

# The London Tunnels

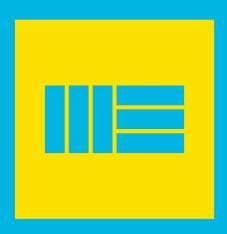
37. Health Impact Assessment

18 December 2023



# THE LONDON TUNNELS HEALTH IMPACT ASSESSMENT

**18 DECEMBER 2023** 



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## 1.0 INTRODUCTION

- 1.1 This Health Impact Assessment ("HIA") has been prepared as part of a full planning application for a change of use of the existing buildings and tunnel complex ("the Proposals" / "Proposed Development" / "Scheme") at 38-39, 40-41 Furnival Street, London, EC4A 1JQ and part ground and lower floor 31-33 High Holborn, London, WC1V 6AX ("the Site" / "the Tunnels" / "the London Tunnels"), on behalf of The London Tunnels PLC ("the Applicant").
- 1.2 The full description of development for this Application for full planning permission, is as follows:

"Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (F1), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works"

- 1.3 The Site is located across the jurisdiction of two local planning authorities, the City of London ("CoL") and the London Borough of Camden ("LBC"), making it a 'cross-boundary' application. Identical planning applications have been submitted to both LPAs.
- 1.4 The purpose of this HIA is to assess and identify the potential positive and negative impacts and likely effects of the Proposed Development on health and wellbeing in accordance with the National Planning Policy Framework, The London Plan, LBC and CoL Planning Policy.
- 1.5 National Planning Practice Guidance (PPG) states that local planning authorities should ensure that the healthcare infrastructure implications of any relevant proposed local development are considered. The PPG also refers to HIA as a useful tool to assess and address the impacts of development proposals (paragraph ref 53-005-20190722).
- 1.6 In accordance with the Mayor of London's Social Infrastructure SPD, the CoL's Draft City Plan 2040, and LBC's Planning Guidance on Planning for Health and Wellbeing, this HIA includes assessment using the NHS London Healthy Urban Development's Rapid Health Impact Assessment Tool, which allows for a focused investigation of health impacts in relation to development.

### 2.0 THE PRINCIPLE OF HIA

- 2.1 A Desktop HIA is considered the most appropriate for the London Tunnels development because it does not include a major infrastructure project nor is it expected to have an overall detrimental impact on the local environment.
- 2.2 To provide an appropriate level of assessment and in accordance with guidance in the Mayor's SPG, the NHS London Healthy Urban Development's Rapid Health Impact Assessment Fourth Edition (October 2019) Tool has been used.
- 2.3 The assessment tool helps identify those determinants of health which are likely to be influenced by specific development proposal. Specifically, the rapid HIA tool provides an assessment matrix based on 11 broad determinants:
  - 1. Housing Quality and Design;
  - 2. Access to Healthcare Services and other Social Infrastructure;
  - 3. Access to Open Space and Nature;
  - 4. Air Quality, Noise and Neighbourhood Amenity;
  - 5. Accessibility and Active Travel;
  - 6. Crime Reduction and Community Safety;
  - 7. Access to Healthy Food;
  - 8. Access to Work and Training;
  - 9. Social Cohesion and Lifetime Neighbourhoods;
  - 10. Minimising the Use of Resources; and
  - 11. Climate Change.
- 2.4 The health impacts relating to the relevant health determinants have been assessed against the Proposed Development, in the context of the site location, using the assessment matrix. Impacts on the future users of the Proposed Development, and the local community, have been identified and are detailed in the assessment Matrix below. Where an impact is identified, proposed mitigation or enhancement measures are also included within the matrix.

