

Proposed Retail Development Bankwood Way, Birstall

Rapid Health Impact Assessment

Lidl GB Ltd

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LICHFIELDS



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Contents

1.0	Introduction	1
2.0	Assessment Methodology & Significance Criteria	3
	Definition of Health	3
	Assessment Methodology	3
3.0	Legislative, Policy and Strategy Context	6
	National Context	6
	Local Planning Policy	7
	Summary	9
4.0	Assessing the Baseline Profile	10
5.0	Community and Environmental Profile	13
	Existing Conditions	13
	Health Indicators	16
	Receptor Groups	17
6.0	Assessment of Impacts	19
7.0	Conclusions	1

1.0 Introduction

- 1.1 This Rapid Health Impact Assessment (“HIA”) report has been prepared by Lichfields on behalf of Lidl GB Ltd (“Lidl”). It accompanies a full planning application for retail development at a currently vacant site in at land off Bankwood Way, Birstall.
- 1.2 Policy LP 47 (Healthy, active and safe lifestyles) of the adopted Kirklees Local Plan states that HIAs are to be *“carried out for proposals that are likely to have a significant impact on the health and well-being of local communities, or particular groups within it, in order to identify measures to maximise the health benefits of the development and avoid any potential adverse impacts.”* The guidelines titled “Kirklees Council Rapid Health Impact Assessment (HIA) for Spatial Planning Guidance Notes” have been followed throughout this assessment. These are understood to be the most up to date HIA guidelines published by the Local Planning Authority (LPA).
- 1.3 The proposed development, as set out within the subject planning application, includes the following:
- A new 2,231 sqm gross (1,414 sqm net sales area) Lidl store;
 - A separate Home Bargains store of circa 2,280 sqm gross (2,014 sqm net sales area) with associated garden centre;
 - A joint servicing area to the rear of the stores;
 - 175 car parking spaces including 10 accessible spaces, 2 electric vehicle charging spaces, and 9 parent and child spaces;
 - A co-ordinated scheme of landscaping around the site including a stepped and ramped footpath link from Woodhead Road and ornamental shrub planting; and
 - Vehicular access from Bankwood Way and Woodhead Road.
- 1.4 The application site comprises a currently vacant site at land off Bankwood Way, adjacent to the Showcase Cinema at Birstall Retail Park. The former business units that were located on the site have been demolished after failing to attract long-term occupiers.
- 1.5 The site extends to approximately 1.53 ha and is broadly rectangular in shape. Both the proposed Lidl and Home Bargains stores front the centre of the site, while the rear of the proposed Lidl store faces Bankwood Way and the rear of the proposed Home Bargains store faces the adjoining business unit (adjacent to the south western boundary of the site). The side elevation of the Home Bargains store (the north western boundary of the proposed unit) faces Woodhead Road.
- 1.6 The site benefits from an existing vehicular access point from Bankwood Way to the north. The site slopes at a gentle gradient down from Woodhead Road / Bankwood Way to the north and a number of trees are located along its boundaries.
- 1.7 The site is located adjacent to ‘Birstall Shopping Park’, an established retail and leisure destination. The site is bound:
- to the north by Bankwood Way with fast food restaurants and a cinema beyond;
 - to the east by Bankwood Way with open grassland beyond;
 - to the south by Bankwood Way with open grassland beyond; and
 - to the west by office buildings and Woodhead Road with restaurants beyond.

- 1.8 The site falls predominantly within the “Middle” zone of a COMAH (Control of Major Accident Hazards) hazardous installation, with the eastern most part of the site falling within the “Outer” zone. It is understood that the hazardous installation is the Tennants Distribution site, which is a low-tier COMAH site and is located some 350m south-west of the proposal site.
- 1.9 A full description of the site is provided in the Planning and Retail Statement submitted with the planning application.
- 1.10 Outline permission was recently granted at the site for four retail units, totalling approximately 7,800 sqm, with associated access, parking and landscaping (planning ref: 2018/92563).
- 1.11 This report provides an assessment of the key health impacts associated with the proposed development. The structure of the report is as follows:
- **Section 2.0** sets out the assessment methodology;
 - **Section 3.0** sets out the legislative policy context and strategy for the proposed development;
 - **Section 4.0** identifies the baseline profile area for assessment;
 - **Section 5.0** sets out the demographic, socioeconomic and environmental context of the baseline profile area and identifies priority groups;
 - **Section 6.0** considers the health impacts of the proposed development on the identified groups and the general population of the area; and,
 - **Section 7.0** sets out the overall conclusions of the assessment.

2.0 **Assessment Methodology & Significance Criteria**

Definition of Health

- 2.1 The World Health Organization (‘WHO’) defines health as the “*state of complete physical, mental, and social well-being, and not merely the absence of disease or infirmity*”.

Assessment Methodology

- 2.2 As stated in paragraph 1.2, Policy LP 47 (Healthy, active and safe lifestyles) of the adopted Kirklees Local Plan confirms that a HIA is required to be submitted when the proposal is, “*likely to have a significant impact on the health and well-being of local communities, or particular groups within it*”.
- 2.3 Kirklees Council provided its guidance notes on “Rapid Health Impact Assessment (HIA) for Spatial Planning”. The guidance confirms that the developer is required to complete a HIA for proposals which are likely to have a significant impact on the health and well-being of local communities, or particular groups within it, in order to identify measures to maximise the health benefits of the development and avoid any potential adverse impacts.
- 2.4 The guidance states that if a more in-depth HIA is required to be completed, the applicant will be informed of this at the pre-application stage and a clear rationale and additional guidance will be provided. The Council has not requested an in-depth HIA as part of its pre-application discussions. To our knowledge, no further guidance has been published widely by Kirklees Council and therefore, a Rapid HIA using the Council’s guidance provided to Lichfields in 2018 has been undertaken to accompany this planning application.
- 2.5 The guidance states that the Rapid HIA must involve desk-top research and professional knowledge and expertise; with insight from stakeholders and/or local people where relevant if desired.
- 2.6 As part of the pre-application discussions with the Council, no objections have been raised. The Environmental Health team raised no objections, including matters relating to hours of operation or lighting. Environmental Health did request a detailed lighting scheme and Construction Environmental Management Plan be submitted as part of a full planning application submission, which it said should provide details of external artificial lighting associated with both the construction and operational phases of development.
- 2.7 This Rapid HIA has been prepared in accordance with the guidance notes set out by Kirklees Council. It has also been produced using Lichfields’ experience of preparing HIAs elsewhere in England and Wales using our in-house methodology, which draws upon a number of respected approaches¹ to undertaking such assessments.
- 2.8 Whilst stakeholder consultation is not required for Rapid HIA, this assessment has considered comments raised during a virtual public consultation for the proposed scheme which was held between 11 December 2020 – 3 January 2021 and comments received as part of the pre-application response. Further information relating to the public consultation is provided in paragraphs 4.6 – 4.9 of this report.

¹ Including those by the World Health Organization, Public Health England and the Welsh Health Impact Assessment Support Unit.

Determinants, Pathways and Outcomes

- 2.9 The assessment adopts a determinants, pathways and outcomes approach which is a readily recognised approach to assessing the impacts of health for development proposals for a HIA. The definitions for these three terms are:
- **Health Determinants:** Health determinants are factors that can influence health outcomes. Factors may be personal, social, cultural, economic and environmental. They include living and working conditions such as housing, employment, the environment, transport, education and access to services.
 - **Health Pathways:** Health pathways are the factors that lead to a change in a determinant which creates the health outcome.
 - **Health Outcomes:** Health outcomes reflect the range of medical and general well-being impacts on a particular population. For the purpose of this assessment, health impacts are considered as potential changes in health outcomes arise from the proposed development.
- 2.10 This approach is implicit in the methodology adopted by the Council and reflects the literature review and evidence base used to inform the assessment and in undertaking the assessment itself.
- 2.11 Based on the Kirklees Council guidance notes for Rapid HIA, the themes (“determinants”) of health that are considered as part of the main assessment have been established as:
- Construction (Air, noise and water pollution);
 - Housing;
 - Access to Green and Open Space;
 - Sustainable Travel and Transport;
 - Access to Healthy Food;
 - Community Safety;
 - Employment and Economy;
 - Community Cohesion; and,
 - Climate Change.

Cause and Effect

- 2.12 Public Health England contends that the natural and built environment plays a key role in shaping the social and economic determinants of health but there is often not a single direct cause and effect relationship between a determinant and an outcome. Many factors influence the effect of a determinant, including those unrelated to the influences of the built environment and the planning system (such as genetics or decision to smoke). The issues are therefore complex, multi-dimensional and with a multitude of interdependent factors (Public Health England 2017). As recognised by Public Health England² the evidence underpinning the principles of improving health outcomes through action on the built and natural environment is still a matter of debate amongst scientific and practitioner communities. It is difficult to universally apply evidence for the successful transfer of practices.
- 2.13 Long-term studies have, however, demonstrated that there are clear relationships and trends between a range of determinants and outcomes, with a greater impact upon vulnerable groups within the general population.

