancing biodiversity; a playing pitch assessment to identify provision and requirements; and measures in response to emerging evidence on Brent Geese and Solent waders."

Evidence base update consultation (February 2019)

- 5.1.4 A further consultation on the development of the Local Plan's evidence was run in February 2019. Four responses were received on the Health and Wellbeing background paper (responses were received directly addressing it), but highlighted key issues for the Local Plan to consider including air quality,

¹⁷ Portsmouth City Council (2018) *Local Plan Issues and Options Summary of Responses*
<https://www.portsmouth.gov.uk/ext/development-and-planning/planning/the-local-plan>

childhood obesity, mental health, play and active travel as well as the relation with the wider built environment in general.

- 5.1.5 A full summary of the responses can be found on pages 24 and 25 of the February 2019 Evidence Base Consultation Summary document¹⁸. The initial Council response to the matters raised was as follows:

The comments raised here on health issues are all relevant for the emerging Local Plan. Overall, no particular concerns were raised about the proposed Health Impact Assessment tool set out in the Background Paper and its potential use in helping in drafting the emerging Local Plan. Regarding air quality, the new Local Plan will need a clear approach to air quality issues over the whole Local Plan period to 2036.

5.2 Health and wellbeing in the new Local Plan

- 5.2.1 As detailed in the earlier sections of this paper, good health includes physical, social and mental wellbeing and therefore goes beyond absence of illness and care of persons who have become ill. The Local Plan therefore has a role to play in considering all of the aspects that impact on an individual's health and to help influence positive health and wellbeing outcomes across all parts of the city.

- 5.2.3 The current Portsmouth Plan contains a specific policy on health and wellbeing (PCS14: A healthy city), however as the previous sections of this paper shows, the impact that planning has on health and wellbeing is wide ranging. Therefore in developing the new Plan, these impacts will be considered throughout the entire document. The following paragraphs touch upon some examples of how health and wellbeing can be considered throughout the plan, framed around four key themes: healthy housing; transport and accessibility; social infrastructure; and a healthy environment.

Healthy housing

- 5.2.4 Housing can negatively impact on a person's health and wellbeing in a number of ways, whether that is through poorly designed housing that provides inadequate levels of daylight or ventilation; overcrowding; injuries in the home; or inadequate heating or cooling of the building.

¹⁸ Portsmouth City Council (2019) *Local Plan Evidence Base Consultation (Feb 19) Summary of Responses* <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Portsmouth-Local-Plan-evidence-based-consultation.pdf>

How can healthy housing influence health and wellbeing?
Focus on: Healthy homes

A number of the negative health and wellbeing outcomes experienced by Portsmouth's residents can be influenced by planning and the built environment. For example, in Portsmouth a large proportion of the housing stock is over 100 years old, and therefore is more likely to fall short of meeting modern standards of heating, insulation and energy efficiency. In turn this can result in higher heating costs compared to newer homes which in some cases can lead to fuel poverty.

The conditions in which people live in are an important influencing factor in increased winter mortality. The death rate rises by around 2.8% for every degree Celsius drop in temperature for those living in the coldest 10% of homes. This is compared to a 0.9% rise in the death rate for every degree Celsius in the warmest 10% of homes.

In Portsmouth the rate of excess winter deaths is higher than that seen across England. In the period 2011 to 2014 there were 21.9 excess winter deaths in Portsmouth, compared to an average of 15.6 in England. During the period 2012 to 2015 the rate in Portsmouth worsened with 25.5 excess winter deaths in Portsmouth compared to an average of 19.6 across England.

Transport and Accessibility

- 5.2.5 Accessibility can be important for an individual's health and wellbeing as poorly connected places can lead to social isolation. Availability, quality and choice of modes of transport are also important in facilitating travel to employment, healthcare and social facilities.

How can transport and accessibility influence health and wellbeing?
Focus on: Active travel

In Portsmouth, 65.3% of adults are overweight or obese and 21.6% of children in year six are obese. This compares to 61.3% and 20% respectively across England. The causes of obesity are complex and include a variety of factors including biology and behaviour. The cultural, environment and social framework of an individual's lifestyle also play a key role in influencing obesity. However, one way in which the built environment can positively influence some of the lifestyle factors that can lead to obesity is through creation of safe, attractive and convenient walking and cycling routes.

Walkable neighbourhoods are a useful approach to help encourage healthy lifestyles. This includes provision of high quality footways so that pedestrians are safe from traffic as well as routes with proximity to necessary destinations and safety from crime. Such elements of walkable neighbourhoods are positively linked to lower BMI in individuals and are also correlated with fewer instances of obesity.

Social Infrastructure

- 5.2.7 Provision of social infrastructure is vital for creation of vibrant neighbourhoods. These are neighbourhoods which enable residents to have access to goods and services and which provide opportunities for social interaction. Social infrastructure can include things such as: schools; health centres; local food shops; public buildings and local workplaces.

How can social infrastructure influence health and wellbeing? Focus on: Public spaces

Access to convenient and well-designed public spaces can improve mental health and wellbeing. Public spaces are important for social interaction and social capital and can provide relief from daily routines as well as adding to a neighbourhood's sense of community.

Provision of well-designed public space also has benefits for those suffering from specific health conditions. For example, for people with dementia, going outside can feel unsafe and unfamiliar and as a result social isolation can become an issue. However, including dementia friendly design that enables dementia sufferers to navigate their way easily through the use of clear, consistently placed signage, step-free access and symbols and other way-marking can help people suffering with conditions such as dementia to continue to live their everyday lives and feel part of the community.

A local example of where dementia friendly design can be seen is in neighbouring Local Authority Fareham. In 2013 Fareham was identified as having the country's first dementia friendly high street.

Healthy environment

- 5.2.8 The quality of the environment and in particular, access to green space can have a positive impact on health and wellbeing¹⁹, through increased physical activity and mental health benefits²⁰. Healthy environments can also provide opportunities for local food growing which can help promote healthy diets and active lifestyles. Poor air quality can be one aspect of an unhealthy environment and can impact on a range of health problems including asthma and cardiovascular diseases.

How can healthy environments influence health and wellbeing?

Focus on: Air quality

Public Health data shows that the number of premature deaths from cardiovascular diseases is significantly higher than the average numbers experienced across England. Although cardiovascular diseases have a number of causes, poor air quality can be one of a number of contributing factors and can exacerbate existing conditions.

The position of buildings and design of buildings can help to minimise public exposure to air pollution. Narrow streets with buildings close to the kerbside can cause 'canyons' where air pollutants can build up. Equally, roads with high traffic flows and roads with congestion can experience problems with air quality.

As well as the location and form of buildings, soft features can also have a positive impact on air quality. Provision of green infrastructure, which can take the form of street trees, hedges, green walls and green roofs, has been shown to successfully reduce levels of air pollution. Green walls for example have been shown to reduce nitrogen dioxide levels in the air by up to 35% and particulate matter by up to 50%.