## 3.0 ASSESSMENT METHODOLOGY

#### THE SITE

- 3.1 The World Health Organisation (WHO) Europe defines health as "a state of complete physical mental and social well-being and not merely the absence of disease or infirmity." Factors that have the most significant influence on the health of a population are called "determinants of health" defined by WHO as "the range of personal, social, economic and environmental factors which determine the health status of individuals and populations."
- 3.2 The London HUDU Planning for Health Rapid HIA Tool Fourth Edition (October 2019) recommends the assessment of potential health impacts under 11 different broad health determinants. It does not identify all issues related to health and wellbeing but focuses on the built environment and issues directly or indirectly influenced by planning decisions. The health matters which have been considered in this Report Chapter and consideration of their relevance is set out in Table 3.1 below

Table 3.1: Health Determinants from the HUDU Rapid Impact Assessment Tool, October 2019, Fourth Edition

	Health Determinant	Potential Health Impacts	Relevance to Proposed Development
1	Housing Quality and Design	Environmental factors, overcrowding and sanitation in buildings as well as unhealthy urban spaces have been widely recognised as causing illness since urban planning was formally introduced. Postconstruction management also has impact on community welfare, cohesion and mental wellbeing.	No residential accommodation is proposed and therefore determinants relating specifically to housing quality are not considered relevant.
2	Access to healthcare services and other social infrastructure	Strong, vibrant, sustainable and cohesive communities require good quality, accessible public services and infrastructure. Access to social infrastructure and other services is a key component of Lifetime Neighbourhoods. Encouraging the use of local services is influenced by accessibility, in terms of transport and access into a building, and the range and quality of services offered. Access to good quality health and social care, education and community facilities has a direct positive effect on human health. Opportunities for the community to participate in the	No healthcare services or social infrastructure are proposed or lost as part of the development. In addition, no new population will be created. This determinant is not considered relevant.

	Health Determinant	Potential Health Impacts	Relevance to Proposed Development
		planning of these services has the potential to impact positively on mental health and wellbeing and can lead to greater community cohesion.	
3	Access to open space and nature	Providing secure, convenient and attractive open/green space can lead to more physical activity and reduce levels of heart disease, strokes and other ill-health problems that are associated with both sedentary occupations and stressful lifestyles. There is growing evidence that access to parks and open spaces and nature can help to maintain or improve mental health. The patterns of physical activity established in childhood are perceived to be a key determinant of adult behaviour; a growing number of children are missing out on regular exercise, and an increasing number of children are being diagnosed as obese. Access to play spaces, community or sport facilities such as sport pitches can encourage physical activity. There is a strong correlation between the quality of open space and the frequency of use for physical activity, social interaction or relaxation.	This determinant is relevant to the proposal however as no residential accommodation is proposed, policy requirements for open space are not significant.
4	Air quality, noise and neighbourhood amenity	The quality of the local environment can have a significant impact on physical and mental health. Pollution caused by construction, traffic and commercial activity can result in poor air quality, noise nuisance and vibration. Poor air quality is linked to incidence of chronic lung disease (chronic bronchitis or emphysema) and heart conditions and asthma levels of among children. Noise pollution	This determinant is relevant to the proposal.

	Health Determinant	Potential Health Impacts	Relevance to Proposed Development
		can have a detrimental impact on health resulting in sleep disturbance, cardiovascular and psychophysiological effects. Good design and the separation of land uses can lessen noise impacts.	
5	Accessibility and active travel	Convenient access to a range of services and facilities minimises the need to travel and provides greater opportunities for social interaction. Buildings and spaces that are easily accessible and safe also encourage all groups, including older people and people with a disability, to use them. Discouraging car use and providing opportunities for walking and cycling can increase physical activity and help prevent chronic diseases, reduce risk of premature death and improve mental health.	This determinant is relevant to the proposal
6	Crime reduction and community safety	Thoughtful planning and urban design that promotes natural surveillance and social interaction can help to reduce crime and the 'fear of crime,' both of which impacts on the mental wellbeing of residents. As well as the immediate physical and psychological impact of being a victim of crime, people can also suffer indirect long-term health consequences including disability, victimisation and isolation because of fear. Community engagement in development proposals can lessen fears and concerns.	This determinant is relevant to the proposal
7	Access to healthy food	Access to healthy and nutritious food can improve diet and prevent chronic diseases related to obesity. People on low incomes, including young families, older people are the least able to eat well because of	This determinant is relevant to the proposal

