

Director of Public Health
Sarah Perman



Hertfordshire County Council
Public Health Service
Farnham House
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Email: healthyplaces@hertfordshire.gov.uk

Date: 28/08/2025

Dear Ms Reynard

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

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 above planning application. For all development proposals Public Health recommends that applicants refer to the Hertfordshire Health and Wellbeing Planning Guidance¹, Public Health England's Spatial Planning for Health evidence resource² and the NHS England 'Putting Health into Place, 10 Principles' Guidance document 2019.³

This sets out our expectation of developers in terms of the delivery of healthy development and communities and focusses on the principle of 'designing in' health and wellbeing as an essential part of the planning process. In doing so, this recognises the *wider determinants of health* as a diverse range of social, economic, and environmental factors which influence

¹ [hertfordshires-health-and-wellbeing-planning-guidance-may-2017.pdf](#)

² [Spatial planning for health: evidence review - GOV.UK](#)

³ [Executive Summary](#)

people's mental and physical health and would demonstrate that an application for development has been *positively prepared*.

National and Local Policy

The recently revised NPPF, in its planning objective 8b, sets out that the planning system has a social objective to support strong, vibrant, and healthy communities and to support communities' health, social and cultural wellbeing. This has been retained from the previous NPPF and should be seen as an equal consideration to environmental and economic objectives.

Paragraph 96 requires planning to aim to achieve healthy places which enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and wellbeing needs and reduce health inequalities between the most and least deprived communities (Paragraph 96c).

Paragraph 98b sets out that planning decisions should take into account and support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community.

The Hertfordshire Health and Wellbeing Strategy 2022 – 2026⁴ sets out the vision and strategic priorities for improving health and wellbeing and reducing health inequalities in the County. This strategy outlines three key overarching ambitions and six themed strategic outcomes we are collectively aspiring to in Hertfordshire.

Specific Comments on the Proposal

1. **Air quality:** The effects of air pollution on health have been intensively studied in recent years. The results of these studies showed that air pollution harms human health and particularly is harmful for those who are already vulnerable because of their age as children and older people or existing health problems. Ambient air pollution has been associated with a multitude of health effects, including mortality, respiratory and cardiovascular hospitalisations, changes in lung function and asthma attacks.⁵ Whilst it is better to reduce air pollution at source than mitigate the consequences, every new development will have an impact on air quality, usually by increasing emissions from buildings or from traffic generation. The links between

⁴ [Hertfordshire Health & Wellbeing Strategy 2022 - 2026](#)

⁵ https://www.researchgate.net/publication/221917185_Impact_of_Air_Pollution_on_Public_Health

poor air quality, human health, and the environment are well documented and is classed by Public Health England as a major public health risk alongside cancer, heart disease and obesity.

Public Health advises that the developer should consider placement of sensitive receptors to air pollution. This includes careful location of any affordable dwelling contribution in areas likely to have low concentrations of air pollutants and noise.

I defer to North Hertfordshire's Environmental Health team to ensure that development will not create air quality problems. In particular, I seek reassurance that this development will not contribute to a worsening of local air quality that may lead to poor health outcomes (through exposure) for the existing community living in the vicinity, or for new and vulnerable populations (such as the elderly or young children).

The Planning Authority may wish to consider the National Institute for Health and Care Excellence (NICE) 2017 Guidance on Outdoor Air Pollution, as well as the 2019 Quality Standard (QS181) which covers road-traffic-related air pollution and its impact on health. The Quality Standard describes high-quality actions in priority areas for improvement, with Quality Statement 2 focussed on planning applications.

The Royal College of Physicians (2025) A Breath of Fresh Air, responding to the Health Challenges of Modern Air Pollution⁶ provides updated evidence on the impact poor air quality has on health and provides recommendations to reduce air pollution to prevent illness. The report recommends a Health in All Policies approach to the build environment and delivery of local services in urban and rural areas to maximise health gain. The report also recommends national and local governments need to deliver improvements in the provision of public transport to reduce emissions from personal vehicle travel and ensure that the infrastructure needed for increased active travel is in place, with the goal of achieving 50% of urban journeys being made on foot or by bike by 2030.

