



A review of regional and local planning policies within England:

Existing requirements to account for
development impacts on people's wellbeing

Biodiversity Net Gain and People's Wellbeing / October 2021

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1. Summary

Biodiversity Net Gain (BNG) could transform how we finance, design, build and operate development, with the UK's Good Practice Principles providing an approach that supports developers to generate long-term, measurable, and meaningful net benefits for biodiversity¹. But while we are making progress towards this goal, focussed on the conservation of biodiversity for its own sake, it is important to remain mindful of the connection between biodiversity and people's wellbeing.

The UK's BNG Good Practice Principles involve sharing the benefits fairly among stakeholders and achieving an overall gain in the services that ecosystems provide². However, the principles do not explicitly state that BNG should avoid detrimental impacts on people, in other words they lack the "do no harm" principle adopted internationally for sustainable development³. Neither do they explicitly link BNG to wellbeing or consider the social impacts of BNG in a holistic way that fully understands and addresses how people's wellbeing is affected by BNG within the wider context of sustainable development.

With funding from the Esmée Fairbairn Foundation, CIEEM, in collaboration with Balfour Beatty, the University of Oxford, and Wild Business Ltd, undertook a scoping study on whether, and, if so, how, wellbeing should be incorporated more directly into the UK's BNG Good Practice Principles. The aim of incorporating wellbeing into BNG good practice is for development projects to achieve BNG in ways that "do no harm" to people's wellbeing and, where possible, enhance wellbeing.

This report describes a desk-based review of adopted regional and local plans by Local Planning Authorities (LPAs) in England. The aims were to understand existing planning policy requirements on people's wellbeing within England, and how these existing requirements might apply to developments seeking to achieve BNG. England was selected because its National Planning Policy Framework refers to measurable net gains in biodiversity, and this enabled an assessment of links between the two policy requirements: wellbeing and BNG.

Approximately one third of all adopted regional and local plans in England were reviewed, which totalled 152 plans. Of these 152 plans, 52 had specific health and wellbeing policies and many sign-posted to Health Impact Assessments as the tool to assess a development project's impact on people's wellbeing. However, only 34 of the 52 plans required a Health Impact Assessment to accompany planning applications. Of the 34 LPAs that require a HIA to accompany planning applications, 25 of these (73%) had separate BNG policy statements.

While this review only regarded a sample of adopted local plans, it shows some LPAs in England already require a development's impacts on wellbeing to be considered as part of a planning application, depending on the scale of the development. Almost three quarters of these authorities also require BNG, which means in practice that consideration of wellbeing impacts should also cover how BNG affects people's wellbeing. Accordingly, in those areas where LPAs have policies both on wellbeing and on BNG, to apply all policies consistently, developers should consider the impacts of BNG on people's wellbeing.

Further work to build on this review should consider draft plans, especially given the rise in awareness about wellbeing in recent years, and UK-wide planning policy, especially the Wellbeing of Future Generations (Wales) Act 2015 introduced by the Welsh Government. Further work should also consider Local Nature Recovery Strategies in England, which are expected to tackle biodiversity, climate and health.

2. Introduction

Biodiversity Net Gain (BNG) could transform how we finance, design, build and operate development, with the UK's Good Practice Principles providing an approach that supports developers to generate long-term, measurable, and meaningful net benefits for biodiversity⁴. But while we are making progress towards this goal, focussed on the conservation of biodiversity for its own sake, it is important to remain mindful of the connection between biodiversity and people's wellbeing.

¹ CIEEM, CIRIA, IEMA (2016) Biodiversity Net Gain Good Practice Principles for Development. UK

² [Biodiversity Net Gain: Good Practice Principles for Development](#). | CIEEM

³ The "do no harm" principle of sustainable development is to avoid or mitigate impacts that create or exacerbate poverty, or that undermine the resilience of people or communities. In recent years, international sustainable development has adopted a "do good" agenda of actively working to improve human livelihoods and wellbeing.