² Spatial Planning for Health: An evidence resource for planning and designing healthier places (June 2017)

- 2.14 The assessment has used this evidence base to discuss the potential effects of the proposed development. A health impact assessment cannot be definitive or exhaustive nor can it predict the future. However, where potential effects are identified, the benefit of the effect or otherwise is set out in the assessment and where necessary mitigation and/or long-term recommendations have been made.
- 2.15 Appendix 1 seeks to illustrate the relationship between health determinants, pathways and outcomes. The grouping of determinants identified is based upon the requirements of the Council's Rapid HIA guidance.

3.0 Legislative, Policy and Strategy Context

- 3.1 This section sets out the national and local legislation, policy and strategy context relating specifically to health and summarises the key documents.

National Context

National Planning Policy Framework

- 3.2 The National Planning Policy Framework 2019 (NPPF) sets out the overarching policy priorities for the planning system in England, against which local plans will be prepared and decisions on planning applications made. The document highlights the economic, social and environmental dimensions of sustainable development and the roles that planning has to play in each dimension.
- 3.3 Health is intrinsic to sustainable development and interacts with each of the three strands of sustainability. This is evidenced through links to planning and health being developed continually throughout the Framework, including policies on transport, high quality homes, good design, climate change and the natural environment. Chapter 8 ‘Promoting healthy and safe communities’, in particular, sets out how the planning system should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and support healthy lifestyles.
- 3.4 The importance of the links between planning and health is further underlined by paragraph 92 of the NPPF which states that *“to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should... take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community...”*.
- 3.5 The NPPF therefore adopts the WHO definition of health.

Planning Practice Guidance

- 3.6 The Planning Practice Guidance (PPG) is an online “living” source of planning guidance issued by the Department for Communities and Local Government. The PPG sets out guidance across a range of planning issues, including health and well-being.
- 3.7 Paragraph 001 of the Healthy and Safe Communities section states that:
“The design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population)” (Reference ID: 53-001-20190722).
- 3.8 Furthermore, paragraph 003 sets out the Government’s vision of healthy communities:
“A healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing.

It is a place which is inclusive and promotes social interaction. The [National Design Guide](#) sets out further detail on promoting social interaction through inclusive design including guidance on tenure neutral design and spaces that can be shared by all residents.

It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments” (Reference ID: 53-003-20191101).

- 3.9 Paragraph 004 of PPG considers how planning can create a healthier food environment. The guidance focuses on LPAs supporting opportunities for communities to access a wide range of healthier food production and consumption choices. It also supports LPAs making decisions on planning policies and supplementary guidance to limit the extent of ‘particular uses’ where it is appropriate. Whilst not explicit, the latter appears to be focusing on unhealthy take-aways rather than the creation of food supermarkets which sell a full range of food choices, including a significant level of healthy food choices (Reference ID:53-004-20190722).

Local Planning Policy

Kirklees Local Plan

- 3.10 The development plan for Kirklees comprises the Kirklees Local Plan which was adopted by the Council on 27 February 2019. The following Local Plan policies are considered to be relevant to this assessment:
- Policy PLP 3 (Location of new development) – which requires development proposals to support the delivery of employment growth and housing by ensuring that opportunities for development on brownfield sites are realised and providing access to local services;
 - Policy PLP 9 (Supporting skilled and flexible communities and workforce) – which states that, wherever possible, proposals for new development will be required to contribute to the creation of local employment opportunities;
 - Policy PLP 20 (Sustainable travel) – which states that the Council will support development proposals that can be served by alternative modes of transport such as public transport, cycling and walking;
 - Policy PLP 21 (Highway safety and access) – which requires proposals to demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users;
 - Policy PLP 24 (Design) – which states that proposals should promote good design by ensuring that they provide a high standard of amenity for future and neighbouring occupiers, high levels of sustainability and the needs of a range of different users are met including disabled people, older people and families with small children to create accessible and inclusive places;
 - Policy PLP 33 (Trees) – which requires proposals to retain any valuable or important trees where they make a contribution to public amenity;
 - Policy PLP 47 (Healthy, active and safe lifestyles) - which states that healthy, active and safe lifestyles will be enabled by:
 - a Facilitating access to a range of high quality, well-maintained and accessible open spaces;
 - b Increasing access to green spaces and green infrastructure to promote health and well-being;

- d Supporting initiatives which enable or improve access to healthy food, for example, land for local food growing or allotments;
 - e Increasing opportunities for walking, cycling and encouraging more sustainable travel choices;
 - f Supporting energy efficient design and location of development;
 - g Ensuring that the current air quality in the district is monitored and maintained and, where required, appropriate mitigation measures included as part of new development proposals; and,
 - h Creating high-quality and inclusive environments incorporating active design and the creation of safe, accessible and green environments which minimise and mitigate against potential harm from risks such as pollution and other environmental hazards; and,
- Policy PLP 51 (Protection and improvement of local air quality) – which states that development will be expected to demonstrate that it is not likely to result, directly or indirectly, in an increase in air pollution which would unacceptably affect or cause a nuisance to people.

3.11 The application site is within a designated Priority Employment Area (“PEA”) (ref: PEA46). Policy LP8 (Safeguarding Employment Land and Premises) states that proposals for development for employment generating uses in such areas will be supported where there is no conflict with the established employment uses in the area. The Committee Report relating to the extant outline permission at the site (planning ref: 2018/92563) confirms that retail development comprises an ‘*employment generating use*’ and is therefore considered an appropriate form of development in a designated PEA. This is discussed in further detail in the Planning and Retail Statement which accompanies the application.

Kirklees Joint Health and Wellbeing Strategy 2014-2020

3.12 The Kirklees Joint Health and Wellbeing Strategy 2014-2020 (JHWS), although recently outdated, provides supporting information for improving health and wellbeing and tackling inequalities. The strategy is linked to The Kirklees Economic Strategy and recognises that a successful economy that offers good jobs and incomes for all communities makes a huge contribution to prosperity, health and well-being of all age groups.

3.13 Of relevance to the proposal, the JHWS states that health and wellbeing will support economic development by improved perceptions of places and communities helping to support enterprise and investment. By 2020, the JHWS states that people will be able to take up opportunities that have a positive impact on their health and wellbeing through; strong communities, active and safe travel, and, improved regulation of factors that affect health and wellbeing (e.g. air pollution).

Kirklees Health and Wellbeing Plan 2018 – 2023

3.14 The Kirklees Health and Wellbeing Plan 2018 – 2023 also provides supporting information for improving health and wellbeing for all age groups. The strategy is linked to The Kirklees Economic Strategy and the Kirklees JHWS and it sets out seven outcomes which will enable the Council to improve the health and wellbeing of citizens and places within Kirklees. Those of relevance to the proposal include:

- Sustainable economic growth which provides good employment for and with communities and businesses; and,

- Ensuring people live in cohesive communities, feel safe and are protected from harm.

3.15 The Plan discusses the importance of creating healthy places, highlighting that the planning process is able to influence choices over food, diet and lifestyle choices when considering new proposals for such uses. The Plan also states that the planning process can influence the range of services provided within a particular centre.

Summary

3.16 There is a strong policy context that requires the consideration of how development affects the health and wellbeing of the population. The policy review highlights the key planning policies related to the potential health implications of development and priorities for Kirklees District Council that should be considered in relation to the proposed development.

4.0 Assessing the Baseline Profile

4.1 To understand the potential impacts of the development, it is typical to define a baseline area covering those most directly affected by the proposals. This area will form the primary focus for understanding the demographic, economic, health and environmental profile of the community before assessing the impacts of the development. It is also used as one tool to identify the priority groups in the assessment. However, it does not restrict the area for assessment in the HIA and consideration will be given to the affected populations both within and outside the baseline profile area.

4.2 A baseline profile area is typically defined using the following considerations:

- 1 The nature of the development;
- 2 The scale of the development;
- 3 The location of the development including the nature of the geography and whether there are any cross-boundary issues;
- 4 The types of impact likely to be created during construction and operational phases;
- 5 The data available at the relevant scales; and
- 6 The availability of benchmarks.

