ED-HIS1

Quod

Health Impact Assessment

Local Plan Review

City Plan 2040

DECEMBER 2023

Contents

1 Introduction

1.1 This Health Impact Assessment (HIA) considers the potential health effects in relation to the proposed policies of the City Plan 2040. The main objective of the HIA is to provide the City of London Corporation with information, particularly with regard to their impact on the population health, to support its decision making process in adopting the Local Plan. This Report has been prepared by Quod.

The City Plan

1.2 The new City Plan 2040, sets out the City Corporation's vision, strategic objectives and planning framework to guide future development and decision making in the City of London (CoL) area ("the City") to the year 2040. The City Plan 2040 replaces the Local Plan 2015 adopted in January 2015.

1.3 The Local Plan has been built on the principles of sustainable development in line with the National Planning Policy Framework (NPPF) objective for the planning system to deliver economic, social and environmental change.

1.4 The **economic objectives** build on the City's existing role as a national and global economic centre and look to support the continued economic and employment growth. The City Plan 2040 sets out to:

- Deliver sustainable economic growth, including a minimum of 1.2 million sqm net additional office floorspace by 2040;

- Ensure new and refurbished office space meets the environmental, social and governance (ESG) priorities of occupiers and their workforces;

- Provide flexible and adaptable workspace that meets the needs of different sectors and business sizes, supporting specialist business clusters and promoting a range of complementary uses including education;

- Create a more vibrant and diverse retail economy;

- Enhance the City's evening and weekend economies;

- Create new and enhanced culture, leisure and visitor attractions;

- Deliver the accommodation, facilities, attractions and infrastructure required for a leading destination;

- Ensure development plays a significant role in enhancing the life of the Square Mile and the capital as a whole, both through the uses and design of development and through appropriate planning contributions; and

- Help to facilitate the infrastructure requirements of the Square Mile.

1.5 The **social objectives** aim to reimagine the City as a 24-hour, 7-day-a-week destination and diversify the uses in the City through:

- Delivering new, inclusive open spaces and enhancing the City's public realm for everyone;

- Enhancing the City's riverside for everyone through the delivery of new and improved public realm and greater vibrancy;

- Enhancing and transforming seven Key Areas of Change where significant change is expected and providing a policy framework to guide sustainable change in those areas;

- Engaging with the City's communities including workers and residents and other stakeholders;

- Creating a more inclusive, healthier, and safer City for everyone;

- Delivering additional homes within the Square Mile and on City Corporation estates and other appropriate sites outside the City; and

- Enhancing the City's social infrastructure and creating new sports and recreation opportunities across the Square Mile.

1.6 The **environmental objectives** aim to ensure that residents, workers and visitor in the City enjoy a good living environment by:

- Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a 'retrofit first' approach to development;

- Delivering urban greening and greater biodiversity;

- Celebrating, protecting and enhancing the City's unique heritage assets;

- Enhancing the City's distinctive and iconic skyline while preserving strategic views of St Paul's Cathedral and the Tower of London World Heritage Site;

- Ensuring exemplary design of development;

- Promoting greater use of the River Thames for passenger and freight transport, increased enjoyment of the City's riverside and reductions in the risk of flooding; and

- Ensuring development and infrastructure help transform the City's streets, creating attractive and accessible places to walk, wheel, cycle and spend time, and enabling sustainable transport and active travel.

Assessment Summary

1.7 This Health Impact Assessment has not found any potential negative health effects associated with the policies of the City Plan 2040. The assessment has looked at the impact on determinants of health.

1.8 This assessment considers that the policies of the City Plan will have a positive impact on population health through its contribution to the wider determinants of health.

2 Methodology

2.1   Health is influenced by a combination of biological and environmental factors. Biological factors are largely inherent. However, environmental factors can be influenced through design and management of buildings and spaces which may be able to impact on health outcomes. These are recognised as the 'wider determinants of health' and include:

- General socio-economic, cultural and environmental conditions;

- Living and working conditions;

- Social and community influences; and

- Individual lifestyle factors.

2.2   Urban planning and development can play a significant role within these wider determinants of health.

Health and Planning

2.3   The World Health Organisation (WHO) defines health as a state of complete physical, mental and social well-being and not the absence of disease or infirmity.

2.4   An ever-growing body of research indicates that the environment in which we live is inextricably linked to our health, and whilst the causal links between the built environment and health are often complex, research consistently reports that most health outcomes are influenced by factors other than genetics and healthcare[1].

2.5   Barton and Grant's health map (shown in **Figure 2.1**) highlights the relationship between health and these wider physical, social, economic, and environment factors (the 'wider determinants of health'). The direct process of planning and development is highlighted within one sphere - the 'built environment'. However, planning and development can have wider reaching effects on health with direct or indirect effects on several spheres of life and society. For example, the design of neighbourhoods can influence physical activity levels, travel patterns, social connectivity and mental and physical health outcomes[2].

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[1] Public Health England, 2017. Spatial Planning for Health: An evidence resource for planning and designing healthier places.
[2] Barton, H., and Grant, M. 2006. A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health, 126 (6). Pp. 252-253 (modified from Dahlgren and Whitehead (1991).

Figure 2.1 – Barton and Grant's Health Map
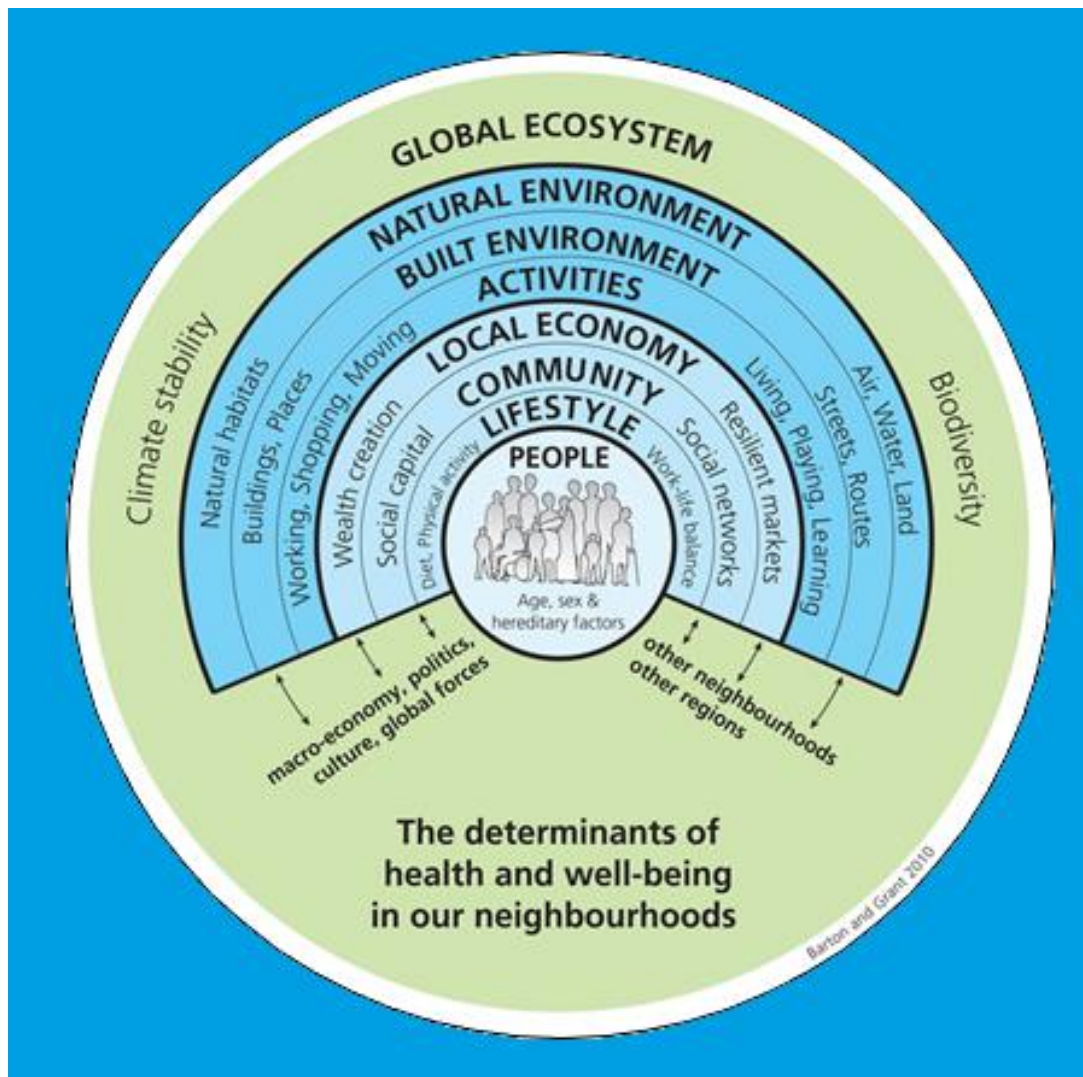
[Figure describing the determinants of health and wellbeing.]