	Health Determinant	Potential Health Impacts	Relevance to Proposed Development
		lack of access to nutritious food. They are more likely to have access to food that is high in salt, oil, energy-dense fat and sugar. Opportunities to grow and purchase local healthy food and limiting concentrations of hot food takeaways can change eating behaviour and improve physical and mental health.	
8	Access to work and training	Unemployment generally leads to poverty, illness and a reduction in personal and social esteem. Works aids recovery from physical and mental illnesses.	This determinant is relevant to the proposal
9	Social cohesion and lifetime neighbourhoods	Friendship and supportive networks in a community can help to reduce depression and levels of chronic illness as well as speed recovery after 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. Voluntary and community groups, properly supported, can help to build up networks for people who are isolated and disconnected, and to provide meaningful interaction to improve mental wellbeing. Lifetime Neighbourhoods places the design criteria of Lifetime Homes into a wider context. It encourages planners to help create environments that people of all ages and abilities can access and enjoy, and to facilitate communities that people can participate in, interact and feel safe.	This determinant is relevant to the proposal.  Determinants specific to residential development are not relevant to this proposal.

	Health Determinant	Potential Health Impacts	Relevance to Proposed Development
10	Minimising the use of resources	Reducing or minimising waste including disposal, processes for construction as well as encouraging recycling at all levels can improve human health directly and indirectly by minimising environmental impact, such as air pollution.	This determinant is relevant to the proposal.
11	Climate change	There is a clear link between climate change and health. The Marmot Review is clear that local areas should prioritise policies and interventions that 'reduce both health inequalities and mitigate climate change' because of the likelihood that people with the poorest health would be hit hardest by the impacts of climate change. Planning is at the forefront of both trying to reduce carbon emissions and to adapt urban environments to cope with higher temperatures, more uncertain rainfall, and more extreme weather events and their impacts such as flooding. Poorly designed homes can lead to fuel poverty in winter and overheating in summer contributing to excess winter and summer deaths. Developments that take advantage of sunlight, tree planting and accessible green/brown roofs also have the potential to contribute towards the mental wellbeing of residents.	This determinant is relevant to the proposal.

Source: HUDU Rapid Impact Assessment Tool, 2019, Fourth Edition

# 4.0 SPATIAL BOUNDARIES OF THE ASSESSMENT

- 4.1 The potential impacts on existing health conditions varies by spatial scale. This is due to the sensitivity of the matters being assessed. A table outlining the spatial scales of the extent of impacts which is most likely to be experienced for each of the health and wellbeing matters is provided in Table 4.1 below.
- 4.2 As the Proposed Development will not generate a new residential population, this HIA focuses on the potential positive and negative impacts and likely effects of the Proposed Development on health and wellbeing in accordance with the 11 broad determinants. This HIA does not address future additional demand for social infrastructure (such as schools, GPs, dentists, open/amenity space) from a newly introduced population.

Table 4.1: Spatial Scales of External Impacts

Matters	Spatial Level
Housing Quality and Design	Site
Access to healthcare services and other social infrastructure	Local, Borough and Regional
Access to open space and nature	Site and Local
Air quality, noise and neighbourhood amenity	Site, Local and Borough
Accessibility and active travel	Site and Local
Crime reduction and community safety	Local
Access to healthy food	Site and Local
Access to work and training	Local and Borough
Social cohesion and lifetime neighbourhoods	Site and Local
Minimising the use of resources	Site
Climate change	Site, Borough and Global

## 5.0 RAPID HIA TOOL

- 5.1 The HUDU Tool has been designed to look at the positive and negative health impacts and likely effects of a development as well as assessing the indirect implications for the wider community.
- 5.2 The Rapid HIA Tool covers a wide range of health determinants and is largely a qualitative assessment, rather than quantitative. There is no formal or statutory requirement to assess or measure the scale and so the significance of effects within a standalone HIA and for the most part, it is not possible to quantify the severity or extent of the effects which give rise to these impacts. Indeed, HUDU notes "it may not be possible to quantify the impacts as many of the effects on an individual's or community's health are not easily measurable and many health effects are indirect and take many years to manifest themselves." To this end, the potential health impacts are described as outlined in Table 5.1 below, based on broad categories for the identified qualitative impacts.