- 5.2.9 Improving health and well-being will underlie many of the draft policies in the new Local Plan. Some policies will relate more directly to the topic than others. The draft Pollution, Health and Amenity policy, for instance, includes a requirement that all development consider health and well-being and that major development will need to undertake a health impact assessment to inform the approach to the development of the site. The draft Open Space and Outdoor Recreation policy will seek to protect and enhance existing green space and increase access by providing new open space in the city.
- 5.2.10 A health impact assessment has been carried out on the draft new Local Plan policies. See Appendix B

¹⁹ World Health Organisation (2016) Urban Green Spaces and Health: A Review of Evidence http://www.euro.who.int/_data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1

²⁰ Parliamentary Office for Science and Technology (2016) Green Space and Health <file:///C:/Users/431421/Downloads/POST-PN-0538.pdf>

6. Local Plan Health Impact Assessment - Health Impact Assessment

- 6.1 The examples set out in section 5 show that all aspects of planning policy can have an impact on health and wellbeing. The preparation of new Local Plan will therefore be reviewed against a Health and Wellbeing Impact Assessment (HIA) Framework.

WHAT IS A HEALTH IMPACT ASSESSMENT?

A Health Impact Assessment (HIA) is a process which ensures both health and health inequalities are carefully considered and addressed as an integral part of the planning process for all new developments.

HIA aims to predict the health implications on a population when implementing a plan, policy, program or project, and in so doing aid the decision-making process. HIA should aim to enhance the potential positive aspects of a proposal through assessment.

- 6.2 Reviewing the policies against such a framework enables the Council to be confident that the Local Plan has been designed in a way that has a positive role in enhancing health and wellbeing in the city. The process will also capture the impact that planning can have on the wider determinants of health. Such an approach should help to ensure that the Local Plan is positively addressing the overarching objectives of the Portsmouth Health and Wellbeing Strategy; improving healthy life expectancy and reducing inequality.
- 6.3 Whilst there is as yet no national standard for how to undertake a health impact assessment, the process the Council has followed is documented here.

Portsmouth Local Plan Health Impact Assessment Process

- 6.4 The Council has devised a HIA framework against which the Plan's policies can be assessed. The HIA assessment framework uses the Healthy Urban Planning Checklist²¹ as a starting point, and also considers the specific health and wellbeing challenges in Portsmouth. The themes and planning issues set out in the earlier sections of this paper have been used as a basis for the framework also.
- 6.5 The full process of Health Impact Assessment that was applied to the draft plan is as follows:

²¹ London Healthy Urban Development Unit (2017) *Healthy Urban Planning Checklist- third edition*, <https://www.healthyurbandevlopment.nhs.uk/wp-content/uploads/2017/05/Healthy-Urban-Planning-Checklist-3rd-edition-April-2017.pdf>

- i. Health and Wellbeing background paper identified demographic trends and health and wellbeing priorities for the city using available evidence (e.g. Joint Strategic Needs Assessment and Council Health and Wellbeing strategy), which all officers formulating Local Plan policies had access to.
- ii. Individual evidence bases collated and Local Plan policies were drafted by relevant planning officers in the planning policy team.
- iii. Planning officers used the HIA framework to review each Local Plan policy once drafted - the summaries of each assessment are compiled in Appendix B of the report.
- iv. The HIA review of draft policies identified any potential negative impacts for health and wellbeing as well as any additional opportunities for improving health and wellbeing that are available for the policy. These are summarised in the second column of the assessment summaries in Appendix B.
- v. Initial policies were redrafted to take into account anything identified in the stage above. Amendments to policies and reasoning behind these changes are captured through the third column of the assessment summaries in Appendix B. These demonstrate how health and wellbeing has been factored into the development of the Local Plan.

6.6 The Health Impact Assessment framework itself is structured around four key focus areas. These have been developed from the same themes which were identified in section 5 of the paper and detailed again in Figure 6.1.



Figure 6.1: The four themes of focus for the Portsmouth Health Impact Assessment - healthy housing; transport and accessibility; social infrastructure; and healthy environment.

6.7 Each of the four broad categories highlighted in Figure 6.1 were then broken down into a range of key issues that were considered during the assessment of each policy including what the implications on health could be. These factors were not intended to be exhaustive but they served as a minimum list of the most important considerations as agreed with the PCC Public Health team. A full breakdown of the matters considered under each topic can be found in Appendix A.

6.8 It should be noted that proposals ought to be read against all of the policies set out in a Local Plan as a whole. Certain policies by their nature address certain themes within the HIA framework more than others. As such, for matters of conciseness, the individual policy assessments only addressed the specific direct impacts of that policy against each of the four themes. A

summary of how the draft policies were assessed against the four themes is shown in the Figure below.

	Housing need and supply	Housing tenure mix with housing types	Houses in Multiple Occupation (HMOs)	Gypsies, Travellers and Travelling (G/Ts)	Housing Design	Residential Space	Economic Growth and Regeneration	Employment	Culture and Tourism	Supporting Pioneers' Town Centres	Community Facilities	Infrastructure and Community Benefits	Transport	Contaminated Land	Biodiversity	Green Infrastructure (GI)	Open Space and Recreation	Water Quality and Use	Lower Carbon and Carbon Neutral Development	Sustainable design and construction	Flooding and drainage	The Coastline	Conservation and design	Amenity	Heritage Enhancement	Archaeology	City Centre and City Centre North	Tipper and Horse Island	Fratton Park and the Pombeyst Centre	St James' Hospital and Langstone Campus	Coastal	Southeast Lakeside	Porchester Campus	Portsmouth Hill	Health and Learning		
Healthy Housing	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Transport and accessibility	x	x		x	x	x	x	x	x	x	x	x	x			x	x	x					x	x	x	x	x	x	x	x	x	x	x	x	x	x	
Social infrastructure				x	x	x	x	x	x	x	x	x	x			x	x						x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Healthy environment		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x

Figure 6.2: Summary of how the draft policies were assessed against the four themes.

6.10 The assessments for each individual policy are included in Appendix B. The draft policies will be reviewed and the HIA updated in response to the 'Reg 18' and any subsequent consultations where relevant.

Appendix A - Local Plan Health and Wellbeing Impact Assessment Framework

Each policy in the Portsmouth Local Plan has been assessed against the topics (with examples) in the table to consider the impact that policy could have on health and wellbeing in the city.

