

Milton Keynes Council Draft Health Impact Assessment SPD (2020) – Consultation Responses and Officer response

Response ID	Respondent	Section of SPD	Comment Summary	Council Response & Proposed Changes to SPD
HIA1	Broughton and Milton Keynes Parish Council Vicky Mote (Parish Clerk)	Whole document	<p>Whilst we agree that The Healthy Living paper is very thorough and contains a great deal of information, does it amount to an exhortation with no teeth to Developers to produce better proposed new homes and neighbourhoods, or whether the SPD has teeth.</p> <p>If it has no teeth, Developers will not spend money to create healthier future neighbourhoods, they'll build the most profitable schemes they can get permission for. Whereas if it has teeth, meaning, schemes assessed to be bad for people's health do not receive planning permission, it achieves something really useful.</p> <p>Unless this SPD leads to unhealthy proposals (anything that isn't better than MK's current average, say) being refused permission, it's a missed opportunity and largely a waste of everyone's time.</p> <p>If the Health Impact SPD is going to have any impact, it needs to create a clear rationale for refusing permission for poor planning applications, and the current draft document doesn't seem to achieve this.</p>	<p>HIA has been recognised by national planning policy and guidance as an appropriate tool to identify the health impacts of spatial plans and development projects and to develop recommendations to maximise the benefits and minimise harm. When based on evidence of local health needs and with the involvement of local public health teams, an HIA can help address health inequalities by protecting those who are vulnerable to the negative effects of development.</p> <p>A HIA is not designed to simply form a rationale for refusing planning applications, it is designed to be an iterative process carried out from the earliest stages of preparing a development scheme, so as to fully consider and mitigate against the potential health impacts of the proposed scheme and enhance the positive impacts of the development, whether that be through informing the design of the scheme, helping the development to meet other policy requirements, or outlining recommendations that can be implemented through planning conditions and S106 obligations.</p> <p>However, where a HIA omits key points, does not satisfactorily address recognised health issues related to the proposed development or, highlights that the development does not comply with other policies within Plan:MK, it will enable an objection to be raised and where not resolved could lead to the refusal to grant planning permission.</p> <p>Extra text has been added to the '<i>Carrying out a HIA – the stages</i>' section so as to provide more detail on how a HIA should be carried out and how it should influence the design of development proposals and, further text has been added to the '<i>5.Evaluation and monitoring</i>' part of this section to explain how the submitted HIA will be assessed and to outline that this can result in objections being raised which could ultimately result in the refusal to grant planning permission.</p>
HIA2	Bletchley and Fenny Stratford Town Council Gill Long (Support Services Manager)	Whole document	<p>The Town Council welcomes the provision of this toolkit and guidance for developers to ensure that there is no negative impacts on the community but that tangible benefits result instead. The TC understands the need to ensure that there is a great need to promote healthier living, lifestyles and to reduce the impact on the NHS by ensuring adequate and timely provisions. It is keen that there should be controls in place to ensure that the delivery of these benefits for the larger developments are both delivered and available mid phase and not once the development is finished. This would ensure that the residents can access these and this would in turn grow the community.</p>	<p>Comments noted.</p> <p>It is not the role of the HIA SPD to set controls to ensure the timing of delivery of infrastructure within new developments however, with regards to larger strategic development sites, Plan:MK does provide provision for this to be fully considered through the assessment of a planning application.</p> <p>Policy SD9 (General Principles for Strategic Urban Extensions), in particular criteria 2 and 3. vii. outline the requirements for new developments to deliver necessary infrastructure at the appropriate stage, rate and scale to support the proposed delivery, also outlining that this should be done in accordance with an agreed Infrastructure Delivery Plan and through incorporation of planning obligations relating to the phasing of the development and provision of on-site and off-site infrastructure and facilities.</p> <p>Furthermore, for Strategic Urban Extensions, Criteria A of Policy SD10 (Delivery of Strategic Urban Extensions) outlines that planning permission will only be granted following the approval by the Council of a comprehensive development framework which incorporates amongst other items, phasing of the development and infrastructure delivery for the whole of the site, to ensure the site is brought forward in a strategic and comprehensive manner.</p>