4.3 Based upon these considerations, the following statistical geographic areas have been considered for inclusion in this baseline area:

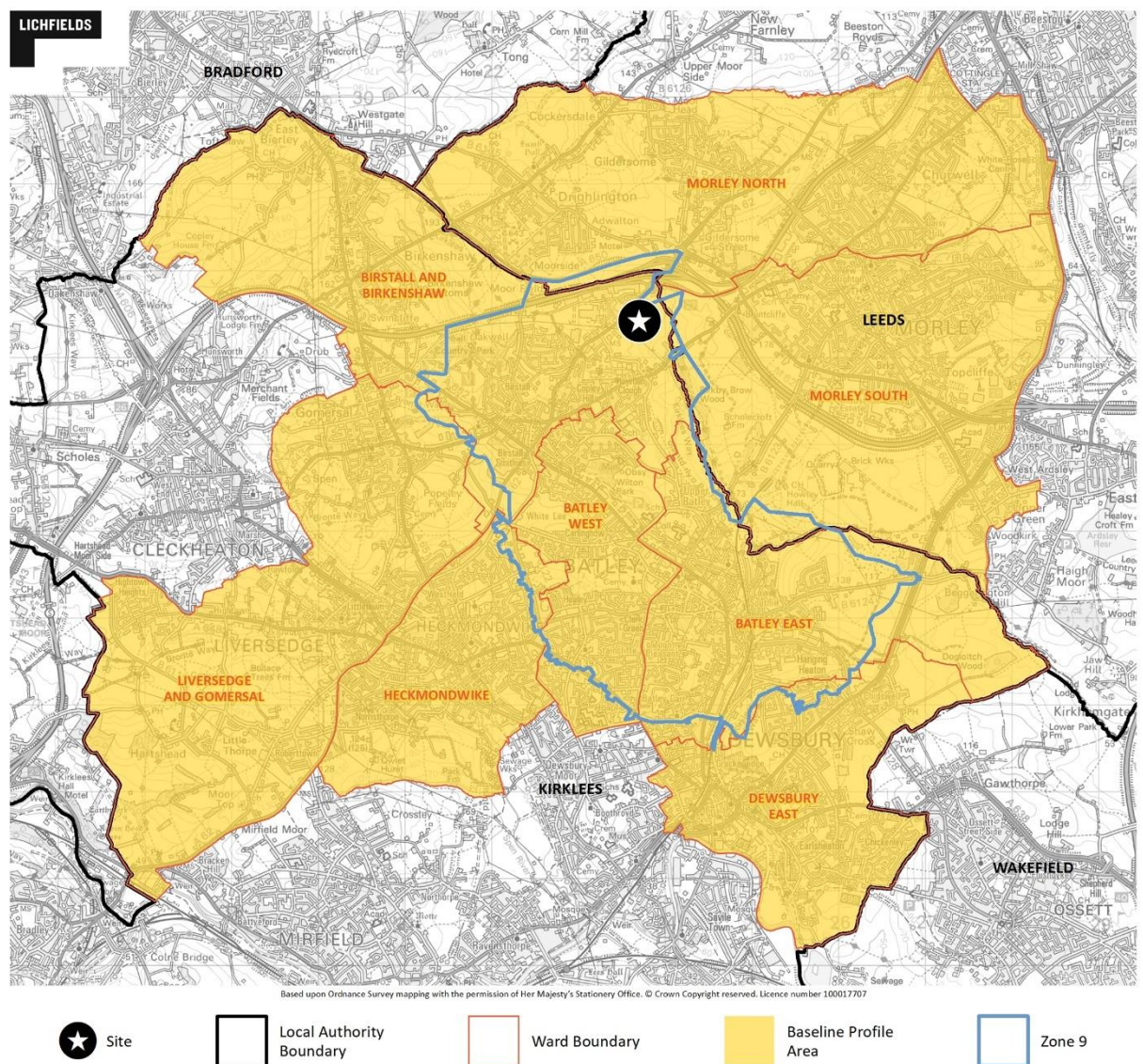
- Wards
 - a Batley East
 - b Batley West
 - c Birstall and Birkenshaw
 - d Dewsbury East
 - e Heckmondwike
 - f Liversedge and Gomersal
 - g Morley North
 - h Morley South
- Local Authorities
 - a Kirklees

4.4 The key considerations in defining the baseline area have been:

- 1 The accessibility of the site;
- 2 Future employees of the foodstore;
- 3 The occupiers of surrounding residential properties;
- 4 The availability of data at the appropriate level; and,
- 5 The benefits presented to the wider community.

4.5 Given the nature of the proposal, the baseline profile area covers all the wards included within Zone 9 of Kirklees Council – Kirklees Retail Capacity Study Update (August 2016) (Figure 4.1).

Figure 4.1 Baseline Profile Area



Source: Lichfields

Stakeholder Engagement

- 4.6 As detailed in the Council's guidelines, stakeholder engagement is not required for Rapid HIA. However, a virtual public consultation for the proposed development was held between 11 December 2020 – 3 January 2021. A dedicated consultation website was created in order to allow members of the public to view and comment on the detailed elements of the proposal online. To supplement the digital consultation event, a consultation leaflet was delivered door-to-door to 16,000 homes and businesses in Birstall and the wider area between the 14 – 17 December 2020.
- 4.7 A total of 389 responses were received in relation to the online survey (via the consultation website) and two responses were received by email. A summary of consultee responses is provided in the accompanying Statement of Community Consultation.

- 4.8 In summary, the comments from the virtual public consultation raised the following points that are relevant to this Rapid HIA:
- Concerns relating to vehicular access and congestion/traffic issues in the local area, particularly at Junction 27 and associated roundabouts, with existing traffic backing out onto Gelderd Road.
 - There is need to ensure there is a suitable amount of car parking in the proposal.
 - Concerns regarding the walkability of the site and its pedestrian connections to the rest of the Birstall Retail Park, stating that walking from one store to another can be dangerous with a lack of pedestrian crossings.
 - Sustainable design should be considered and electric vehicle charging points ought to be included.
- 4.9 Where relevant the above issues have been considered in the assessment of determinants of health in Section 6 of this report.

5.0 Community and Environmental Profile

Existing Conditions

- 5.1 The section sets out the demographic, socio-economic and health context of the baseline area. The data is presented, and indicators are benchmarked against ward-wide and local authority-wide averages where available and applicable.

Age

- 5.2 ONS mid-year population estimates show that the population within the wards that comprise the baseline profile area equated to 159,205 people in 2019, which was equivalent to approximately 36.2% of the total resident population of Kirklees.
- 5.3 Table 5.1 provides a breakdown of the baseline profile area population by age group. It shows that 20.8% of the resident population within the baseline profile area comprises children aged 0-15. This proportion is comparable to Kirklees overall which equates to 20.4%. The proportion of those of working age (18-64) within the baseline profile area is also comparable to Kirklees overall (59.7% and 59.5% respectively). The baseline profile area has a similar proportion of elderly people (65+) to the Kirklees average at 17.8% compared to 17.3%.

Table 5.1 Comparative Demographic Profile 2019

Age	Baseline Profile Area	Kirklees
0-15	20.8%	20.4%
16-17	2.3%	2.4%
18-24	7.4%	8.4%
25-49	33.7%	32.2%
50-64	18.6%	18.9%
65+	17.3%	17.8%

Source: ONS Mid-Year Population Estimates 2019/ Lichfields Analysis

Gender

- 5.4 The proportion of females within the baseline profile area is slightly higher than males. As of 2019, there were in total, 80,592 females which is equivalent to 50.6% of the total population - 78, 613 males accounted for 49.4% of the population. In comparison, there is a similarly balanced split in the population of females and males across Kirklees (50.4% and 49.6% respectively)³.

Health and Disability

- 5.5 Census 2011 data indicates that 17.3% of the population within the baseline profile area have a long-term health problem or disability that limits their day-to-day activities. This is comparable to Kirklees overall, where 17.0% of the population have a long-term health problem or disability that limits their day-to-day activities. It is also slightly less than the Yorkshire and The Humber Region (18.8%), within which the site falls, and England overall (17.6%).
- 5.6 The Kirklees Health and Wellbeing Plan (2018 – 2023) highlighted that, *‘there are an estimated 7,500 to 8,300 adults with a learning disability living in Kirklees. People with learning disabilities are far more likely to die early and to die of a preventable disease’* (page 6). It was

³ ONS Mid-Year Estimates 2019

also highlighted that, '*1 in 3 adults has a mental health condition, up from 1 in 5 in 2012*' (page 6).

Access to Open and Green Space

- 5.7 There is no existing formal or informal open or green space within the site.
- 5.8 As identified on the Kirklees Local Plan proposals map, the site is located within 1km of Urban Green Space comprising Howden Clough Recreation Ground (Leeds Road, Birstall) and Fieldhead Primary Academy (Charlotte Chlose, Birstall) as well as Small Open Space comprising informal open space (Land South of 23 Bampton Grove, Birstall). It is our understanding, that these spaces are accessible to the public.
- 5.9 In the most recent Kirklees Council Open Space Assessment Report (2015 – Revised November 2016)⁴ it was stated that there are 54.2 hectares (ha) of parks and recreation grounds in the ward of Birstall and Birkenshaw, within which the site falls, which equates to 3.23 ha per 1,000 population. This is noticeably higher compared to the district wide standard of 1.06 ha per 1,000 population.
- 5.10 There are no Public Rights of Way ('PRoW') within the site.
- 5.11 A review of Kirklees Council's online PRoW map shows that there are four PRoW in the vicinity of the application site. BAT/8/50 and BAT/8/60 are two very short footpaths located 250 metres south west of the site which. BAT/8/30 and BAT/8/40 form an almost continuous route between the shopping park and industrial estate and then crossing over the M62/M621 and connecting to the Morley 48 Public Right of Way that is located within the Leeds Council area.
- 5.12 Forming part of Kirklees Council's core walking and cycling network, a proposed cycling and walking route has been identified approximately 200 metres south east of the site within the Green Belt, a Biodiversity Opportunity Zone (Pennine Foothills) and a Wildlife Habitat Network (Woodland), as shown on the Local Plan policies map. It is not known if this has been delivered.