HIA topic	Individual issues	Impact on Health & wellbeing	Possible mitigation/enhancement measures
Healthy Housing	Sufficient quantity of housing to meet needs	Ensuring that there is enough housing coming forwards in the future to meet the needs of a growing population will support the sustainable development of the city and reduce risks of homelessness, unaffordability etc.	Ensure that an appropriate level of housing is being planned for and allocated through the Local Plan to meet the identified needs of the city now and in the future.
	Housing design and quality	Adequate space for home dining helps to encourage home cooking and to discourage consumption of less healthy 'out of home' foods.	Ensure that kitchen spaces are large enough to accommodate a space to sit and eat together.
		Overcrowding is poor for mental health.	Ensure that housing design and quality are of a high standard and that <u>Nationally Described Space Standards</u> are met.
		Stress and sleep disruption caused by poor ventilation and excessive noise.	Ensure that ventilation and insulation are adequate.
		Reduction of excess deaths from cold/overheating.	Ensure sound proofing through good design.
	Accessible housing	Reduces inequalities faced by those with disabilities. Not only for residents but also visitors to the development. Also ensures that accommodation is suitable for residents as they age and addresses potential impacts associated with age on mobility.	Ensure a proportion of accessible housing on new developments in line with local need.
	Housing mix	Not having the right housing mix to accommodate both families and the ageing population could result in overcrowding as well as people living in homes that are not suitable for their needs with impacts on both their mental and physical health.	Ensuring a mix of housing types and tenures to cater for all population groups, including the ageing population of Portsmouth.
			Where appropriate, ensure that affordable units are intermixed with other housing, 'pepper potting' to assist with social cohesion and reduce the risk of creating concentrated areas of high deprivation.
Housing affordability	Providing affordable housing can help to decrease rates of homelessness. Being homeless is associated with significantly reduced life expectancy and poor health outcomes.	Ensure new developments provide proportion of affordable housing in line with local need.	

Transport and accessibility	Minimising car use	Negative impact of noise and air pollution from vehicles on mental and respiratory health.	Ensure access to efficient and affordable public transport links.
		Reduces collisions particularly involving cyclists and pedestrians.	Maximise opportunities for active travel.
		Encourages people to be more active in the way that they travel.	Reduce parking. Where parking is provided, support the use of electric vehicles with charging facilities and designated spaces.
	Promoting active travel	Sedentary lifestyles and low levels of physical activity increase the risk of diabetes, cancer and cardiovascular disease.	Provide safe and secure bike storage facilities.
			Ensure that cycle lanes are incorporated into infrastructure planning.
			Ensure pavements are well lit and safe.
			Planting green infrastructure on walkways to make them more pleasant to walk or cycle.
Public transport	Use of public transport rather than personal vehicles reduces air and noise pollution.	Ensure that new developments have adequate transport links to promote health and wellbeing of the local community.	
	Affordable and reliable public transport improves accessibility and allows those without access to a car to travel to employment and to access health services, education, healthy food outlets and recreational facilities.		
Social infrastructure	Access to healthy food	Lack of access to healthy food outlets can lead to overconsumption of takeaway foods and less healthy options from convenience stores. Poor access to shops selling fresh fruit and vegetables and other staple ingredients make it challenging to consume a healthy, balanced diet and can contribute to the development of diabetes, cancer and cardiovascular disease.	Seek to deliver an appropriate mix of development where planning permission is required, without over-concentrations of fast food takeaways and convenience stores where this can be controlled.
	Connectivity	Social isolation can have a detrimental impact on mental health and increase the risk of experiencing loneliness.	Spaces should be designed with opportunities for social interaction in mind.
	Healthcare services	Easy access to primary care services is required for residents to maintain good physical and mental health.	Ensure that new developments are located in sustainable locations with access to healthcare services such as GPs, dentists and pharmacists.
	Education	Access to education ensures the best possible start in life and improves long term employment, prosperity and health.	Ensure that there are adequate plans in place to accommodate children of school age at local schools.
	Employment opportunities	Mental illness and poor self-esteem are associated with unemployment.	Ensure that new developments are focused on providing employment for local people throughout the planning, building and into the future by creating commercial space.
Poverty resulting from unemployment can both directly and indirectly impact mental and physical health.			

	Safe play areas	Access to playing fields and play facilities for children and young people to play and be more physically active offers an opportunity to aid in the reduction of child obesity.	Ensure suitable provision and protection of safe and suitable places for children to play outdoors in every neighbourhood. Provide adequate lighting for safety and winter use.
	Recreational facilities e.g. swimming pools, gyms, sports halls, outdoor gyms	Easy and affordable access to recreational facilities helps to encourage physical activity which reduces risk of chronic illness.	Consider proximity to recreational facilities. Where need is identified positively encourage the development of new facilities to address deficits.
Healthy environment	Air quality	Poor air quality causes increased incidences of respiratory disease and other illnesses. Air pollution also has negative impacts upon the surrounding natural environment including designated habitats.	Support measures to improve active travel such as: provide safe and secure bike storage facilities, work to improve cycling infrastructure and ensure pathways are safe and well lit.
			Work with the transport department to ensure new developments are appropriately serviced by public transport.
			Support the use of electric cars by incorporating charging points.
			Consider layout and orientation of streets to promote airflow within street canyons.
	Green infrastructure and green, open space	Green infrastructure has multiple benefits for mental health and wellbeing providing people with relief from the urban environment and promoting interaction with nature and with each other. Open spaces in particular provide an environment for physical activity and social activities which are positive for both mental and physical health.	Ensure that green space is maintained and accessible to the whole community.
			Installation of benches so that less mobile people can still use the space. Step free access. Create green space that is multifunctional (e.g. to provide shade in summer, encourage biodiversity and create opportunities for people to socialise).
	Local food growing	Mental health benefits from access to nature, encouraging social cohesion, educating children about food sources and encouraging healthy eating.	Encourage new development to consider the inclusion of landscaping that could be a source of food for the community where appropriate. i.e. fruit trees, vegetables, herbs. Protect existing areas of food cultivation e.g. allotments.
Flood risk	During severe flood events there can be safety risks for those living within higher level flood zones. Poor wellbeing and stress are also negative implications for residents in fear of flood recurrence.	Provide flood risk mitigation measures i.e. flood resistance and flood resilience, emergency evacuation measures.	
		Incorporate green infrastructure and ensure that surface water drainage is handled appropriately on-site.	
		Follow national guidance with respect to sequential approach to development, also do not place bedrooms in basements within areas of flood risk.	

	Overheating	Excess summer deaths due to overheating and heat stress.	Planting trees and providing areas of natural shade.
			Ensuring that properties have adequate ventilation and window design to help to reduce heat in summer
	Construction disruption and safety	Increased traffic flow, vehicle, noise and air pollution can cause disturbance and stress to local residents.	Adjust vehicle movement and operation hours to suit surrounding communities.
			Incorporate sustainable construction practices which aim to limit pollution and disturbance arising from development.
			Ensure site safety throughout the development period.
	Promoting safety and reducing crime	A safe feeling environment.	Consider the safety of people as part of the design process. Ensure that new development is designed to reduce crime and opportunities for terrorism.
	Poorly designed spaces can be utilised by criminals and terrorists to cause harm (e.g. using vehicles to collide with crowds).		