Approach

2.6 The City of London Corporation published a Health Impact Assessment (HIA) Guidance Note[3] in June 2021 which sets out the process to identify the potential positive and negative effects development could have on determinants of health. The determinants of health identified have been developed to focus on issues facing the City of London.

2.7 This HIA has used this guidance as part of the assessment of policies proposed in the City Plan 2040. The assessment considers the effect of these policies against identified wider determinants of health, where relevant, to establish potential direct and indirect health impacts.

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[3] City Corporation (2021) Health Impact Assessment Guidance Note – June 2021.

2.8   The determinants and themes assessed in this HIA are:

- **Engagement and public consultation**
    - Engagement with the local community, including residents, workers and stakeholders is important in understanding the health risks prevalent in the area and local needs.
    - Consultation empowers local communities to clearly set out where they feel improvements are required to support them or where benefits could be maximised. The process of engagement helps inform the design progression shape a place that reflects community aspirations.

- **Active lifestyles**
    - Promoting active lifestyles includes incorporating physical activity through active modes of transport (walking and cycling) and providing opportunities and space to engage in physical activity, such as open spaces.
    - Transport can have positive or negative effects on health. Planning and development may provide or hinder access to public transport, walking and cycling routes that support active lifestyles.
    - Green space has been associated with a decrease in health complaints, improved mental health, reduced stress levels and the perception of better general health. The provision of open space has indirect benefits by encouraging social interaction and providing space for physical activities, improving air quality and reducing the urban heat island effect.
    - Physical activity, which is more likely to be undertaken if open space or improved linkages are provided, plays a key role in the prevention of specific diseases/health issues that include cardio-vascular disease, depression, and obesity.

- **Healthy environment and design**
    - Planning and development control land use and, therefore, may influence the location of uses that affect environment including roads and energy centres which could produce emissions or noise and vibrations affecting health outcomes. Design choices can positively influence health outcomes through providing a comfortable and positive living and working environment.
    - Development can influence health outcomes directly throughout processes of construction including minimising waste, and indirectly by minimising environmental impact including promoting energy efficiency. Employing appropriate standards and encouraging sustainable design and construction can therefore help to improve health outcomes.

- **Healthy workplaces**
    - Providing a healthy workplace for employees is mostly the responsibility of the occupier through active commitment and practices which encourage and support health and wellbeing of individuals. The location, design and

amenity space of a building can contribute to supporting businesses in enhancing workplace health.

- **Healthy housing**
  - Access to good quality housing is essential for public health, particularly for vulnerable groups such as the elderly or young people. Poor housing conditions – which include factors such as homelessness, temporary accommodation, overcrowding, insecurity and housing in poor physical conditions – constitute a risk to health, and this is most likely to affect the more vulnerable groups in society.

- **Safe and vibrant neighbourhoods**
  - New development can help contribute to vibrant neighbourhoods through creating new spaces for all. Buildings can provide or improve access to community uses and spaces creating places for people to meet and enjoy, improving social cohesion.
  - Safety is a key determinant to maintaining neighbourhoods. Crime or the fear of crime may discourage individuals from enjoying spaces and have negative psychological health impacts.

- **Access to work and training**
  - Access to employment can be a significant contributing factor to increased health. Being in work can make it easier to pursue a healthy lifestyle, with income being one of the strongest indicators of health and disease in public health research. Unemployment is often related to an increased risk of poor physical and mental health, and premature death.
  - Unemployed people often experience a multitude of elevated health risks. They experience higher rates of limiting long-term illness, mental illness, and cardiovascular disease. Unemployment has also been consistently associated with an increase in overall mortality and with suicide. Unemployed individuals experience a much higher use of medication and worse prognosis and recovery rates.
  - Getting people into work is, therefore, of critical importance to reducing health inequalities. Patterns of employment reflect and reinforce social differences and there are serious inequalities of access to labour market opportunities. Rates of unemployment are highest among those with no or few qualifications and skills, people with disabilities and mental ill-health, those with caring responsibilities, lone parents, those from some ethnic minority groups, older workers and, in particular, young people.

Spatial Approach

2.9 The City as a whole has a small residential population as it is a largely commercial area of London. Consequently, the workplace population is significantly higher and therefore has been captured in this baseline analysis.

2.10 Due to the close employment and community relations between the City and its neighbouring boroughs (as shown in **Figure 2.2**), a baseline analysis of the neighbouring boroughs has also been included for the purpose of this assessment.

Figure 2.2 – Study Areas
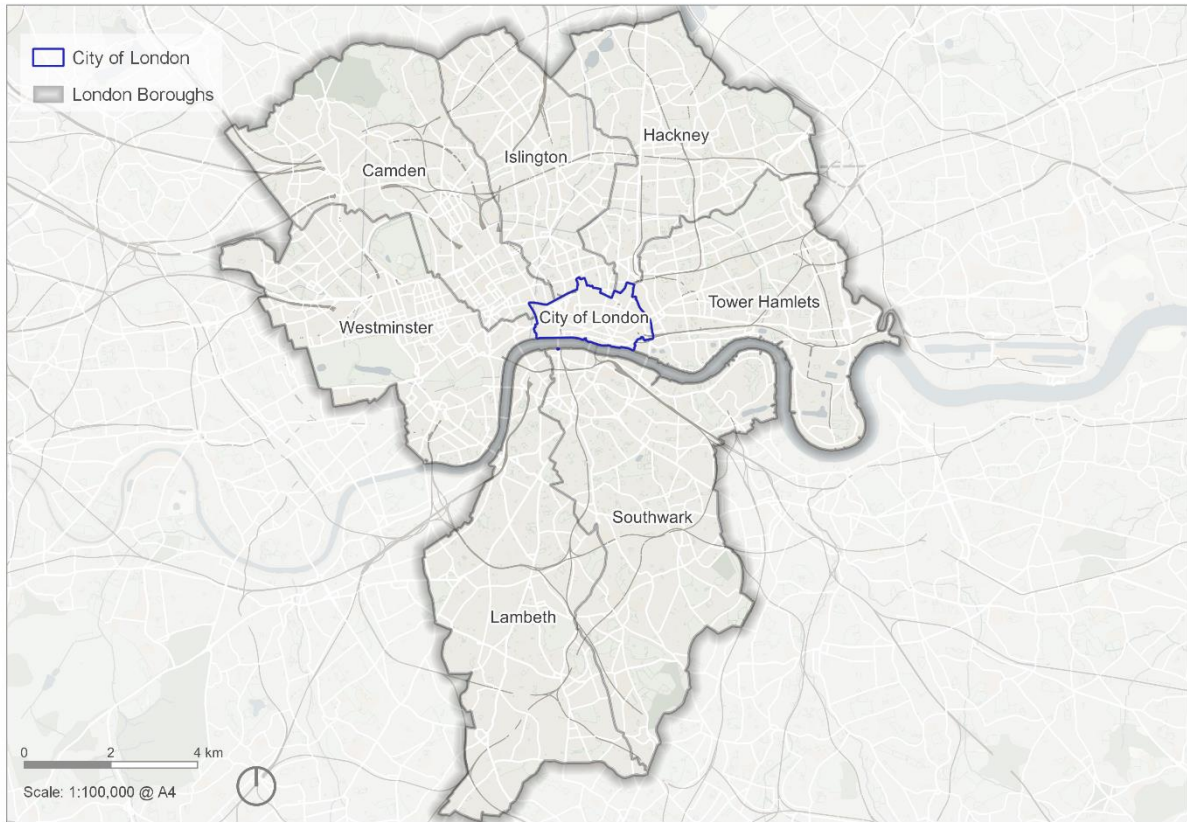
Created by Quod, December 2023

[Map showing the London boroughs of Westminster, Camden, Islington, Hackney, Tower Hamlets, Southwark, Lambeth and the City of London.]

3 Local Context

3.1 This section of the HIA provides relevant baseline information in relation to the health of the local resident population. The baseline information has been informed by a range of datasets and resources, comprising:

- Census 2021[4];
- Census 2011[5];
- Indices of Multiple Deprivation (IMD)[6];
- Public Health Profiles from the Office of Health Improvement and Disparities (OHID)[7].

