www.oxford.gov.uk

OXFORD CITY COUNCIL

Local Plan 2040 Health Impact Assessment

Oxford Local Plan 2040

1. Introduction 2
2. Methodology for undertaking this HIA 2
3. HIA conclusions by topic 3
   - HIA topic A - Healthy housing 3
   - HIA topic B - Healthy environment 4
   - HIA topic C - Movement & Accessibility 5
   - HIA topic D - Social infrastructure 6
   - HIA topic E - Oxford's inequalities 7
   - HIA Topic F - Economy & jobs 7
   - HIA topic G - Climate Change 9

4. Next steps..... 7

1. Introduction

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

1.2 But the way we design and build the places we live and work in can have a significant impact on the health and wellbeing of local people. Social, environmental and economic factors within the built environment like the availability of safe and appropriate housing; access to shops selling quality food and goods; good schools and employment; open space to socialise and be active in, as well as the ease with which we can move around and between these spaces can all have an influence on our health and wellbeing. Sometimes these factors are referred to as the 'wider determinants' of health[2], and they can all have an influence on behaviours which promote higher risk of disease and general ill health. For example, living somewhere without easy access to shops or open space makes it more challenging to engage in regular physical activity, which can lead to increased risk of a variety of health problems.

1.3 The Local Plan 2040 sets out the policies that will influence how the city's built and natural environment develops over the coming years. These policies will have a direct role in shaping the design of new development and as such will play an important role in addressing many of the wider determinants of health highlighted above. The way such policies are written and presented can determine how subsequent development in the city might positively or negatively support health. We are keen to ensure that wherever possible, we have maximised opportunities to formulate policies that support positive health outcomes for people in future whilst mitigating potential negative impacts wherever possible. In order to do this, we have undertaken a high-level Health Impact Assessment to inform the Regulation 19 Local Plan, as we did at the Preferred Options stage to help shape the emerging policies.

1.4 This report builds on the screening assessment that was prepared for the Preferred Options consultation and details how the policies that comprise the Local Plan 2040 are addressing health and wellbeing in the city. Alongside this work, the Local Plan is supported by a broader Sustainability Appraisal which assesses a wide range of sustainability impacts (health is one small part of this). The HIA should be considered as a separate piece of analysis, which takes a particular focus on health and wellbeing impacts because we consider this to be a key issue of focus for the new Local Plan. As with the SA, the HIA details part of the overall 'story' of how we have come to the final version of the Local Plan 2040.

2. Methodology for undertaking this HIA

[1] https://www.instituteofhealthequity.org/resources-reports/marmot-review-10-years-on

[2] https://fingertips.phe.org.uk/profile/wider-determinants

2.1 As part of the HIA screening undertaken to support the preferred options we undertook a review of health and wellbeing context in the city and considered the various elements of health and wellbeing that the Local Plan could feasibly have influence over. To help shape the screening HIA we identified seven topics that influence health and wellbeing outcomes and which formed the basis of an assessment framework to review the policies against. We carry these seven topics forward to form the basis of the assessment for the regulation 19 Local Plan policies too. The topics are as follows:

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

2.3 This report then takes each of the seven HIA topics above in turn, sets out the various health and wellbeing issues that were identified against them at the previous screening stage, and then discusses how the policies of the new Local Plan seek to help address these issues. Sometimes, due to the Local Plan's primary influence over how new development occurs in the city where it requires planning permission, the Local Plan's policies are only able to partially help in addressing these issues, it cannot force change on existing buildings that have already been through the planning process for example. To support the Regulation 19 submission we have also undertaken an updated review of health issues which is again summarised within its own separate background paper, this may have resulted in updates to certain parts of the analysis compared with what was presented at the Regulation 18 consultation stage.

3. HIA conclusions by topic

HIA topic A - Healthy housing

3.1 The type of housing we live in is an important component of being able to live a healthy life. This means not only having a home to live in, and one that has enough space for all our daily needs (both indoors and outdoors), but also having access to housing that is affordable. Certain groups have specific housing needs, for example older persons, sheltered housing, or people with disabilities which require adaptions which we also need to take into account in the design of new homes.