Positive	A beneficial impact is identified
Neutral	No discernible health impact is identified
Negative	No discernible health impact is identified
Uncertain	Where uncertainty exists as to the overall impact
N/A	Criteria is not relevant to the Proposed Development

5.3 Whilst HIA is not an exact science and is made on the basis of many assumptions of a complex reality into a simple model. This report has also sought to provide a simplified methodology for this assessment based on the standard impact assessment methodology. Any assessments in terms of the sensitivity of receptor and the magnitude of impacts are made using the assessor's best professional judgement and are considered accurate at the time of writing.

Table 5.1: Rapid HIA Tool Matrix

Assessment Criteria	Relevant	Details / Evidence	Potential Health Impact (Positive, Negative, Neutral, Uncertain)	Recommended Mitigation or Enhancement Measures
Housing Design & Affordability	1			
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?	N/A	The Proposed Development does not include housing development.	N/A	N/A
Does the proposal address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?	N/A	The Proposed Development does not include housing development.	N/A	N/A
Does the proposal include homes that can be adapted to support independent living for older and disabled people?	N/A	The Proposed Development does not include housing development.	N/A	N/A
Does the proposal promote good design through layout and orientation, meeting internal space standards?	N/A	The Proposed Development does not include housing development.	N/A	N/A
Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?	N/A	The Proposed Development does not include housing development.	N/A	N/A
Does the proposal contain homes that are highly energy	N/A	The Proposed Development does not include housing development.	N/A	N/A

Assessment Criteria	Relevant	Details / Evidence	Potential Health Impact (Positive, Negative, Neutral, Uncertain)	Recommended Mitigation or Enhancement Measures
efficient (e.g. a high SAP rating)?				
Access to health and social car	re services a	nd other social infrastructure		
Does the proposal retain or reprovide existing social infrastructure?	N/A	The Proposed Development does not involve any existing social infrastructure, health, or social care services.	N/A	N/A
Does the proposal assess the impact on health and social care services and has local NHS organisations been contacted regarding existing and planned healthcare capacity?	N/A	The Proposed Development does not involve any existing social infrastructure, health, or social care services.	N/A	N/A
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?	N/A	The Proposed Development does not involve any existing social infrastructure, health, or social care services.	N/A	N/A
Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g. primary, secondary and post 19 education needs and community facilities?	N/A	The Proposed Development does not involve any existing social infrastructure, health, or social care services.	N/A	N/A
Does the proposal explore opportunities for shared community use and co-location of services?	N/A	The Proposed Development does not involve any existing social infrastructure, health, or social care services.	N/A	N/A
Access to open space and natu	ıre			

Assessment Criteria	Relevant	Details / Evidence	Potential Health Impact (Positive, Negative, Neutral, Uncertain)	Recommended Mitigation or Enhancement Measures
Does the proposal retain and enhance existing open and natural spaces?	N/A	There is no open or natural space currently on site.	N/A	N/A
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	Yes	There is no open or natural space currently on site.  Improvements are proposed to the local environment, this includes replacing and upgrading the immediate public realm and opening up public access to the tunnels.  The Proposed Development includes a root top terrace providing open space, with greenery, for staff.	Positive	N/A
Does the proposal provide a range of play spaces for children and young people?	No	The Proposed Development does not provide open spaces for children and young people. The above ground space is limited, and this is not a policy requirement of the proposed use.  However, the visitor attraction will be open to children and young people, with free school visits for school children within the City of London and Camden.	Neutral	N/A
Does the proposal provide links between open and natural spaces and the public realm?	Yes	Improvements are proposed to the local environment, this includes replacing and upgrading the immediate public realm and providing public access to the tunnels.	Positive	The proposed public realm improvements will be secured via planning condition or legal agreement.
Are the open and natural spaces welcoming and safe and accessible for all?	Yes	The existing tunnel networking is not accessible. The Proposed Development will create a public accessible visitor attraction.  The Proposed Development has been designed to be fully accessible. The Access Strategy (contained with the Design and Access Statement) prepared by David Bonnett Associates sets out in detail how the Proposed Development is welcoming, safe and accessible for all.	Positive	No mitigation required.