HIA3	Canal & River Trust Jane Hennell (Area Planner)	Section 2.1	<p>As a waterway and wellbeing trust, support the aims of the SPD and have one detailed comment:</p> <p>With regards the text: <i>"The type of HIA required will depend on the type, size and location of the development scheme as well as the likely implications for local public health issues and health infrastructure. An HIA may fit in between two of these categories, as the approach taken will also depend on the timescales and resources available to undertake the HIA. It is important to use an approach that makes the best use of the resources available."</i></p> <p>It would be helpful for clarity on examples of the type, size and location which aligned to the relevant type of HIA. Concern that the timescales/resources comment provides an opportunity to avoid completing the most appropriate levels of HIA.</p>	<p>A HIA is intended to be a bespoke assessment for the development proposal in question, as each development may require the consideration of different health related factors dependant on, amongst other factors, the type, size and location of the scheme.</p> <p>For example, the development of a retirement village will have different health implications to consider to that of a development of family homes, or a large apartment block. Similarly, a strategic urban extension will likely have a much wider range of health considerations than a development of 50 units within an existing grid square of Milton Keynes however, the smaller development may have a more focused set of issues to consider if it is in an area of Milton Keynes, or is for a type of development, whereby specific health related issues have been recognised and the development can assist in mitigating these.</p> <p>It is therefore intended that for each development proposal that meets the threshold set out in Policy EH6 of Plan:MK, the scope of the HIA, will be agreed at an early stage of the development preparation process, preferably no later than at pre-application stage, and this will be agreed with the involvement of Public Health and Planning Officers.</p> <p>Furthermore, it is intended that the completion of the HIA Screening/Scoping Template, as outlined in Appendix 4 will assist applicants in determining the scope of HIA to be prepared.</p> <p>It is however acknowledged that outlining different types of HIA that could be undertaken, without providing clarity on the type that would be expected of different development proposals does not provide clarity to those preparing a HIA and could cause confusion. As such, to provide clarification on the approach the Council will take, the <i>'What Type of HIA should be undertaken?'</i> section has been removed and the <i>'Carrying out a HIA – the stages'</i> sections of the SPD have been amended to provide more detail on the process applicants will be expected to take in preparing a HIA, particularly in relation to the role of the HIA Screening/Scoping Template and pre-application engagement.</p>
HIA4	Community Action:MK Clare Walton (CEO)	Section 2 and Section 9	<p>These sections relate to Social Infrastructure and community wellbeing. There could be merit in ensuring that the components set out in each of these sections is fundable- so either connect to Planning Obligations, and or the Council Plan and other specific programmes which could generate funds to promote some of the excellent proposals laid out in the document.</p>	<p>Each section in Appendices 2 and 4 provide points for applicants to consider when preparing a HIA and designing their development proposals so as to ensure health and wellbeing are taken into account and the scheme ultimately mitigates any negative impacts and enhances the positive impacts; all development schemes will not however be able to provide, or contribute to the provision of, all the social infrastructure elements outlined in Sections 2 and 9.</p> <p>The actual requirements for each scheme will differ and, will also need to be considered on a case-by-case basis, taking account of a range of factors, such as, the nature of the scheme, its location and its assessment against all relevant policies within Plan:MK, so as to determine what social infrastructure provision is required to be provided, or what S106 contributions a scheme may be required to make.</p> <p>It will then be for the applicant to outline within the HIA what their development will be providing, whether physically or through financial contributions, with regards social infrastructure so as to demonstrate how their scheme impacts positively on health and wellbeing.</p> <p>As such, it is not possible in the HIA SPD to link delivery of certain components to specific funding mechanisms, however, in preparing their schemes, developers will still need to take into account all other policy and guidance, including for example the Planning Obligations SPD and the Council's Infrastructure Delivery Plan.</p>
HIA5	Central Milton Keynes Town Council Paul Cranfield (Clerk)	Whole document	<p>CMK Town Council has considered the draft SPD and is content with all its proposals.</p>	<p>Noted</p>

