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Email: healthyplaces@hertfordshire.gov.uk
Ref: 25/02571/OP
Date: 13 September 2026

To the Case Officer

Location: Growing Baldock Development Site

Proposal: Outline planning application with all matters reserved except for means of highway access into the development from North Road and Clothall Road for: up to 3,200 homes, up to 16ha of employment, waste and leisure infrastructure, a mixed use local centre, up to 1 secondary school, up to 2 x primary schools, nursery/childcare facilities, health hub, green infrastructure (including parks, formal sports provision, play, habitat areas, informal open space and structural planting), internal street network, access junctions and railway crossing, public transport infrastructure, pedestrian/cycle network (including PRow diversions, active travel routes, mobility hubs and crossing of the railway), utilities and drainage infrastructure (including diversions of existing and provision of new infrastructure, pumping stations, sustainable drainage, primary substations, rising main/strategic sewer and renewable energy infrastructure), ground remodelling/earthworks and any necessary demolitions (as amended)

App. No: 25/02571/OP

Thank you for the opportunity to comment on the reconsultation for the above application.

I refer you to HCC Public Health's previous advice dated 5 November 2025 and 6 June 2026. Among other things, this advice requested that a comprehensive Health Impact Assessment (HIA) be undertaken as per Hertfordshire County Council's HIA Position Statement. An HIA

does not yet appear to have been carried out, and we recommend that this be prioritised in the interests of evaluating the likely health impacts (both positive and negative) of the proposed development and guiding any subsequent reserved matters applications.

Health Impact Assessment

Health Impact Assessment (HIA) is a recognised tool that can assist development applications demonstrate both the positives of the proposal as well as identifying any unintended consequences. Robust assessments of the health implications of development proposals consider how different populations will be positively and negatively impacted by the development; HIA can draw out these inequalities in relation to the impact of a development on existing local communities and how the development may influence the health and wellbeing of its new residents. It is also important to consider the cumulative impact of neighbouring developments on new and existing communities which can be taken into account when undertaking an HIA.

In November 2019, Hertfordshire County Council adopted a HIA Position Statement which sets out the process for carrying out a HIA. It also sets out the recommended frameworks to use for each stage of the HIA process. This includes guidance on the quality assurance framework that will be used to assess how well an HIA has been undertaken. The Hertfordshire County Council (HCC) HIA Position Statement can be downloaded from this link:

<https://www.hertfordshire.gov.uk/media-library/documents/public-health/health/hia-position-statement.pdf>

The HIA Position Statement does not specify a particular methodology to use for the appraisal stage – this is to be determined by the developer. However, we recommend developers familiarise themselves with the “Wales Health Impact Assessment Support Unit (WHIASU) Quality Assurance Review Framework for HIA” to ensure the framework chosen meets the requirements of a high quality HIA. Hertfordshire Public Health will quality assess HIAs (using the WHIASU Quality Assurance Review Framework) submitted with planning applications either as standalone assessments or as part of Environmental Impact Assessments.

In the absence of an agreed national set of guidelines on HIA, and appreciating there are different methodologies, our expectation is that an HIA must:

- consult Public Health and the planning authority on its scope.
- have robustly considered *health inequalities* and demonstrate an understanding of how health inequalities apply in the context of the development proposal.
- have clearly and appropriately identified vulnerable populations as part of the HIA process (see Population Group Checklist⁹ for example).
- have utilised relevant local health profiles and other appropriate community data, preferably down to ward level where possible.
- be robust in its consideration of the *wider determinants of health* and can demonstrate understanding of what these are in the context of the development proposal and wider communities.
- be balanced in its findings.

To ensure the completeness and quality of the Health Impact Assessment: (a) the developer must ensure that the Health Impact Assessment is prepared by competent experts; and (b) the Health Impact Assessment must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts.

For a development of this size, we would be expecting a comprehensive HIA to be undertaken. The applicant should consider how much more work this would entail (compared to a rapid HIA) set against the benefits of demonstrating to the local planning authority how the proposal is positively planned and how it will offer opportunities to the existing and new communities.

The development proposal represents significant change to the built environment which, whilst intended as positive, may have unintended negative impacts on health that a HIA may highlight. There is a range of guidance and resources that can be used to inform HIA development to ensure it is robust, balanced, evidence-driven and puts health at the heart of planning. See Table 1 of the recent Public Health England publication on HIA. More useful guidance on HIA is available here: <https://www.hertfordshire.gov.uk/services/health-in-herts/healthy-places/the-role-of-public-health-in-planning.aspx#HIA>

We request that Public Health is consulted at the scoping stage of the HIA via Healthyplaces@hertfordshire.gov.uk to help ensure the HIA focusses on the wider determinants of health and health inequalities. We are happy to discuss baseline information, data and intelligence that the HIA will need to utilise.

Yours sincerely,

Chris Browne
Healthy Places Officer – Planning
Hertfordshire County Council Public Health