Local Plan Preferred Options
Health Impact Assessment screening report

1. Introduction

1.1   Enabling positive health and wellbeing has been a fundamental driver of the modern planning system since its establishment after the Second World War. Indeed, the National Planning Policy Framework (NPPF) identifies that *planning policies and decisions should aim to achieve healthy, inclusive and safe places* (para 92). Yet evidence suggests that health outcomes for people in England are no longer improving as they have been in previous decades, indeed life expectancy for women in the most deprived communities in the country has begun to drop; the time spent living in poor health throughout the country is now increasing for everyone; and health inequalities are growing[1].

1.2   The health and wellbeing topic paper published as part of the evidence base for our 2021 Issues consultation highlighted that particular health trends and challenges that are present in Oxford. Health and wellbeing are strongly correlated with levels of socio-economic deprivation, for example, with those living in the most deprived areas typically facing worse health inequalities compared to those living in less deprived areas.

1.3   But the way we design and build the places we live and work in has a significant impact on the health and wellbeing of local people. Social, environmental and economic factors within the built environment like the availability of safe and appropriate housing; access to shops selling quality food and goods; good schools and employment; open space to socialise and be active in, as well as the ease with which we can move around and between these spaces can all have an influence on our health and wellbeing. Sometimes these factors are referred to as the 'wider determinants' of health[2], and they can all have an influence on behaviours which promote higher risk of disease and general ill health. For

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[1] https://www.instituteofhealthequity.org/resources-reports/marmot-review-10-years-on
[2] https://fingertips.phe.org.uk/profile/wider-determinants

example, living somewhere without easy access to shops or open space makes it more challenging to engage in regular physical activity, which can lead to increased risk of a variety of health problems.

1.4   The Local Plan 2040 will set out the policies that will influence how the city's built and natural environment develops over the coming years. These policies will have a direct role in shaping the design of new development and as such will play an important role in addressing many of the wider determinants of health highlighted above. The way such policies are written and presented can determine how subsequent development in the city might positively or negatively support health. We are keen to ensure that wherever possible, we have maximised opportunities to formulate policies that support positive health outcomes for people in future whilst mitigating potential negative impacts wherever possible. In order to do this, we are undertaking a Health Impact Assessment at each stage of the new Local Plan's development to shape this process.

1.5   This report details the initial Health Impact Assessment that we have undertaken for the policy options presented in the main consultation document. At this stage, we are presenting a range of high-level options for future policies, and as such, the HIA undertaken to assess their impacts is equally high level. This first assessment essentially takes the form of a screening exercise, identifying which policy options sets could have the most direct impacts on various aspects of health and wellbeing in the city and flagging the key areas we will need to focus on at the next stage, as we draft the full wording of these policies. Where we have picked up on connections, we will need to consider in greater detail the opportunities for improving positive outcomes, as well as mitigating any potential negative impacts that the policies could generate.

1.6   Alongside this work, the preferred options are supported by a broader Sustainability Appraisal which assesses a wide range of sustainability impacts (health is one small part of this). The HIA should be considered as a separate piece of analysis, which takes a particular focus on health and wellbeing impacts because we consider this to be a key issue of focus for the new Local Plan. As with the SA, the HIA (and its subsequent iterations at later stages of the Local Plan development) will detail part of the overall 'story' of how we have come to the final version of the Local Plan 2040.

2. Methodology for undertaking this HIA

2.1   As touched upon above, this initial HIA is high level, screening exercise, reflecting the high-level nature of the options for future policies that have been prepared at this stage and the limited detail they entail. The HIA process we have followed has been undertaken in a several stages.

2.2   Initially we have undertaken a review of health and wellbeing context in the city (as was presented in the topic paper at the issues consultation) and considered the various elements of health and wellbeing that the Local Plan could feasibly have influence over. This has led us to identifying an assessment framework of seven topics that influence health and wellbeing outcomes. The topics are as follows:

- Healthy housing
- Healthy environment
- Movement and accessibility
- Social infrastructure
- Oxford's inequalities
- Economy and jobs

- Climate change

2.3   The second stage was to screen all our emerging policy options sets against each of the seven topics within the assessment framework. We have tried to identify which sets of options presented in the consultation could directly contribute to, or influence, an element of health and wellbeing. The screening exercise has identified that some sets of options relate more directly to particular topics than others. However, the policies of the local plan need to be taken as a whole and it becomes clear that all of our identified health and wellbeing topics are addressed to varying degrees when the collection of options sets are taken in its entirety.