HIA6	Urban Design & Landscape Architecture - Milton Keynes Council David Blandamer (Senior Urban Designer)	General Comment	Building for a Healthy Life (BHL) has replaced the previous Building for Life guidance, and should be referenced in the SPD. I would recommend incorporating relevant positive characteristics promoted in BHL within the SPD's Health Impact Assessment Template and associated guidance.	<p>Noted; reference to Building for Life Guidance has been replaced with reference and link to new Building for a Healthy Life toolkit.</p> <p>The HIA Template and associated guidance already incorporates a wide range of the positive characteristics outlined within the Building for Life 12 Guidance, that also align with those in the new Building for a Healthy Life (BHL) Toolkit. However, in light of the new BHL toolkit a number of the existing guidance points have been amended and new guidance points added to reflect the BHL toolkit. The BHL toolkit has also been referred to in preparing an additional section to the guidance and HIA Template as outlined in response to comment HIA7 below.</p> <p>It should also be noted that the HIA template and associated guidance is not exhaustive and it is expected that in preparing a HIA, applicants should utilise the wide range of source material available (some of which is outlined in Appendix 3), alongside an understanding of local issues and, engagement, to ensure the HIA covers all relevant issues. Therefore, it is expected that each individual HIA will be different, may not necessarily cover all the sections outlined in the HIA template and associated guidance and, may indeed add further sections as required.</p>
HIA7	Urban Design & Landscape Architecture - Milton Keynes Council David Blandamer (Senior Urban Designer)	Background Section, Appendix 2 and Appendix 4	<p>The Council Plan includes as one of its commitments: “Support becoming a Dementia Friendly city, to improve the lives of those most in need of help.” In the light of this commitment, UDLA is preparing a design guidance note on designing dementia-friendly neighbourhoods.</p> <p>I note that there are two references to dementia within the SPD, including a link to the RTP1 report 'Dementia and Town Planning'. However, given the Council Plan commitment, I consider that there should be greater emphasis on dementia both in the background section and within the Health Impact Assessment Template (appendix 4) and associated guidance (appendix 2).</p> <p>The issues facing those with dementia don't neatly fit into the criteria included in the proposed Health Impact Assessment Template (appendices 2 & 4). For example, legibility is a health issue for those with dementia, but is not included in the template. As it stands, the Health Impact Assessment template would not capture issues relating to dementia, and therefore developers would not need to show that they had taken account of the impact of their development on people with dementia. Maybe it could be covered in a section on 'Designing for those with Specific Health Conditions'. The Template needs to provide a hook requiring developers to show that they have taken account of the needs of those with dementia. The design guidance UDLA is preparing could help developers identify how they might achieve a dementia friendly scheme.</p> <p>Dementia disproportionately affects older people and therefore those with dementia will also be impacted by health issues affecting older people (mobility, eyesight etc). In the Accessibility and Active Travel section of the template I would suggest that there needs to be some reference to the need to provide places in the public realm for those with mobility issues to rest. Building for a Healthy Life includes as one of its recommended positive characteristics “Frequent benches can help those with mobility difficulties to walk more easily between places.”</p>	<p>Reference to the forthcoming guidance has been added to Appendix 3 - 'Further information and resources'.</p> <p>Reference to the Council's commitment to support becoming a Dementia friendly city and to improving the lives of those most in need of help has been added to a new paragraph on "Milton Keynes Council Plan 2016-2022" commitments under the 'Local Policy Context' section.</p> <p>The following objective has also been added to 'Objectives' section within the 'Purpose of the SPD' Chapter:</p> <p>"To help deliver built and natural environments that consider the needs of, and benefit, everyone, including older people, those with mobility issues and those with specific health conditions"</p> <p>Further references have also been added to the background sections of the document.</p> <p>A new section 12 has been added to Appendices 2 and 4 entitled "Designing for Older People and those with Specific Health Conditions", so as to capture the issues that relate to specific groups within the population, including the needs of those with dementia and other specific health conditions.</p> <p>As outlined above, it is also expected that when utilising the HIA template to assist in preparing a development scheme, further sections and criteria can be added so as to take account of, and/or expand on, issues that specifically relate to the scheme, or the area in which the proposed development is taking place.</p> <p>The following bullet point had been added to the 'positive effects' column of Section 5.'Accessibility and active travel' of Appendix 2:</p> <p>"- Frequent benches in the public realm can encourage and help those with mobility difficulties to walk more easily between places"</p> <p>Reference to this has also been included in the new Section 12 "Designing for Older People and those with Specific Health Conditions"</p>

HIA8	Urban Design & Landscape Architecture - Milton Keynes Council David Blandamer (Senior Urban Designer)	General Comment	What does “Does the proposed development assess the impact on Police infrastructure?” mean in the Impact Assessment Template? How does this impact on health?	Agreed; this has been removed.