Assessment Criteria	Relevant	Details / Evidence	Potential Health Impact (Positive, Negative, Neutral, Uncertain)	Recommended Mitigation or Enhancement Measures
Does the proposal set out how new open space will be managed and maintained?	N/A	No new public open space is proposed.	N/A	N/A
Air Quality, noise and neighbor	urhood amer	nity		
Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	Yes	During the construction processes, control procedures will be put in place to minimise noise, vibration and dust pollution and roads will be kept clean.  An Outline Construction Management Plan, prepared by WSP, has been submitted as part of the planning application and sets out further detail of the proposed control procedures.	Neutral	The Construction Management Plan will be secured via planning condition or legal agreement.
Does the proposal minimise air pollution caused by traffic and energy facilities?	Yes	An Air Quality Assessment, prepared by WSP, has been submitted as part of the planning application and sets out further detail of the potential control procedures for minimising air pollution.	Neutral	Any required air quality mitigation will be secured via planning condition.
Does the proposal minimise noise pollution caused by traffic and commercial uses?	Yes	A Noise and Vibration Impact Assessment, prepared by WSP, has been submitted as part of the planning application and sets out further detail of the potential control procedures for minimising noise pollution.	Neutral	Any required noise mitigation will be secured via planning condition.
Accessibility and active travel				
Does the proposal address the ten Healthy Streets indicators?	Yes	The submitted Transport Assessment, prepared by WSP, focuses on the Healthy Streets Approach and seeks to improve travel by sustainable and active modes.	Positive	No mitigation required.
Does the proposal prioritise and encourage walking, for example, through the use of shared spaces?	Yes	The site is in an area with excellent access to public transport services (PTAL 6b).  The Proposed Development will include improvements to the existing pavements and public realm on Furnival Street.	Positive	Improvements to the public realm will be secured via planning condition or legal agreement.

Assessment Criteria	Relevant	Details / Evidence	Potential Health Impact (Positive, Negative, Neutral, Uncertain)	Recommended Mitigation or Enhancement Measures
Does the proposal prioritise and encourage cycling, for example by providing secure cycle parking, showers and cycle lanes?	Yes	Cycle parking is proposed to be provided in accordance with London Plan standards.  11 Long-stay and 22 short-stay cycle parking are provided across the site.  Staff who choose to cycle to work will have an independent access from visitors. Lockers will be provided both in the cycle store and on the 4th floor, with showers located on the 4th floor.	Positive	Cycle parking details to be secured via planning condition.
Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	Yes	The Proposed Development is located close to key existing and planned local destinations within walking distance. Additionally, the Site has strong access to the local and strategic cycling network, namely through access to the Cycleway 41 and Cycleway 6.	Neutral	No mitigation required.
Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	N/A	The primary access to the site is located on Furnival Street, which is a CoL managed road. Furnival Street is subject to a 20mph speed limit and is approximately 155m in length. The road has carriageway width of 4.3m at the widest and 2.5m at the narrowest. The localised narrowing present on Furnival Street is to enforce the northbound one-way restriction for vehicle movements but allows for contraflow cycle movements. Therefore, this is not deemed to be relevant to the proposal.	N/A	N/A
Is the proposal well connected to public transport, local services and facilities?	Yes	The site is in an area with excellent access to public transport services (PTAL 6b).	Neutral	No mitigation required.
Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	Yes	The Proposed Development is car-free, and providing high-quality cycle parking facilities that will fully support sustainable patterns of travel.  One blue-badge parking space is to be retained on Furnival Street in line with the London Plan.	Neutral	No mitigation required.
Does the proposal allow people with mobility problems or a	Yes	The Proposed Development has been designed to be fully accessible. The Access Strategy (contained with the Design and	Positive	No mitigation required.