2.4   The third stage of work was to take each of the seven HIA topics and begin to think more fully about the how the screened in options sets could address health and wellbeing issues related to each topic. This exercise has flagged contextual issues that it will be important to consider in greater detail as we draft the policies for the full draft (Reg 19) Local Plan in 2023. Conclusions have been drawn out for each topic and are discussed in the next section.

3. HIA conclusions by topic

HIA topic A - Healthy housing

3.1   The housing background papers prepared for the 2021 Issues consultation[3] highlighted the challenges around housing provision in the city. There are issues with high cost of housing, compared with wages (known as housing affordability), with Oxford being one of the most expensive places to buy a property in comparison with monthly earnings, as a result of high land values, limited land availability, and a shortage of homes. This means that housing is so expensive in absolute terms and compared to average salaries, that many people are priced out of the market. Equally, the high cost of housing also has an impact on the private-rented sector with the average rent for properties in Oxford (according to the ONS)[4] being £1,450/ month.

3.2   These issues have a variety of impacts for health and wellbeing and particularly impact those on lower incomes who are already faced with a variety of socio-economic challenges. Lack of access to affordable homes can force people to live in inappropriate housing (e.g. overcrowded or sub-standard). It is also known to be forcing people to live further away from places of work, leading to longer commutes or reduced access to jobs. There is also the impact of pushing more people into poverty as they are forced to spend more of their average monthly income on accommodation costs compared with other needs such as food or heating.

3.3   There are also specific housing needs for certain groups of people, for example older persons and the disabled, which we need to consider. Inappropriately designed housing can exacerbate negative impacts of life-limiting illnesses or mobility impairments which can affect both of these groups to a higher degree. Equally, where housing is in poorly accessible locations, issues around social isolation and loneliness can be exacerbated (an issue that can affect everyone of course).

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[3] https://www.oxford.gov.uk/info/20067/planning_policy/1460/oxford_local_plan_2040
[4] https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/privaterentalmarketsummarystatisticsinengland

3.4	The policy options consultation sets out several approaches that have been formulated to address housing provision in the city and the supply of affordable homes. Options sets **H1** to **H16** are all likely to have some impact in relation to this topic to varying degrees. Options under **H3** set out how we will seek to secure a range of tenures of affordable housing (preferably onsite) as a proportion of all new homes built in the city. This should help to deliver mixed and balanced communities; meeting needs of those on lower incomes who may not be able to afford full market housing. Options under **H6** are aimed at trying to ensure a mix of dwelling sizes, with larger sites that may be better suited for larger families making an appropriate contribution to these needs. Options under **H14** recognise that there are particular needs for elderly and older persons and includes a preference for a policy that would be supportive of elderly persons' accommodation of all types, but with criteria to be met that ensures it provides good quality living accommodation, is in accessible locations and is part of a mixed and balanced community.

3.5	Policy options sets elsewhere in the plan have also been formulated to help address some of the issues highlighted under this topic. For example, options **DH8** to **DH11**, set out preferred approaches for how we would bring forward policies that encourage careful design to address issues like adequate privacy and lighting (**DH8**), internal and external space (**DH9** and **DH10**), which are important for making comfortable homes that people feel comfortable spending time in (supporting mental health). As well as accessible and adaptable homes (**DH11**), which addresses issues like wheelchair access in a proportion of dwellings and should support residents to maintain their independence and help to alleviate pressure on health and social care.

HIA topic B - Healthy environment

3.6	Oxford's natural and built environment is an important determiner of health and wellbeing outcomes in the city and the Local Plan will play a key role in its protection and how it changes into the future.

3.7	The city has a network of green open spaces and areas of valuable ecology and biodiversity which support the wider city and its residents. Access to open spaces like parks and pitches is important for enabling people to stay active and to socialise and supports physical and mental wellbeing. The distribution of green space in the city is fairly even across the city, however, analysis conducted as part of the GI study identifies that there are areas where access is poorer. For example, there are small areas where access to allotments in the city centre and to the north and west could be improved, as well as access to a park in Wolvercote in the north, and a couple of larger gaps in access to children's play facilities in the city centre and in the north (see the GI study for more details). There are areas in the east of the city particularly, where there are higher amounts of housing without access to private gardens that also fall within areas of reduced public open space. Quality of provision of existing facilities also varies across the city, including some lower quality sites falling in areas of high deprivation too, which could be an issue where these communities do not have private open space and may be expected to rely more heavily on public provision.

