

**LONDON BOROUGH OF RICHMOND UPON THAMES
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT**

**MAIN MATTER 21:
CREATING SAFE, HEALTHY AND INCLUSIVE COMMUNITIES**

WEDNESDAY 10 JULY 2024

COUNCIL RESPONSES TO MAIN MATTER 21

Abbreviations

AQAF – Air Quality Action Fund

AQMA – Air Quality Management Area

DtC – Duty to Cooperate

GLA – Greater London Authority

HIA – Health Impact Assessment

HUDU - Healthy Urban Development Unit

LDS – Local Development Scheme

LP – The London Plan

NPPF – National Planning Policy Framework

PPG – Planning Practice Guidance

RLP – Richmond Local Plan

SA – Sustainability Appraisal

SFRA – Strategic Flood Risk Assessment

SoCG – Statement of Common Ground

SPD – Supplementary Planning Document

22.1 Are the requirements justified by appropriate available evidence, having regard to national guidance, and local context, and meeting the requirements of the London Plan?

The requirements of the policies in Chapter 25 'Creating Safe, Healthy and Inclusive Communities' are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan. The primary sources of evidence are:

- Joint Health and Wellbeing Strategy Prevention Framework 2021-2025 (SD-101)
- Health Impact Assessment of the Publication Local Plan (SD-005)
- Health Impact Assessment of the Draft Local Plan (SD-038)
- Social Infrastructure Indicators 2016/17-2022/23 AMR (SD-086)
- Open Space Assessment (SD-067)
- Air Quality SPD 2020 (SD-105)
- Development Control for Noise Generating and Noise Sensitive Development SPD (SD-108)
- Air Quality Positive LPG (SD-141)
- Air Quality Neutral LPG (SD-142)
- Strategic Flood Risk Assessment (SFRA) (SD-061)
- Article 4 Directions – Basements and Subterranean developments (SD-075)
- Basement assessment user guide (SD-117)

Paragraph 96 of the NPPF (December 2023) sets out that planning policies and decisions should aim to achieve healthy, inclusive, and safe places and beautiful buildings which:

- Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other.
- Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life of community cohesion.
- Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.

Social interaction is a key theme throughout the RLP; it is referenced in the RLP's strategic vision with regards to promoting inclusive and sustainable communities for all, through ensuring high standards in new housing and opportunities to build social interaction and create cohesive and healthy communities for the older populations within the borough. The RLP strategic vision

also encourages change in the borough's centres which will be key meeting places where social interaction and a sense of community is fostered.

The RLP promotes inclusive design to ensure that the built environment, both the internal and external parts of buildings and the spaces in between are safe, accessible and convenient for all. Designing out crime is identified throughout the RLP; in Policy 28 'Local Character and Design Quality (Strategic Policy)', in Policy 19 'Managing the Impacts of Development on Surroundings ' in considering ways to manage impacts of evening and food and drink uses, and Policy 43 'Floodlighting and Other External Artificial Lighting ' in recognising the benefits of floodlighting for safety of movement.

Health and wellbeing is a cross-cutting theme across the RLP. A healthy place is one which encourages, supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing. Good air quality is vital to the health and wellbeing of the borough. The Council's Prevention Framework 2021 to 2025 aims to embed prevention in the Council's wider work, particularly through the environment, to promote positive health and wellbeing and to address health inequalities.

The NPPF also outlines in paragraph 97 that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- Plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments.
- Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- Ensure that established shops, facilities and services are able to develop and modernize, and are retained for the benefit of the community; and
- Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Social and community infrastructure facilities are recognised in the RLP as being at the heart of local communities; they are important for the quality of life of residents, in the creation of more

inclusive and sustainable communities and in helping to promote social interaction and encouraging people to lead more healthy and active lives.

The introduction to the RLP sets out the local context; noting that the borough is prosperous, safe and healthy. Although there are health inequalities between more deprived and less deprived areas such as life expectancy. The boroughs population is expected to change, particularly with an ageing population. The following policies are prepared to ensure that the Borough remains a healthy place, which encourages, supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. While each policy deals with a separate issue, they are connected in this chapter by the common aspiration of creating safe, healthy and inclusive communities.