evant Details / Evidence	Potential Health Impact (Positive, Negative, Neutral, Uncertain)	Recommended Mitigation or Enhancement Measures
Access Statement) prepared by David Bonnett Associates sets out in detail how the Proposed Development is welcoming, safe and accessible for all.  One blue-badge parking space is to be retained on Furnival Street in line with the London Plan. One accessible Sheffield stand will be provided as part of the long-stay cycle provision.		
ety		
The scheme has been designed in accordance with 'Secured by Design' principles.  A Security Report, prepared by WSP, sets out in detail the elements incorporated into the scheme design to 'design out crime.'	Positive	Improvements to the security of the design will be secured via planning condition or legal agreement.
The Proposed Development does not include housing development.	N/A	N/A
The Proposed Development will open up a site that is currently inaccessible, to provide a mixed-use visitor attraction that will be open to the public.	Positive	No mitigation required.
<ul> <li>A total of six public consultation events were held, including:</li> <li>A ward councillor preview;</li> <li>A resident's preview; and</li> <li>Four public exhibition events.</li> </ul> The events were advertised through a combination of newsletters, media coverage, social media and letters sent to neighbours. Over the course of the six events, a total of more than 100 people	Positive	No mitigation required.
	<ul> <li>A resident's preview; and</li> <li>Four public exhibition events.</li> </ul> The events were advertised through a combination of newsletters, media coverage, social media and letters sent to neighbours.	<ul> <li>A resident's preview; and</li> <li>Four public exhibition events.</li> </ul> The events were advertised through a combination of newsletters, media coverage, social media and letters sent to neighbours. Over the course of the six events, a total of more than 100 people

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		included local businesses, residents and individuals who had previously worked in the tunnel system.		
		Digital engagement was offered through a bespoke consultation website that provided comprehensive details of the Proposals. Alongside this, a 'geo-targeted' social media campaign was undertaken, to reach out to those in the Site's vicinity and encourage their participation at the in-person events.		
		The Statement of Community Involvement, prepared by LCA, outlines the public engagement undertaken in greater detail.		
Access to healthy food				
Does the proposal facilitate the supply of local food, for example allotments, community farms and farmers' markets?	N/A	The Proposed Development does not include any retail or housing provision.	N/A	N/A
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	N/A	The Proposed Development does not include any retail provision.	N/A	N/A
Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area?	N/A	The Proposed Development does not include any retail provision.	N/A	N/A
Access to work and training				
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Yes	As set out in the Socio-Economic Assessment, prepared by Volterra, the Proposed Development will provide local employment and training opportunities, including temporary and permanent jobs for local people.	Positive	Local employment opportunities will be agreed through an Employment and Training Strategy, secured via legal agreement.

Assessment Criteria	Relevant	Details / Evidence	Potential Health Impact (Positive, Negative, Neutral, Uncertain)	Recommended Mitigation or Enhancement Measures
		It is considered that the Proposed Development would support approximately 105 jobs, equivalent to 85 Full Time Equivalents.		
		The Applicant is committed to working with CoL and LBC to ensure the Proposed Development can provide the most suitable employment and skills opportunities for local residents. As part of this, the Applicant is committed to:		
		<ul> <li>Maximising opportunities to support local jobs and apprenticeships through working with LBC and the City of London to advertise job opportunities locally and plan for future jobs and training.</li> </ul>		
		<ul> <li>Hosting at least eight work experience placements a year for local schools.</li> </ul>		
		<ul> <li>Commitment to paying all staff the London Living Wage (£13.15 as of 2023).</li> </ul>		
		<ul> <li>Working in partnership with local community centres (e.g. Dragon Hall Trust, Holborn Community Association, N1C centre and the wider C4 consortium), will seek to build on existing links with these community centres to keep local residents informed about the progress of the development and to highlight employment and training opportunities as they arise.</li> </ul>		
Does the proposal provide childcare facilities?	N/A	The Proposed Development does not include any childcare facilities. This is not considered relevant to the Proposed Development.	N/A	N/A
Does the proposal include managed and affordable workspace for local businesses?	N/A	The Proposed Development does not include office floorspace, except for ancillary offices associated with the visitor attraction use.	N/A	N/A