3.8	There are a number of wider issues that affect the environment and by extension, health and wellbeing. The entire city has been designated as an Air Quality Management Area (AQMA) because of poor air quality and there are hotspots around the city centre where levels of air pollutants exceed targets[5]. Any level of air pollution can be harmful for people, particularly those who suffer from existing respiratory or cardiovascular conditions and the city has set itself rigorous targets for improving the situation. There are also areas of the city which are likely to be affected by land contamination, due to the history of land uses

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[5] https://www.oxford.gov.uk/download/downloads/id/7428/air_quality_action_plan_2021-2025.pdf

that have been situated in these locations over time, which can be harmful to health. Equally, issues of flooding and overheating bring their own health risks, though these are discussed in greater detail later (see topic G).

3.9   The policy options sets that are included within chapters 4 and 5 of the preferred options document are most directly of relevance to this topic. Options sets **G1**, **G5** and **G6** seek to protect the green and blue infrastructure network including areas important for biodiversity, which is important as once these spaces are lost it will be challenging to replace them. These policies will help to retain levels of access to green spaces across the city and help ensure no further deficits are created through development. Options sets **G2**, **G3**, **G4** and **G5** set out approaches for delivering net gains in greening and biodiversity, which are more likely to influence greening of developments and urban areas. These approaches could have the added benefit of making space more pleasant for people, encouraging them to adopt active travel behaviours like walking/cycling rather than resorting to car.

3.10   Options sets within chapter 5 address broader environmental/amenity concerns such as air quality (**R5**), which seeks to ensure new development does not exacerbate air quality issues. Option set **R7** requires that applicants consider land contamination risks and have undertaken the appropriate assessments and incorporated any remediation measures where necessary, which will help reduce the chances of occupants encountering harmful substances left over from historic uses on a site. Options set **R8** seeks to ensure proposals mitigate any risks of direct impacts from development, e.g. production of noise or dust from construction that could be harmful to health of people in the vicinity.

HIA topic C - Movement & Accessibility

3.11   A key concept that is guiding the development of the new Local Plan is that of 15 minute neighbourhoods and striving to ensure that residents have all of their daily needs met within no more than a 15 minute walk of their home. The focus in Oxford is around district and local centres being a hub for the majority of daily needs and therefore ensuring that people are no more than 15 minutes from one of these locations. Being within walking distance of such a centre is considered to be positive for encouraging walking/cycling and reducing dependence on the car, this has positive health benefits in terms of promoting physical activity as well as more indirect benefits like potentially reducing air pollutants arising from vehicles. Current analysis indicates that the majority of the city falls within a 15 minute radius of a district/local centre, however, there are small gaps in access, where residents have further to go.

3.12   The transport topic paper published as part of the 2021 Issues consultation highlighted that in terms of walking, as of 2019, Oxford was among the top ten local authorities in England with high levels of cycling too, being the 2nd highest authority in the UK after Cambridge[6]. According to 2011 census data (new 2021 data is expected the largest mode of transport in terms of commuting to work has been private cars or vans, making up 50% of the overall share, though cycling and walking are the commuting option for just over a quarter. As noted above, encouraging more people to travel in active ways is important for promoting good physical and mental health, and whilst there are clearly many in the city who partake in active transport options, many do not. In terms of uptake of more active travel options however, there are known barriers in the city, for example, the Local Cycling and Walking Infrastructure Plan (LCWIP) identifies that cycling conditions, provision and routes

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906698/walking-and-cycling-statistics-england-2019.pdf

are often very poor. Of course, it is recognised that many will also live and work at distances that cannot be easily/safely walked or cycled.

3.13   As noted above, the new Local Plan is being developed with the concept of 15 minute neighbourhoods as a key overarching thread that runs throughout the formulation of its policies. There are several policy options sets which try to guide future development in a way that is in line with this concept, for example, options set **C1** includes options that would seek to focus town centre uses within our district and local centres helping to ensure these are in the most accessible locations possible. There are also options a number of more specific sets of options that looks to protect access community facilities and education uses (**C3** and **C5** respectively) and also ensure that new provision is in accessible locations (e.g. option set **C4** and **C6**). Options sets that seek to protect and provide new green infrastructure including open space will also contribute to meeting 15 minute neighbourhoods (**G1** and **G2**).