3.2 The data informing this context analysis is presented in **Annex 1**.

Population Context

3.3 According to the 2021 Census, the City has a total residential population of 8,600 people. Between the 2011 and 2021 Censuses, the population has grown by 16% - twice the growth rate seen in London. Camden saw a similar growth rate in the same period. Tower Hamlets had a slightly higher growth rate of 22%. Approximately 1 in 5 Londoners live across the eight boroughs.

Table 3.1: Population Change across Study Area

Measure	LBC	LBH	LBI	LBL	LBS	LBTH	LBW	CoL	London
Population									
Population 2011 Census	220,300	246,270	206,125	303,086	206,125	254,096	8,170,000	**7,375**	8,170,000
Population 2021 Census	8,600	259,148	216,587	317,662	216,587	310,303	8,800,000	**8,583**	8,800,000
Population Growth	16%	5%	5%	5%	5%	22%	8%	**16%**	8%

3.4 Given the nature of the City as an employment and commercial area, the workday population is considerably larger than the resident population. The workday

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[4] Office for National Statistics, 2021. Census.
[5] Office for National Statistics, 2011. Census.
[6] Ministry of Housing, Communities and Local Government, 2019. English Indices of Deprivation.
[7] Office of Health Improvement and Disparities, various years. Public Health Profiles. Available at: https://fingertips.phe.org.uk/ [Accessed December 2023]

population of the City is close to 615,000 people[89], representing almost a fifth of the total workforce of London.

3.5   Across the City and the eight neighbouring boroughs, the proportion of working age residents is higher than the average for London (2021 Census). The City has a significantly lower proportion of residents under the age of 20 and a higher proportion of working age residents, particularly aged between 20 and 30, compared to London, as shown in **Figure 3.1**.

Figure 3.1 – Comparison between the Population Structure in City of London and London (2021 Census)
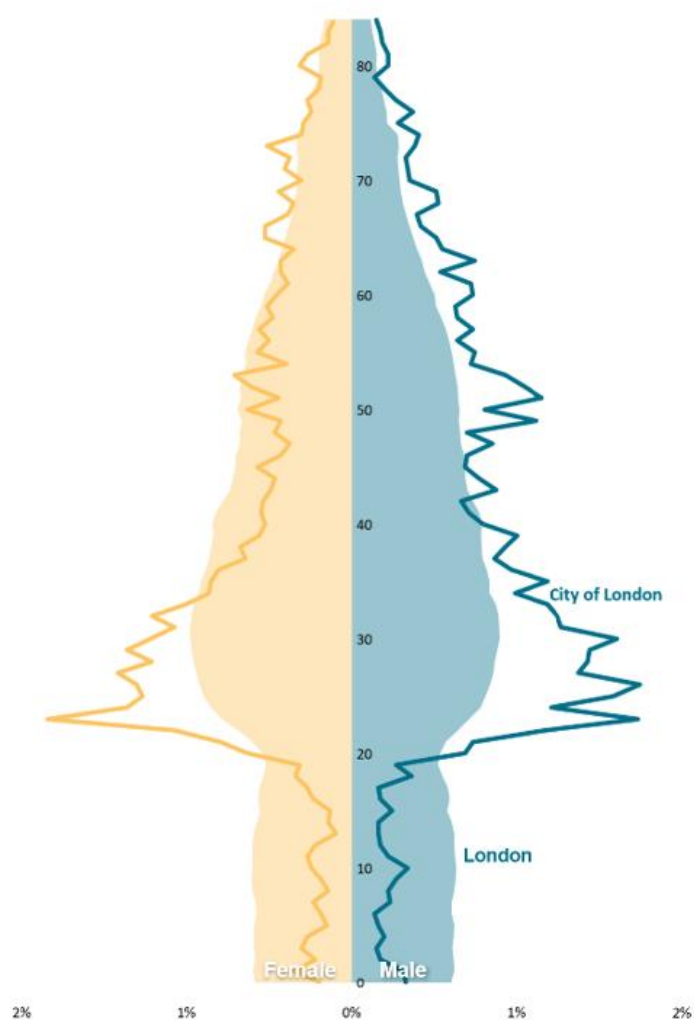
[Population pyramid showing the population structure in the City of London compared to London overall.]

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8 Office for National Statistics, 2022. Business Register and Employment Survey.
9 Workplace estimates vary with the Annual Population Survey (2022) suggesting it could be as high as 770,000.

Health Outcomes

3.6   City residents on the whole experience significantly better general health than the London average (OHID, 2020). Life expectancy at birth for men is over 10 years higher in the City than in England. For women, life expectancy is seven years higher in the City than in England.

3.7   The 2021 Census asked residents to self-assess their health. The proportion of residents in the City who have self-assessed their general state of health as "very good" and "good" is higher than across all spatial levels. Across all spatial levels, the highest proportion of residents who self-assessed their health as "bad" and "very bad" is in Islington. A smaller proportion of City residents are disabled under the Equality Act (2010) (have their day-to-day activities limited a lot or a little) compared to London and surrounding boroughs (2021 Census).

3.8   Across all boroughs, the mortality rate attributable to air pollution is high (OHID, 2021). The concentration of particulate matter is also high across all spatial areas (OHID, 2020).

Wider Determinants of Health and Risk Factors

3.9   The City generally experiences better outcomes in relation to wider determinant indicators compared to London, with fewer residents living in fuel poverty (OHID, 2018) and fewer households in temporary accommodation (statutory homelessness) (OHID, 2021).

3.10   However, the City performs significantly worse than the London when it comes to environmental factors such as noise exposure and air pollution. Nearly a third of the resident population experience noise of 65dB or higher during the day and 55dB or higher during the night (OHID, 2016). The London averages are significantly lower.

3.11   It should be noted however that there are disparities between residents and workers in terms of lifestyle and risk factors. A survey of the City's workers in 2012 revealed that a quarter (25%) smoked. Furthermore, research commissioned by the CoL in 2012 ('Insight into City Drinkers'[10]) revealed that among the City workers, nearly 50% drank at higher risk levels (compared to around 25% at national levels), and 33% of workers were at an increased risk of alcohol related harm.

3.12   The City experiences the highest rate of violent crime in London (OHID, 2021). Violent crime is on the increase according to the 'Population health across the life course in the CoL' (2020)[11].

3.13   The rate of people being killed or seriously injured (KSI) on roads in the City was the highest in London (OHID, 2021). Area-based measures which have been standardised

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[10] City of London Substance Misuse Partnership, 2012. Insight into City Drinkers – January 2012.
[11] City of London Corporation, 2020. Population health across the life course in the City of London (infographic).

on population suggest high levels of violent crime and KSI rates in the City. These do not, however, consider the daytime population (such as workers and visitors).

Mental Health

3.14 Mental health and physical health are intricately linked: poor physical health can cause mental health problems and vice versa. Those that suffer from obesity, substance misuse, smoking, cancer and cardiovascular disease are particularly likely to also have a mental health problem.

Health Deprivation

3.15 The Government's Index of Multiple Deprivation (IMD) (2019)[12] measures deprivation by combining indicators including a range of social, economic and housing factors, to establish a single deprivation score for each small area (Lower-layer Super Output Area, LSOA[13]) across England. All LSOAs are ranked relative to one another according to their level of deprivation.

3.16 These factors are divided among seven domains of deprivation, outlined as follows:

- Income deprivation;
- Employment deprivation;
- Education, skills, and training deprivation;
- Health deprivation and disability;
- Crime;
- Barriers to housing services; and
- Living environment deprivation.

3.17 The health deprivation and disability domain measures "the risk of premature death and the impairment of quality of life through poor physical or mental health"[14]. Measures of health include morbidity, disability and premature mortality.

3.18 **Figure 3.2** shows areas within 20% and 10% most deprived across the study area. There are no health deprived neighbourhoods in the City. Pockets of health deprivation are more prevalent in neighbourhoods in Islington, Hackney, Tower Hamlets, Lambeth and Southwark.

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[12] DCLG, 2019. Indices of Multiple Deprivation.
[13] LSOAs are statistical geographic areas based on population size. The minimum population for a LSOA is 1,000 residents, or 400 households.
[14] Ministry of Housing, Communities and Local Government,2019. The English Indices of Deprivation 2019: Statistical Release.