8 DECEMBER 2023 Assessment Criteria	Relevant	Details / Evidence	Potential Health Impact (Positive, Negative, Neutral, Uncertain)	Recommended Mitigation or Enhancement Measures
Does the proposal include opportunities for work for local people via local procurement arrangements?	Yes	As set out in the Socio-Economic Assessment, prepared by Volterra, the Proposed Development will target a local procurement target of 10% of total procurement value.	Positive	Local employment and procurement opportunities will be agreed through an Employment and Training Strategy, secured via legal agreement.
Social cohesion and inclusive	design			
Does the proposal consider health inequalities by addressing local needs through community engagement?	Yes	A wide range of consultation has taken place during the design evolution of this scheme. This has included engagement with CoL and LBC Officers, Local Councillors, local residents and community groups. The design has also been presented to the City of London Accessibility Group ('CoLAG').	Positive	No mitigation required.
Does the proposal connect with existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	Yes	The Proposed Development has been designed to be fully accessible. The Access Strategy (contained with the Design and Access Statement) prepared by David Bonnett Associates sets out in detail how the Proposed Development is welcoming, safe and accessible for all.  The internal spaces have been designed to ensure a welcoming space for visitors, with areas to sit within the exhibition space.	Positive	No mitigation proposed.
Does the proposal include a mix of uses and a range of community facilities?	No	The Proposed Development provides a visitor attraction (Class F1) and bar, which will be accessible to members of the public. The Proposed Development is not considered to be a community facility.	Neutral	No mitigation proposed.
Does the proposal provide opportunities for the voluntary and community sectors?	Yes	The Cultural Plan, prepared by Future City, considers the future operational opportunities for the site. There is scope for voluntary and community sectors to use the Proposed Development in the future.	Positive.	Opportunities for the voluntary and community sectors could be secured via planning condition or legal agreement, through the Operational Management Plan.
Does the proposal consider issues and principles of	Yes	The Proposed Development has been designed to be fully accessible. The Access Strategy (contained with the Design and	Positive	No mitigation required.

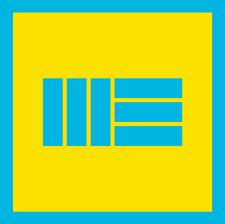
Assessment Criteria	Relevant	Details / Evidence	Potential Health Impact (Positive, Negative, Neutral, Uncertain)	Recommended Mitigation or Enhancement Measures
inclusive and age-friendly design?		Access Statement) prepared by David Bonnett Associates sets out in detail how the Proposed Development is inclusive to all.		
Minimising the use of resource	S			
Does the proposal make best use of existing land?	Yes	The site is not currently accessible to the public. The Proposed Development will open up the existing tunnels to create a new visitor attraction.	Positive	No mitigation required.
Does the proposal encourage recycling, including building materials?	Yes	The Proposed Development aligns with the GLA's Circular Economy Targets by emphasising resource conservation, waste elimination, and sustainable waste management. The Proposed Development aims to use at least 20% recycled materials in the construction process and minimize waste generation, ensuring that 95% of construction and excavation waste is reused, recycled, or diverted from landfills.  Additionally, the Waste Management Plan, encourages waste segregation and recycling.  The design principles focus on efficient material use, longevity, adaptability, and sustainable waste management to meet these goals and minimise environmental impact.  The Circular Economy Strategy and Waste Management Plan, prepared by WSP, provide further detail.	Positive	Measures to be secured via planning condition or legal agreement.
Does the proposal incorporate sustainable design and construction techniques?	Yes	During design development, significant consideration has been given to how the building fabric will respond to its environment in order that the energy consumption of the building is reduced as far as possible through passive means.  Most of the project makes use of existing structures. The project has some design constraints due to its bespoke nature.	Positive.	Measures to be secured via planning condition or legal agreement.