3.14   We also include policy options that can support people to move about without relying on private car in future. For example, policy options sets **DH5** and **DH6** address bike storage and parking standards, as well as option set **DH7** which addresses car parking and continues to put downward pressure on its provision.

HIA topic D - Social infrastructure

3.15   The provision of high-quality social infrastructure across Oxford is crucial for the health and wellbeing of Oxford's residents. Having access to healthy food outlets, healthcare services, places of education and green spaces/recreational facilitates allow people to have good levels of physical and mental health. A good network of public transport is a necessity in allowing people to get across and in out of the city to access the key services that they need.

3.16   The Local Plan recognises the importance of identifying infrastructure need and methods for delivery and states the need to ensure that development is supported by the appropriate infrastructure and community facilities. Additionally, the Local Plan acknowledges that the funding of infrastructure is crucial and must be delivered in a timely manner to support development. The Local Plan states that where new development creates a need for new or improved infrastructure, contributions from developers will be sought to make the development acceptable in planning terms.

3.17   The Council is acutely aware of the challenges facing the city in relation to infrastructure. We published an infrastructure background paper as part of our early issues consultation on the new Local Plan in the summer of 2021. There was a range of feedback to the consultation. The Plan must locate development in areas supported by necessary transport infrastructure with adequate public transport and cycle infrastructure. The city must have an adequate electric vehicle infrastructure (also supporting vehicle battery to grid energy flows, as this opportunity develops) alongside other electrical infrastructure needed to move to net zero and accommodate climate change mitigation measures, such as shift from gas to electric heating, and increased PV on buildings and certain sites.

Adequate health, social and educational infrastructure to support new development whilst safeguarding Oxford's heritage and existing infrastructure.

3.18   Strategic Policy Option Set **S3** considers infrastructure considerations in new development. The potential for options will set out that physical, social and green infrastructure will be required to support any new development within the city. Such infrastructure will be secured via planning obligations, conditions attached to planning permissions and funding through the City Council's Community Infrastructure Levy. This potential approach to this policy will ensure that new sizeable developments will be supported with sufficient infrastructure and the physical and financial requirements will be secured within the planning process.

3.19   Policy option set **G1** is the 'protection of the green infrastructure network and green features'. The aim of this policy setup is to identify a network of green and blue infrastructure for protection which will be informed by the green infrastructure study. This policy will be effective as green networks that are crucial for people's physical and mental wellbeing will be protected and local resident's needs will be met. The city only has a finite amount of green space so it is crucial that this protected. Furthermore, Oxford's bespoke green spaces can be protected and enhanced via specific policies.

3.20   Alongside physical connections throughout the city, digital connectivity is of increasing importance to how we live, work and communicate with each other. Strong, high quality digital infrastructure can also support jobs and
         businesses, particularly technology and research, which form a strong part of Oxford's economic profile. Digital access (or lack of it) was an issue that was highlighted by the recent covid pandemic and social distancing, which has brought about a greater shift towards home working for many, as well as greater reliance on internet connectivity for other practices such as learning and shopping. Despite the increased shift to digital ways of connection, there are still communities who do not benefit from high quality digital connectivity, particularly those in more deprived areas of the city.

3.21   National policy and supporting guidance emphasise how local authorities should support high quality digital communications infrastructure which reduces the need for locally set policies as any local policy would be unlikely to add much variation on this, thus our preference would be not to have a specific local policy. Where there are specific local contextual issues arising from new infrastructure, e.g., heritage or biodiversity, the relevant policies elsewhere in the plan would ensure any specific concerns in relation to these topics are addressed. Regarding digital connectivity in residential developments, we would wish to ensure that new developments consider digital connectivity by including this as a principle within the design checklist rather than having a specific policy.

HIA topic E - Oxford's inequalities

3.22   There are distinct contrasts in health profiles across the city resulting in differences in life expectancy, prominence of physical/mental illness and reduced outcomes in certain areas. Attaining good health and wellbeing for residents living in these areas is potentially more challenging. The city hosts some of the most socio-economically deprived and least deprived neighbourhoods in the County. Socio-economic deprivation is often correlated with poorer health and wellbeing outcomes. According to the 2019 Index of Multiple Deprivation, 10 of Oxford's 83 neighbourhood areas ('Super Output Areas') are among the 20% most deprived areas in England. These areas, which are in the Leys, Rose Hill, Littlemore, Barton and areas of the city, experience multiple levels of deprivation – low skills, low incomes and relatively high levels of crime. Those living in most deprived areas may be more likely to be living in poorer quality accommodation or unable to access the housing they need. Inequalities exist more broadly in population.