Figure 3.2 – Health Deprivation (IMD, 2019)
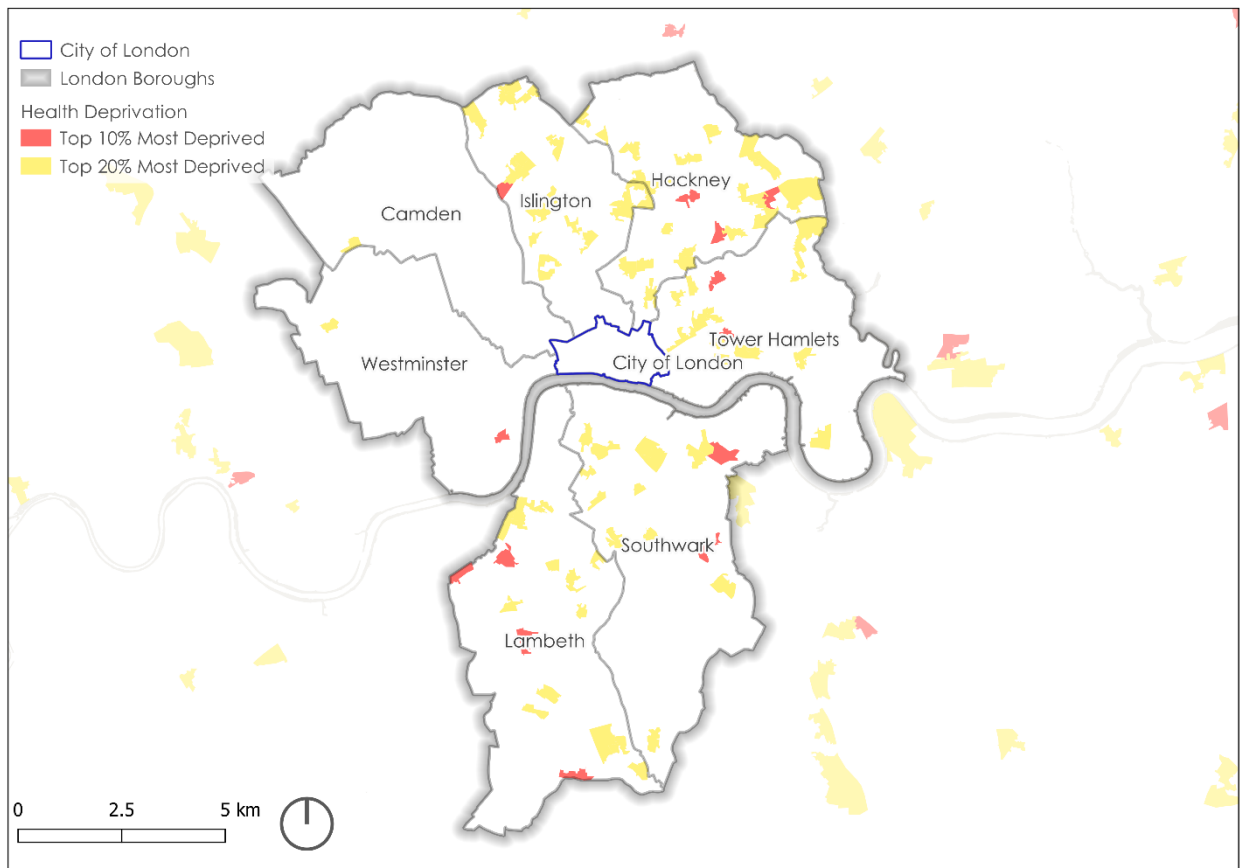
Created by Quod. December 2023

[Map showing the top 10% and 20% most deprived areas in the London boroughs of Westminster, Camden, Islington, Hackney, Tower Hamlets, Southwark, Lambeth and the City of London.]

Summary of Community Consultation

3.19 Building a Healthy and Inclusive City was a selected topic area for a Stakeholder Engagement Workshop held in June 2023. This workshop included a presentation from City of London Corporation on policy development process for the City Plan 2040.

3.20 Sessions were held on sub-topics including: healthy streets and spaces; wellbeing and inclusion.

Healthy Streets and Spaces

3.21 Feedback included:

- Need for increased facilities including childcare and education to encourage people back to the city and support intergenerational activities;
- Increased offer of natural and public spaces for people to relax, rest and dwell;

- Addressing concentration of certain uses such as takeaway food and betting shops;
- Providing inclusive public spaces; and,
- Supporting sustainable active travel that prioritise pedestrian safety.

Wellbeing

3.22 Feedback included:

- Promoting cultural and historical attractions;
- Supporting nighttime and weekend uses activating space 24 hours, seven days a week;
- Ensure new buildings are built to high standards with health and wellbeing as a priority;
- Improving access to riverside and public amenity;
- Encouraging spaces for social cohesion – community centres, cultural institutions and community gardens to encourage collaboration;
- Improved wayfinding and diversions from busy roads; and,
- Improving air quality and tackling air pollution.

Wellbeing

3.23 Feedback included:

- Providing more inclusive and welcoming spaces – disability badge systems, emergency vehicle access, improved wayfinding and dementia friendly environments;
- Accessible and public access to buildings – street level access; and,
- Supporting inclusive and diverse modes of transport (e.g. mobility scooter hire).

4 Assessment

4.1 The impacts of each policy in the draft City Plan on the wider health determinants have been classified as follows:

- Positive (+): The assessed policy is likely to have a positive impact on the wider determinant of health.
- Neutral (0): The assessed policy is likely to not have any impact on the wider determinant of health.
- Negative (-): The assessed policy is likely to have a negative impact on the wider determinant of health.

Health, Inclusion and Safety

Strategic Policy S1: Healthy and Inclusive City

4.2 Strategic Policy S1 supports an inclusive living and working environment, setting out requirements for development to achieve this. The policy is likely to have an overall positive health impact on population health by encouraging measures that support a healthy living and working environment to be implemented during the design, construction and operation of new developments. The policy requires the implementation of the principles of the City of London Corporation Joint Health and Wellbeing Strategy, which sets out health priorities for the City.

4.3 The policy requires an HIA to be prepared in line with the scale and impact of new development. This is likely to have a positive health impact by ensuring that polices and strategies are implemented within new developments.

4.4 The detailed policies under Strategic Policy S1 are assessed below in **Table 4.1**.

Table 4.1 – Strategic Policy S1: Healthy and Inclusive City Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy HL1: Inclusive building and spaces	+	+	+	+	+	+	+	Policy HL1 requires buildings and spaces to be designed with inclusive principles and promote equity, diversity and social inclusion. This is likely to have a positive health impact across all determinants of health. Inclusive and welcoming environments support social interaction and encourage people to engage in public life. They support active lifestyles by creating a safe and inclusive walking environment. Designing safe and inclusive buildings and spaces sustain healthy living and workplace environment, which ultimately facilities access to work and training.
Policy HL2: Air Quality	0	0	+	+	+	0	0	Policy HL2 sets air quality standards for future developments. The policy is likely to have a beneficial health impact by promoting a healthy living, working and visiting environment through ensuring that air quality is not impacted by new developments and, where possible, air quality is improved.
Policy HL3: Noise	0	0	+	+	+	0	0	Policy HL3 sets out noise standards for future developments and the requirement for noise mitigation measures to be implemented during

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
								construction. The policy is likely to have a beneficial health impact by promoting a healthy living, working and visiting environment through ensuring that noise impacts from new development are appropriately mitigated, and where possible, noise is reduced.
Policy HL4: Contaminated land and water quality	0	0	+	+	+	0	0	Policy HL4 requires site investigations to be carried out to establish land contamination during ground works and creation of open spaces. The policy is likely to have a beneficial health impact by promoting a healthy living, working and visiting environment through ensuring that land contamination is reduced.
Policy HL5: Location and protection of social and community facilities	+	+	+	+	+	+	+	Policy HL5 supports the provision of social and community facilities and protects existing infrastructure. This policy will have a positive health impact on some determinants of health, by promoting and sustaining social interaction and community cohesion.
Policy HL6: Public toilets	0	0	+	0	0	0	0	Policy HL6 supports the provision of public accessible toilets and free 'Changing Places'. This provision of public toilets supports a healthy environment and therefore contributes to positive health outcomes.