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		The Tunnels have a high level of insulation and thermal mass as result of the surrounding soil which encapsulates all external surfaces of the Tunnels.		
		Passive design measures will be incorporated into the design to reduce energy demand and the risk of overheating in the above ground buildings.		
		Further information of the proposed sustainable design measures are set out within the Energy and Sustainability Reports, prepared by WSP.		
Climate Change				
Does the proposal incorporate renewable energy?	Yes	Heat recovery heat pumps will allow for simultaneous heating and cooling through an all-electric low carbon hot water solution.  A high level of heat recovery is present in the design with heat recovery chillers and highly efficient water-cooled chillers will provide cooling.		Measures to be secured via planning condition or legal agreement.
Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, for example ventilation, shading and landscaping?	Yes	Yes, overheating risk has been considered throughout the design development and an overheating risk analysis is set out within the submitted Energy Strategy, prepared by WSP.	Positive	Measures to be secured via planning condition or legal agreement.
Does the proposal maintain or enhance biodiversity?	Yes	Opportunities will be taken to enhance the ecological value of the site, through features such as planting and biodiverse landscaping.	Positive	Measures to be secured via planning condition or legal agreement.
Does the proposal incorporate sustainable urban drainage techniques?	Yes	The proposed drainage strategy arrangement will comprise of blue roof systems and harvesting, which are both considered sustainable urban drainage solutions that will provide a significant benefit in terms of reducing direct runoff to the existing sewer network as well as aiding a sustainable water supply.	Positive	Measures to be secured via planning condition or legal agreement.

# 6.0 CONCLUSION ON HEALTH IMPACTS

- This Health Impact Assessment ("HIA") has been prepared as part of a full planning application for a change of use of the existing buildings and tunnel complex ("the Proposals" / "Proposed Development" / "Scheme") at 38-39, 40-41 Furnival Street, London, EC4A 1JQ and part ground and lower floor 31-33 High Holborn, London, WC1V 6AX ("the Site" / "the Tunnels" / "the London Tunnels"), on behalf of The London Tunnels PLC.
- 6.2 The purpose of this HIA is to assess and identify the potential positive and negative impacts and likely effects of the Proposed Development on health and wellbeing in accordance with the National Planning Policy Framework, The London Plan, LBC and CoL Planning Policy.
- 6.3 In accordance with the Mayor of London's Social Infrastructure SPD, the CoL's Draft City Plan 2040, and LBC's Planning Guidance on Planning for Health and Wellbeing, this HIA includes assessment using the NHS London Healthy Urban Development's Rapid Health Impact Assessment Tool.
- 6.4 The Applicant is committed to ensuring that the Proposed Development contributes, where possible, to promoting sustainable development and travel, enhancing public realm, reducing pollution and protecting, neighbourhood amenity. In addition, the internal design of the Proposed Development has been carefully designed to ensure a safe, accessible and welcoming space for all.
- 6.5 Considering the 11 broad determinants outlined, the Proposal will bring forward health and social benefits to the local and regional area, achieving the overarching objective of improving standards of health in the community.

# MONTAGU EVANS 70 ST MARY AXE LONDON EC3A 8BE



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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALLY SENSITIVE INFORMATION. WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.

#### MONTAGU EVANS LLP

Montagu Evans LLP 70 St Mary Axe London EC3A 8BE

www.montagu-evans.co.uk