3.2 The screening report highlighted the following issues the Local Plan would need to address:

- High cost of housing in Oxford compared with wages (known as housing affordability). City is one of the most expensive places to buy or rent a property in comparison with monthly earnings meaning many people are priced out of the market. Knock on impacts include:
    - People having to live further away from places of work, resulting in longer commutes which can impact quality of life;
    - People are forced to spend a greater proportion of their average monthly income on accommodation costs, leaving less money for other needs such as food or heating. These impacts fall particularly hard on those on lower incomes who are already faced with a variety of socio-economic challenges;

- Inappropriately designed housing can exacerbate negative impacts of life-limiting illnesses or mobility impairments which can disproportionately affect certain groups who are more vulnerable (e.g. elderly and disabled);
- Where housing is located in poorly accessible locations, issues around social isolation and loneliness can be exacerbated, which can in turn impact on mental health; and
- If homes are poorly designed or insulated then it can lead to increased heating costs, which many people are already struggling with since the rises in fuel costs in recent years linked to the war in Ukraine and other global factors.

3.3 The Local Plan includes a number of policies in **Chapter 2** that seek to address health issues which can be linked with the provision of new housing. In particular, there are several policies which aim to deliver affordable housing. **Policy H2** seeks that qualifying developments provide a proportion of the site as affordable housing, and specifies that this should be provided onsite, then **Policies H3 and H4** seek financial contributions towards delivering affordable housing off-site from developments of purpose-built student accommodation and self-contained older persons accommodation. Collectively these policies will all help to support delivery of affordable homes, either directly by developers or to contribute towards delivery by the City Council affordable housing programme. The Plan also includes **Policy H5** to support delivery of affordable housing through key employers for their employees, which will support more affordable choices and also people to live closer to work with reduced commuting. The Plan also includes Policy requirements in **Policy H13** for specialist housing that can meet the needs of particular groups like the older persons and accessible housing for people with disabilities, as well as homes for travelling communities and boat dwellers.

3.4 In terms of the location of sites for new homes, the site allocations in **Chapter 8** have all considered accessibility to key services and transport routes. A substantial proportion of sites in Oxford each year are windfall (unidentified) sites but inherently within the City boundary is sustainable in terms of access to services, jobs, and transport because of the compact nature of the city.

3.5 In addition to the more housing focussed policy areas discussed above, there are also policies in **Chapter 5** which are likely to support housing-related health issues, by driving energy efficient homes and supporting the retrofitting of existing buildings, which of course make up the majority of homes in Oxford (new builds each year only make up a small element). These policies also seek to ensure that new build homes are energy and resource-efficient, which will help to address running costs. The layout of new homes, such as provision of open space (private or public) is covered in **Chapter 4**, and design factors that are set out in **Chapter 6** will also support more healthy environments to live in, including provision of green infrastructure that can help to break up the urban fabric of the city.

HIA topic B - Healthy environment

3.6 Oxford's natural and built environment is an important determiner of health and wellbeing outcomes in the city. Having access to a network of green open spaces and areas of valuable ecology as well as open spaces like parks and pitches is important for enabling people to stay active and to socialise and supports physical and mental wellbeing. Being supported by an environment that is free from pollutants and contamination is also essential for avoiding harmful impacts on health.

3.7 The screening report flagged the following in terms of particular issues the Local Plan would need to address:

- The distribution of green space in the city is fairly even across the city, however, analysis conducted as part of the GI study identifies that there are areas where access to particular typologies of space is poorer (reference the Green Infrastructure Study 2022 for more details).
- There are areas in the east of the city particularly, where there are higher amounts of housing without access to private gardens that also fall within areas of reduced public open space.
- Quality of provision of existing facilities also varies across the city including some lower quality sites falling in areas of high deprivation too which could compound issues created by a lack of private open space where there is already a higher reliance on public provision.
- The entire city has been designated as an Air Quality Management Area (AQMA) because of poor air quality and there are particular hotspots around the city centre where levels of air pollutants exceed targets[3].
- Any level of air pollution can be harmful for people, particularly those who suffer from existing respiratory or cardiovascular conditions and the city has set itself rigorous targets for improving the situation.
- Also areas likely to be affected by land contamination, due to the history of land uses that have been situated in these locations over time, which can be harmful to health.
- Issues of flooding and overheating bring their own health risks, though these are discussed in greater detail later (see topic G).