Employment and Economy

- 5.13 The ONS claimant count dataset shows that the population in unemployment (age 16+) within the baseline profile area equated to 6,580 people in December 2020. This was equivalent to approximately 36.0% of the total number of residents in unemployment in Kirklees and 1.5% of the total resident population of Kirklees.
- 5.14 The ONS jobseeker's allowance by occupation dataset shows that the most sought-after occupations within the baseline profile area were elementary occupations in December 2020. Elementary occupations include professions such as agricultural, construction, administrative, cleaning, security and sales occupations jobs. This is consistent with the most popular occupation residents are currently working in within the baseline profile area. The most sought-after occupation and most popular current occupation within Kirklees overall is also elementary occupations.
- 5.15 The Kirklees Local Plan (February 2019) also states at paragraph 3.6 that the Kirklees, '*labour market is characterised by part time jobs. These jobs are filled with mainly females on lower incomes, but also a predominantly low waged and lower skilled workforce...Low income levels are directly related to employment opportunities.*'

⁴ Kirklees Local Plan Open Space Assessment Report (2015 – Revised November 2016)

Community Safety

Crime

- 5.16 The Kirklees Observatory provides crime profiles by Ward. For the financial year 2019/20, it shows that the ward of Birstall and Birkenshaw had an overall crime rate of 128.6 per 1000 population compared with 105.9 per 1000 population for Kirklees and 84.4 per 1000 for England.
- 5.17 For the financial year 2019/20, it also shows that the ward of Birstall and Birkenshaw had 28.2 per 1000 population anti-social behaviour offences compared with 16.9 per 1000 population for Kirklees and 21.1 per 1000 for England.

Highway safety

- 5.18 The Transport Assessment, prepared by Bryan G Hall, states that a record of personal injury collisions (“PICs”) which occurred as a result of road traffic accidents within the vicinity of the site on Woodhead Road / Bankwood Way, and at the off-site junctions, from 16th November 2015 – 16th November 2020, has been obtained from Leeds City Council. The data indicates that there have been 10 PICs within the study period, eight were classified as slight in severity, with the remaining two being classified as serious.
- 5.19 The Transport Assessment identified all 10 PICs as being attributed to driver error. There were no recurring patterns or readily identifiable geometric road characteristics which had an adverse impact upon road safety on the road network in the vicinity of the site.

Hazardous Installation

- 5.20 The application site falls predominantly within the “Middle” zone of a COMAH (Control of Major Accident Hazards) hazardous installation, with the eastern most part of the site falling within the “Outer” zone. The hazardous installation is the Tennants Distribution site at Gelderd Road Birstall, approximately 350m south-west of the proposal site.
- 5.21 Based upon the information provided by HSE to Kirklees Council and reported to the Strategic Planning Committee in July 2019⁵, Tennants Distribution is a chemicals distributor with 800 stock lines stored within its warehouse. The hazardous substances consent for the site allows the operator to store highly toxic, oxidising and highly flammable substances. The same Committee Report notes that the risks are dominated by the bulk storage of hydrogen peroxide which if contaminated could cause an explosion leading to potential serious injury or death from building damage or collapse. At that time, it was reported that the operator was taking advantage of the full benefits of the hazardous substances consent.
- 5.22 Planning permission was granted for a larger scale retail development on the same site in 2019, with officers concluding that the hazardous installation did not pose such a risk as to prevent the redevelopment of the site for retail use. It is also noted that the site is designated for ongoing occupation/redevelopment for employment generating uses in the adopted Local Plan, this designation will have taken into account any health and safety risks during the plan preparation stage.
- 5.23 Through pre-application discussions with the Council it has been established that officers do not consider that the hazardous installation presents a risk which would prohibit the development of the site.

⁵ Reported in 20 June 2019 Strategic Planning Committee Report for Planning Application 2018/92563

Access to Healthy Food

- 5.24 The nearest allotments (Birkenshaw Allotments) are located approximately 3 miles north west of the site, just off Old Lane, Birkenshaw.
- 5.25 The only foodstore of any significant size in Birstall itself is an M&S Simply Food, at Birstall Shopping Park. There is also a Tesco superstore, Asda foodstore and an Aldi discount foodstore in Batley, approximately 3 km to the south of the site.

Education, Training and Skills

- 5.26 ONS annual population survey dataset for January – December 2019, shows the percentage of the Kirklees population (aged 16 – 64) with GCSE grades A-C or equivalent is 27.8%, which is markedly higher than that of the region (23.7%) and England (21.2%). However, 31.8% of the Kirklees population (aged 16 - 64) have an NVQ Level 4+, which is lower than the region (34.2%) and England (40.0%). The Kirklees population (between 16 – 64) with a degree or equivalent and above equates to 26.5% which is also lower than the region (27.3%) and markedly lower than England (33.1%).
- 5.27 As highlighted above, the Kirklees Health and Wellbeing Plan (2018 – 2023) highlighted that, *'there are an estimated 7,500 to 8,300 adults with a learning disability living in Kirklees.'* Also mentioned above, the Kirklees Local Plan (February 2019) stated at paragraph 3.6 that, *'Kirklees residents have differing skills and incomes'* and the local labour market is characterised by part time jobs which are filled mainly by a low skilled female workforce.

Health Indicators

- 5.28 Using Public Health England data, it is possible to compare the health of the residents in Kirklees with trends in England across a range of indicators.

Adult Health

- 5.29 As of 2017-2018, the average life expectancy at birth in Kirklees was 78.7 years for males and 82.5 years for females. This is approximately a year less than the average for England which is 79.8 years and 83.4 years respectively⁶.
- 5.30 The all-causes mortality rate is all of the deaths that occur in a population, regardless of the cause reported as an age-standardised rate per 100,000 persons. The all-causes mortality rate for persons aged under 75 years in Kirklees is reported as 362, this is higher than the rate for England which is reported to be 326⁷. Deaths from cardiovascular diseases and cancer are also markedly higher in Kirklees compared to England overall. The suicide rate in Kirklees is similar to that of England overall.
- 5.31 The diabetes diagnosis rate in Kirklees is comparable to that of the rest of England⁸. The percentage of adults who are physically active in Kirklees is 63.4% compared with 67.2% in England⁹.

⁶ Public Health England. Local Authority Health Profiles. Kirklees. Life Expectancy at Birth (2017-2019)

⁷ Public Health England. Local Authority Health Profiles. Kirklees. Under 75 mortality rate: all causes (2017-2019)

⁸ Public Health England. Local Authority Health Profiles. Kirklees. Diabetes diagnoses (2018)

⁹ Public Health England. Local Authority Health Profiles. Kirklees. Physical Activity Rates for Augusts (2018-2019)

Children's Health

- 5-32 As of 2017-2019, the infant mortality rate in Kirklees was 6.2 per 1,000 live births. This is markedly higher than the rate for England overall of 3.9¹⁰. As of 2019-2020, the prevalence of obesity among children aged 10-11 is 21.0% which is the same as the rest of England (21.0%)¹¹.

Receptor Groups

- 5-33 This report considers the impacts of the proposed development on both the health of the population of the baseline area and for Kirklees as a whole.
- 5-34 There is also a need to consider whether the proposed development could have a disproportionate impact upon particular groups of people within the general population. Such impacts could give rise to or exacerbate inequalities between the main population and other groups within the population. Within this assessment these sub-groups will be known as receptor groups. The receptor groups are likely to be more sensitive to changes in the determinants of health and are at risk of being adversely affected by greater health inequality.
- 5-35 Receptor groups have been identified through a review of the literature and having regard to the context of the site and the nature of the proposed development.
- 5-36 The groups to be assessed in this rapid HIA are:
- 1 General population within the baseline area;
 - 2 Neighbouring employment and business uses located off Bankwood Way and Woodhead Road;
 - 3 Future users and workforce of the proposed development (ref: Future users and workforce); and,
 - 4 General population outside of the baseline area.
- 5-37 The above analysis has also highlighted the following health outcomes. These health outcomes have not been identified as receptor groups, but it should be considered that the determinants of health set out below may help to improve these statistics.
- **Health and Disability** - 1 in 3 adults has a mental health condition, up from 1 in 5 in 2012.
 - **Community Safety** - Birstall and Birkenshaw had an overall crime rate of 128.6 per 1000 population compared with 105.9 per 1000 population for Kirklees and 84.4 per 1000 for England. The application site is located within the Consultation Zone of a hazardous installation.
 - **Education, Training and Skills** - 31.8% of the Kirklees population (aged 16 - 64) have an NVQ Level 4+, which is decidedly lower than the region (34.2%) and England (40.0%). In addition, the Kirklees population (between 16 – 64) with a degree or equivalent and above equates to 26.5% which is also lower than the region (27.3%) and markedly lower than England (33.1%).
 - **Adult Health** - The average life expectancy at birth in Kirklees was 78.7 years for males and 82.5 years for females. This is a little lower than the average for England over this time period which is 79.8 years and 83.4 years respectively¹². Secondly, the all-causes mortality rate for persons aged under 75 years in Kirklees is reported as 362, this is higher than the

¹⁰ Public Health England. Local Authority Health Profiles. Kirklees. Infant mortality rate (2017-2019)

¹¹ Public Health England. Local Authority Health Profiles. Kirklees. Year 6: Prevalence of obesity (including severe obesity) (2019-2020)

¹² Public Health England. Local Authority Health Profiles. Kirklees. Life Expectancy at Birth (2017-2019)

rate for England which is reported to be 326¹³. Thirdly, deaths from cardiovascular diseases and cancer are also markedly higher in Kirklees compared to England overall. Finally, the percentage of adults who are physically active in Kirklees is 63.4% compared with 67.2% in England¹⁴.