HIA9	Forestry Commission (South East & London Area) Caroline Gooch (Local Partnerships Advisor)	General Comment	Existing Trees in your community - encourage communities to review the trees and woodlands in their neighbourhood and consider whether they are sufficiently diverse in age and species to prove resilient in the face of tree pests and diseases or climate change. Ancient Woodland - It is important that Ancient Woodland, Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS) are considered within your plan. It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland unless “there are wholly exceptional reasons and a suitable compensation strategy exists” (National Planning Policy Framework paragraph 175).	Noted; although this is not a planning matter. Noted; Plan:MK, the Local Plan for Milton Keynes, contains policies within its 'Environment, Biodiversity and Geodiversity' chapter that cover these points and are used to assess planning applications.
HIA10	MK Centre for Integrated Living Ernie Boddington (Chair)	Whole document	A well put together and informative document although I’m not sure that developers will be too interested in reading and their agents undertaking the HIA will hopefully know the content already.	Noted
HIA11	MK Centre for Integrated Living Ernie Boddington (Chair)	Figure 1	Although is an extract from a published book/document we feel that the identified living and working conditions should also include the Public Realm, Built Environment and Transport. For the disabled and elderly, the ability to get around the local area or city in total, to be able to get into a location and to be able to participate in activities or social interactions has a considerable positive effect on their health and wellbeing. (As is highlighted in Appendix 2 Item 2). Whether they are then listened to requires something above the infrastructure aspects.	It is agreed that these additional factors are important to all groups, especially for older people, those who are less mobile and those with specific health conditions. Whilst these factors cannot be added to the diagram, additional text has been added to paragraph 1.6 to include them in the text that relates to the diagram. Furthermore, the importance of these factors to older people, those who are less mobile and those with specific health conditions has now been further emphasised in the SPD through the addition of Section 12 to Appendices 2 and 4.
HIA12	MK Centre for Integrated Living Ernie Boddington (Chair)	Page 6, first full paragraph	Refers to the MK NEW Residential Design Guide SPD (2012). How can it be referred to as new when 8 years old? It also has not been officially reviewed since, even though was identified on adoption as being scheduled for review in 2017. It is also a document that has been adversely commented on by disabled groups and contains several design proposal that are viewed by the disabled community as unacceptable and in our view now contains design arrangements that have been ceased as an acceptable practice by the Government and Planning Authorities.	Comments noted: The MK New Residential Design Guide SPD (2012) is an adopted SPD of the Council and, as such, remains a material consideration in relation to decision making on planning matters. The Council recognises that there is a need to update the SPD and are currently considering its update as part of the current round of SPD production following the adoption of Plan:MK (2019) and as part of the ongoing work in preparing a review of Plan:MK. The Government’s proposals in the recent Planning White Paper: “Planning for the Future (August 2020)”, will also need to be taken into consideration with regards to the timing and scope of any update. It should also be noted that the word ‘New’ in the title of the document is a reference to the guidance applying to new residential developments, as opposed to it relating to being a newly produced or updated document.