Appendix B - Local Plan Health and Wellbeing Impact Assessment policy summaries

H1	Housing need and supply
HIA topic	Policy review comments
Healthy Housing	This policy sets out how the Council will aim to meet the minimum housing targets set out by Government for the area. It is important for ensuring that enough housing is provided to meet projected needs over the plan period. Furthermore, the policy sets out that an appropriate contribution is made for bespoke housing such as students and other specialist and communal needs (such as for older persons).
Transport and accessibility	By ensuring that enough housing comes forward in the local area, this will help to ensure that people have access to suitable housing and reduce the need to commute and travel further afield.
Social infrastructure	Not applicable
Healthy environment	Not applicable

H2	Housing Types, Mix and Affordability
HIA topic	Policy review comments
Healthy Housing	Policy helps to ensure that development meets the needs of a growing population. Wording with respect to affordability is about meeting the need for a proportion of affordable homes as guided by the affordable need assessment. Policy also addresses the need for the right mix of tenures including meeting needs for older people, family housing, accessible and adaptable homes, Purpose Built Student Housing, and other specialist adaptable housing.
Transport and accessibility	Policy wording sets out the need for being close to facilities and sustainable transport.
Social infrastructure	Not applicable
Healthy environment	Not applicable

H3	Houses in Multiple Occupation (HMOs)
HIA topic	Policy review comments
Healthy Housing	An important aspect of the policy is ensuring that the right balance of homes is protected in the community, e.g. whilst HMOs meet the affordable housing needs of a proportion of the population, we must also ensure that this does not come at the cost of the supply of family homes. Policy directs proposals towards ensuring the appropriate space standards are achieved as set out elsewhere in the policy framework, this is important for ensuring that overcrowding is minimised and that residents have enough space to live.
Transport and accessibility	Not applicable
Social infrastructure	This policy states that planning permission for HMO's will only be granted where less than 10% of residential properties within a 50m radius of the application property are in existing use as a HMO. This encourages social cohesion across demographic groups and reduces clustering of HMO's which are predominantly occupied by the student demographic of Portsmouth.
Healthy environment	The policy refers to the HMO SPD which looks to ensure that HMO's protect the amenity of the local environment by ensuring HMO's provide sufficient storage space within the curtilage for bins and waste.

H4	Travellers and Travelling Showpeople
HIA topic	Policy review comments
Healthy Housing	Policy sets out what would be looked for when considering suitable locations for this type of accommodation - as such it is an important means of addressing housing needs of a particular demographic group. Many of the factors that help determine suitability relate to the other topics of the HIA (e.g. accessibility to key services, flood risk etc).
Transport and accessibility	The policy sets out what is considered acceptable in terms of a sustainable location for this type of accommodation - as such sustainable transport methods and general accessibility are a key concern. Access to services and other facilities including play spaces is mentioned which should help to encourage reduced reliance on car use wherever possible.
Social infrastructure	Access to services and other facilities including play spaces will be important for health and wellbeing. Play spaces are important for enabling children and young people to stay active and healthy. Access to other services like healthcare and education are also important for reducing social isolation in communities and promoting social interaction which has been shown to be important for good mental health.
Healthy environment	The policy wording includes the need for consideration of flood risk on traveller and gypsy sites which should help to protect health impacts from flooding.

H5	Housing Density
HIA topic	Policy review comments
Healthy Housing	<p>The density policy seeks to increase the quantity of housing that is achieved in certain parts of the city which can accommodate increased numbers - this should ultimately help to ensure an ample supply of housing to meet peoples' needs. The greater density numbers on certain sites could also improve viability of development which will in turn have a knock on positive for housing affordability in the city. There is a risk that higher density housing tend could encourage one/two bedroom dwellings over larger family homes of three to five bedrooms - this is managed by setting higher density targets in more accessible areas of the city and comparatively lower minimum targets for other areas better suited to larger dwellings. The policy will be read in conjunction with the Local Plan's design and housing standards policies. Ultimately, density will be influenced by various factors on a case by case basis to deliver the best outcomes in all aspects of design.</p>
Transport and accessibility	<p>The density policy can achieve positive health impacts in respect of reducing the need for private car use and encouraging greater uptake of active and sustainable transport. By seeking greater densities around hubs in the city where users are within walking distance of shops and key services, users have less need to drive and therefore air quality will be less negatively impacted. Equally the concentration of uses can enable active transport which has various benefits including reduced obesity and improved cardio vascular health both of which are key health concerns in Portsmouth's population. The proposed higher density areas which are located in the parts of the city which have less existing access to public open space; but the proposed open space and green infrastructure include</p>

	provisions to increase the both quantity and quality of such assets in these areas. The Space Standards policy also includes a requirement to provide sufficient private and/ or communal outdoor amenity space.
Social infrastructure	Community uses and healthcare services are likely to be more viable and sustainable in higher density areas due to the larger user base within the surrounding catchment.
Healthy environment	Reducing reliance on the private car should have benefits for local air quality and for safety on the road. There is the potential for densification (greater urbanisation) which could exacerbate overheating and the urban heat island effect - particularly in light of increasing summer temperatures with climate change. Overheating risk however is addressed within the green infrastructure and open space policies and the sustainable design and construction policy. An increase in residential occupancy of areas could help to address crime/ and or the fear of crime through 'more eyes on the street'.

H6	Residential Space Standards
HIA topic	Policy review comments
Healthy Housing	The policy is focused upon ensuring a minimum space standards in new residential development. The issues of overcrowding and a lack of space which have been shown to impact negatively on residents' health and wellbeing; the government seeks to address this through the imposition of imposing of national minimum space standards. Consideration of the provision of bin stores at the design stage can tackle the risks of pests and poor sanitation.
Transport and accessibility	The expectation that proposals incorporate secure bicycle stores is important for encouraging and enabling active travel, which is beneficial for physical health as well as reducing reliance on private cars with positive effects for air quality.
Social infrastructure	Not applicable
Healthy environment	In respect to having access to private open spaces, the opportunity has been identified in the proposed policy wording to strengthen the requirements for provision of private open space. Sufficient private and/ or communal outdoor amenity space/ balcony space should be provided proportionate to the number of bedrooms. This could be more flexible where there is good accessibility to public outdoor open space.

E1	Economic Development and Regeneration
HIA topic	Policy review comments
Healthy Housing	Not applicable
Transport and accessibility	One aspiration of the policy is seeking to create local employment opportunities, this would have the benefit of reducing need for commuting out of the city, potentially reducing reliance of private car use.
Social infrastructure	The links between health and wellbeing and economic activity in the population have been made clear. If health and wellbeing can be improved for residents, this could lead to more people being in a position to return to work. The draft policy includes text on addressing health inequalities and seeks to improve the health and wellbeing of Portsmouth's residents through the Council's Health and Wellbeing Strategy and through good planning and design to help reduce economic inactivity.
Healthy environment	The policy seeks to create local opportunities which could help to reduce reliance on private car and therefore benefit air quality in the city. The principles of 'clean growth' have been included; to ensure that economic development does not come at the cost of the environment.