3.23   As shown by Oxford's index of multiple deprivation map (IMD 2019) there are a variety of geographical locations that feature within the 20% most deprived wards in the city. Wards with the highest levels of deprivation tend to be focused in central, eastern or southern areas of the city. Two Northfield Brook wards and Rose Hill and Iffley are scored as the most deprived wards in the city. Oxford ranks 182nd out of 317 most deprived wards nationally in terms of average score for overall indices of multiple deprivation. This was a slight improvement on the situation in 2015. To the contrary, 21 of Oxford's 83 lower super output areas are in the top 20 least deprived areas nationally.

3.24   Policy **H3** will aim to continue to prioritise the delivery of affordable housing across the city. Affordable housing will be provided across the city and of these affordable homes it is likely that a requirement will be set to provide a percentage of these as First Homes, Socially Rented and intermediate (likely shared ownership) homes. AS a policy this will help tackle inequality as a proportion of the city's housing stock will be available below the market rate. In addition, the likely prioritisation of Social Rent over intermediate homes can access housing set with rents set at local housing authority rents. It should be note that 50% affordable homes has been deliverable and viable in the city under the current Local Plan and previous core strategies. Policy **H4** seeks to gain a financial contribution towards affordable housing elsewhere in the city. This could be delivered either on or off site and financial viability needs to be considered before a specific policy can be implemented. This would hopefully create an additional source of affordable housing contributions.

3.25   Policy option **E6** focuses on the Employment and Skills Plan. This is an approach that aims to allow local people to be able to access training and education more easily. The policy will aim to encourage or possibly require applicants for employment land to consider both the training, education and employment benefits that they could bring to an area. This policy may be encouraged rather than enforced if applied at all. Continuing with the theme of employment, Oxford City Council are keen to provide workplaces that are affordable. When developers are providing commercial development, especially that of a large scale, it may be considered to ask for or encourage the developers that a percentage of the development is made affordable. The overall aim of this policy id to help to secure the most affordable workplaces across the city to help facilitate an inclusive and diverse economy.

HIA Topic F - Economy & jobs

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3.26   The City of Oxford is home to around **4,935 active** businesses[7], collectively employing approximately **121,000** people[8]. In addition, self-employment and the armed forces account for another **7,900[9] and 60** jobs[10] respectively, bringing the total number of jobs in the local economy to **128,960** jobs. Oxford's importance as an employment location is clearly demonstrated by its job density ratio (jobs to residents aged 16-64) of 1.33 (2019), which is well above the South-East (0.90) and Great Britain (0.87)[11]. In 2017 it was estimated that Oxford contributes £7.34bn to the national economy annually[12]. Furthermore, Oxford is the seventh most visited city in the UK https://www.visitbritain.org/town-data and as a result tourism plays an important role when assessing the health and wellbeing of Oxford's residents. In addition to this

3.27   The high-tech sector, however is not the only sector that should be considered when analysing Oxford's economy. Plenty of other non-high-tech businesses exist that also need to be supported and protected through the Local Plan 2040's policies. It is crucial that local people have access to jobs in Oxford whichever sector a person's skills and expertise lie in. The growth of hybrid working patterns should be considered when considering the balance in allocation of land for both employment and housing.

3.28   Having a diverse economy to provide jobs for Oxford's residents is a staple of providing good levels of health and wellbeing as an unstable economy can lead to a reduction in the number of jobs available which an in-turn cause people to have stress for their own job security or in many cases unemployment. High amounts of unemployment for residents reduces people's quality of life and therefore health as families are forced to cut costs and in extreme cases be threatened with becoming homeless. These issues will only be amplified by the increase in energy prices and turbulent economic situation the UK finds itself in during 2022.

3.29   Policy Options **E1** Employment Strategy and **E2** Making the most of existing employment sites focuses on meeting employment need by maximising the current availability of employment land. Policy options **E6** Employment and Skills Plans focuses on creating an inclusive economy for the city. The preferred option asks developers to produce an employment and skills plan which sets out a vision for employment and training opportunities for people employed on any new development sites.