HIA13	MK Centre for Integrated Living Ernie Boddington (Chair)	Page 6, third full paragraph	Makes comment that there is a high quantity of car use. This is almost certainly true but surely is a function of the initial design concept for MK with higher speed grid roads to facilitate the ease of moving between areas. So, since that is seen as a contributory factor to the level of inactivity and obesity continuation of the grid road system will continue this effect. Of course, slowing traffic movement will undoubtedly certainly in the short term increase levels of pollution. It is also unlikely that people will not use cars to move between areas unless there is an alternative system in place that is fast, convenient and accessible in the wider context of the word. Having said all that how will the individual developments that this SPD is aimed at overcome the main problem? The only way of overcoming are by the development of local facilities that support everyday living and entertainment and by reducing the need to travel to enjoy such facilities. Then by having a suitable transport system in place when they do. Both of which would be outside of the scope of the development.	<p>Comments noted.</p> <p>It is acknowledged that there are causes of health issues that require large scale change and that planning for the built environment has a key role to play in this.</p> <p>Whilst many developments will be too small to bring about change on their own, delivering them as part of a framework or development strategy, as outlined in Plan:MK, can lead to them contributing to wider objectives. In this regard, the HIA is important in ensuring each development delivers against relevant policies.</p> <p>It should also be noted that HIA will be required of all strategic growth sites and as such can play a big role in ensuring these significant developments are designed and delivered in a manner which helps to contribute to alleviating wider scale issues.</p> <p>Many of these wider issues will also need to be considered and addressed as part of the review of Plan:MK</p>
HIA14	MK Centre for Integrated Living Ernie Boddington (Chair)	Section 2.2, Part 3 ("Appraisal")	Section states that the appraisal should also include an understanding of the demographic, health and economic situation of the area. SPD should clarify what 'area' is referring to; it is the whole of MK as an area, the area of the development itself, or the vicinity that the development is in.	<p>The ' area' will vary for each application dependant on a range of factors (for example; the size of the proposed development, and its location etc.) and, as such, will need to be set on a case-by-case basis.</p> <p>It is expected that, as outlined in "Section 2: Scoping" of the HIA stages, the geographical boundaries of the HIA will form one of the considerations for the design and planning of the HIA at this stage.</p> <p>Added following text at paragraph 2.13 to confirm this:</p> <p>"(The 'area' which the HIA will cover will vary on a case-by-case basis in relation to a number of factors and should therefore be considered and agreed during the Scoping stage)."</p>
HIA15	MK Centre for Integrated Living Ernie Boddington (Chair)	Appendix 1	The data used in the table is considerably out of date and the key associated with it has not been used. The trend 'graphs' are largely over 6 points. What actually is the duration of each 'graph'	<p>Data contained within Appendix 1 was, at the time of writing, the most up-to-date data available for each health measure reported and was compiled from Public Health England sources. As the data for each measure reported is updated at different times and can vary in the period the data covers, the data reported here is only intended to provide a snapshot view so as to outline some of the current health factors in Milton Keynes.</p> <p>The key and associated comparison section has been removed, due to there not being a complete dataset to be able to cover comparisons for each measure reported on.</p>
HIA16	MK Centre for Integrated Living Ernie Boddington (Chair)	Appendix 2, Item 3	<p>This would gain from identifying Access for the disabled and elderly under considerations, as per item 2. For the reasons as stated in item 1) (Comment HIA11 above) of this response.</p> <p>This table should also include provision of quiet spaces to allow people to sit and relax and contemplate.</p>	<p>The following bullet has been added to 'Considerations' under Section 3 of Appendix 2.</p> <ul style="list-style-type: none"> Easy access for older people, those who are less mobile and those with specific health conditions <p>Reference to providing accessible informal open space has been included in the new Section 12 'Designing for Older People and those with Specific Health Conditions'.</p>
HIA17	MK Centre for Integrated Living Ernie Boddington (Chair)	Appendix 2, Item 5	We believe that under considerations a statement to the effect that suitably designed pavement to road transitions should be installed covering all primary and secondary routes as a minimum, together with all associated infrastructure for crossings etc. Might require them to submit a plan showing the identification of these routes for approval. As a positive effect this will help to facilitate this cohort to lead a more active and involved life. Will also assist pushchairs/prams, those with luggage and those with transient mobility problems.	Reference to provision of suitable footpaths and walking routes that aid accessibility for all and support older people and those with mobility issues to be more active, has been included in the new Section 12 'Designing for Older People and those with Specific Health Conditions'.