2. **Indoor air quality:** Exposure to poor indoor air quality can impact negatively on health⁷. The National Institute for Clinical Excellence (NICE) have recently published guidance on indoor air quality (NICE guideline NG149).⁸

⁶ [21072025-update-rcp-full-report-a-breath-of-fresh-air.pdf](#)

⁷ <https://www.nice.org.uk/guidance/ng149/resources/visual-summary-pdf-7022755693>

⁸ <https://www.nice.org.uk/guidance/ng149>

3. **Creating access for all:** To meet the needs of an ageing population and individuals with physical disabilities and limiting illnesses, it is recommended to give consideration to the accessibility across the development. This includes: footpath surfaces and colour schemes (particularly for people with dementia) and street furniture design (i.e. seating suitable for older adults). We recommend adopting a [Healthy Streets](#) approach to improve social, economic, and environmental sustainability through how public spaces are designed and managed.
4. **Adoption of active travel behaviours from the new occupants:** We recommend there is appropriate signage for pedestrian/cycle routes towards key local destinations (including the bus and train stations) and rights of way which includes journey times. To encourage the adoption of new active travel behaviours, this needs to be in place prior to first occupation when individuals are more susceptible to change. The planning authority may wish to consider this by way of a condition.
5. **Active Design:** Sport England, with support from Active Travel England and OHID, has produced 'Active Design'⁹ a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design which is consistent with paragraphs 96 and 129 of the NPPF. Sport England commends the use of the guidance in the master planning process for new residential developments.

In particular, the checklist in the Active Design guidance should be used for informing the design and consideration of how the checklist has been considered should be included in a planning application e.g. as part of the Health Impact Assessment or Design and Access Statement. For outline planning applications in particular, the planning authority may wish to consider this by way of a condition to request details to be submitted and approved which demonstrate how promoting physical activity has been considered in the design and layout of the development. A standard condition can be provided upon request.

⁹ <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

6. **Community Sports Facilities:** Consideration should be given to the content of Sport England's response to the planning application. General planning guidance and advice can be found on Sport England's website [Sport England Planning Guidance](#).

If the proposal involves the provision of a new sports facility, then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition, to ensure they are fit for purpose, such facilities should be designed in accordance with design guidance notes produced by Sport England, or the relevant sport National Governing Body (NGB). These notes cover: artificial lighting, accessible facilities, clubhouses, swimming pools, combined leisure provision, outdoor surfaces (including both artificial sports surfaces and natural turf), sports halls and cost guidance. The following link also contains details of sport specific guidance produced by NGBs [Design Guidance Notes](#)

Sport England's Playing Pitch Calculator [Playing Pitch Calculator](#) and Sports Facility Calculator [Sports Facility Calculator](#) tools can be used to estimate the additional demand for key community sports facilities from a new population and convert that demand into sport facility requirements with indicative costs that can be used as starting point for securing developer contributions. Sport England can provide further advice upon request.

7. **Affordable Housing:** having a good quality home is important to our health and wellbeing and ensuring accessibility to affordable housing is a priority across the County. It is important that the development provides its affordable housing in a way which is integrated and avoids demarcation. It should also have equal access to the green space provided.
8. **Provision of healthy, affordable food:** The environment in which we live, work and play has a considerable influence on our food choices.¹⁰ Easy access to affordable, healthy food choices can help to support a balanced diet and prevent unhealthy weight in the population.¹¹

¹⁰<https://publichealthmatters.blog.gov.uk/2019/08/08/health-matters-addressing-the-food-environment-as-part-of-a-local-whole-systems-approach-to-obesity/>

¹¹ <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=7166d749-288a-4306-bb74-10b6c4ffd460>

9. **Contributions towards modal shift and active recreation:** We recommend the planning authority considers seeking contributions by way of a planning condition towards local schemes to encourage modal shift towards active and sustainable travel.
10. **Charging points for electric vehicles:** To encourage the use of cleaner vehicles, electric charging points should be provided for all new residential and non-residential buildings with associated parking.
11. **Car club:** We would like to see the developer making a contribution to setting up a car club.
12. **Safe crossing points beyond site perimeter:** to encourage residents to use active travel, a key indicator will be perceptions of safety. Safe crossing points will encourage behaviour change for residents to use active travel in favour of car usage.

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 that an HIA is undertaken for developments in excess of 100 residential units. It also clearly 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 the link below:

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

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 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.

Given the scale of the proposed development, Public Health will require the developer to undertake a Health Impact Assessment (HIA) to assess the potential positive and negative health impacts of this development. In doing so, the applicant would be demonstrating how it is meeting the various requirements of the NPPF, chapter 8.

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 Checklist¹² for example);

¹² <https://www.hertfordshire.gov.uk/media-library/documents/public-health/health/appendix-a-populationgroups-checklist.pdf>

- 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 and at this stage of the planning process, a Rapid HIA would be sufficient. However, if further into the planning process, any significant Public Health concerns are identified there may be a need to consider conducting a Comprehensive HIA.

The applicant should consider how much more work this would entail 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 proposals represent significant change to the built environment which, whilst intended as positive, may have unintended negative impacts on health that an HIA may highlight. There are 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-inherts/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,

Hollie Rawlings

Healthy Places Officer – Planning

Hertfordshire Public Health