E2	Employment Land
HIA topic	Policy review comments
Healthy Housing	Planning for the future of the city will need to strike a balance between allocating land to provide enough homes to meet the growth needs of the city while protecting land for employment uses so that proposal do not increase out-commuting. It is expected that some of Portsmouth's assessed housing need will need to be met outside of the city through the duty to co-operate with neighbouring authorities.
Transport and accessibility	Part of the process of determining the most suitable locations for allocating land for employment is an assessment of the sustainability of sites, this includes considerations like the proximity to sustainable transport such as bus stops/train stations. Employment land has been allocated in locations that should minimise car use as much as possible and promote active travel.
Social infrastructure	The allocation of land for employment is important for ensuring that there is a supply of land for new businesses and the creation of employment opportunities in sectors that may support the provision of local services.
Healthy environment	Part of the process of determining the most suitable locations for allocating land for employment is an assessment of the sustainability of sites (see the Council's Housing and Economic Land Availability Assessment), this includes considerations like the proximity of sites to designated ecological assets and proximity to flood risk.

E3	Culture, Tourism and Leisure
HIA topic	Policy review comments
Healthy Housing	Not applicable
Transport and accessibility	The policy is designed to seek to protect and resist the loss of culture and leisure facilities at certain locations in the city; this supports the availability of local facilities which can be accessed by active and sustainable transport options, rather than needed to commute further afield via car.
Social infrastructure	Culture and tourism facilities comprise part of the social infrastructure network which contributes to the wellbeing of residents as well as visitors into Portsmouth. Protecting their provision can support social cohesion and provide gathering places which have benefits for physical and mental wellbeing, for example tackling issues such as isolation and loneliness. There is a body of research that suggests cultural assets and heritage can help to generate a 'sense of place' and belonging that can counter feelings of social isolation. Tourism is also crucial to Portsmouth's economy.
Healthy environment	Local attractions may reduce out commuting and the associated impacts on air quality.

E4/E5	Supporting Portsmouth's Town Centres & Town Centre Strategies (Combined assessment)
HIA topic	Policy review comments
Healthy Housing	Each centre has a proposed vision and guiding principles for its future development; this will include the provision of additional housing in accessible locations with active and public transport options.
Transport and accessibility	Policy seeks to protect the hierarchy of town centres which helps to contribute towards ensuring that employment uses and commercial and leisure facilities are located in accessible and sustainable locations in the city - this contributes to reducing reliance upon car use, improving uptake of active and sustainable travel options.
Social infrastructure	The hierarchy helps to ensure a network of well-connected centres, acting as 'social hubs' throughout the city - this can be beneficial for enabling social connectivity and reducing isolation and loneliness amongst residents. A mix of development is envisioned for the centres including healthcare services.
Healthy environment	Potential benefits for air quality by directing development to the most well-connected and accessible locations, in the first instance, reducing the need to drive. By ensuring the healthy development of the city's centres, safety and reduction of crime can be positively impacted - healthy and prosperous areas encourage more people, particularly if the mix of uses can occur with day and night time activity - the benefit is more 'eyes on the street' and reduced chances for crime. The draft policy highlights a lack of 'greenery' in centres and encourages more green infrastructure which can enhance the environment and bring more resilience to climate change through shading and slowing surface water runoff.

C1	Community and Leisure Facilities
HIA topic	Policy review comments
Healthy Housing	Not applicable
Transport and accessibility	Background evidence on the provision of indoor sports facilities recognises that there are some areas of the city with poor accessibility, which could potentially exacerbate existing health inequalities. The draft policy states that proposals for new community facilities, particularly any replacement facilities, need to be accessible to their intended users without the need for additional vehicle trips.
Social infrastructure	The draft policy protects existing community facilities and ensures any replacement provision is sustainably located, in recognition of the important social and health role that they provide within communities. It focuses in particular on indoor sports facilities which are a vital component of healthy neighbourhoods and seeks to ensure that these are protected from inappropriate development in order to support the health and wellbeing of local residents. The policy also sets out how communities can protect facilities via nomination under the Community Right to Bid.
Healthy environment	Not applicable

C2	Open Space and Recreation
HIA topic	Policy review comments
Healthy Housing	<p>Access to open space is an important aspect of a healthy environment. The draft policy proposes to require the delivery of open space provision from larger major residential development schemes, or an offsite contribution for the enhancement of a nearby open space. This is particularly important to address health inequality in the city and is one means of ensuring that those without access to high quality private open space can still take advantage of the various benefits open space can provide. The new draft policy seeks to apply open space requirements to larger major older persons and student accommodation where possible, expanding the potential delivery of open space through this policy and directly benefiting the future occupants of these developments.</p>
Transport and accessibility	<p>Seeking to protect and enhance existing open spaces, and deliver new open space where possible, will increase access and help reduce the need to travel, which will be particularly important for those without access to private open space.</p>
Social infrastructure	<p>The draft policy seeks to ensure that where new development at schools or higher education establishments seek permission for playing pitches and/or artificial grass, that a community use agreement is formulated to ensure the wider community has access to the space, thus increasing the social infrastructure potential of the development. Any proposals for redevelopment of a protected open space, where all the criteria for this loss is met, will need to demonstrate that the public benefit that outweighs its loss would apply to the local area (and its existing users) in the first instance, to maintain the public use of such assets where possible. Any new open space provision will need to consider the needs of the intended occupants and that of the local area (especially in terms of noted deficiencies in provision), which may include a greater range of formal and informal play spaces for a greater range of ages and abilities. The recognition of the protection of and need for playing pitch provision in the city is important for providing opportunities for health and fitness.</p>
Healthy environment	<p>The draft policy protects existing areas open space in the city, seeks to deliver new open space where applicable and/ or enhances existing spaces so that they can be more resilient to increasing pressures. The supporting text also addresses formal playing pitch provision in the city, and again aims to ensure that this is protected in recognition of the importance of this space for keeping people fit and active.</p>

C3	Transport
HIA topic	Policy review comments
Healthy Housing	The city has recognised issues with air quality and is developing an Air Quality Local Plan in conjunction with the Government to reduce the concentrations of harmful pollutants. There are areas of the city that are particularly affected, recognised by Air Quality Management Areas designations. The draft policy's overall principle is to deliver a people centred travel network that prioritises walking, cycling and public transport, in-line with the Council's Local Transport Plan 4, will help to tackle poor air quality and reduce exposure to both new and existing residential areas.
Transport and accessibility	The draft policy sets out the high level delivery strategy for transport infrastructure and principles for transport in development, as per the Council's Local Transport Plan 4. Development should reduce the need to travel, prioritise walking, and cycling, and support and encourage use of public transport modes and improve accessibility to local facilities, ensuring safe and suitable access for all users, including the needs of people with disabilities and reduced mobility. This will create opportunities for active travel, contributing to physical and mental wellbeing. This should reduce reliance on cars, thus having positive effects for climate change and air pollution.
Social infrastructure	Improving access to local facilities by active and public transport.
Healthy environment	The draft policy sets out the Council's intention to work with partners on interventions to improve poor air quality from transport sources including introduction of a charging Clean Air Zone. The policy also requires that sufficient space and/ or infrastructure is provided for electric or ultra-low emission vehicle charging, which is one means of supporting the transition towards a carbon neutral city and mitigating impacts on climate change, of which transport is a major contributor.

