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Ref: 26/00558/HYA
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To the Case Officer

Location: Land At Pound Farm, Bedford Road, Ickleford, Hertfordshire, SG5 3RS

Proposal: Hybrid application for a mixed-use development to provide a total of up to 230 dwellings, a residential care home (Use Class C2), an Independent Special School (ISS) and new sports pitch, with access from Bedford Road, landscaping, parking and SuDS comprising: Phase 1 Application for full planning permission for the erection of 100 dwellings, an ISS, new sports pitch and associated parking, landscaping, open space and SuDS; Phase 2 An outline application on the remaining part of the site for the erection of up to 130 dwellings, a residential care home (Use Class C2) and associated works with access from Bedford Road (all matters reserved apart from access).

App. No: 26/00558/HYA

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 Growth Board's recently adopted Healthy and Safe Places Framework¹, as well as the Hertfordshire Health and Wellbeing Planning Guidance², Public Health England's Spatial Planning for Health evidence resource³ and the NHS England 'Putting Health into Place, 10 Principles' Guidance document 2019.⁴

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 health and would demonstrate that an application for development has been *positively prepared*.

National and Local Policy

The recently revised NPPF 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).

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.

Local health evidence that is specifically relevant to planning can be found in the Hertfordshire Healthy Places Joint Strategic Needs Assessment (JSNA)⁶.

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.⁷ 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.

¹ <https://hertshealthyplacemaking-hertscc.hub.arcgis.com/>

² hertfordshires-health-and-wellbeing-planning-guidance-may-2017.pdf

³ [Spatial planning for health: evidence review - GOV.UK](https://www.gov.uk/spatial-planning-for-health-evidence-review)

⁴ [Executive Summary](#)

⁵ [Hertfordshire Health & Wellbeing Strategy 2022 - 2026](#)

⁶ <https://www.hertfordshire.gov.uk/microsites/jsna/jsna-documents/healthy-places-jsna.pdf>

⁷ https://www.researchgate.net/publication/221917185_Impact_of_Air_Pollution_on_Public_Health

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.

We defer to the North Herts Environmental Health team to ensure that development will not create air quality problems. In particular, we 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 Pollution'⁸ 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 health⁹. The National Institute for Clinical Excellence (NICE) have recently published guidance on indoor air quality (NICE guideline NG149)¹⁰.
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 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'¹¹ 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

⁸ [21072025-update-rcp-full-report-a-breath-of-fresh-air.pdf](https://www.nice.org.uk/guidance/ng149/resources/visual-summary-pdf-7022755693)

⁹ <https://www.nice.org.uk/guidance/ng149/resources/visual-summary-pdf-7022755693>

¹⁰ <https://www.nice.org.uk/guidance/ng149>

¹¹ <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

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 135 of the NPPF. Sport England recommends 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. 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.

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. **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.
9. **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.
10. **Car club:** We would like to see the developer making a contribution to setting up a car club.

- 11. 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 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 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 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.

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, though HIA scoping may identify the need for a comprehensive HIA. Should the application require an EIA process, a comprehensive HIA will be required. 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.

We note that this application has two separate phases. We recommend that a single HIA be undertaken to cover both phases, as this will better capture any cumulative impacts.

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
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