- **Children's Health** – The infant mortality rate in Kirklees was 6.2 per 1,000 live births. This is markedly higher than the rate for England overall of 3.9¹⁵.

¹³ Public Health England. Local Authority Health Profiles. Kirklees. Under 75 mortality rate: all causes (2017-2019)

¹⁴ Public Health England. Local Authority Health Profiles. Kirklees. Physical Activity Rates for Adults (2018-2019)

¹⁵ Public Health England. Local Authority Health Profiles. Kirklees. Infant mortality rate (2017-2019)

6.0 Assessment of Impacts

6.1 This section considers the potential impacts of the proposed development on the determinants of health for both the construction and operational phases.

6.2 The impact of the proposed development assumes the proposed mitigation identified by the design team will be accepted and incorporated into the delivery of the proposal.

6.3 In accordance with Kirklees Council's Rapid HIA Guidance Notes, recommendations detailing how positive impacts could be maximised and negative impacts could be minimised have been suggested. These recommendations are for the applicant to consider opportunities for mitigation and/or enhancement and are not requirements arising from the rapid HIA.

6.4 In accordance with the guidance notes, the following terms have been used to define the significance of the impacts identified:

- **No impact:** Proposal has no impact;
- **Negligible impact:** Proposal has no discernible impact;
- **Positive impact (+):** Proposal has a positive impact;
- **Negative impact (-):** Proposal has a negative impact; and,
- **Unknown impact (?):** It is unsure what impact the proposal will have.

6.5 The following terms have been used to define the certainty of the impacts identified:

- **Assumed impact (?):** Some research may be required; and,
- **Known impact (!):** The assessment is correct and based on evidence.

6.6 The full tables of assessment are provided below:

Construction (Air, noise and water pollution)

The site is located within the established retail and leisure area of Birstall Shopping Park which is not considered to be a sensitive location in terms of nuisance dust generated from the construction phase of development on the site. The nearest Air Quality Management Area ("AQMA") (the Kirklees AQMA No.4) is located approximately 3.2km west of the site. Sources of air pollution include dust creating works on site, particularly the earthworks required and track-out from construction traffic vehicles.

The accompanying Air Quality Assessment ("AQA") compiled by Wardell Armstrong confirms the suitability of the site for commercial use with regards to air quality and states that subject to the implementation of mitigation measures, the dust impacts from the construction are not considered to be significant.

The assessment concludes that predicted concentrations of NO₂, PM₁₀ and PM_{2.5} are forecast to be below the relevant annual mean objectives at all of the fifteen existing sensitive receptors considered in the Defra Emissions Factor Toolkit (Version 10.1 released in August 2020) Assessment ("EFT 10 Assessment"). The EFT 10 Assessment predicts a negligible impact on NO₂, PM₁₀ and PM_{2.5} concentrations at all fifteen existing sensitive receptors considered, with the development in place in both 2022 (the opening year of the development) and 2026 (future year, with the proposed development in place).

The AQA also states in accordance with all of the fifteen existing sensitive receptors considered in the EFT 10 Assessment, a conservative sensitivity analysis was undertaken and also predicts a negligible impact on NO₂, PM₁₀ and PM_{2.5} concentrations at all fifteen existing sensitive receptors considered, with the development in place in both 2022 and 2026.

The accompanying Noise Assessment produced by Environmental Noise Solutions Ltd (ENS) indicates that the principal noise sources potentially associated with the site are noises associated with servicing arrangements (deliveries) and fixed external plant equipment. The assessment states the noise levels produced from servicing arrangements (deliveries) would be significantly below the night time background noise levels in the vicinity, and will be wholly inaudible at the nearest dwellings. It is therefore considered that (even at night) delivery noise represents a 'No Observed Effect Level' and there is no justification to restrict delivery hours. In terms of noise associated with fixed external plant equipment, the assessment states the noise levels are wholly negligible and represent a 'No Observed Effect Level'. The report therefore recommends that the overall noise impact of the proposal is negligible and no specific mitigation measures are required.

The Noise Assessment also concludes that the ambient noise climate in the vicinity of the application site is due to road traffic on the local road network, and distant road traffic on the A62 Gelderd Road, the A643 Leeds Road, and the M62 and M621 motorways.

The Flood Risk Assessment with a Detailed Drainage Strategy, produced by Beam Consulting (March 2021), states that the site is located within Flood Zone 1, therefore has a less than 0.1% annual probability of flooding from rivers and seas. Whereas, the site has between 1% and 3.3% annual probability of flooding from surface water run-off. There is no risk of flooding from reservoirs. The report concludes that surface water flooding within the site and surrounding areas is very unlikely and in Beam Consulting's professional judgment the proposed development is acceptable. No flood protection measures are required. The proposed site levels are to be similar to that of the existing and the proposed building floor level should be higher than external levels.

The Flood Risk Assessment/Detailed Drainage Strategy goes on to say, in terms of surface water drainage, due to the site being mostly underlain by clay or clayey soils, the use of site infiltration and other similar SUDS systems are not suitable for this development. No evidence of attenuation has been found on site. Based on 1 in 100-year rainfall and 30% allowance for climate change, a total of 245 m³ on site attenuation is required. Attenuation can be provided using a traditional attenuation system located within the car parking/road areas of the development. The 30% climate change allowance will ensure that the proposed development drainage system can cope with future predicted rainfall increase.

In terms of foul water drainage, the Flood Risk Assessment/Detailed Drainage Strategy states, the existing foul water system comprises underground pipes discharged into the public sewer on the north side of the site in Bankwood Way. It is proposed to discharge to the same public sewers for the new development. It is proposed to install a new foul water system for the proposed new Lidl store and Home Bargains store. The foul drainage will comprise underground piped drainage and will discharge into the public sewer on Bankwood Way.

During the virtual public consultation held between 11th December 2020 – 3rd January 2021, residents did not raise concerns relating to construction (air, noise and/or water pollution) produced by the development during the construction and/or operation phases of the development.

Groups	Description of Impact	Impact	Certainty	Recommendations
General population within the baseline profile area	Negligible change.	Negligible	!	No group specific recommendations.
Neighbouring employment and business uses	Negligible change.	Negligible	!	No group specific recommendations.
Future users and workforce	Negligible change.	Negligible	!	No group specific recommendations.
General population outside of the baseline profile area	No change	No impact	!	No group specific recommendations.

Sustainable Travel and Transport

During the virtual public consultation held between 11th December 2020 – 3rd January 2021, residents raised their concerns about the possibility of increased traffic congestion within the local area, particularly at Junction 27 and associated roundabouts, with existing traffic backing out onto Gelderd Road. It was also highlighted that a suitable amount of car parking and electric vehicle charging points should be incorporated into the proposal.

With reference to the accompanying Transport Assessment produced by Bryan G Hall:

The development is considered to be well located to encourage journeys by all modes of sustainable transport. There is a limited population area within a convenient walking distance of the proposed site, but a significant area is within a convenient cycle distance, providing a real opportunity for future staff and customers living in local areas to travel to the site by this mode.

Existing bus stops on A62 Gelderd Road are conveniently located very close to the site to provide a very good opportunity for travel to and from the site by bus. Both bus stops benefit from a shelter and timetable information, with the westbound bus stop on the southern carriageway also benefitting from a lay-by. A further bus stop is provided to the south-west of the roundabout junction for eastbound services only. The bus stops on A62 Gelderd Road are served by up to 6 buses per hour in each direction (westbound and eastbound), which equates to 1 bus every 10 minutes. These buses provide services towards Leeds, Gildersome, Birstall, Batley, Dewsbury and a number of other residential areas within the wider area. The above bus services are understood to be accurate, but they may be experiencing reduced services due to the COVID-19 pandemic and associated lockdown restrictions in the UK.

The cycling accessibility TRACC Plan, included within the Transport Assessment, shows that there is a large residential area within a 5 km cycling distance of the site and within an 8 km cycling distance of the site. These areas combined provide a significant residential area within cycling distance of the site, from where future staff can reasonably be expected to cycle from. There are also a number of advisory cycle routes within the local and wider areas, as well as some traffic-free cycle paths to the north-east providing a safe route through Junction 27 of the M62 via a shared footpath / cycleway. The Local Plan policies map has identified a proposed cycling and walking route approximately 0.2 km south east of the site. Therefore, suggesting there are possibilities to enhance the cycle/walking route provision in the future.

The nearest railway station to the site is Morley railway station some 4 km to the north-east of the site. This railway station offers regular rail services to regional destinations including Leeds, Huddersfield and Wigan. More local destinations served from Morley railway station include Batley, Dewsbury, Mirfield, Brighouse, Sowerby Bridge, Cottingley and Ravensthorpe. The station is not within a reasonable walking distance, but it can be reached within a reasonable cycling distance including using the shared footway / cycleway across Junction 27 of the M62 to the north. It may therefore provide an opportunity, if required, for access by staff or visitors combining these modes of travel.

