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Dear Naomi

Location: Land At Roundwood Back Lane Graveley Hertfordshire

Proposal: Residential development of 281 dwellings and associated roads, parking, realignment of Back Lane, drainage, landscaping, open space, servicing facilities and associated works

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 2019³.

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 people's mental and physical health⁴ 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 (Para 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 – 2026⁵ 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.

Health Impact Assessment

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 hospitalizations, changes in lung function and asthma attacks.⁶ 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 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 the 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 the North Hertfordshire District Council Environmental Health team to ensure that the 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.

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.
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).
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 in occupation when individuals are more susceptible to change. The planning authority may wish to consider this by way of a condition.
5. **Active Design:** The development should maximise opportunities for encouraging physical activity by following the guidance in Sport England's and Public Health England's Active Design guidance <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>. 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. 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.
6. **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.
8. **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.
9. **Car club:** We would like to see the developer making a contribution to setting up a car club.
10. **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, Herts County Council adopted a HIA Position Statement which does not set a threshold for HIA for non-residential planning proposals, this should be determined on a case by case basis.

The HIA Position Statement 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-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 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 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 rapid HIA to be undertaken. 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-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 it focusses on the 'wider determinants of health'¹⁰ and 'health inequalities'.¹¹ We are happy to discuss baseline information, data and intelligence that the HIA will need to utilise.

Yours sincerely,

Hollie Rawlings
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Hertfordshire Public Health