⁴ CIEEM, CIRIA, IEMA (2016) Biodiversity Net Gain Good Practice Principles for Development. UK

BNG can benefit people directly, for example when communities enjoy high quality natural surroundings either by BNG being achieved within the development footprint or when a biodiversity offset increases people's access to, or views of, nature. Indirectly, BNG has a wider societal benefit of enhancing the natural environment for everyone, and people can benefit from simply knowing there has been a net gain of biodiversity from a development. But poorly designed BNG can be detrimental to people's wellbeing, for example by restricting access to nature within a development site, without adequate alternative provision.

In 2018, international principles were published to give guidance on how to assess the social impacts of No Net Loss (NNL) and BNG in depth and ensure that people are not left worse off by BNG interventions (Bull et al, 2018⁵). These 'People Principles' set an outcome for NNL/BNG projects to achieve, as follows:

"People perceive the components of their wellbeing affected by biodiversity losses and gains to be at least as good as a result of the development project and associated biodiversity NNL/BNG activities, than if the development had not been implemented."

Wellbeing is defined as a positive physical, social, and mental state, and these international 'People Principles' for BNG focus on wellbeing related to biodiversity. Their application involves measuring change to people's wellbeing that is caused by losses and gains in biodiversity from a development and its BNG activities, and then making sure that this change is positive through an inclusive approach to planning BNG activities to support the wellbeing of affected people. The UK's BNG Good Practice Principles involve sharing the benefits fairly among stakeholders and achieving an overall gain in the services that ecosystems provide⁶. However, the principles do not explicitly state that BNG should avoid detrimental impacts on people, in other words they lack the "do no harm" principle adopted internationally. Neither do they explicitly link BNG to wellbeing or consider the social impacts of BNG in a holistic way that fully understands and addresses how people's wellbeing is affected by BNG within the wider context of sustainable development.

1.1. Scoping Study

With funding from the Esmée Fairbairn Foundation, CIEEM, in collaboration with Balfour Beatty, the University of Oxford, and Wild Business Ltd, undertook a scoping study to determine whether, and, if so, how, wellbeing should be incorporated more directly into UK industry's BNG Good Practice Principles.

The scoping study involved desk-based reviews and consultations that included webinars, an on-line questionnaire, interviews and focus group discussions. The study commenced during Autumn 2020 and was completed in Spring 2021. The project team was supported by a Technical Advisory Panel, with expertise from industry, academia, and government, who provided advice and feedback throughout. The team and Technical Advisory Panel members are listed in Appendix A.

The study findings are documented in the following reports:

Defining and assessing human wellbeing: what the science says	A literature review of how wellbeing is defined assessed within the academic literature
How do governments define wellbeing?	A literature review of how wellbeing is defined by international and UK governments and key organisations
Accounting for wellbeing within planning applications	A desk-based review of whether Planning Authorities in England require consideration of a development's impacts on people's wellbeing as part of a planning application
Biodiversity Net Gain and Wellbeing: consultation responses	A report on responses to this study's consultations on whether, and, if so, how, wellbeing should be incorporated more directly into UK industry's BNG Good Practice Principles
Biodiversity Net Gain and Wellbeing: core messages and recommendations	A summary of the core messages from all of the evidence gathered by this scoping study, together with the recommendations.

⁴ CIEEM, CIRIA, IEMA (2016) Biodiversity Net Gain Good Practice Principles for Development. UK

⁵ [ensuring_no_net_loss_-_bull_et_al_2018.pdf \(iucn.org\)](#)

⁶ [Biodiversity Net Gain: Good Practice Principles for Development. | CIEEM](#)

3. This Review

This review was to assess whether regional and Local Planning Authorities (LPAs) in England require consideration of a development's impacts on people's wellbeing as part of a planning application and if so, what guidance on methods and tools to consider health and wellbeing impacts is provided.

The aims were to understand existing planning policy requirements on people's wellbeing within England, and how these existing requirements might apply to developments seeking to achieve Biodiversity Net Gain (BNG) as a requirement of planning or legalisation⁷ or on a voluntary basis.

4. Methods

A review of 152 (around one third) of all adopted regional and local plans in England (as available on the internet) was undertaken. This covered a total of 142 Planning Authorities in England. This only represents a sample of adopted plans, i.e. not those in draft, in order to illustrate examples of wellbeing requirements for planning applications.