Vehicular access to the site will be provided from two separate points. The first point of access will be provided from Woodhead Road to the north-west via a new priority-controlled T-junction. The second will be provided from the existing priority-controlled T-junction with Bankwood Way to the north-east. Car park users will be able to use either access and can freely travel between them internally within the site through the shared car park. The car park will be provided with a total 175 spaces, including 10 accessible spaces, 2 electric vehicle (EV) charging spaces, 9 parent & toddler spaces and cycle parking (number of cycle spaces will be subject to LPA input and approval).

Remedial measures will be put in place to offset the impact of development traffic, which were agreed as part of the extant permission on the site and will be implemented as part of this scheme. These measures will:

- Change the priority of the Woodhead Road / Bankwood Way junction to prevent queuing on Woodhead Road, and subsequently back to the A62 Gelderd Road; and,
- Provide directional signage within the site and upon egressing, to direct drivers travelling towards Birstall / Batley to turn right out of the site via the Bankwood Way access junction, and to join the A62 Gelderd Road at its priority-controlled junction with Bankwood Way to the south-west of the site. This would reduce development impacts at the A62 Gelderd Road roundabout and improve its operation.

The Transport Assessment concludes that the proposed development site will be accessible by all modes of transport, and that the local highway network will largely continue to operate satisfactorily following the proposed development. Subject to the delivery of the change of priority scheme at the Woodhead Road / Bankwood Way junction and the delivery of directional signage within the site, the impact of the development on the local highway network is considered to be acceptable, and less than that associated with the consented scheme on the site.

Dropped kerbs will be provided throughout the site on key pedestrian desire lines and at the site access.

Both Lidl and Home Bargains propose to adopt Travel Plans. The objectives of the Travel Plans include reference to raising awareness amongst staff and customers of the detrimental impacts of car use in order to encourage the use of alternatives, as well as, reducing the need for unnecessary car travel through the promotion of suitable and reliable alternatives to the private car. Both Lidl and Home Bargains will designate a Travel Plan Co-ordinator who will work proactively with senior management at the stores to maximise the potential for the Travel Plans to reduce the reliance on the private car amongst staff and customers. The Travel Plans also state all prospective employees will be provided with sustainable travel information and made aware of the Travel Plans as part of their induction. The designated Travel Plan Co-ordinator will ensure that the information is kept up to date and will work with Kirklees Council to access the most appropriate information and timetables and ensure that any local campaigns are well advertised internally at the store.

Groups	Description of Impact	Impact	Certainty	Recommendations
General population within the baseline profile area	It is not expected that any bus or footpath routes will require closure during the construction phase.	+	!	No group specific recommendations.
Neighbouring employment and business uses	It is not expected that any bus or footpath routes will require closure during the construction phase. Therefore, there are no foreseen impacts upon neighbouring employment and business uses.	No impact	!	No group specific recommendations.

Future users and workforce		+	!	Assuming the Travel Plans are delivered, there are no group specific recommendations
General population outside of the baseline profile area	The changes are localised and are unlikely to make any difference to how the general population outside of the baseline area would travel across the wider area.	No impact	!	No specific group recommendations.

Access to Green and Open Space

The existing land comprises a currently vacant site, comprising brownfield land, which previously accommodated former business units that were demolished after having failed to attract sufficient long-term occupiers. There is no existing green and open space available on-site and the proposal will not introduce new open space. The Landscape Masterplan shows that a small proportion of the site will include proposed trees and ornamental shrub planting.

The nearest publicly accessible open spaces are located within 1km of the site at Howden Clough Recreation Ground (Leeds Road, Birstall) and Fieldhead Primary Academy (Charlotte Chlose, Birstall) which are identified on the Local Plan policies map as Urban Green Space. In addition, informal open space (Land South of 23 Bempton Grove, Birstall) is also located within 1km of the site and is identified on the Local Plan policies map as Small Open Space.

Groups	Description of Impact	Impact	Certainty	Recommendations
General population within the baseline profile area	There is unlikely to be any change to how the general population within the baseline profile area access their preferred formal and informal open spaces across Kirklees as a result of the proposed development.	No impact	!	No group specific recommendations.
Neighbouring employment and business uses	There is unlikely to be any change to how people within neighbouring employment and business uses access their preferred formal and informal open spaces across Kirklees as a result of the proposed development.	No impact	!	No group specific recommendations.
Future users and workforce	Construction phase employees will not have any established routines for accessing the nearby existing green and open space provision. Given the temporary nature of construction activities, many employees will not remain throughout the whole construction phase to establish routines. Future users and workforce of the proposed stores will be able to access formal green and open space through existing connections albeit existing nearby green and open space provision is limited and is unlikely to be a realistic choice for those working at the stores during their breaks.	Neutral	!	No group specific recommendations.

	The provision of open space on this site would be unfeasible and the space would likely be undesirable. As a brownfield site, planning policies seek to maximise the density of development and maximise employment generating use due to the allocation. It is unlikely that future users of the stores would seek linked journeys to nearby open space.			
General population outside of the baseline profile area	There is unlikely to be any change to how the general population outside the baseline profile area access their preferred formal and informal open spaces across Kirklees as a result of the proposed development.	No impact	!	No group specific recommendations.

Access to Healthy Food				
The proposal will provide a foodstore where healthy food can be purchased. The only foodstore of any significant size in Birstall itself is an M&S Simply Food, at Birstall Shopping Park. There is also a Tesco superstore, Asda foodstore and an Aldi discount foodstore in Batley, approximately 3 km to the south of the site. The proposed development will therefore provide a different qualitative offer to the existing foodstores within the area providing increased choices to the community. The proposal will not have an impact on access to allotments.				
Groups	Description of Impact	Impact	Certainty	Recommendations
General population within the baseline profile area	The proposal will provide a foodstore where healthy food can be purchased. The foodstore will provide an alternative option for purchasing healthy food.	+	!	No group specific recommendations.

Neighbouring employment and business uses	The proposal will provide a foodstore where healthy food can be purchased in close proximity to the current work premises. The foodstore will improve access and will be an option for purchasing healthy food.	+	!	No group specific recommendations.
Future users and workforce	Future employees will have the option to purchase healthy food within the proposed foodstore.	+	!	No group specific recommendations.
General population outside of the baseline profile area	The proposed changes are localised, and it is unlikely that people will travel from outside the baseline profile area to the proposed foodstore to access healthy food. The proposal is not expected to give rise to those accessing alternative healthy food sources.	Negligible	!	No group specific recommendations.

Community Safety

The former business units that were located on the site have been demolished after having failed to attract sufficient long-term occupiers. The development will therefore bring this vacant, privately-owned site into use. During the pre-application consultation, the West Yorkshire Police highlighted that the vacant site currently attracts some antisocial behaviour.

With reference to the accompanying Design and Access Statement, the need to maximise natural surveillance, and reduce crime and antisocial behaviour has been established based upon the analysis of the site and its context. The layout of the proposed site will create a safe and attractive environment with a modest landscaping scheme. The stores will be oriented to allow natural surveillance of the proposed car and cycle parking areas. External lighting will also be provided and will be powered by sensors ensuring that the lights are on during dark hours whilst the store is open, which will reduce opportunities for antisocial behaviour.

With reference to the light spill drawing for Lidl prepared by Signify, the external lighting will only impact upon the immediate surroundings. There are no sensitive residential properties adjacent to the application site and therefore it is not anticipated that there will be any adverse impact upon health from the Lidl lighting scheme. No lighting scheme has been prepared for the Home Bargains unit to date but it is not considered that this will be significantly different to the Lidl proposal and nevertheless there are similarly no sensitive receptors in the immediate vicinity of the proposed unit. Therefore, it is not anticipated that there will be any adverse impacts upon health arising from the Lidl store. The LPA could choose to condition the lighting detail for the two stores if it has any concerns.

During the virtual public consultation held between 11th December 2020 – 3rd January 2021, concerns were raised regarding the walkability of the site and its pedestrian connections to the rest of the Birstall Retail Park, stating walking from one store to another can be dangerous with a lack of pedestrian crossings.

It is acknowledged that the area can be busy with vehicular traffic. However, there are pavements on both sides of the majority of the roads in the vicinity and there are two formal pedestrian crossing points with traffic light signalling. The Design and Access Statement goes on to say, pedestrian and vehicular routes will be clearly delineated within the site. Dropped kerbs will also be provided throughout the site on key pedestrian desire lines. Separate pedestrian and vehicular accesses are provided at the site entrances to avoid pedestrian conflict with vehicles and therefore will improve community safety.

In terms of the Tennants Distribution hazardous installation located some 350m south-west of the proposal site, the retail development comprises 5,019 sqm of new floorspace. The proposed development, which straddles into the Middle Zone will be classified as a Level 3 sensitivity because it is marginally over the 5,000sq m threshold in the Health and Safety Executive's ("HSE") land use methodology. In this circumstance the HSE would 'Advise Against development'.

The HSE reached the same conclusion on the larger nearly 8,000sq m retail proposal which was granted planning permission in 2019. However, the HSE decided not to request that the Secretary of State call in the application for determination concluding that it was of the view that the Kirklees Council clearly understood the risks of the development. In the light of the information provided by HSE and in balancing the benefits of the proposal and the risks the Council granted planning permission for a significantly larger development than that proposed under this application. It is also noted that the site is designated for ongoing occupation/redevelopment for employment generating uses in the adopted Local Plan, which will have considered any health and safety risks in forming land designations and allocations.