Policy 51 Health and Wellbeing

Paragraph 96 of the NPPF states that policies should aim to achieve healthy, inclusive and safe places. Policy 51 is in accordance within this, supporting development that promotes healthy lifestyles and reduces health inequalities, aiming for land uses and facilities to provide; access to sustainable modes of travel, access to green infrastructure, access to local community facilities, access to local healthy food, access to free public toilet facilities (in accordance with London Plan Policy S6), access to free drinking water (in accordance with London Plan Policy D8), a safe inclusive development layout and public realm that considers the needs of all, active design and access to healthy housing.

Policy 51 aims to deliver this by requiring developments to; submit a Health impact Assessment (majors), an Inclusive Design Statement as part of the Design and Access Statement, refusing proposals for new fast food takeaways located within 400 metres of the boundaries of a primary or secondary school, retaining existing health facilities where these continue to meet or can be adapted to meet residents' needs and applications for new or improved facilities or loss of health and social care facilities will be assessed in line with the criteria set out in Policy 49 'Social and Community Infrastructure.

The Council's response to Main Matter 20 also sets out details in the broader social and community infrastructure context about the collaborative approach to working with health bodies. Particularly with regard to healthcare, proposed new development will create an increased demand for which in some places could create the need for additional capacity. There is already pressure on health facilities in the borough with currently some shortfall in GP

floorspace in parts of the borough, as set out in the Infrastructure Delivery Plan (SD-SD-069 and SD-070). Further details are set out in relation to financial contributions in the Council's response to question 22.3 below.

Note the Council's response to Main Matter 14 sets out more detail in relation to fast food takeaways.

The approach to health as a cross-cutting theme is carried forward from the adopted Local Plan, but has been updated to reflect health priorities and future infrastructure needs, such as space for social prescribing, emphasis on inclusive access, dementia-friendly environments, and public toilets and drinking water.

Policy 52 Allotments and Food Growing Spaces

Paragraph 96 of the NPPF requires planning policies to enable and support healthy lifestyles and uses the example of achieving this through the provision of allotments. Policy G8 (Food Growing) in the London Plan requires Development Plans to protect existing allotments and encourage provision of space for urban agriculture – both of which are covered in Policy 52.

Policy 53 Local Environmental Impacts

Paragraph 193 of the NPPF and London Plan Policy D13 Agent of Change ask new developments to reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby. Policy 53 is in accordance with both the NPPF and London Plan and requires local environmental impacts of all development proposals to ensure that they do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land.

Paragraph 192 of the NPPF requires planning policies to sustain and contribute towards compliance with relevant limit value or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. The London Plan, through Policy SI 1 'Improving Air Quality' challenges Development Plans to seek opportunities to identify and deliver further improvements to air quality and to tackle poor air quality. The RLP Policy 53 has been prepared in line with both the NPPF and London Plan and sets out that good air quality is vital to health and wellbeing. There are a number of areas in the borough that do not comply with the air

quality targets and action must be taken to control, minimise, and reduce the contributing factors of poor air quality. The whole of the borough has been declared as an Air Quality Management Area (AQMA)¹ and as such any new development and its impact upon air quality must be considered very carefully. Strict mitigation will be required for any developments proposed within or adjacent to 'Air Quality Focus Areas'. To tackle poor air quality, protect health and meet legal obligations, minor developments are required to be at least "Air Quality Neutral" or "Emissions Neutral". Major development proposals must be submitted with an Air Quality Assessment which will be enough to demonstrate that they are in accordance with Part B1 of London Plan Policy SI 1.

Paragraph 193 and 191 a) and b) of the NPPF are applicable to noise, requiring the applicant (or 'agent of change') to be required to provide suitable mitigation before the development has been completed, where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity and mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life. The London Plan policies D14 'Noise' and D13 'Agent of Change' require new development to mitigate and minimise the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses. The RLP reflects this, making it clear that the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development.