C4	Infrastructure and Community Benefits
HIA topic	Policy review comments
Healthy Housing	The draft policy seeks to ensure that the city has the required infrastructure to support and enable growth, including the provision of new homes and local provision of services.
Transport and accessibility	The draft policy will ensure the adequate provision of key infrastructure, such as highway improvements, active transport routes, is secured at the planning application stage to allow for or mitigate the impact of the proposal.
Social infrastructure	Development will need to consider the need for new and/or enhanced infrastructure such as schools, parks, transport facilities and health facilities required for sustainable development.
Healthy environment	The infrastructure needs of a development may include the need to make necessary provision for its impact on the environment or to make development and its users safe from existing environmental hazards, such as the need for flood or air quality mitigation. Reference is made to green infrastructure needs as part of key infrastructure deliver.

G1	Biodiversity
HIA topic	Policy review comments
Healthy Housing	Net gains in biodiversity for residential development will help create high quality places and bring people closer to nature which has benefits for mental wellbeing, particularly for those have less existing access to local greenspace and/ or restrictions on their mobility to visit places outside of the urban area.
Transport and accessibility	The proposed ecological network includes the draft green infrastructure network which proposes greening of key transport routes.
Social infrastructure	The delivery of new social infrastructure may need to include the provision for biodiversity enhancement which would benefit occupants and users.
Healthy environment	Proposes to protect and enhance the city's ecological networks and assets and requires that all applications assess the potential ecological value of a site, helping to maintain the ecological services that we all rely on. There would be secondary benefits for air quality and climate resilience (green spaces are beneficial for acting as flood storage as well as reducing urban heat island effects).

G2	Green Infrastructure
HIA topic	Policy review comments
Healthy Housing	<p>Policy seeks to avoid net loss in green infrastructure in the city and to deliver net gains in high quality green infrastructure where possible. This will apply to residential development in the city and should therefore help to deliver housing environments that are healthier for the people who live there. The Council is promoting its Urban Greening Factor (UGF) tool to help enable GI in development to be quantified and to encourage net gains, this will be compulsory for key centres and strategic sites where appropriate and strongly encouraged elsewhere.</p>
Transport and accessibility	<p>Policy seeks to encourage active, sustainable travel through increasing greening of the city and more direct measures such as the creation of 'green corridors' on key routes.</p>
Social infrastructure	<p>Green infrastructure is not just as a facet of the environment, but as a key aspect of physical infrastructure with wider social benefits to the health and wellbeing of the city, includes the potential to improve air quality. The approach to the policy was to identify new green corridors and areas for enhanced greening that would correspond with areas of poor air quality and higher deprivation in order to deliver benefits in terms of encouraging more active travel and potentially reducing incidences of obesity and other life limiting conditions that can arise from a heavily urbanised environment.</p>
Healthy environment	<p>Policy is directly aimed at improving the natural environment in the city and explicitly links this to the benefits that a greener environment can have on health and wellbeing. The green grid has been devised to include some green corridors which link areas of higher deprivation and health inequality with the wider network, this should not only help to improve the environment in these areas but also encourage sustainable travel across the wider city. Proposals are encouraged not just to include green infrastructure, but to design it to be multi-functional, in particular: Mitigating and/or adapting to climate change; Sustainable urban drainage; Achieving a net gain in biodiversity; High quality aesthetics; Air quality improvements; providing mental and physical health and wellbeing to people.</p> <p>The aspiration for the UGF is, by providing a tool to quantify it in a simple way, this will help increase greening in the city (particularly the city centre area) with a range of associated health and well-being benefits.</p>

G3	Water Quality (Nutrient Neutrality)
HIA topic	Policy review comments
Healthy Housing	Requiring all new homes and tourism development to include efficiency measures that will limit water use to 110 litres per person per day will also provide more energy efficient homes and lower utility costs for occupants.
Transport and accessibility	Not applicable
Social infrastructure	Not applicable
Healthy environment	Draft policy seeks to ensure there is no net additional impact from the city's wastewater outputs (licensed offshore outflows from Budds Farm in Havant) into the Solent's protected water bodies which affect water quality in designated Natura 2000 habitat sites. Proposals must be able to demonstrate that mitigation will be secured prior to the occupation of the development to be granted planning permission.

G4	Contaminated Land
HIA topic	Policy review comments
Healthy Housing	Housing is particularly sensitive to land contamination due to the presence of sensitive receptors such as young children. Policy includes provisions to require measures to be taken to ensure contamination is appropriately addressed so that it is not a detriment to people's health and wellbeing.
Transport and accessibility	Not applicable
Social infrastructure	Not applicable
Healthy environment	Development on land this is known or suspected to be contaminated will need to be investigated; development could therefore deliver benefits through effective remediation or a beneficial use of the land.

G5	Flooding Risk and Drainage
HIA topic	Policy review comments
Healthy Housing	<p>The intention of the sequential approach to development is that more vulnerable uses (like residential development) are located in areas where the risk from flooding is lowest - this is a key means of ensuring healthy and safe housing. Also policy seeks to ensure that flood resilient and resistant design measures are incorporated into new development. This means that when a flooding event does occur, water intrusion should be minimised, and where flood waters do enter a property, clean up and recovery are much quicker. The intention is that this would reduce the negative health impacts of flooding, such as mental stress and anxiety which can follow flood events as residents are forced out of their properties for prolonged periods and lose personal possessions. The Environment Agency identified that there are particular risks in permitting self-contained basement accommodation in areas of known flood risk in the city highlighting concerns with areas of Southsea in the past. The draft Policy therefore restricts permissions of self-contained basement accommodation in flood zones now or in the future.</p>
Transport and accessibility	<p>Draft policy states that proposals need to be accompanied by an appropriate flood warning and emergency evacuation plan (based on advice from emergency services and in line with the multi-agency flood plan) in order to mitigate impacts from flooding. This will help ensure the safety of access and egress to the site at times of flooding.</p>
Social infrastructure	<p>Policy will help to direct development to appropriate locations in terms of flood risk. The need for avoidance, resilience and resistance measures as part of the development are highlighted alongside emergency warnings and evacuation plans.</p>
Healthy environment	<p>Policy directly addresses new development and the risks of flooding over its lifetime, including the projected risk from climate change and the need to ensure that flood risk has not been increased elsewhere. Suitable on-site drainage is also addressed.</p>

D1	Design
HIA topic	Policy review comments
Healthy Housing	Seeking design excellence will be key to providing new homes that support health and well-being. Emphasising to link to health and well-being in the draft text could be considered, potentially as part the design and statement access or the need for a HIA (required as part of Draft policy D3: Pollution, Heath and Amenity). It should also be highlighted that good design should consider the occupants and users of a development when it is completed and in use, including any opportunities for improving positive and reducing negative health and wellbeing impacts.
Transport and accessibility	Highlights the importance of cycle storage that is integral to the development. This is an important consideration when designing developments as it is considered a key means of encouraging people to adopt more sustainable and active modes of travel.
Social infrastructure	Policy wording includes, 'i) High quality public and private space that is attractive, clearly defined and safe' which along with the safety by design requirement below tries to set out the council's expectations of safety and security being inherent to the design of proposals. Safety by design is an important means of avoiding mental stress and anxieties that can come with living in spaces which are perceived to be unsafe. This will be key to ensuring spaces that are secure for all ages.
Healthy environment	The draft policy includes the requirement that design mitigating impacts of climate change and micro-climates, including wind speeds at ground level, glare, overshadowing, and heat island effects. This is ensure there is emphasis on the importance of considering the microclimatic impacts that new development can have on its surroundings, for example by exacerbating urban heat islands, as well as impacts on air quality which could in turn have impacts on peoples' health and wellbeing.