These examples are documented in the spreadsheet 'Examples of Wellbeing Requirements for Planning Applications', which should be read in conjunction with this report.

For each regional and local plan reviewed, a search for the terms 'health', 'wellbeing' and 'health impact assessment' within a policy statement was made. Searches were made for alternate ways of writing wellbeing i.e. 'well-being' and 'well being' to avoid missing key words.

When these terms were identified, relevant policy headings, wording and weblinks were reviewed to identify:

- Specific health and wellbeing or health impact assessment policies (where health and wellbeing or similar is in the policy statement title); and
- The extent to which policies with these headings outline the requirement for health and wellbeing assessments (e.g. Health Impact Assessments⁸ [HIA]) to accompany planning applications from developers, if at all.

Where policies for health and wellbeing were not present but the key words were recorded throughout the regional and local authority documents in strategic objectives, these were noted incidentally.

A quick search of the regional and local plans for terms relating to Biodiversity Net Gain (BNG) was also undertaken looking for key words such as 'no net loss', 'net gain', 'biodiversity offsetting' and 'biodiversity gain'. The aim was to assess whether LPAs requiring consideration of wellbeing, as part of a planning application, also required the development to achieve BNG. When these were found, they were recorded within the spreadsheet.

Whole tracts from relevant policy statements were not copied, although relevant policy information was recorded in the spreadsheet, which outlines the regional and LPAs and their respective policy considerations on health and wellbeing.

Quality assurance of the search consisted of a 10% check of details recorded in the spreadsheet (i.e. details of 15 LPAs). This included checking the accuracy of details recorded and checking that the details related to the purpose of this review.

This review was only undertaken for England because its National Planning Policy Framework refers to measurable net gains in biodiversity, and this enabled an assessment of links between the two policy requirements: wellbeing and BNG. Also, the forthcoming mandatory BNG requirement for developments seeking planning permission, which will be introduced under the Environment Bill, only applies to England. It is noted that the Welsh Government has introduced the Wellbeing of Future Generations (Wales) Act 2015 (WFGA) (Welsh Government 2015), which places a statutory duty on public bodies and public service boards to ensure that sustainable wellbeing becomes a core focus for all. Further reviews on existing policy requirements on people's wellbeing should be UK-wide, especially to learn lessons and gather experiences from Wales.

⁷ At the time of writing, the draft Environment Bill includes a mandatory requirement for developments in England seeking planning permission to achieve Biodiversity Net Gain. [Environment Bill 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/929230/HIA_in_Planning_Guide_Sept2020.pdf)

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/929230/HIA_in_Planning_Guide_Sept2020.pdf [accessed February 2021]

5. Results

The term 'health and wellbeing' frequently appeared throughout the sample of regional and local development plans and core strategies that were reviewed. Additionally, the term health and/or wellbeing appeared frequently as a main strategic objective for regional or local authorities. However, of the 152 plans reviewed, only 52 had specific health and wellbeing policies. The term 'Health Impact Assessment' showed up less with only 34 of the 52 Planning Authorities having health and wellbeing policies that contained some level of requirement for a HIA to accompany planning applications.

Of the 34 plans:

- 22 outline a requirement for a HIA for major⁹ development planning applications or strategic proposals (Ref 1, 3-7 10, 12, 15, 18, 19, 21-30 and 32) (see Example 1).
- Five state that they may require a HIA for planning applications but do not state under which circumstances this would be required (Ref¹⁰ 11, 13, 14, 17, 20, and 34) (see Example 2).
- Four Local Planning Authorities mention the requirement of a HIA for specific types of development (Ref 2, 8, 9, and 31) (see Example 3). For example, one requires HIAs to be undertaken for developments requiring an Environmental Impact Assessment (EIA) (Ref 33) whereas another requires planning applications to "review community needs" (e.g. HIA) (Ref 16) (see Example 4).

Of the 34 LPAs that require a HIA to accompany planning applications, 25 of these (73%) had separate BNG policy statements.

Throughout the search, the only reference to tools other than HIA relating to an assessment of health and wellbeing could be considered to include developer contributions. One planning authority referred to this.