HIA18	MK Centre for Integrated Living Ernie Boddington (Chair)	Appendix 2, Item 11	Not directly a disability issue but something identified within the review. The considerations identify buildings design and renewable energy but there a number of aspects that could be considered under these and other sustainability issues that should be considered and which are part of the full development design e.g. energy centres (solar panel and/or wind farms), heat pumps, aquifer cooling, rainwater storage etc.	The 'Positive Effects' part of Section 11 in Appendix 2 outlines ' <i>encouraging renewable energy sources</i> ' as a way in which new developments can help to reduce greenhouse gas emissions. Furthermore, Chapter 17. (Sustainable Construction and Renewable Energy) of Plan:MK contains specific policies which deal with the provision of renewable energy sources on new developments and standalone renewable energy schemes.
HIA19	MK Centre for Integrated Living Ernie Boddington (Chair)	General Comment	The provision of an HIA will obviously be added to the Planning Validation List. Has consideration been given at any time as to whether an EIA should also be required?	As per Policy EH6 of Plan:MK, once the SPD is adopted by the Council, all Use Class C2 developments and Use Class C3 residential development in excess of 50 dwellings will be required to prepare and submit a HIA as part of their application. For these types of applications, a HIA will therefore be required for validation. The process of Environmental Impact Assessment (EIA) in the context of town and country planning in England is currently governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As set out in the Regulations, EIA is only required of certain types of development projects whereby they are deemed as likely to have a significant effect on the environment. The Regulations set out a procedure for identifying those projects which should be subject to an EIA, and for assessing, consulting and coming to a decision on those projects which are likely to have significant environmental effects. EIA cannot therefore be required of all development projects however, where a development proposal in Milton Keynes is considered to be likely to have a significant effect on the environment, as per the Regulations, an EIA will be required.
HIA20	Gloucestershire County Council Lorraine Brooks	No Comment		Noted
HIA21	Natural England (Thames Solent Team) Ellen Satchwell (Sustainable Development Lead Advisor)	General Comment	SPD unlikely to have major effects on the natural environment, but may have some. Green Infrastructure - SPD could consider making provision for Green Infrastructure (GI) within development, in line with GI Strategy for the area. Provides multiple benefits including resilient ecological networks, manages environmental risks such as flooding and, greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. Biodiversity enhancement - SPD could consider incorporating features which are beneficial to wildlife within development e.g. guidance on, the level of bat roost or bird box provision or other measures to enhance biodiversity in the urban environment. Landscape enhancement - SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. E.g. it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die. Other design considerations - The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).	Comments noted. The positive impacts on health and wellbeing in relation to access to good quality green infrastructure, open space and nature are considered and covered in Sections 3, 4, 5 and 11 and the new Section 12 of Appendices 2 and 4. Whilst other points raised here, in relation to impacts upon, and improving of, biodiversity, GI and Landscape will need to be considered when planning for and developing the built and natural environment, they are not directly linked to the aims of the HIA SPD and they are also covered under specific policies relating to the Environment, Biodiversity and Geodiversity within Chapter 17 of Plan:MK, which will be used for assessing planning applications relating to these matters.
HIA22	SGN Simon Harkins (Network Support Assistant)	General Comment	No comments, however offer of future support to assess the impact of any potential development/s to the gas infrastructure or help with any questions in relation to the SGN gas network	Noted

HIA23	Wolverton and Greenleys Town Council Sally McLellan (Clerk)	Appendix 4, Section 2 "Access to healthcare services and other social infrastructure"	The question 'Does the proposed development retain or re-provide existing social infrastructure', should be changed to 'enhance'. It is important that any new development should enhance the existing facilities.	Criteria re-written to read as follows: Does the proposed development ensure provision of required and, where necessary, enhanced retain or re-provide existing social infrastructure?