Through pre-application discussions with the Council it has been established that officers do not consider that the hazardous installation presents a risk which would prohibit the development of the site. As it not possible for Lichfields to reach a view on the level of risk or the potential impact that would arise should there be an incident at the Tennants Distribution site, the table below concludes an uncertain impact with unknown certainty for all receptor groups. However, it should be reiterated that there is no evidence to suggest that officers should come to a different view than that reached for the previous retail application at the site, particularly so given that this proposal is smaller in nature and will likely result in less people being present at the site at any one time.

Groups	Description of Impact	Impact	Certainty	Recommendations
General population within the baseline profile area	Away from those who use the site, the general population area unlikely to be affected by the proposed development. External lighting and CCTV have the potential to reduce opportunities for the known existing and anti-social behaviour and fear of crime albeit given the relative distance it is unlikely that this will have a positive or negative affect on this receptor group.	Uncertain	?	It is recommended that the future operators liaise with the Council's emergency planning teams in the event planning permission is granted.
Neighbouring employment and business uses	The development will bring this vacant site into public use and will introduce a safe space for social interaction for neighbouring employment and business uses who will use the proposed stores. External lighting and CCTV have the potential to reduce opportunities for known existing anti-social behaviour and fear of crime and this is likely to result in a positive impact upon the health of this receptor group.	Uncertain	?	It is recommended that the future operators liaise with the Council's emergency planning teams in the event planning permission is granted.
Future users and workforce	External lighting and CCTV have the potential to reduce opportunities for future anti-social behaviour and fear of crime.	Uncertain	?	It is recommended that the future operators liaise with the Council's emergency planning teams in the event planning permission is granted.

General population outside of the baseline profile area	The proposed changes are localised and are unlikely to have noticeable improvements to the community safety of the general population outside of the baseline profile area.	Uncertain	?	It is recommended that the future operators liaise with the Council's emergency planning teams in the event planning permission is granted.
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Employment and Economy				
With cross reference to the Planning and Retail Statement, Lidl seeks to employ 15 full time and 25 part time staff from their local community, whilst Home Bargains will employ 70 staff members (unspecified mix of full and part time staff). These figures relate to gross employment, and do not take into account any indirect or induced employment that could be supported. This includes employment which will be generated through spending in the local economy by those employed at the new stores, and through the use of local firms/suppliers by the proposed stores. It is noted in the baseline study that more than a third of Kirklees' unemployed live within the baseline area and are seeking elementary roles such as in retail. The proposed development represents a sizeable investment in the local area and would also generate new employment during the construction phase, a proportion of which will be captured at the local level, as well as related spin-off jobs. The proposed development will therefore result in a boost to local employment and the local economy. All operational jobs will be a net increase to the local area as there is currently no employment available at the site at this time and there is no economic activity taking place since the demolition of the former business uses. Lidl's approach to employment of new store teams is to recruit from the pool of talent in the local area, wherever possible because this often improves the overall shopping experience for their customers. A candidate's proximity to the store will be considered during the recruitment process.				
Groups	Description of Impact	Impact	Certainty	Recommendations
General population within the baseline profile area	This receptor group is located in closest proximity to the site and the development will provide the best potential employment opportunities for this group during the construction and operational phases of development given Lidl's preference for recruiting within the local community. It is not known whether those within the vicinity have the experience and skills to access the jobs available or whether they are seeking work, but the development provides some employment opportunities for the population within the baseline profile area who are known to be seeking such opportunities.	+	?	No group specific recommendations.
Neighbouring employment and business uses	No jobs will be lost in association with the construction and operation of the development.	Negligible	!	No group specific recommendations.

Future users and workforce	The development proposal is expected to create 15 full time and 25 part time jobs at the Lidl foodstore and 70 jobs (unspecified mix) at the Home Bargains store.	+	!	No group specific recommendations.
General population outside of the baseline profile area	Whilst Lidl's policy is to recruit from the local area (which is not defined), there remain opportunities for both retailers to recruit from beyond the baseline area.	+	?	No group specific recommendations.

Community Cohesion				
The development will bring this vacant site into use and provide a built environment that will enable the interaction of individuals within the community whilst they undertake their shopping. The proposal will also provide opportunities for all members of the community to reinforce local social networks, particularly in the case of Lidl's local recruitment policy. The proposal will comprise purpose-built, single use buildings and is therefore not possible to facilitate multiple uses for different community activities.				
Groups	Description of Impact	Impact	Certainty	Recommendations
General population within the baseline profile area	The development will bring this vacant site into use and provide a built environment that will enable the interaction of individuals within the community whilst they undertake their shopping. Those living locally are more likely to use this facility rather than travelling outside of the immediate area to do their shopping. This creates improved opportunities as an informal meeting place to reinforce existing social networks.	+	!	No group specific recommendations.
Neighbouring employment and business uses	It is unlikely that community groups operate at the neighbouring employment and business uses. The proposed stores will therefore enhance community networks by providing opportunities for informal social activity.	+	?	No group specific recommendations.
Future users and workforce	The proposed development will provide opportunities for prospective employees to create their own network which, if made up from people in the local community as well as their colleagues, will add to community	+	!	No group specific recommendations.

	cohesion. The improvement for this group will be significant given the current vacant state of the site.			
General population outside of the baseline profile area	The proposed changes are localised and are unlikely to have noticeable improvements to the community cohesion of the general population outside of the baseline profile area. However, those who travel to the proposed stores from outside of the baseline profile area will experience opportunities for informal social interaction.	Negligible	?	No group specific recommendations.

Climate Change

The site is not within an area at risk of river or tidal flooding.

With reference to the accompanying Planning and Retail Statement, Lidl operates a corporate environmental policy which provides a structure to reduce carbon emissions through store design and operating procedures. The following features will be implemented at the proposed foodstore:

- the store will be heated using a refrigeration waste heat recovery system. This form of renewable energy recovers waste heat from the food chilling equipment and is used to provide heating to the main sales area, warehouses and offices area. The use of this system will reduce carbon dioxide emissions by 26%;
- temperature levels within the store will be controlled by a Building Management System (BMS) and will vary throughout the store dependent on the use of each area;
- low energy lighting design, using highly efficient LED luminaires, will be used throughout the store;
- all lighting will be connected to the BMS. The lighting within the sales area will be controlled by timers linked to the opening times of the store which means that lighting is not left on unnecessarily. The sales area uses full lighting during trading hours and cuts back to one third lighting before and after trading hours to allow for the stocking of the store. Occupancy lighting controls will be used on non-retail areas;
- BMS and LUX sensors also power the external lighting. This means that lights are only on during dark hours and ensures that they do not remain on later than one hour after the store closes;
- water consumption is carefully monitored and there are sensors on the taps in the toilets in order to minimise usage and prevent wastage from them being left on;
- Lidl use '4 fan' chiller condenser units, which are externally mounted. These units are designed to omit very little noise and be as environmentally friendly as possible;
- Lidl undertake careful planning of store stock levels, stock availability and deliveries to the foodstore to ensure unnecessary journeys are avoided and the maximum amount of products possible are delivered per litre of fuel used. In addition, Lidl will optimise each delivery by returning all waste to the distribution depot on the lorry's return journey, and there are no separate waste collections made their stores;

- an Integrated Waste Management Policy, which complies with relevant legislation and minimises the impact of the foodstore on the environment, will be used with high packaging recoverability as a result of Lidl's efficient delivery and stocking system. Lidl will install waste handling equipment, such as a plastic/cardboard baler, into the store;
- Lidl install manually operated 'dock levelling' plates within new stores which are used in conjunction with a sloped loading ramp. These 'dock levelling' plates replace hydraulic scissor lifts, which were previously used by Lidl, and have significantly lower energy consumption levels; and
- By reference to the accompanying drawings, solar panels will be installed on the roof of the store which will generate approximately 25% of the store's electricity requirements per year and will reduce carbon emissions by at least 44 tonnes per year. The solar panels will be non-reflective to avoid glare.

Home Bargains also seek to minimise the environmental impact of its stores both in store and as part of its supply chain. It achieves this by fulfilling the following sustainability objectives:

- Stores are fitted with energy efficient Led lighting throughout, including motion sensors linked to a Building Management System which can be monitored at head office. LED car parking & building mounted lighting is also installed;
- Waste produced by all stores is collected and sent back to the main office depot for recycling and reuse if possible, wherever possible packaging is reused to package internet deliveries;
- Home Bargains fund the safe disposal of all electrical equipment and battery bins are present for customer use in each store;
- Staff Travel Plans are adopted and reviewed on a regular basis.

The proposed development will include 2 electric car charging points. Lidl currently offers this service free of charge. Some bicycle parking spaces will be provided but the number is not yet confirmed.

The Planning and Retail Statement also states that the site is ideally situated to meet local shopping needs, given its location, central to the various new housing developments. It would reduce the need for residents to travel to stores further afield, including by private car, facilitating more sustainable travel patterns and retaining more spending in the local area.