Paragraph 191 c) of the NPPF requires development to limit the impact of light pollution from artificial light on local amenity. Policy D8 'Public realm' of the London Plan states that lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution. Policy 53 of the RLP has been prepared to accord with both the NPPF and London Plan, aiming to ensure that artificial lighting in new development does not lead to unacceptable impacts; requiring an assessment of new lighting and its impact, mitigation measures and the promotion of good lighting design and use of new technologies.

The London Plan at paragraph 3.13.4 makes it clear that although the Agent of Change principle predominantly concerns the impacts of noise generating uses and activities, other

¹ www.richmond.gov.uk/services/environment/pollution/air_pollution/air_quality_action_plan

nuisances should also be considered under this policy, including odour. The RLP reflects this by ensuring that any potential impacts relating to odour and fumes from commercial activities are adequately mitigated by requiring; an impact assessment, details on the type and nature of filtration and the height and position of any chimney or outlet and the promotion and use of new abatement technologies. Other parts of the RLP also reference the Agent of Change as relevant, including in relation to managing the impacts of development and the tensions that can arise between particular uses (see for example paragraph 18.43 and 19.3, along with Policy 46).

Policy 54 Basements and Subterranean Developments

The Council made two Article 4 Directions (SD-075) that came into effect in 2018, which remove permitted development rights across the whole borough for basement and subterranean developments. The Article 4 Directions do not prevent the construction of basements; however, they enable consideration of the impacts of basement extensions, including new basements, are properly assessed in and that any potential harmful impacts including the potential risk to life are mitigated.

The development of basements in residential areas is becoming an increasingly popular way of gaining additional space in homes without the need to relocate to larger properties as well as for increasing the value of a property. The shortage of land for development as well as high land values in the borough, coupled with constraints imposed by heritage designations, has led to an increase in the number of applications for basement developments in recent years, whereby the vast majority of these relate to new, or extensions to existing basements, under existing dwellings within established residential areas. The London Plan Policy D10 'Basement development' requires Boroughs to establish policies in their Development Plans to address the negative impacts of large-scale basement development beneath existing buildings. The RLP responds to this by setting out in Policy 54 limitations to the size and extent of a basement ensuring that the special character of this borough is preserved and that proposals do not lead to over-development or inappropriate intensification of existing properties. While Policy 8 deals with basements in flood affected areas, this policy sets out the circumstances when a site-specific Screening Assessment to assess the likely impacts from subterranean development, which may determine the need for a basement impact assessment.

22.2 Do the policies provide clear direction as to how a decision maker should react to a development proposal?

The Council's response to Main Matter 1 sets out the general context for the Plan as a whole, providing clear direction for the decision maker. The Council considers that Policies 51 -54 provide a clear direction as to how a decision maker should react to a development proposal. The Council consider that Policies 51 – 54 are in accordance with Paragraph 16 of the NPPF, which requires that they are 'clearly written and unambiguous,' and drafted in such a manner that it is 'evident how a decision maker should react to development proposals.' The policies are positively worded unless local evidence suggests an alternative approach, and – where appropriate – set out the requirements for decision makers using a criteria-based approach. The threshold to which a policy applies are clearly set out, with a variable approach to location type and/or scale of development within the policy areas to ensure appropriate development is maintained. The justification for each policy and how it will be applied is clearly set out with the relevant support text.

For air quality, the policy is also supported by further guidance in the Council's Air Quality SPD (SD-105) which guides developers when making planning applications to provide clear information as to what is required and how planning applications will be evaluated in terms of air quality, to aid the planning process. Alongside this is the Mayor's Air Quality Neutral LPG (SD-142) and Air Quality Positive LPG (SD-141) which set out air quality benchmarks for all development, as well as a simplified approach for minor developments.