The following examples illustrate the various wellbeing requirements for planning applications, although all examples contained within the accompanying spreadsheet should be reviewed.

Example 1

Coventry City Council

The Coventry City Council Local Plan includes the following policy statements in respect of HIAs for major developments.

"Policy W1: Health Impact Assessments (HIA)

1. All major development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a:
 - a. HIA where significant impacts on health and wellbeing would arise from that proposal; or
 - b. HIA Screening report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing.
2. All HIAs shall be undertaken in accordance with the Council's HIA Supplementary Planning Document.
3. Where a development has significant negative or positive impacts on health and wellbeing the Council may require applicants to provide for the mitigation or provision of such impacts through planning conditions and/or financial/other contributions secured via planning obligations and/or Council's CIL Charging Schedule. "

⁹ This term is often defined by a specific number of dwellings or the size of a development footprint. This varies per adopted regional and local plan.

¹⁰ A reference number in the spreadsheet, which corresponds to the results section, has been given for the regional and local planning authorities which require health and wellbeing assessments to accompany planning applications.

Example 2

Wyre Council

The Wyre Local Plan includes the following policy statement in respect of HIAs for development proposals:

“Policy SP8 Health and Well-Being

1. The council will support development which promotes healthy communities and will promote health and well-being of local communities. Development should help maximise opportunities to improve quality of life and to make it easier for people in Wyre to lead healthy, active lifestyles.
2. Where a proposal has the potential to impact on public health, the Council will require the developer to demonstrate how public health issues have been taken into account in formulating the development proposal and how any impacts are to be mitigated. The Council may require the developer to carry out a Health Impact Assessment which will identify the potential health effects on new and existing residents within the community and the potential for public services to meet existing and new demand.
3. Development with potential to adversely impact on public health will only be permitted where it is demonstrated that it will not, in isolation or in conjunction with other planned, committed or completed development, contribute to an unacceptable impact on the health of the Borough’s population. In assessing the likely health impact if new development the Council will take into account evidence indicating the expected effect of the development on individual’s behaviour and choices.”

Example 3

Cambridge City Council

The Cambridge Local Plan includes the following policy statement in respect of HIAs:

“Policy 83: Aviation Development

Aviation development at Cambridge Airport will only be supported where it could not have significant adverse impact on the environment and on residential amenity.

A health impact assessment will be submitted alongside any planning application to demonstrate the potential impacts on health have been considered at the planning and design stage.”

Example 4

Colchester Borough Council

The Colchester Borough Local Development Framework – Core strategy says the following in with regards to policy SD3:

“The borough council will safeguard existing facilities and will work with partners including the local community to bring together funding from a variety of public and private sources to deliver new community facilities. Development proposals will be required to review community needs (e.g. Health Impact Assessment) and provide community facilities to meet the needs of the new population and mitigate impacts on existing communities.”

6. In Summary

One fifth of the reviewed regional and Local Planning Authorities required the health and wellbeing impacts of a development to be considered as part of a planning application. However, this review only covered a sample of LPAs within England and only adopted plans, some of which dated back to 1997. It could be that local plans in draft mention wellbeing and the requirement for HIAs more frequently and in greater detail, especially because awareness of

wellbeing has greatly increased in recent years.

Sometimes 'wellbeing' was a reason underpinning the formulation of policy statements, rather than a specific objective of the policy statement. For example, the term 'health and wellbeing' was often listed as a local planning authority strategic objective, but with no corresponding policy statement in relation to wellbeing. Similarly, there could be no requirement to consider the impacts on wellbeing from development as part of a planning application (i.e. by using a HIA) from local authorities even when health and wellbeing was one of their strategic objectives.

Most regional and local plans that required a HIA were clear about which developments these applied to. However, it was less clear under which circumstances a HIA must be undertaken for the remaining Planning Authorities that mentioned HIAs. For example, policies stating that there may be a requirement to undertake an HIA for planning applications, there were often no criteria for when a HIA should be undertaken or for what types of development. Similarly, there were often health and wellbeing policies within regional and local plans, but the information needed to understand the policy was found in separate documents. Finally, it took time to find the various documents; sometimes the documents were located on different webpages to core strategy documents (e.g. where supplementary planning documents or 'Part 2' Local Plans contained additional information).