D2	Sustainable design and construction (inc. health & well-being)
HIA topic	Policy review comments
Healthy Housing	The requirements for achieving certification against an independent sustainability framework such as BREEAM or HQM mark means that developments will need to address a range of sustainability criteria which should reduce impacts on the environment and create healthier and higher quality residential development.
Transport and accessibility	Sustainable framework certificates include consideration of all aspects of the development and construction process, including how materials are sourced and transported.
Social infrastructure	Not applicable
Healthy environment	The requirements for achieving certification against an independent sustainability framework such as BREEAM or HQM mark means that developments will need to address a range of sustainability criteria which should reduce impacts on the environment. Furthermore, policy identifies the risk of overheating in new developments and urban areas more widely and the impacts on health. This policy sets out the need for a cooling strategy which is proportionate to the scale of the development and sets out how this risk will be addressed. Policy also identifies the risks to water supplies in the future with climate changes as well as issue of nitrate pollution in water around the Solent - therefore sets out the need for using water resources efficiently in new development and a requirement of achieving water efficiency standards of no more than 110 litres per person (in line with national policy guidelines).

D3	Pollution, Health and Amenity
HIA topic	Policy review comments
Healthy Housing	Draft policy includes consideration of residential amenity and air quality impacts, both for existing residents and the future users/ occupants of proposed development. Development proposals are required to demonstrate how health inequalities and the wider determinants of health and well-being have been incorporated into the design, layout and the use of the development, and its impact on mental and physical health and wellbeing; major developments are required to be accompanied by a HIA.
Transport and accessibility	Not applicable
Social infrastructure	See healthy housing section; requirements would also apply to proposals for social infrastructure.
Healthy environment	The draft approach requires mitigation for the impact of a proposal in terms of pollution and air quality impacts to protect environmental quality.

D4	Low Carbon and Carbon Neutral Development
HIA topic	Policy review comments
Healthy Housing	<p>Policy seeks to secure low and zero carbon design in new development in the city; this follows a sequential approach which starts with a higher level of fabric efficiency than what is currently demanded in building regulations. One of the benefits of this requirement will be for reducing household energy bills (it will take less energy to heat homes) which should help to mitigate fuel poverty in the city and reduce levels of mental stresses that can accompany this problem. Fabric efficiency measures can reduce the likelihood of residents living in cold/damp homes or being affected by extreme heat with benefits for physical health as a result also. A requirement for onsite energy generation via renewable means could bring about reductions in energy bills further by reducing reliance on grid energy.</p>
Transport and accessibility	Not applicable
Social infrastructure	Not applicable
Healthy environment	<p>The policy seeks to encourage a move towards cleaner means of powering and heating new development, this will have multiple benefits for the environment particularly in respect to mitigating climate change (by reducing carbon emissions), but also through improving air quality.</p>

D5	Heritage and Archaeology
HIA topic	Policy review comments
Healthy Housing	Not applicable
Transport and accessibility	Not applicable
Social infrastructure	Not applicable
Healthy environment	Not applicable

D6	Heritage enhancement
HIA topic	Policy review comments
Healthy Housing	Draft policy potentially allows for the positive re-use of heritage assets or remediation of at risk assets. This could led to opportunities for new or improved homes. Monitoring of 'at risk' assets will contribute to safety of residents.
Transport and accessibility	Not applicable
Social infrastructure	Enhancement of Heritage assets potentially provides opportunities for 'culture-led regeneration' and the achievement of wider environmental, social, and economic objectives.
Healthy environment	Re-use of assets could potentially include opportunities wider land remediation where applicable.

S1	City Centre
HIA topic	Policy review comments
Healthy Housing	The draft policy aims to contribute to securing new housing of various tenures in an accessible location, including taller buildings in order to meet identified housing needs for various groups guided by the strategic housing policies in the Local Plan. The draft Policy could be enhanced by acknowledging that the ward area has higher levels of deprivation and exploring how regeneration would benefit the existing communities.
Transport and accessibility	The approach, informed by the draft City Centre Masterplan work, aims to establish a more permeable and pedestrian friendly environment which will reduce reliance on the car. It incorporates a number of linear parks and walking routes that are intended to better support active travel throughout the sites. The development of a new transport hub with appropriate cycle service provision as well as better connections to the train station should further support new residents and visitors to take up more sustainable modes of travel around the city.
Social infrastructure	Includes the need to deliver a range of new leisure, civic/culture, and commercial uses throughout the city centre which will be able to support the economy and social fabric of the area.
Healthy environment	The draft approach includes proposals for the creation of new open spaces throughout the city centre, including linear parks that will help to weave new green infrastructure throughout. The approach of the draft masterplan work will seek to create new high-quality public realm and environment in order to support the sustainable development of the area. There isn't reference to the recognised air quality issues from the adjoining road network; while is this covered by other aspects of the Plan, this could be included to highlight the particular vulnerability of the area to this issue.

S2	Tipner
HIA topic	Policy review comments
Healthy Housing	Option 1 and 2 seeks to establish a new community at Tipner which will contribute to securing new housing of various tenures in order to meet identified housing needs. The development could be a key opportunity for affordable housing delivery in the city (Option 1).
Transport and accessibility	The proposed approach to creating a highly sustainable new community (Option 1) includes car-free streets as a key guiding principle, a focus on sustainable/active transportation within the site and through connections to the wider city which will help encourage more active and healthy lifestyles for residents. The proposed bridge link to Horsea Island would support connectivity from the city to the new County Park being established as part of the remediation at the Paulsgrove landfill (also Option 1 only).
Social infrastructure	The creation of specialist marine employment hub would provide local skilled jobs and training opportunities (Option 1). New community and commercial development would be delivered to support the new community (Options 1 & 2) which also provide work opportunities. Plus new public open space and coastal routes (option 1, and 2 to a lesser extent).
Healthy environment	One of the key principles for the new community is the provision of low/zero carbon development which will be important in order to achieve climate mitigation objectives in the city (Option 1). Blue and green infrastructure is also expected to be weaved throughout the site. Proposals would need to fully mitigate, and/or compensate for the loss and/or harm to the Portsmouth Harbour Special Protection Area (SPA), and would be expected to deliver net gains in habitat creation overall (Options 1 and 2).