3.8 The Local Plan has been prepared with a range of policies that will help to address the issues set out above so as to support improved health and wellbeing for people. Policies in chapter 4 include protections for the green infrastructure network (**policy G1**) and a network of ecological sites (**policy G6**) which seek to ensure everyone has access to a range of open spaces and that these are not further lost to inappropriate development that could exacerbate existing deficits in access. Because it is so challenging to establish large new open spaces in a constrained city like Oxford, the Local Plan also includes policies that seek to bring about greening in other ways, particularly by making sure major development meets certain minimum standards as assessed by the Urban Greening Factor (**policy G3**), and then making sure that this green infrastructure provide multiple benefits for people (**policy G2**).

3.9 Protection of the wider environment is set out in several policies within chapter 5, such as requirements that new development does not exacerbate poor air quality and demonstrates this through submission of air quality assessments through **policy R4**. This policy requires design of development to take account of existing air quality issues and tailor layout of sites to protect people, particularly more sensitive groups. **Policy R5** meanwhile sets out requirements for investigating potential land contamination and remediation where necessary so as to help reduce the chances of people coming into contact with harmful contaminants.

HIA topic C - Movement & Accessibility

3.10 Being able to move across the city in an efficient and a sustainable manner is crucial to ensure that residents have all their daily needs met. The focus of the city is around district and local centres being a hub for the majority of people's daily needs. Enabling people to take the option of travel in active ways such as walking and cycling is an important means of supporting them to stay healthy. If people cannot walk or cycle to their destination, the public

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

transport infrastructure across the city should be an efficient and affordable option for people too so that they are not forced to rely upon private vehicles.

3.11 The screening report flagged the following in terms of particular issues the Local Plan would need to address:

- Current analysis indicates that the majority of the city falls within a walkable distance from a district/local centre, however, there are small gaps in access, where residents are not as close.
- The largest mode of transport in terms of commuting to work has been private cars or vans, though cycling and walking are the commuting option for just over a quarter.
- In terms of uptake of more active travel options, there are known barriers in the city, for example, the Local Cycling and Walking Infrastructure Plan (LCWIP) identifies that cycling conditions, provision and routes are often very poor.
- Many are also likely to live and work at distances that cannot be easily/safely walked or cycled.

3.12 The Local Plan has limited influence on highways of the city as this falls within the responsibilities of the County Council, however the Local Plan (through policy **C6**) sets out requirements for new major development proposals to optimise active travel and public transport opportunities, and limit the increase in car journeys and requires this to be demonstrated where necessary via Travel Assessments and Travel Plans accompanying the application. Further to this, the Local Plan includes standards in relation to bicycle and motor vehicle parking, as well as provision for electric vehicle charging (policies **C7** to **C9**).

3.13 The site allocations policies of **Chapter 8** have all been assessed for a variety of sustainability criteria including topics such as proximity to public transport options. Where necessary, guidance in the allocations policies sets out expectations for how active/sustainable travel should be supported as part of any new development.

HIA topic D - Social infrastructure

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

3.15 The screening report flagged the following in terms of particular issues the Local Plan would need to address:

- The importance of identifying infrastructure need and methods for delivery ensuring that new development is supported by the appropriate infrastructure and community facilities.
- Alongside physical connections throughout the city, digital connectivity is of increasing importance to how we live, work and communicate with each other.
- Despite the increased shift to digital ways of connection, there are still communities who do not benefit from high quality digital connectivity, particularly those in more deprived areas of the city.

3.16 **Chapter 7** of the Local Plan includes a number of policies which set out protections for community assets such as community facilities **(policy C3),** learning and non-residential institutions **(policy C4)** and cultural venues/visitor attractions **(policy C5)**. The chapter also includes policies that seek to protect district and local centres **(policy C1)** as well as for maintaining vibrant uses within these areas **(policy C2).**

3.17 Beyond the policies set out above, there are also a range of other policies which are important for protecting social infrastructure. For example, **policy G1** sets out protections for a network of different types of green space which includes spaces like allotments, playing pitches and cemeteries. The strategic policy **S3** also sets out that infrastructure provision may need to be supported through developer contributions.

HIA topic E - Oxford's inequalities

3.18 Oxford is a city characterised by distinct health inequalities across its populations. Certain areas within the city have very healthy life expectancy figures of just over 80 years for men and over 84 years for women. Both of these statistics are above than the national average; however such high levels of expectancy are only relevant to a small portion of the city. In other areas within the city life expectancy life expectancy for men is 67 and 75 for women. This is a difference of 13 years for men and 9 years for women which is a wide a gap, representative of stark inequalities within the city.