The policies are clearly linked to the ten strategic environmental, social and economic objectives of the Local Plan, as set out in Chapter 3 of the Local Plan. These objectives, support the achievement of the Local Plan's vision for all residents to 'live locally' through implementing the 20-minute neighbourhood concept and form the basis of its spatial strategy. The Council has assessed the clarity and intent of the policies using the Planning Advisory Service Soundness Self-Assessment Checklist (SD-016), and in particular Question 44 which asks 'Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?'

Following the public consultation on the Pre-Publication (regulation 18) Local Plan, minor changes were made to the polices in providing additional references to relevant strategies to reflect the current contexts for health bodies and the Council's strategies on healthy housing and the Allotment Strategy (Policies 51 (Health and Wellbeing) and 52 (Allotments and Food

Growing spaces) respectively), and amendments on the reference to the agent of change for noise and other nuisances, risk to water quality and mitigation of groundwater from contamination (Policy 53 – Local Environmental Impacts), and for Policy 54 (Basements and Subterranean Developments) a cross-reference to protection from sewer flooding covered by Policy 8 has been included. The Council’s detailed responses and outcome of the representations submitted with respect to the Local Plan are set out in the Council’s Statement of Consultation – Including all Pre-Publication Responses and the Councils Response (SD-007), with those specific to Policies 51-54 from pages 438-439.

The Local Plan Publication (Regulation 19) Consultation Version (SD-001) has been submitted to the Secretary of State for Examination. The Council has reviewed the representations received (see document ref SD-013 for the summary of the main issues raised) and have set out detailed comments within the Schedule of Responses to the Publication Local Plan (Regulation 19) Consultation (in Plan Order) with Council’s Response (SD-014). Generally these raised comments on specific aspects of policies, and the Council considers overall the policy framework allows for consideration of relevant issues in the decision-making process. A number of comments on these policies were supportive of the approach and there were no specific comments on Policy 54.

Based on the responses received under the Regulation 19 Consultation no additional modifications were considered necessary for Policies 52-54. Modifications have been considered for Policy 51 (Health and Wellbeing Strategic Policy) regarding the requirements for the Health Impact Assessment (HIA) including the submission of details of the existing health and wellbeing implications, and removal of the reference to the Healthy Urban Development Unit (HUDU) rapid HIA tool which has since become out of date and reference to the latest Health Impact Assessment (HIA) template to use. For ease, the relevant sections of the schedule of modification have been included within the table located at the end of this document.

22.3 Is it clear how the need for any financial contributions would be triggered, calculated and spent? Is this justified by specific local evidence?

The Council considers that how the need for any financial contributions would be triggered, calculated and spent is clear within the RLP and has been supported by local evidence. The specific details for each policy are outlined below.

Policy 51 Health and Wellbeing

Policy 51 requires a Health Impact Assessment (HIA) to be submitted with all major applications. Policy 51 is clear that, as set out in the Planning Obligations SPD, the HUDU guidance and their Planning Contributions Model should be used to calculate the capital cost of additional health facilities required to meet the increased demand which arises from new developments. Discussions on the specific details of the financial contributions and how they should be spent will be undertaken on a site-specific basis depending upon the development that is being proposed, and the resulting increase in demand for existing facilities. An example of this, is St Clare Business Park (development of 100 units) – which the Planning Committee resolved to approve 22/2204/FUL, subject to a legal agreement (s106). The Heads of Terms require the provision of a financial contribution of £94,210 to be used to address the impact on primary care services at the local GP practices and community services at Teddington Memorial Hospital.

The Council publishes an Infrastructure funding statement (SD-090) annually which sets out how much Section 106 and Community Infrastructure Levy income is collected and what it is spent on, which provides supporting evidence towards this approach. The infrastructure funding statement sets out the amount of funds that were collected for health at the end of 2022/23 was £374,020. In line with Regulation 122 of the Community Infrastructure Levy, obligations will only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

Policy 52 Allotments and Food Growing Spaces

Typically for allotment and food growing spaces financial contributions are not sought and therefore details of how financial contributions are triggered, calculated and spent have not been included. As outlined in paragraph 25.27 of the supportive text for Policy 52, the Borough's Open Space Assessment (2023) (SD-067) identifies that there is a sufficient number of

allotment plots within the borough and currently provides 28.7 plots per 2,301 residents, and therefore it is not expected that there will be a significant growth in the number of allotments and food growing spaces.