Groups	Description of Impact	Impact	Certainty	Recommendations
General population within the baseline profile area	This receptor group is located in proximity to the site and the development provides the opportunity for those within the baseline profile area to use sustainable, low-carbon active travel options to carry out their shopping. It is difficult to quantify the impact that the above measures will have but overall it is expected that there will be a positive contribution towards the challenge of addressing climate change when compared with operators which do not adopt measures to reduce carbon impacts.	+	?	No group specific recommendations.

Neighbouring employment and business uses	This group is within a suitable walking distance of the site. It is difficult to quantify the impact that the above measures will have but overall it is expected that there will be a positive contribution towards the challenge of addressing climate change when compared with operators which do not adopt measures to reduce carbon impacts.	+	?	No group specific recommendations.
Future users and workforce	The site can be accessed by sustainable, low-carbon transport routes. It is difficult to quantify the impact that the above measures will have but overall it is expected that there will be a positive contribution towards the challenge of addressing climate change when compared with operators which do not adopt measures to reduce carbon impacts.	+	?	No group specific recommendations.
General population outside of the baseline profile area	The site can be accessed by sustainable, low-carbon transport routes, including public transport. It is difficult to quantify the impact that the above measures will have but overall it is expected that there will be a positive contribution towards the challenge of addressing climate change when compared with operators which do not adopt measures to reduce carbon impacts.	+	?	No group specific recommendations.

7.0 Conclusions

- 7.1 This Rapid HIA has been prepared to accompany a planning application to assess the potential impacts of the development of the proposed Lidl foodstore and separate Home Bargains Store upon the health of the local population by looking at the changes to factors that could have temporary and permanent impacts upon defined receptor groups. The HIA uses the World Health Organisation's definition of health which encompasses physical and mental health and well-being, reflecting the approach taken in national planning policy.
- 7.2 The assessment has been structured around the themes set out in Kirklees Council's Rapid HIA for Spatial Planning Guidelines and has taken into account adopted local planning policy and outputs of the public consultation event for the proposed development.
- 7.3 The HIA uses a determinants, pathways and outcomes approach and has particular regard to the aims of the local policies and strategies that seeks to address the causes of ill health, to support healthy behaviours, to manage long term conditions and to mitigate the effects of socio-economic deprivation.
- 7.4 Issues related to health are complex, multi-dimensional and with a multitude of interdependent factors and the evidence base linking the physical environment to health rarely demonstrates a causal relationship, but it is widely accepted that the built and natural environment plays a key role in shaping the social and economic determinants of health. The health impact assessment cannot be definitive or exhaustive, nor can it predict the future. It is not possible to quantify an impact upon health with precision. It is also not possible to weigh one determinant against another as the outcomes upon an individual are not predictable. This assessment has used the conclusions drawn from such evidence to discuss the potential effects of the proposed development.
- 7.5 This assessment considers the impact of the development proposal upon the health of the following defined groups:
- General population within the baseline area;
 - Neighbouring employment and business uses located off Bankwood Way and Woodhead Road;
 - Future users and workforce of the proposed development; and,
 - General population outside of the baseline area.
- 7.6 The proposed development is likely to provide a range of socioeconomic outcomes for the defined baseline area which will impact on the health and well-being of defined receptor groups.
- 7.7 The proposed development will bring the currently vacant site into beneficial use. It is assessed that overall, the proposed development will have a positive impact on the identified receptor groups across most of the determinants of health. The positive outcomes are linked to the creation and enhancement of social networks; the accessibility of the site by sustainable modes of transport; improved road safety; improved access to affordable healthy food; improved community safety in terms of anti-social behaviour; improved soft landscaping; the generation of employment opportunities; and, actions to combat climate change.
- 7.8 In terms of construction (air quality, noise and water pollution), the anticipated impacts for all identified receptor groups are negligible, provided that the recommended mitigation measures are implemented.
- 7.9 A small number of recommendations have been made which would seek to reduce any negligible health impacts and enhance any neutral/positive health impacts associated with employment,

access to green and open space and sustainable travel and transport. These do not affect the overall assessment conclusions but provide potential opportunities for improving the community's health.

Appendix 1

Determinant	Pathways	Outcomes	Evidence Reference
Construction (Air, noise and water pollution)	Living in an area with clean air. Exposure to pollutants resulting from construction traffic and commercial activity. Exposure to excessive noise. Exposure to sources of water pollution.	Living in an area with clean air can lead to positive changes in people's health behaviours and reduced risk of cardiovascular disease, stroke, mental health problems and some cancers. Decreased exposure to particulate matter and other gaseous pollutants decreases risk of chronic obstructive pulmonary disease (COPD), low birth weight and reduction in myocardial infarction. Improved air quality is associated with increased physical activity among local communities, including the elderly. Poor air quality is linked to incidence of chronic lung disease, heart conditions and asthma levels among children. Excessive noise can lead to hearing damage and loss, high blood pressure, sleep disturbance and extreme stress and anxiety. Surface water run-off can carry pollutants from the site including toxic chemicals. Pollutants can also soak into groundwater which is a source of human drinking water which is difficult to treat.	Kirklees Council Rapid HIA Guidance Notes Spatial Planning for Health: An evidence resource for planning and designing healthier places (July 2017)¹⁶ Kirklees Council Rapid HIA Guidance Notes HUDU Rapid HIA Toolkit (April 2017)¹⁷ Kirklees Council Rapid HIA Guidance Notes HUDU Rapid HIA Toolkit (April 2017)
Housing	Access to decent and adequate housing.	Factors such as the location, affordability and construction of homes can have a significant impact on the health and wellbeing of communities.	Kirklees Council Rapid HIA Guidance Notes
Access to Green and Open Space	Access to high quality, well-maintained open space, nature and opportunities for sport and recreation.	Growing evidence that access to open spaces, parks and nature can help to maintain or improve mental health and wellbeing of individuals and communities.	Kirklees Council Rapid HIA Guidance Notes

¹⁶ Public Health England. Spatial Planning for Health. An evidence resource for planning and designing healthier places (July 2017).

¹⁷ NHS London Healthy Urban Development Unit. HUDU Planning for Health: Rapid Health Impact Assessment Tool, Third Edition (April 2017).

Sustainable Travel and Transport	Providing convenient access to a range of services and facilities. Discouraging car use and providing opportunities for walking, cycling and public transport.	Having the ability to travel actively and easily access local public transport can have a positive impact on the health and wellbeing of communities. Reducing car dependency and the provision of convenient, safe, sustainable transport options (e.g. walking, cycling and public transport) can have a significant effect on health by encouraging participation in physical activity and social interaction, as well as reducing preventable road traffic accidents and air and noise pollution. It also provides greater opportunities for social interaction.	Kirklees Council Rapid HIA Guidance Notes HUDU Rapid HIA Toolkit (April 2017)
Access to Healthy Food	Access to healthy and nutritious food. Access to opportunities to grow and purchase healthy food locally.	Access to healthy and nutritious food can improve diet and general health and prevent chronic diseases and health conditions including diabetes, obesity, heart disease, cancer and stroke.	Kirklees Council Rapid HIA Guidance Notes HUDU Rapid HIA Toolkit (April 2017)
Community Safety	Planning and urban design that promotes natural surveillance and social interaction. Creating spaces and buildings that are easily accessible and safe for all groups.	Providing safe environments can help to reduce crime and the “fear of crime”, both of which impacts on the mental wellbeing of individuals. As well as the immediate physical and psychological impact of being a victim of crime, individuals can also suffer indirect long-term health consequences including disability, victimisation and isolation because of fear. Excluding certain individuals or groups from buildings or public spaces can create feelings of alienation, inequality and social isolation and can lead to antisocial behaviour. Spaces and buildings that are easily accessible and safe encourage all groups, including older people and those with disabilities, to use them.	Kirklees Council Rapid HIA Guidance Notes HUDU Rapid HIA Toolkit (April 2017)
Employment and Economy	Access to employment in accessible locations. Providing a diversity of local jobs and training opportunities.	Locating employment in inaccessible locations or failing to provide a diversity of local jobs or training opportunities can negatively affect health and mental wellbeing both directly and indirectly. Unemployment generally leads to poverty, illness and a reduction in personal and social esteem; work aids	Kirklees Council Rapid HIA Guidance Notes HUDU Rapid HIA Toolkit (April 2017)

		recovery from physical and mental illnesses.	
Community Cohesion	Providing a built environment and public spaces that promotes the interaction of individuals and communities.	Supportive networks in a community can help to reduce depression and chronic illness and improve wellbeing. Fragmentation of social structures can lead to communities demarcated by socio-economic status, age and/or ethnicity, which can lead to isolation insecurity and a lack of cohesion.	Kirklees Council Rapid HIA Guidance Notes HUDU Rapid HIA Toolkit (April 2017)
Climate Change	Providing development that takes advantage of sunlight and tree planting. The majority of the UK's greenhouse gas emissions arise from the production and consumption of energy.	Research shows that climate change is likely to impact on human health in a range of ways. Harmful impacts may include extreme rainfall events and hotter weather and heatwaves. Limit the impacts of climate change by considering relevant issues such as location, materials, designs or technologies that could help to reduce energy consumption.	Kirklees Council Rapid HIA Guidance Notes HUDU Rapid HIA Toolkit (April 2017)

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