3.19 The screening report flagged the following in terms of particular issues the Local Plan would need to address:

- There are distinct contrasts in health profiles across the city resulting in differences in life expectancy, prominence of physical/mental illness and reduced outcomes in certain areas.
- Socio-economic deprivation is often correlated with poorer health and wellbeing outcomes. According to the 2019 Index of Multiple Deprivation, 10 of Oxford's 83 neighbourhood areas ('Super Output Areas') are among the 20% most deprived areas in England.
- Wards with the highest levels of deprivation tend to be focused in central, eastern or southern areas of the city.
- Oxford ranks 182 out of 317 most deprived wards nationally in terms of average score for overall indices of multiple deprivation.
- Inequalities also exist in provision of natural features in the environment, e.g. access to open space as detailed under topic B.

3.20 The Local Plan’s influence over inequalities is focussed primarily on addressing the balance of land uses in the city and how the quality of the built environment. As such the commentary addressing the other topics in this assessment, particularly those in relation to housing and the natural environment are also of relevance here and not repeated for conciseness. It will be essential for other strategic areas such as the work of Oxfordshire’s public health teams to also help support the work of the Local Plan, in particular addressing other social needs and provision to help address these inequalities further.

HIA Topic F - Economy & jobs

3.21 Having access to a stable job and sufficient income to support daily needs such as paying for accommodation, healthy food and involvement in social activities makes an important contribution to health and wellbeing. Oxford is home to around 4,950 active businesses, collectively employing approximately 117,000 people in full-time work and has the highest employment rate in the county of 128,000 jobs. Yet there are individuals in the city who do not have access to stable employment or who are unable to work for various reasons such as having long term health conditions or not having sufficient qualifications to access the types of jobs on offer.

3.22 The screening report flagged the following in terms of particular issues the Local Plan would need to address:

- Oxford's importance as an employment location is clearly demonstrated by its job density ratio (jobs to residents aged 16-64) of 1.33 (2019), which is well above the South-East (0.90) and Great Britain (0.87)11.
- It is crucial that people have access to jobs in Oxford that are available to their particular skills and qualifications – a varied economy is important in supporting this as well as sufficient training and experience opportunities improve access to employment.
- Instability in the national and local economy can lead to a reduction in the number of jobs available and uncertainty of job security which an in-turn cause people to have stress for their own job security or in many cases unemployment.
- High amounts of unemployment reduces people's quality of life and therefore health as families are forced to cut costs and in extreme cases be threatened with becoming homeless.
- Growth of hybrid working patterns can be beneficial for supporting people to access employment, however, this style of working is not accessible to all work sectors – e.g. those who provide services such as in retail, building, manufacturing, social care.

3.23 The Local Plan includes a number of policies within **Chapter 3** which are intended to support economic growth and stability in the city. The employment strategy set out in policy **E1** has a key role in protecting a range of employment sites within the city which are important for supporting jobs in Oxford. Policy **E3** has requirements have been introduced in order to support the creation of affordable workspaces which can help a broader range of businesses to remain and locate in the city who might otherwise not be able to afford typical rent spaces. The provision of such workspaces should bring more diversity to the city's employment offer and provides employment opportunities that would not be available in the city as well as help local people to start-up new businesses, support social enterprises and promote social value.

3.24 In order to support the promotion of an 'inclusive economy', the Local Plan also includes requirements for community employment plans as set out in policy **E4** which are intended to help deliver greater job opportunities and skills for local people. There are various requirements set out in the policy such as in the construction phase of a major development providing the opportunity for local people to work in the building industry (through apprenticeships / skills / training and making links to schools and colleges) and to secure commitments from a developer to procure materials and labour supply locally. Developers are also encouraged to pay employees the Oxford Living Wage and use contractors who pay this higher level than the national living wage. During the operational phase of developments, the applicants are encouraged to secure a proportion of the longer-term workforce or supply chain locally or commitments to community education and outreach can ensure ongoing benefits.