HIA24	Wolverton and Greenleys Town Council Sally McLellan (Clerk)	Appendix 4, Section 2 "Access to healthcare services and other social infrastructure"	In relation to Question 'Does the proposal assess the impact on healthcare services (both primary and acute)?' All developments will impact health services; therefore, this question should be focused on what provision has been made to increase the support for healthcare services? This same question should be used for education needs, as again most developments add to educational needs.	HIA is a tool used to identify the health impacts, in this case, of a proposed development, and to develop recommendations to maximise the positive impacts and minimise the negative impacts. It is designed to be undertaken prospectively and concurrently so as to inform and shape the development (i.e. before decisions are made and submitted as part of a planning application), therefore the questions are worded in this manner to ensure the applicants fully explore, identify and consider, in detail, all the differential health impacts, both positive and negative, of the development proposal up front, as well as providing the suitable mitigation measures and enhancements which are required. The 4th column ("Recommended mitigation or enhancement actions") of the template is for outlining mitigation and enhancement measures. For the Criterion outlined here, the words " and where required address " have been added to the question so as to be clear that the HIA requires mitigation and enhancement measures to be outlined as well. In relation to education, the relevant criteria question within Section 2 of Appendix 4, is already worded in such a manner.
HIA25	Wolverton and Greenleys Town Council Sally McLellan (Clerk)	Appendix 4, Section 4 "Air quality, noise and neighbourhood amenity"	Add in the question: 'Has the developer provided tree lined streets as part of the development, ensuring the right tree in the right place with a maintenance programme? This is a requirement in the new White Paper, which enhances the surroundings and improves air quality. In many areas across Milton Keynes there are tree density issues, which this provision would help address.	The positive health and air quality impacts of tree provision within urban areas is recognised in the HIA SPD and is outlined under the 'considerations' and 'positive effects' columns of both Section 3 "Access to open space and nature" and, Section 4 "Air quality, noise and neighbourhood amenity" in Appendix 2 as elements that applicants will need to consider in designing a development and compiling a HIA. Furthermore, under Plan:MK Policy D1 (Designing a High Quality Place) Criterion A.5., new developments are required to incorporate street trees and planting to soften the streetscape and ensure the public realm is not dominated by hard surfaces and boundaries and by parked cars. Further guidance on the provision of trees and landscaping in the urban area including, regarding issues of type, location and future maintenance, is provided in the Council's New Residential Design Guide (SPD) and is also outlined in design codes for specific strategic developments. With regards to the principle of 'tree lined streets' there are a number of other elements that need to be taken into account and considered which mean that this approach is not always appropriate. The implementation of this principle is something that will need to be considered in more detail through a review to the New Residential Design Guide and taking into account any new national policy and guidance and, as such, it is not felt suitable to include as a requirement in the HIA SPD, particularly when the principle health benefits of tree provision in the urban area are already covered.

HIA26	Wolverton and Greenleys Town Council Sally McLellan (Clerk)	Appendix 4, Section 5 "Accessibility and Active Travel"	All routes should be required to be well lit to reduce crime and make a safe accessible route for day and night.	<p>Lighting is already covered under Section 6 "Crime reduction and Community Safety" as outlined in Appendix 2. Further text, as follows has been added to emphasise this element in Appendix 2 and Appendix 4.</p> <p><u>Appendix 2</u> The following text has been added to the third bullet point under Section 6 "Considerations": - Security and street surveillance including effective lighting.</p> <p>The following text has been added to the third bullet under Section 6 "Positive Effects": - Active use of street and public spaces, combined with effective lighting, is likely to decrease opportunities for antisocial behaviour or criminal activity and create safer environments during both day and night.</p> <p><u>Appendix 4</u> The following text has been added to the second criteria under Section 5 "Accessibility and Active Travel": - Do pedestrian routes feel safe by being well lit and overlooked by adjacent housing and streets?</p>
HIA27	Wolverton and Greenleys Town Council Sally McLellan (Clerk)	Appendix 4, Section 5 "Accessibility and Active Travel"	A question to be added 'what enhancements are made to link and enhance existing pedestrian and cycle routes	<p>This topic is already covered within Section 5 of Appendix 4 under the criteria:</p> <p><i>- Does the proposed development connect public realm and internal routes to local and strategic cycle and walking networks?</i></p> <p>The HIA template also requires applicants to outline 'Recommended mitigation or enhancement actions' that are provided by the development in response to meeting each criteria.</p>