

**Public Health
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Ref: 25/01696/OP

Date: 11 December 2025

To the Case Officer

Location: Land South East Of Holwell Road And North Of Hambridge Way, Pirton, Hertfordshire.

Proposal: Outline application for the erection of up to 130 dwellings with public open space, landscaping, sustainable drainage system (SuDS), and associated works with all matters reserved save for access.

App. No: 25/01696/OP

Thank you for the opportunity to comment on the Health Impact Assessment (HIA) for the above outline planning application.

Health Impact Assessments are 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; HIAs 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.

The Hertfordshire County Council (HCC) HIA Position Statement can be downloaded from the link below: <https://www.hertfordshire.gov.uk/healthyplaces>

This sets out the recommended methodologies to use for each stage of the HIA process. 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^[1]” to ensure the framework chosen to undertake the HIA meets the requirements of a high quality HIA. Hertfordshire Public Health will be quality assessing HIAs (using the WHIASU Quality Assurance Review Framework) submitted with planning applications either as standalone assessments or as part of Environmental Impact Assessments.

There is a risk with using the HUDU tool that it will appraise the general links between health determinants and the proposed design without considering the local context, using local community intelligence. When undertaken in a generic way, health inequalities^[2] and the impacts on vulnerable population groups are not always considered. All HIAs should be conducted taking into consideration the local context, existing health inequalities across the wider determinants of health to assess the potential positive and negative health impacts on the existing and new community. In our opinion, the WHIASU Health Impact Assessment toolkit is a more comprehensive methodology to use (to consider health inequalities and the wider determinants of health), than HUDU for conducting HIAs.

Specific comments on HIA Report

The Health Impact Assessment has been quality assessed using the WHIASU Quality Assurance Review Framework (2017). The findings are detailed in this section. They have been broken down into four headings:

1. Clarifications required; 2. Strengths; 3. Weaknesses; and 4. Revisions required

Clarifications required

1. Who was involved in the scoping of HIA? Was input into the scope sought from Hertfordshire Public Health?

Strengths

- The timing of the HIA is at planning application stage.
- The type of HIA is appropriate for the nature, size and scale of the development.
- Provides a description of the proposed development.
- HIA includes references to the National Planning Policy Framework, the North Hertfordshire Local Plan and the Pirton Neighbourhood Plan.
- Report is clearly structured with subheadings.
- Have acknowledged the positive, negative and neutral impacts of the development and recommendations mitigations or enhancement actions have been identified for these impacts.

Weaknesses

1. The Wales Health Impact Assessment Support Unit (WHIASU) HIA methodology has not been used for the HIA. This methodology is endorsed by the Hertfordshire County Council Health Impacts Assessment Position Statement.
2. The 10 Healthy Streets Indicators have not been addressed in the HIA, despite being applicable to all environments.
3. The World Health Organisation's definition of health has not been used in the HIA.
4. HIA does not include a literature review.
5. The HIA does not consider the sensitivity, magnitude, and the significance of effects.
6. The HIA does not consider the health of the existing population of the surrounding areas.
7. The assessment does not consider impact on vulnerable population groups and the impact magnitude (number of people affected and duration of impact/exposure).
8. The HIA does not include a local health profile for Pirton/ North Hertfordshire, considering wider determinants of health such as unemployment and crime data.
9. No constraints or limitations in preparing the HIA have been explained.
10. The cumulative effects of other nearby developments has not been considered.

Revisions required

The HIA needs to answer the question and points raised in the 'clarifications required' and 'weaknesses' sections before re-submitting it for review to Public Health.

Conclusion

The HIA should be revised to incorporate the points listed in the clarifications and weaknesses sections.

Reason: To ensure that the impacts on health and wellbeing, both positive and adverse are adequately identified as a result of the proposed development and to demonstrate that the proposed development contributes to reducing the causes of ill-health, improving health and reducing health inequalities within the district.

If you would like to discuss the points raised, please do not hesitate to contact me (healthypaces@hertfordshire.gov.uk). We are happy to discuss baseline information, data and intelligence that the HIA will need to utilise.

Yours sincerely,

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