In summary, this review highlights that some Local Planning Authorities require consideration of a development's impacts on wellbeing as part of a planning application. However, there was variation in how these requirements were set out and described. When specific requirements for wellbeing impacts to be considered within planning applications were outlined, there were differences as to what types of planning applications these requirements applied to.

While this review has shown that people's wellbeing is a material consideration in determining planning permission by some local authorities, it was limited to England and to adopted local plans. To expand this initial review, assessing new and draft plans across the UK is recommended for a comprehensive assessment of the planned considerations for health and wellbeing in local planning policy.

7. Implications for Biodiversity Net Gain

This review highlights that some Local Planning Authorities in England already require a development's impacts on wellbeing to be considered as part of a planning application. Some of these authorities also require BNG, which means in practice that consideration of wellbeing impacts should also cover how BNG affects people's wellbeing.

Accordingly, in those areas where Local Planning Authorities have policies both on wellbeing and on BNG, to apply all policies consistently, developers should consider the impacts of BNG on people's wellbeing. However, as noted above, there is variation between local authorities on the requirements. There also appears no direct link between the two policy requirements: considering impacts on people's wellbeing from the development (which would include its BNG measures) and achieving BNG (which can affect people's wellbeing positively but also negatively).

This can hinder practice, with the consequence possibly being that wellbeing impacts and BNG are considered in isolation by the relevant specialists and no links are made between the two.

At the time of writing this report, the Ministry of Housing, Communities and Local Government was consulting on the draft text of the revised National Planning Policy Framework (NPPF) for England (8th February 2021¹¹). Revisions to the NPPF, as well as work to establish a National Framework of Green Infrastructure Standards, include direct links between wellbeing and nature / BNG. Firstly, the definition of Green Infrastructure has been amended as follows:

*Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing **benefits for nature**, climate, local and wider communities and prosperity*

Secondly, within Chapter 15 "Conserving and enhancing the natural environment", paragraph 179(d) has been amended to clarify that development whose primary objective is to conserve or enhance biodiversity should be supported, and that:

¹¹ [National Planning Policy Framework and National Model Design Code: consultation proposals](https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals) - GOV.UK (www.gov.uk)

While opportunities to improve biodiversity in and around other developments should be pursued as an integral part of their design, especially where this **can secure measurable net gains for biodiversity and enhance public access to nature**

Enhancing public access to nature might be one indicator of wellbeing depending on the local context, but it is unlikely to be the only indicator when assessing BNG impacts on people's wellbeing. Also, there is a difference between green spaces, nature and biodiversity, yet these terms are often used inter-changeably with regards to people. This further limits practice, as there is no explicit point of reference between BNG and people. Nonetheless, these policy revisions explicitly link nature / BNG with wellbeing / access to nature, and this could help link the two in practice.

8. References

References to the local plans reviewed in relation to this document can all be found in the accompanying spreadsheet.

Appendix A: Project Team

Project Lead

Julia Baker, Balfour Beatty

Technical Advisory Panel

TAP Member	Organisation
Sally Hayns	Chartered Institute of Ecology and Environmental Management (CIEEM)
Kerry ten Kate	Independent Consultant
E.J. Milner-Gulland	University of Oxford
Joseph W. Bull	Wild Business Ltd; Durrell Institute of Conservation and Ecology (DICE)
Sarah Scott	Department for Environment, Food & Rural Affairs (DEFRA)

Research Team

TAP Member	Organisation	Leading on:
Hannah Williams	WSP	Requirements to consider development impacts on people's wellbeing within regional and local planning policies in England
Shuo Gao	University of Oxford	What the science says: defining and assessing wellbeing
Isobel Taylor	Wild Business Ltd	Consultation responses on whether and how BNG good practice should more directly incorporate wellbeing



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Grosvenor Court, Ampfield Hill, Ampfield, Romsey, SO51 9BD

t: 01962 868626

enquiries@cieem.net | www.cieem.net

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