HIA topic G - Climate Change

3.25 When considering health and wellbeing in relation to the topic of climate change, our focus in this assessment is resilience to the projected impacts of two key hazards, flooding and overheating. Climate change is a reality that we need to plan for, the impacts of carbon emissions are likely to continue regardless of the levels of decarbonisation we achieve in coming years. Risks of climate change on human health are not equal, however, impacts like flooding and overheating are felt to differing degrees across communities based on how exposed they are to such hazards and how well resourced they are to withstand and recover when these hazards arise.

3.26 The screening report flagged the following in terms of particular issues the Local Plan would need to address:

- City has a history of flood events due to its proximity to a variety of sources of flooding, particularly from the rivers. Climate change is projected to bring about wetter winters and increased incidences of intense rainfall events which are likely to exacerbate these risks in the future.
- Ongoing stress that is caused by flooding events including the threat of flooding, can be taxing on the mental health of those living in close proximity to flood zones and this could exacerbate challenges faced by those already in poor mental health.
- As an urban area Oxford is already susceptible to urban heat island affect. Warmer, drier summers and more intense/prolonged heat waves can exacerbate this with significant implications for health and wellbeing of the most vulnerable including issues of overheating and heat stress.
- Risks of overheating are exacerbated further by the urban environment around us, including poorly designed buildings (e.g. those with insufficient ventilation and other cooling measures), and outdoor spaces that are lacking in green infrastructure and other forms of shading.
- Prolonged heat wave events have been shown to be particularly threatening for those with pre-existing health conditions such as heart and lung disease, as well as the young and the elderly.
- Climate risk is not equal across communities. Those living in higher deprivation have increased vulnerability to climate impacts, potentially living in poorer quality accommodation, less resources (financial and material) to build their own resilience to impacts (e.g. to afford cooling measures in the house) and to recover when impacted (e.g. to pay to fix damage after flooding).

3.27 The Local Plan's **Chapter 4** sets out a range of policies which are intended to support the city's resilience to the impacts of climate change. Most directly, the Local Plan includes policy G9 which seeks to drive considerations of climate resilience through the design of all development. The policy includes various resilience requirements which development needs consider in terms of managing overheating risk and also flood risk. The policy also sets out requirements for water efficiency and conservation measures which are important in Oxford due to its location in a water stress area. Naturally, this policy has crossover with a number of other policies in the chapter.

3.28 In terms of these other policies, **G1** to **G3** address the protection of a network of green and blue spaces across the city as well as provision of new green infrastructure in development. Green infrastructure is important for not only managing surface water (slowing and storing) but also for helping to mitigate against hot temperatures through the cooling benefits green features like tress can provide (either by direct shading or evapotranspiration). Meanwhile, policies **G7** and **G8** address the management of flood risk in

the city and how new development needs to approach this as well as expectations for SuDS provision as a way of managing surface water runoff.

4. Conclusions

4.1 The built environment is a key determiner of health and wellbeing and as such the Local Plan should have an important influence in helping to address known issues affecting the city. The Local Plan covers a range of policy areas such as the provision of high-quality housing and employment opportunities, to protection and enhancement of the natural environment, and building resilience to climate change, and the majority of these topics have direct and indirect benefits for people's health and wellbeing. The HIA has touched upon some of the key policies, although the list is not exhaustive.

4.2 Of course, the Local Plan also has other overarching policies which support achieving health and wellbeing aims which were not touched upon in every section for brevity. In particular, requirements for Health Impact Assessment on major development as set out in **policy HD10** is intended to touch upon the wide range of ways that a development can impact upon health and steer applicants to consider the local health context of the city in informing the design of their development. Where possible, it seeks to encourage applicants to reduce potential negative impacts of their development on health and wellbeing whilst also making most of opportunities to improve it and to use available data to help evidence their reasoning. The checklist of design criteria set out in the Appendix which supports **policy HD7** (Principles of High Quality Design) should also have indirect benefits for health, through encouraging improved design of development coming forward in the city.

4.3 Ultimately, the Local Plan is one tool in the toolbox for addressing health and wellbeing in the city of Oxford. The Plan's influence is largely over new development which comes forward and requires planning permission, thus cannot fully address all extant issues in the city without the support of other strategies and public health measures. Nevertheless, whilst the Council works together with other stakeholders to address these wider challenges, this HIA helps to illustrate where policies should help to address known issues and where it falls within the Local Plan's remit.