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy HL7: Sport and recreation	0	+	+	0	0	0	0	Policy HL7 supports the provision of sports facilities and recreation facilities. This policy is likely to have a positive health impact by contributing to sustaining active lifestyle through the provision of infrastructure and health environments which encourages physical activity.
Policy HL8: Play areas and facilities	0	+	+	0	0	+	0	Policy HL8 supports the provision of play space facilities. This is likely to have a positive health impact particularly on children, by encouraging physical activity and play from a young age and supporting a healthy environment for child development.
Policy HL9: Health Impact Assessment	+	+	+	+	+	+	+	Policy PH9 requires developments to undertake a Health Impact Assessment in line the adopted City Corporation's Health Impact Assessment guidance. This is likely to have a positive health impact across all wider determinants of health by ensuring that polices and strategies are implemented within new developments.

Strategic Policy SP2: Safe and Secure City

4.5   Strategic Policy S2 supports a secure and safe environment within the City mitigating the potential for crime, the fear of crime, anti-social behaviour and terrorism by requiring development to include design measures which will design-out crime and encourage natural surveillance. This policy is likely to have a positive health impact overall on population health.

4.6   The detailed policies under Strategic Policy S2 are assessed below in **Table 4.2**.

Table 4.2 – Strategic Policy S2: Safe and Secure City Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy SA1: Publicly accessible locations	0	0	+	+	0	+	0	Policy SA1 sets out the requirement to address the risk of terrorism in publicly accessible locations. This policy is likely to have a positive health impact by contributing to healthy environment, including in tall office buildings and ensuring that the City's buildings and public realm are safe for visitors, workers and residents.
Policy SA2: Dispersal routes	0	0	+	0	0	+	0	Policy SA2 requires mitigation measures to be undertaken to reduce over-crowding, noise nuisance and anti-social behaviour in areas with night-time uses. This policy will likely have a positive health impact by contributing to healthy environment and ensuring that the buildings and public realm within the City is safe for visitors, workers and residents.

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy SA3: Designing in Security	0	0	+	+	0	+	0	Policy SA3 sets out the security principles to be undertaken in proposals to ensure public safety. This policy will likely have a positive health impact by contributing to healthy environment and ensuring that the buildings and public realm within the City is safe for visitors, workers and residents.

Housing

Strategic Policy S3: Housing

4.7   Strategic Policy S3 sets out the minimum housing provision for the City at a minimum of 1,998 net new homes between 2023/24 and 2039/40. Housing development is encouraged in or near identified residential areas. Affordable housing, co-living, build to rent, hostels, sheltered and extra-care housing should be prioritised. A minimum provision of 50% affordable housing is expected on public sector land and 35% of private sector land with the potential for 10 or more units. This policy will have a beneficial impact on population health overall as it contributes to housing provision.

4.8   The detailed policies under Strategic Policy S3 are assessed below in **Table 4.3**.

Table 4.3 – Strategic Policy S3: Housing Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy HS1: Location of New Housing	+	+	+	+	+	+	+	Policy HS1 sets out the principles for choosing a suitable location for housing. This policy is likely to have a positive health impact across all determinants of health by ensuring suitable sites for new homes.
Policy HS2: Loss of housing	0	0	0	0	+	0	0	Policy HS2 protects existing homes. This policy is likely to have a positive health impact by protecting loss of housing.
Policy HS3: Residential environment	0	0	+	0	+	0	0	Policy HS3 protects residential uses from noise disturbance from new development and seeks to ensure privacy for overlooking. This policy is likely to have a positive health impact by protecting privacy within new and existing homes.
Policy HS4: Housing quality standards	0	0	+	0	+	+	0	Policy HS4 sets out the housing quality standards for new development to facilitate health and wellbeing of occupants. This policy is likely to have a positive health impact by providing quality standards of living environment, including access to open spaces and amenity spaces which sustain healthy communities.

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy HS5: Short term residential letting	0	0	0	0	+	0	0	Policy HS5 restricts the provision of short-term letting to protect the existing housing stock and residents. This policy is likely to have a positive health impact by preventing loss of housing.
Policy HS6: Student accommodation and hostels	0	0	0	0	+	0	0	Policy HS6 sets out the principles for Purpose-Build Student Accommodation provision. This policy is likely to have a positive health impact by ensuring appropriate provision of student housing.
Policy HS7: Older persons housing	0	0	0	0	+	0	0	Policy HS7 sets out the principles for older person housing. This policy is likely to have a positive health impact by ensuring appropriate provision of older person housing.
Policy HS8: Self and custom housebuilding	0	0	0	0	+	0	0	Policy HS8 encourages the provision of self and custom-built units. This policy is likely to have a positive health impact by improving housing provision.

Offices

Strategic Policy S4: Offices

4.9   Strategic Policy S4 encourages the provision of office floorspace to increase the City's office floorspace stock by a minimum of 1,200,000 m² net between 2021 and 2040. New floorspace should be designed to be flexible to allow the transformation and adaptation of space to support new uses, different layouts and configurations, different types and sizes of occupiers, and to

meet the needs of small-medium sized enterprises (SMEs), start-up companies, creative industries and those requiring move-on accommodation.

4.10 Retrofitting of existing office buildings for office use and upgrades to their environmental performance and the quality of accommodation is also encouraged. Where appropriate, the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City is supported.

4.11 This policy supports employment creation and therefore is likely to have a beneficial health impact. The detailed policies under Strategic Policy S4 are assessed below in **Table 4.4.**

Table 4.4 – Strategic Policy S4: Offices Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy OF1: Office Development	0	0	+	+	0	+	+	Policy OF1 sets out the design standards for office space provision, including the inclusion of design measures which promote health and wellbeing. This is likely to have a positive health effect through the promotion of healthy work environments which sustain access to work and training. Office buildings that include active uses on the ground floor activate the space and contribute to safe neighbourhoods.
Policy OF2: Protection of Existing Office Floorspace	0	0	0	+	0	0	+	Policy OF2 sets out principles to protect existing office floorspace. This is likely to have a positive health effect through the promotion of healthy

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
								work environments which sustain access to work and training.
Policy OF3: Temporary 'Meanwhile' Uses	0	0	0	+	0	+	+	Policy OF3 sets out the principles where temporary uses are encouraged. This is likely to have a positive health through the promotion of healthy work environments which sustain access to work and training. Meanwhile uses promote social cohesion and inclusion, and activate construction spaces, contributing to a sense of safety.

Retail

Strategic Policy S5: Retail and Active Frontages

4.12 Strategic Policy S5 encourages the provision of a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City. The quantity and quality of retailing and the retail environment is particularly promoted across City's four Principal Shopping Centres. This is likely to have a positive health impact overall by encouraging a mix of uses, and therefore a mix of job opportunities, and by providing a diversity of uses which contribute to the vibrancy of places and support social interaction.

4.13 The detailed policies under Strategic Policy S5 are assessed below in **Table 4.5**.

Table 4.5 – Strategic Policy S5: Retail and active frontages Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy RE1: Principal Shopping Centres	0	0	+	0	0	+	+	Policy RE1 protects existing Principal Shopping Centres and active frontages. This is likely to contribute to job creation and healthy work environments, and thus have a positive health impact. Active frontages contribute to personal perception of safety and activate public spaces, which will have a positive health impact.
Policy RE2: Active Frontages	0	0	+	0	0	+	+	Policy RE2 encourages provision of active frontages at ground floor levels. Active frontages contribute to personal perception of safety and activate public spaces, which will have a positive health impact. The policy could also support more employment opportunities by maximising employment floorspace within a building.
Policy RE3: Specialist Retail Uses and Clusters	0	0	+	0	0	+	+	Policy RE3 supports retail uses and clusters in areas that are culturally and historically significant. This is likely to contribute to positive health impacts by providing new jobs opportunities in various sectors and activate historical areas by creating opportunities for social interaction.
Policy RE4: Markets	0	0	+	0	0	+	+	Policy RE4 supports the provision of temporary markets and retail pop-ups to enhance the vitality

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
								of existing retail centres. This is likely to contribute to positive health impacts by providing new jobs opportunities in various sectors, protect markets and promote vibrant neighbourhoods.

Culture and Visitors

Strategic Policy S6: Culture and Visitors

4.14 Strategic Policy S6 encourages the enhancement of the cultural offer, visitor experiences and infrastructure, and the City's evening and weekend economy to support a vibrant environment. This will contribute to creating a sense of social cohesion and providing means for interaction. This is likely to have an overall positive health impact on population health.