Policy 53 Local Environmental Impacts

The whole of the borough has been declared as an Air Quality Management Area (AQMA) and as such any new development and its impact on air quality must be considered very carefully. Policy 53 is clear that the Council will require financial contributions towards off-site air quality measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact upon poor air quality. As outlined in paragraph 25.36 of the supporting text for Policy 53, Developers will be required to contribute to off-site measures by making a financial contribution to the Borough's Air Quality Action Fund (AQAF) secured through a Section 106 Agreement.

The specific guidance for air quality in new developments is set out in the Council's Air Quality SPD (2020) (SD-105), including the rates for calculating contributions and how funds will be spent. Details of the AQAF is set out on p.15 of the Air Quality SPD. It outlines that where it is not possible to fully mitigate the air quality impacts of a new development on-site, developers will be required to contribute to off-site measures by making a financial contribution to the Borough's Air Quality Action Fund (AQAF) through a Section 106 agreement. It includes the rates for calculating contributions, which are in line with the statutory tests based on best practice and guidance, and kept under review.

The Air Quality SPD clearly outlines that the AQAF will then be used to implement measures in the Air Quality Action Plan (AQAP) relevant to the development and its impact. Such examples of using this fund include;

- Public education campaign to change behaviors
- The purchase, servicing and maintenance of air quality monitoring equipment to ensure the construction and operational phases of the development do not negatively impact on the local area.
- The provision of advice to developers and their contractors, on the control of emissions during demolition and construction works.

The Air Quality SPD is also clear that developers will need to pay the Council's cost of regulating the air quality impacts of new development and enforcement of air quality planning

conditions to ensure that there is no detrimental impact on air quality. This fee is recognised to vary depending on the type and size of the development.

A Planning Obligations Calculator was developed alongside the Planning Obligations SPD (SD-110), which can be used to identify the contributions required for a proposed development, following the approach set out in the SPD, as a starting point for discussions.

Policy 54 Basements and Subterranean Developments

Typically, the development of basements and subterranean developments is limited to residential developments which are restricted in scale and therefore due to the limited scale and impact of these types of developments financial contributions are not sought and therefore details of how financial contributions are triggered, calculated and spent have not been included.

22.4 Policy 53 (O) - Is it clear in what circumstances the Council will seek a monitoring fee in relation to construction management plans?

Part O of Policy 53 sets out that where applicable and considered necessary, the Council may seek a bespoke charge specific to the proposal to cover the cost of monitoring the Construction Management Plan (CMP). The Council requires the submission of Construction Management Plans (CMP) or referenced as a Construction Logistics Plan or a Construction Environment Management Plan (CEMP) in a number of policies across the RLP: for major development, any basement and subterranean development, development of sites in confined locations or near sensitive receptors, if substantial demolition/excavation works are proposed, and all development using the river to transport construction materials and waste.

This is considered necessary to ensure the Construction Management Plans are adhered to. Due to the character and nature of this borough, which consists predominately of large swaths of protected parks and open spaces with the remaining areas being relatively dense low-medium rise centres, towns and villages, it is important that occupiers and residents are protected from environmental disturbances. As a suburban borough, construction activities can have significant impacts on surrounding communities, particularly in relation to impacts on roads, noise and air quality. The purpose of a CMP/CEMP is to minimise the potential harmful impacts of construction, such as noise, dust and fumes, including potential impacts relating to air quality and vibration both for construction on site and the transport arrangements for

servicing with possible impacts on congestion and road safety. In a recent case² the Council did take a construction firm to court for breaches of a management plan.