3.30   Options **E8** and **E9** will protect and encourage short-stay tourist locations to be located in suitable locations. The aim of this policy option is to encourage more visitors to stay overnight and contribute further to the economy than just a day trip. Increased

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[7] Source: NOMIS - UK Business Counts (2020)

[8] Source: NOMIS – Employee jobs

[9] Source: NOMIS – Labour Supply – Oxford (2020)

[10] ONS - Location of UK regular service and civilian personnel annual statistics: 2020

[11] Source: NOMIS – Labour Demand

[12] Centre for Cities, 2017, using ONS Productivity Data

investment In Oxford's economy will create demand for services in Oxford which will in turn create demand for services and products which will benefit local people in turns of commerce and in turn improved financial standing and less stress too.

HIA topic G - Climate Change

3.31   When considering health and wellbeing in relation to the topic of climate change, our focus in this assessment is resilience to the projected impacts of two key hazards, flooding and overheating. Even before climate change, the city has a history of flood events due to its proximity to a variety of sources of flooding, particularly from the rivers. However, the ongoing impacts of climate change are projected to include wetter winters and increased incidences of intense rainfall events which are likely to exacerbate these risks in the future, with a variety of negative consequences for property, economy and ecosystems as well as human health. The ongoing stress that is caused by flooding events including the threat of flooding, can be taxing on the mental health of those living near flood zones and this could exacerbate challenges faced by those already in poor mental health. Furthermore, those living in deprivation, or with little disposable income, may have fewer resources (financial and material) to adapt to increasing flood risk, which can exacerbate the impacts they face, for example, being unable to pay for insurance that can cover damages during a flood event.

3.32   The other climate hazard of increasing significance is likely to be that of warmer, drier summers and more intense and prolonged heat waves. We are likely to see more heat wave events of a similar nature to those that affected the country this summer, with significant implications for health and wellbeing of the most vulnerable. Such events create issues for temperature regulation leading to increased risk of overheating and heat stress, and the impacts of prolonged heat wave events have been shown to be particularly threatening for those with pre-existing health conditions such as heart and lung disease, as well as the young and the elderly. Risks of overheating are exacerbated by the urban environment around us, including poorly designed buildings (e.g. those with insufficient ventilation and other cooling measures), and outdoor spaces that are lacking in green infrastructure and other forms of shading.

3.33   The consultation includes policy options sets within chapter 4 that seek to address climate resilience and issues like flooding and overheating. The options set **G7** 'Flood risk and Flood Risk Assessments (FRAs)' sets out the approach to ensuring flood risk is addressed in any new development, meanwhile, options set **G8** 'Sustainable Drainage Systems (SuDS)' will seek to ensure that drainage on sites is managed effectively and is designed to incorporate green and natural features as much as possible in the first instance.

3.34   Meanwhile, policy options sets **G1**, **G2** and **G3** set out our approaches to protecting green infrastructure and seeking to ensure that new development incorporates new green infrastructure wherever possible. Green features have a range of benefits, helping to slow down and store surface water run off (helping to improve resilience to flooding), but also providing shading and cooling that can be invaluable during warm summers and heat wave events. Another important set of options for resilience to climate change are set out in policy options set **G10** 'Resilient Design and Construction', which seeks to ensure that a range of impacts from climate change are considered in the design of new development by flagging a variety of requirements that need to be addressed. One of these requirements includes details of a cooling strategy, as well as measures to conserve water.

4. Next steps

4.1   This screening report has detailed the initial health impact assessment that has been carried out against the preferred options consultation document. At this stage, in the absence of full details of policies, the assessment has necessarily been high level, however the screening has helped us to identify key areas that could support health and wellbeing objectives. It highlights that across the seven topics of health and wellbeing in our assessment framework, there are a variety of policy options sets being consulted upon which can potentially make some contribution to positively supporting them, should we adopt policies that follow the approaches as set out.

4.2   Following on from the 2022 consultation, as we progress toward drafting full policies, we will need to consider how opportunities for positively supporting health and wellbeing can be maximised within these policies and supporting guidance. We will also need to seek to ensure that any negative impacts of policy wording are considered and mitigated wherever possible. We expect this to be an iterative process, with the HIA work helping to refine the policies as they emerge, wherever possible. We envisage producing an update assessment to accompany the consultation on the full draft plan in 2023 which details how this process has been undertaken.

4.3   Any feedback on this initial assessment is welcome through the current consultation process.