4.15 The detailed policies under Strategic Policy S6 are assessed below in **Table 4.6.**

Table 4.6 – Strategic Policy S6: Culture and Visitors Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement and public consultation	Active lifestyles	Healthy environment and design	Healthy workplaces	Healthy housing	Safe and vibrant neighbourhoods	Access to work and training	
Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities	+	0	+	+	0	+	+	Policy CV1 protects existing visitor, arts and cultural facilities. This is likely to contribute to job creation and contribution to healthy work environments, and thus have a positive health impact. Visitor, arts and cultural facilities activate public spaces and contribute to social cohesion, which will have a positive health impact.
Policy CV2: Provision of Arts, Culture and Leisure Facilities	+	0	+	+	0	+	+	Policy CV2 encourages the provision of new visitor, arts and cultural facilities to encourage visitors to the City. This is likely to contribute to job creation healthy work environments, and thus have a positive health impact. Visitor, arts and cultural facilities activate public spaces and contribute to social cohesion, which will have a positive health impact.
Policy CV3: Provision of Visitor Facilities	0	0	+	0	0	+	0	Policy CV3 encourages the provision of facilities that meet the needs of visitors in new cultural developments, including children's play areas, seating, accessible toilets and well-designed signage. Visitor,

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement and public consultation	Active lifestyles	Healthy environment and design	Healthy workplaces	Healthy housing	Safe and vibrant neighbourhoods	Access to work and training	
								arts and cultural facilities activate public spaces and contribute to social cohesion, which will have a positive health impact.
Policy CV4: Hotels	0	0	+	0	0	+	0	Policy CV4 sets out the principles where hotels and visitor accommodation are permitted. The provision of hotels diversifies the land uses across the City, increases footfall across the day and supports active uses, therefore the policy is likely to have a positive health impact.
Policy CV5: Evening and Night-Time Economy	0	0	+	0	0	+	0	Policy CV5 sets out the principles where evening and night-time economy uses can be provided to minimise the impact on residential uses. The provision of evening and night-time uses diversifies the land uses across the City, increase footfall and support active uses, therefore the policy is likely to have a positive health impact.
Policy CV6: Public Art	0	0	+	0	0	+	0	Policy CV6 supports the provision of public art to enhance local identity. The policy requires that the location must take into consideration pedestrian safety, particularly disabled people. This is likely to have a positive health impact by contributing to

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement and public consultation	Active lifestyles	Healthy environment and design	Healthy workplaces	Healthy housing	Safe and vibrant neighbourhoods	Access to work and training	
								the quality of public realm and encouraging community identity and cohesion.

Infrastructure

Strategic Policy S7: Infrastructure and Utilities

4.16 SP7 ensures the new development facilitates the transition towards a zero carbon and climate resilient city. The provision of appropriate infrastructure is likely to have an overall positive health impact.

4.17 The detailed policies under Strategic Policy S7 are assessed below in **Table 4.7**.

Table 4.7 – Strategic Policy S7: Infrastructure and Utilities Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy IN1: Infrastructure provision and connection	0	0	+	0	0	0	0	Policy IN1 sets out the infrastructure requirements (electricity, gas, water, digital, telecommunications and drainage). This policy is likely to have a positive health impact by ensuring and supporting a healthy environment.
Policy IN2: Infrastructure Capacity	0	0	+	0	0	0	0	Policy IN2 sets out the infrastructure capacity requirements. This policy is likely to have a positive health impact by ensuring and supporting a healthy environment.
Policy IN3: Pipe Subways	0	0	+	0	0	0	0	Policy IN3 requires developments to use pipe subway routes within established networks, where these are available. This policy is likely to have a positive health impact by ensuring a healthy environment.

Design

Strategic Policy S8: Design

4.18 Strategic Policy S8 sets out the requirements for sustainable design in new developments to build a net zero carbon City. The policy aims to secure vibrancy, inclusion and wellbeing through design measures that support a mix of uses and place people

at the heart of the design. The policy is likely to have a positive health impact overall by requiring high design standards which sustain health and wellbeing.

4.19 The detailed policies under Strategic Policy S8 are assessed below in **Table 4.8**.

Table 4.8 – Strategic Policy S8: Design Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy DE1: Sustainable Design	0	0	+	0	0	0	0	Policy DE1 states that development should take a retrofit first approach to existing buildings and support the most sustainable and suitable approach for the Site. The policy supports circular economy design measures and commitments to sustainability standards. The policy is likely to have a positive health impact by supporting a healthy environment and design.
Policy DE2: Design Quality	0	+	+	+	0	0	0	Policy DE2 sets out the design standards for new development, including the requirement to enhance pedestrian permeability and ensure that buildings and public spaces are inclusive and accessible for everyone. The policy is likely to a have a positive health impact by encouraging active lifestyles by supporting improvements within the public

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
								realm and providing high quality working, living and visiting environments.
Policy DE3: Public Realm	+	+	+	0	0	+	0	Policy DE3 requires development to provide high quality, inclusive, welcoming, well designed, safe and functional public realm. The policy is likely to a have a positive health impact by encouraging active lifestyles with improvements across the public realm and supporting well-designed spaces that contribute to increased perception of safety and community cohesion.
Policy DE4: Terraces and Elevated Public Spaces	0	0	0	0	0	+	0	Policy DE4 requires all tall buildings and major developments to provide free-to-enter, publicly accessible elevated spaces, such as roof gardens. It encourages developments to address safety and security risks. The policy is likely to have a have a positive health impact by supporting well-designed spaces that contribute to increased perception of safety and community cohesion.
Policy DE5: Shopfronts	0	0	+	0	0	+	0	Policy DE5 requires shopfronts to be designed at a high standard and promote active frontages through attractive and

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
								welcoming experiences. Active frontages contribute to personal perception of safety and activate public spaces, which will have a positive health impact.
Policy DE6: Advertisements	0	0	+	0	0	0	0	Policy DE6 sets out the conditions for advertising displays. By preventing unsafe adverts and appropriate levels of advertising, the policy contributes to creating a healthy environment.
Policy DE7: Daylight and sunlight	0	0	+	0	+	0	0	Policy DE7 requires development to demonstrate appropriate daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces. This is likely to have a positive health impact on the sensitive uses.
Policy DE8: Lighting	0	0	+	0	0	+	0	Policy DE8 sets out the requirements for internal and external lighting design. This is likely to have a positive health impact by contributing to community perceptions of safety.

Transport

Strategic Policy S9: Transport and Servicing

4.20   Strategic Policy S9 sets out how transport infrastructure will be maintained and improved, including promoting further improvements to public transport capacity and step-free access at existing mainline rail, London Underground stations, and river piers. This is likely to support a healthy impact overall by ensuring appropriate infrastructure provision and encouraging healthy lifestyles.

4.21   The detailed policies under Strategic Policy S9 are assessed below in **Table 4.9**.

Table 4.9 – Strategic Policy S9: Transport and Servicing Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy VT1: The Impacts of Development on Transport	0	+	+	0	0	0	0	Policy VT1 sets out the requirement to mitigate identified negative impacts on transport resulting from development. This is likely to have a positive impact on health by mitigating potential adverse effects (e.g. hostile vehicle approach) and ensuring access to good transport infrastructure.
Policy VT2: Freight and Servicing	0	0	+	0	0	+	0	Policy VT2 sets out the requirements to mitigate freight and servicing trips resulting from development. This is likely to have a positive health impact by designing building that have

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
								appropriate servicing areas which do not hinder public space access and in turn, ensure a safe pedestrian environment.
Policy VT3: Vehicle Parking	0	+	0	0	0	0	0	Policy VT3 sets out the requirement for car-free developments with the exception of designated Blue Badge parking. This is likely to have a positive health impact by promoting healthy lifestyles.
Policy VT4: River Transport	0	0	0	0	0	0	0	Policy VT4 sets out the ambition to improve accessibility to the riverside and the associated infrastructure. No health impact is expected.
Policy VT5: Aviation landing facilities	0	0	0	0	0	0	0	Policy VT5 forbids heliports in the City and allows for helipads where they are essential for emergency or security purposes. No health impact is expected.

Strategic Policy S10: Active Travel and Healthy Streets

4.22 Strategic Policy S10 sets out the requirement to improve the quality and permeability of the public realm to enhance inclusivity and accessibility. The policy gives great consideration to the needs of wheelchair and disabled users. The policy is likely to have a positive health impact overall by promoting healthy lifestyles.