S3	Fratton Park and the Pompey Centre
HIA topic	Policy review comments
Healthy Housing	The draft allocation would contribute to the new housing of various tenures in order to meet identified housing needs for the city.
Transport and accessibility	The proposed development would be in an accessible location with good access to public transport and active travel links to the wider city that can reduce reliance on private car. In order to ensure that the capacity of the stadium can be safely expanded, a new off-road link between the stadium and Fratton train station is expected to be explored for the safety of all users.
Social infrastructure	Provision of retail and employment uses through the allocation will help provide job opportunities as well as deliver social infrastructure essential to creating sustainable neighbourhoods. Indirectly, there could be positive cultural impacts for local residents in terms of encouraging engagement with sport.
Healthy environment	The sustainable location and improvements to pedestrian links between the site and the train station will be beneficial for reducing poor air quality by reducing need to travel by private car. As the need to improve the evident lack of greenery in the area as existing, increases in GI coverage would have indirect benefits for addressing overheating, flood resilience as well as mental and physical health of residents.

S4	Cosham
HIA topic	Policy review comments
Healthy Housing	The draft allocation would contribute to the new housing of various tenures in order to meet identified housing needs for the city.
Transport and accessibility	Cosham is considered to be a highly accessible location with public transport and active travel link options to the wider city that can reduce reliance on private car. The number of redevelopment opportunities on Northern Road present an opportunity to increase the GI coverage in this area to create a 'green corridor' to the wider area; this can encourage active and sustainable travel with benefits for physical and mental health.
Social infrastructure	Provision of retail and employment uses through the allocation will help provide job opportunities as well as deliver social infrastructure essential to creating sustainable neighbourhoods.
Healthy environment	The proposed new green corridor, which is to connect into the wider 'green grid' proposals, would strengthen the wider green infrastructure network with benefits for climate resilience, biodiversity and overall quality of the natural environment. The inclusion of provision to ensure that future flood that risks have been addressed would have positives for mental wellbeing of residents by reducing risks of stress arising from flood events damaging homes.

S5	St James' Hospital and Langstone Campus
HIA topic	Policy review comments
Healthy Housing	The draft allocation would contribute to the new housing of various tenures in order to meet identified housing needs for the city.
Transport and accessibility	The sites are accessible locations with access to public transport and active travel links to the wider city that can reduce reliance on private car. The draft approach notes the opportunity for creating new green links with surrounding areas, including into the wider green grid of the city. This can encourage active and sustainable travel with benefits for physical and mental health.
Social infrastructure	Protection of open spaces will serve to maintain spaces for recreation, allowing people to engage in physical activity as well as social interaction. New healthcare uses are to be incorporated into the mix of uses on the site.
Healthy environment	The creation of new green links with surrounding areas would strengthen the wider green infrastructure network with benefits for climate resilience, biodiversity and overall quality of the natural environment. Opportunities have been identified to preserve green spaces on the site which are valuable for feeding Brent Geese and Wading bird species, thus helping support the Solent SPAs, as well as for potential flood mitigation. This will also have positives for health in terms of access to green space and nature. The inclusion of provision to ensure that future flood risks have been addressed would have positives for mental wellbeing of residents by reducing risks of stress arising from flood events damaging homes.

S6	Lakeside North Harbour
HIA topic	Policy review comments
Healthy Housing	Not applicable
Transport and accessibility	Allocation sets out the need for new development to improve pedestrian and cycle links which should help to encourage active and sustainable travel.
Social infrastructure	The draft approach seeks to protect and enhance Lakeside as the city's premier employment location through the provision of new employment floor space alongside supporting and ancillary uses. Retaining local accessibility to skilled employment opportunities.
Healthy environment	The draft policy acknowledges the ecological importance and quality of natural environment on parts of the site and requires any potential impacts upon the Tree Protection Orders and identified Site of Importance for Nature Conservation (SINC) for rare flora to be avoided in the first instance. It also includes provision for opportunities for creating links to and/ or enhancing existing biodiversity networks with several known ecological networks overlapping with or in close proximity to the site, in line with other strategic policies of the Local Plan. Managing flood risk could include maintaining the existing green open space for flood storage.

S7	PCC Estate Renewal
HIA topic	Policy review comments
Healthy Housing	The need to deliver housing that meets the needs of local residents, within a healthy and safe environment is the focus of this draft policy. The higher levels of deprivation in the wards dominated by PCC housing is acknowledged, including the need for a HIA to accompany proposals.
Transport and accessibility	A key principle for any proposals in this areas will be to improve legible access with the surrounding areas. Improving links within and through the area, connecting key destinations in the vicinity and city.
Social infrastructure	The need to create welcoming, accessible high quality open spaces and play areas and improvements to existing open spaces and amenity areas is included. This will help to support physical and mental wellbeing of residents as well as encourage social interaction.
Healthy environment	Development in this location would be subject to the need to enhance and deliver net gains in green infrastructure and biodiversity in-line with the other policies in the Local Plan.

S8	The Seafront
HIA topic	Policy review comments
Healthy Housing	Not applicable
Transport and accessibility	Greater connectivity between the seafront and the rest of the city is sought, which will help encourage active transport options and decrease trips to the seafront area by car (and the associated congestion and air pollution).
Social infrastructure	Recreational facilities and open space are to be protected through the policy as a key social asset which also benefits for physical and mental wellbeing.
Healthy environment	Cross reference to the policy G2: Green Infrastructure to highlight the opportunity enhance GI and wider green links to the city.

S9	Portsmouth Hill
HIA topic	Policy review comments
Healthy Housing	Not applicable.
Transport and accessibility	Encourages enhancement of active travel networks.
Social infrastructure	Preserving the value of the location for recreational facilities has intrinsic benefits for physical and mental wellbeing. The importance of preserving the heritage and historic assets is highlighted which make a valuable contribution to the enjoyment and wellbeing of those who visit the area.
Healthy environment	Protects and potentially seeks to expand the accessible open space for recreational use and biodiversity enhancement, and acknowledges the potential conflicts. Opportunities for GI network enhancements are also referred to.

S10	Coastal Zone
HIA topic	Policy review comments
Healthy Housing	Not applicable
Transport and accessibility	The draft policy seeks to improve access to the coastal zone where possible; this will potentially have benefits for health and wellbeing by opening up more of this environment for people to utilise for physical exercise.
Social infrastructure	The seafront is a key piece of social infrastructure (open, blue space) for health and wellbeing of residents. Ensuring it is protected from inappropriate development, and access is enhanced where possible, increase access to this resource to more residents in future.
Healthy environment	Draft policy seeks to protect the open coastal zone environment on the eastern side of the city by limiting to approximate development that also requires a coastal location. Requirements are set out in relation to provision of sea defences to manage flood risk and the wellbeing of residents (and their homes/businesses).