The Whole Plan Viability Study (SD-071) has not tested a specific cost for this policy, but it is considered the elements would form part of build costs, and an allowance is made in the appraisals for Section 106 obligations of up to £25 per square metre for non-residential development and up to £2,750 per unit for residential development. Local authorities can seek a fee from applicants for monitoring planning obligations provides they are fairly and reasonably related in scale and kind to the development. The Planning Obligations SPD (SD-110) sets out how a tailored approach is used to setting the fee, including taking into account the type and scale of development and associated monitoring timescales, factoring in the number of obligations to be monitored and the number of payments expected for each category of financial obligation.

22.5 Policy 54 (C) - Are the requirements in relation to basement development clear without recourse to SPD's and other documents that have not been examined alongside the RLP?

Policy 54 C) signposts applicants to sources of further information and advice. The linked documents provide further detail to help applicants when making applications for basement developments, to supplement implementation of the policy.

Policy 54 is designed to limit the size and extent of a basement and also to ensure that the special character of this borough is preserved and that proposals do not lead to over-development or inappropriate intensification of existing properties. Adding basements to existing properties, particularly multiple basements in a residential street or area, can significantly change the character of an area, and can cause significant impacts to living conditions of residents in neighbouring properties. Therefore, the linked information sources in Policy 54 C) help to add detail to the policy, covering both planning and non-planning matters.

Basement development within flood affected areas is also picked up in Policy 8, where the policy sets out which flood zones basement development will be permitted in and guidance that developers should follow. Basements within flood affected areas of the borough represent a particularly elevated risk to life as they may be subject to very rapid inundation. The supporting text of Policy 8 also signposts to the Basement Assessment User Guide and guidance on Basement Developments.

The Council's SFRA (SD-061) also sets out further guidance on basement development in the Borough including the locations of through-flow and ground-water policy zones. Subsurface structure development proposals within these zones need to fulfil site-specific requirements to

² Press release 'Builders prosecuted and fined for repeatedly breaching planning permission in Richmond' www.richmond.gov.uk/news/june_2023/builders_prosecuted_and_fined_for_repeatedly_breaching_planning_permission

demonstrate that basements, cellars, and other subsurface structures can be safely developed without increasing throughflow and groundwater related flood risk.

The Council feel that signposting to further information and advice on basements is helpful in providing further detail to prospective applicants and ensuring that the Borough's special character and the risk of flooding are adequately considered with planning applications. As clear policy requirements are set out in the RLP, there is no deferral of details to other documents that should have been examined.

Table of Proposed Modifications

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				Policy 51 Health and Wellbeing (Strategic Policy)
P51.1	n/a	361	Policy 51 Health and Wellbeing (Strategic Policy), Paragraph 25.14	<p>To update the supporting text in relation to health impact assessment for planning applications, to reflect the HUDU rapid HIA tool has become out of date:</p> <p>A Health Impact Assessment (HIA) must be submitted with all major applications. A HIA should assess the health impacts of a proposed developments including consideration of existing health and wellbeing implications. It should identify mitigation measures for any potential negative impacts as well as measures for enhancing any potential positive impacts. The London Healthy Urban Development Unit (HUDU) have developed a rapid HIA tool to quickly assess the impacts of a development plan or proposal and recommend measures, this tool should be used as early as possible in the planning process and established at pre-application stage. The HIA should be developed from RIBA Stage 1 to help influence concept and technical design as well as consider health and wellbeing inputs from community consultation processes such as workshops. The development of the HIA should demonstrate input from the lead architects and designers. The level of detail required for HIAs will be determined by the scale and impact of the development, HIA guidance is available online via the Council's website. As set out in the Planning Obligations SPD, the London Healthy Urban Development Unit (HUDU) guidance and their Planning Contributions Model should be used to calculate the capital cost of the additional health facilities required to meet the increased demand which arises from new developments.</p>
				Policy 53 Local Environmental Impacts
P53.1	n/a	365	Policy 53 Local Environmental Impacts, Part A	<p>Add full stop to the last sentence:</p> <p>These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination.</p>