4.23 The detailed policies under Strategic Policy S10 are assessed below in **Table 4.10**.

Table 4.10 – Strategic Policy S10: Active Travel and Healthy Streets Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy AT1: Pedestrian Movement, Permeability and Wayfinding	0	+	+	0	0	0	0	Policy AT1 sets out the requirement for development to contribute to the improvement of pedestrian permeability. The policy is likely to have a positive health impact by delivering accessibility and permeability improvements across the public realm – supporting walking and therefore encouraging active lifestyle and a healthy environment.
Policy AT2: Active Travel including Cycling	0	+	+	0	0	0	0	Policy AT2 sets out the requirement for developments to encourage active travel. The policy is likely to have a positive health impact by encouraging active travel and therefore supporting active lifestyle and a healthy environment.
Policy AT3: Cycle Parking	0	+	+	0	0	0	0	Policy AT3 sets out the requirement for developments to provide cycle parking spaces. The policy is likely to have a positive health impact by encouraging cycling and therefore supporting active lifestyle and a healthy environment.

Heritage and Tall Buildings

Strategic Policy S11: Historic Environment

4.24 Strategic Policy S11 sets out the vision for heritage-led regeneration which brings wider social, cultural, economic and environmental benefits. The policy is likely to have an overall positive health impact.

4.25 The detailed policies under Strategic Policy S11 are assessed below in **Table 4.11**.

Table 4.11 – Strategic Policy S11: Historic Environment Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy HE1: Managing Change to the Historic Environment	0	0	+	0	0	+	0	Policy HE1 sets out the conditions to be considered when developing heritage assets. The policy is likely to have a positive health impact by ensuring access to the historic environment which contributes to community identity and cohesion.
Policy HE2: Ancient Monuments and Archaeology	0	0	0	0	0	+	0	Policy HE2 sets out the requirement to protect sites with archaeological potential and ancient monuments. The policy is likely to have a positive health impact by ensuring access to the historic environment which contributes to community identity and cohesion.
Policy HE3: Setting of the Tower of London World Heritage Site	0	0	0	0	0	+	0	Policy HE3 sets out the requirement to protect the Tower of London World Heritage Site. The policy is likely to have a positive health impact by ensuring access to the historic environment which contributes to community identity and cohesion.

Strategic Policy S12: Tall Buildings

4.26 Strategic Policy S12 sets out the considerations that need to be taken into account when building tall buildings (having a height of over 75m) in order to protect the City skyline and ensure quality of the design. This policy is likely to have an overall positive impact on health as it would support the creation of a healthy environment by ensuring the right microclimate in the context of tall buildings and preventing wind impacts.

Strategic Policy S13: Protected Views

4.27 Strategic Policy S13 sets out the requirement to protect and enhance significant City and London views of important buildings, townscape and skylines. No health impact is expected.

Open Spaces and Green Infrastructure

Strategic Policy S14: Open Spaces and Green Infrastructure

4.28 Strategic Policy S14 sets out the ambition to provide a greener City by protecting and enhancing existing open spaces and providing new green infrastructure. The policy is likely to have an overall positive impact on health as it would support the creation of a healthy environment, active lifestyles and social cohesion.

4.29 The detailed policies under Strategic Policy S14 are assessed below in **Table 4.12**.

Table 4.12 - Strategic Policy S14: Open Spaces and Green Infrastructure Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy OS1: Protection and provision of open space	0	+	+	0	0	+	0	Policy OS1 sets out the requirements to protect existing publicly accessible open spaces and increase the provision through development. The policy requires open spaces to be designed for all communities in the City and to be free, accessible, welcoming and inclusive. The policy is likely to have a positive health impact by supporting the increase in open space provision across the City which in turn contributes to active lifestyles, social cohesion and vibrant neighbourhoods and healthy design of open spaces.
Policy OS2: Urban Greening	0	+	+	0	0	+	0	Policy OS2 requires that the provision of urban greening should be integral to the design and layout of buildings, delivering an Urban Greening Factor of 0.3 as a minimum. The policy is likely to have a positive health impact by supporting the increase in open space provision across the City which in turn contributes to active lifestyles, social cohesion and vibrant neighbourhoods and healthy design of open spaces.
Policy OS3: Biodiversity	0	+	+	0	0	+	0	Policy OS3 requires development to incorporate measures that enhance biodiversity. The policy is

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
								likely to have a positive health impact by supporting the increase in biodiversity and open space provision across the City which in turn contributes to active lifestyles, social cohesion and vibrant neighbourhoods and healthy design of open spaces.
Policy OS4: Biodiversity Net Gain	0	+	+	0	0	+	0	Policy OS4 sets out the requirement for major developments to deliver Biodiversity Net Gain to conserve and enhance biodiversity. The policy is likely to have a positive health impact by supporting the increase in biodiversity and open space provision across the City which in turn contributes to active lifestyles, social cohesion and vibrant neighbourhoods and healthy design of open spaces.
Policy OS5: Trees	0	+	+	0	0	+	0	Policy OS5 sets out the ambition to increase the number of trees and their overall canopy in the City. The policy is likely to have a positive health impact by supporting the increase in green environments across the City which in turn contributes to active lifestyles, social cohesion and vibrant neighbourhoods and healthy design of open spaces.

Climate Resilience

Strategic Policy S15: Climate Resilience and Flood Risk

4.30 Strategic Policy S15 sets out the requirement that Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The policy is likely to have an overall positive health impact by contributing to a healthy environment.

4.31 The detailed policies under Strategic Policy S15 are assessed below in **Table 4.13**.

Table 4.13 – Strategic Policy S15: Climate Resilience and Flood Risk Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy CR1: Overheating and Urban Heat Island Effect	0	0	+	0	0	0	0	Policy CR1 sets out the requirement to demonstrate that developments have been designed to reduce the risk of overheating through design. The policy is likely to have a positive health impact by supporting a healthy environment.
Policy CR2: Flood Risk	0	0	+	0	0	0	0	Policy CR2 sets out the requirement for developments to consider flood risk. The policy is likely to have a positive health impact by supporting a healthy environment.
Policy CR3: Sustainable drainage systems (SuDS)	0	0	+	0	0	0	0	Policy CR3 sets out the requirement for all development, transportation and public realm proposals to consider SuDs principles in the design of the schemes. The policy is likely to have a positive health impact by supporting a healthy environment.

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy CR4: Floor protection and flood defences	0	0	+	0	0	0	0	Policy CR4 sets out the requirement for development to protect and enhance where possible the effectiveness of structures intended to minimise flood risk. The policy is likely to have a positive health impact by supporting a healthy environment.

Strategic Policy S16: Circular Economy and Waste

4.32 Strategic Policy S16 sets out the vision for City Corporation to support businesses and residents moving towards a Zero Waste City. The policy is likely to have an overall positive health impact by contributing to a healthy environment.

4.33 The detailed policies under Strategic Policy S16 are assessed below in **Table 4.14**.

Table 4.14 – Strategic Policy S16: Circular Economy and Waste Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy CE1: Sustainable Waste Facilities and Transport	0	0	+	0	0	0	0	Policy CE1 requires all development proposals to incorporate waste facilities. The policy is likely to have a positive health impact by supporting a healthy environment.
Policy CE2: New waste management sites	0	0	+	0	0	0	0	Policy CE2 sets out the design and management requirements for new facilities for waste management, handling and transfer. The policy is likely to have a positive health impact by supporting a healthy environment.

The Temples, the Thames Policy Area and the Key Areas of Change

4.34   The following section presents an assessment for Strategic Strategies that refer to a spatial area within the City. The assessment is presented in **Table 4.15**.

Table 4.15 – Spatial Strategic Policies Assessment

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Policy TP1: The Temples	0	0	+	0	0	0	+	Policy TP1 sets out the ambition for the City Corporation to continue to support the unique functions of the Inner and Middle Temples as places of education and training and providers of common and collegiate facilities for barristers and students. The policy is likely to have a positive health impact by promoting access to work and training and by enhancing the existing historic character and greenery.
Strategic Policy S17: Thames Policy Area	0	+	+	0	0	+	0	Strategic Policy S17 sets the requirement to enhance the unique character of the City riverside for transport and recreation. Thus this policy is likely to have a positive health impact by enhancing the quality of the environment and encouraging new opportunities for social cohesion.
Strategic Policy S18: Blackfriars	0	+	+	0	0	+	0	Strategic Policy S18 sets out the requirements to enhance the character and amenities of the Blackfriars Key Area of Change, including supporting redevelopment and refurbishment of existing post-war buildings and enhancing pedestrian permeability and accessibility, especially through improvements to and along the riverside. This policy

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
								is likely to have a positive health impact by supporting the enhancement of pedestrian routes - supporting active lifestyles, the creation of new amenities which would support social cohesion and overall contribute to shaping a healthy environment.
Strategic Policy S19: Pool of London	0	+	+	0	0	+	0	Strategic Policy S19 sets out the requirement to refurbish and redevelop the building stock and public realm around the Pool of London Key Area of Change to contribute to a vibrant, welcoming and accessible environment. The policy is likely to positive health impact by supporting the enhancement of public realm which would support active lifestyles and social cohesion and overall contribute to shaping a healthy environment by supporting the redevelopment of the building stock.
Strategic Policy S20: Aldgate, Tower and Portsoken	0	+	+	+	+	+	+	Strategic Policy S20 sets out the strategic vision of Aldgate, Tower and Portsoken Key Area of Change to provide a mixed-use area that supports commercial, residential, education and hotel uses. The policy is likely to have a positive health impact associated with the diversification of uses which would contribute to improving access to work and training across various sectors and deliver housing. The mix of uses would contribute to the creation of a

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
								mixed and safe neighbourhood. The policy supports enhancing the public realm and open spaces in various area by improving permeability which would encourage active lifestyles.
Strategic Policy S21: City Cluster	0	+	+	+	0	0	+	Strategic Policy S21 sets out the strategic vision for the City Cluster Key Area of Change to accommodate significant growth in the office floorspace and complementary land uses to support employment growth. The policy is likely to have a positive health impact by providing employment floorspace which would contribute to increasing access to work and training. The policy requires the improvement of streets, spaces and the public realm to improve connectivity and accessibility. This will support healthy lifestyles by encouraging walking and cycling.
Strategic Policy S22: Fleet Street and Ludgate	0	0	+	+	+	0	+	Strategic Policy S22 sets out the strategic vision for the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related businesses a royal and state processional route, and a Principal Shopping Centre. The policy is likely to have a beneficial health impact by ensuring access to work and training and a healthy designed environment.

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
Strategic Policy S23: Smithfield and Barbican	0	+	+	+	+	+	+	Strategic Policy S23 sets out the strategic vision to improve the Smithfield and Barbican Area and encourage culture-led mixed use development to complement existing uses. The policy is likely to have a positive health impact associated with the diversification of uses which would contribute to improving access to work and training across sectors and deliver housing. The mix of uses would contribute to the creation of a mixed and safe neighbourhood.
Strategic Policy S24: Smithfield	0	0	+	+	0	+	+	Strategic Policy S24 sets out the strategic vision to protect and enhance the mixed-use historic character of Smithfield. The policy is likely to have a positive health impact associated with the diversification of uses which would contribute to improving access to work and training across various sectors. The mix of uses would contribute to the creation of a mixed and safe neighbourhood.
Strategic Policy S25: Liverpool Street	0	0	+	+	0	+	0	Strategic Policy S25 sets out the strategic vision for Moorgate-Liverpool Street Area to support the development of flexible office space, additional retail and leisure opportunities to establish a destination area. The policy is likely to have a positive health impact associated with the

Local Plan Strategic Policy	Determinants of Health							Comments
	Engagement & public consultation	Active lifestyles	Healthy environment & design	Healthy workplaces	Healthy housing	Safe & vibrant neighbourhoods	Access to work & training	
								diversification of uses which would contribute to improving access to work and training across various sectors. The mix of uses would contribute to the creation of a mixed and safe neighbourhood.

Implementation

Strategic Policy S26: Planning Contributions

4.35   Strategic Policy S26 sets out the conditions for seeing appropriate contributions from developers to manage and mitigate the impact of development through the Community Infrastructure Levy and Section 106 planning obligations. The policy is likely to have a positive health impact by ensuring that potential negative health impact which might arise from development are mitigated through S106 and CIL contributions.

Strategic Policy PC1: Viability Assessment

4.36   Policy PC1 requires development proposals to carry out viability assessments to demonstrate the financial viability of the scheme. No health impact is expected.

Table A.1 – Baseline data

Health Indicator		CoL	Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	London	England
Health Outcomes											
Life Expectancy at Birth (in years) (2016-20)	Male	**90.4**	82.8	79.2	79.7	78.8	79.4	79.7	84.1	n/a	79.5
	Female	**90.7**	87.4	83.5	83.3	83.8	84.3	83.3	86.8	n/a	83.2
Under 75 mortality rate: all causes considered preventable (per 100,000) (2020)		**n/a**	186.7	261.7	232.6	189.0	210.5	290.2	165.5	186.9	183.2
Under 75 mortality rate: cardiovascular disease (per 100,000) (2021)		**n/a**	75.2	92.0	85.2	80.9	89.5	97.0	52.2	74.3	76.0
Under 75 mortality rate: cancer (per 100,000) (2021)		**n/a**	120.1	130.3	135.2	123.2	119.1	146.4	91.4	110.2	121.5
Under 75 mortality rate: respiratory disease (per 100,000) (2021)		**n/a**	21.4	34.7	36.3	23.4	28.0	42.2	20.2	22.5	26.5
Suicide Rate (per 100,000 population) (2019-21)		**n/a**	8.9	8.6	7.9	5.7	9.0	6.6	7.4	7.2	10.4

Health Indicator		CoL	Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	London	England
Self-reported Health (2021 Census)	'Very Good' and 'Good'	**89%**	85%	85%	84%	86%	86%	85%	85%	85%	82%
	'Fair'	**8%**	10%	10%	10%	10%	10%	10%	10%	10%	13%
	'Bad' and 'Very Bad'	**3%**	5%	5%	6%	4%	4%	5%	5%	4%	5%
Long Term Health Problem/Disability – day-to-day activities limited (2021 Census)		**3%**	7%	6%	7%	5%	6%	6%	6%	6%	7%
Risk Factors											
Excess weight in children (age 10-11 years) (2019/20)		**n/a**	38.1%	41.1%	41.5%	42.4%	42.4%	45.4%	46.9%	40.5%	37.8%
Adults (aged 18+) classified as overweight or obese (2020/21)		**25.2%**	18.0%	20.2%	17.3%	14.2%	15.4%	18.2%	16.3%	19.7%	25.9%
Physically active adults (>30 mins of moderate intensity activity per week) (2019/20)		**36.3%**	72.4%	71.9%	71.8%	69.7%	68.9%	67.6%	70.7%	66.8%	67.3%
Depression: Prevalence in adults aged 18+ (2020/21)		**6.6%**	10.1%	11.7%	11.4%	10.3%	9.7%	9.3%	6.1%	n/a	12.7%
Current smokers (APS) (2022)		**n/a**	9.1%	14.3%	7.9%	13.4%	11.6%	11.7%	12.3%	11.7%	12.7%
Wider Determinants											
Children in absolute low income families (2019/20)		**n/a**	16.6%	18.7%	14.3%	14.4%	14.7%	21.8%	11.6%	13.1%	15.3%
Proportion living in fuel poverty (2018)		**5.4%**	11.2%	12.1%	10.0%	10.8%	9.9%	8.7%	10.9%	11.9%	13.1%

Health Indicator	CoL	Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	London	England
Older people in deprivation (prevalence, age 60+ years) (2019)	**8.3%**	23.2%	40.7%	33.6%	30.2%	31.3%	44.0%	22.6%	n/a	14.2%
Homelessness: households in temporary accommodation (per 1,000) (2020/2021)	**1.2**	4.6	n/a	7.8	n/a	22.7	n/a	n/a	16.3	4.0
Violent Crime: violence offenses per 1,000 population (2020/21)	**98.4**	24.7	29.6	28.6	31.1	26.9	29.8	42.5	27.0	34.9
Killed and seriously injured (KSI) casualties on England's roads (per billion vehicle miles) (2021)	**458.7**	386.7	439.6	375.0	469.8	389.7	302.1	466.2	84.1	95.6
Fraction of mortality attributable to particulate air pollution (2021)[15]	**7.2%**	6.9%	7.0%	7.0%	6.8%	6.9%	7.0%	7.1%	6.5%	5.5%
Air pollution: fine particulate matter (concentration of PM2.5) (2020)	**9.6**	9.1	9.5	9.4	9.5	9.5	9.6	9.4	8.9	6.9
The percentage of the population exposed to road, rail and air transport noise of 65dB(A) or more during daytime (2016)	**27.7%**	18.4%	14.8%	17.7%	16.3%	14.8%	15.0%	19.3%	12.1%	5.5%

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[15] PHE, 2014. 'Estimating Local Mortality Burdens associated with Particulate Air Pollution' Report.

Health Indicator	CoL	Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	London	England
The percentage of the population exposed to road, rail and air transport noise of 55dB(A) or more during the night-time (2016)	**28.3%**	21.7%	17.7%	21.6%	20.2%	18.0%	18.5%	22.3%	15.9%	8.5%

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