

Director of Public Health

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Mr David Elmore
Planning Dept
Welwyn Hatfield Borough Council
By Email

Email: healthyplaces@hertfordshire.gov.uk

Date: 12th July 2022

Dear David,

Location: Former Beales Hotel Comet Way Hatfield AL10 9NG

Proposal: **Demolition of existing building and construction of 145 residential units (Use Class C3) with private and communal amenity space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure.**

App. No: 6/2022/1355/MAJ

Thank you for the opportunity to comment on the above outline 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

¹ <https://www.hertfordshire.gov.uk/media-library/documents/public-health/hertfordshire-health-and-wellbeing-planning-guidance-may-2017.pdf>

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/625568/Spatial_planning_for_health_an_evidence_resource.pdf

³ <https://www.england.nhs.uk/wp-content/uploads/2019/09/hip-executive-summary.pdf>

⁴ <https://www.gov.uk/government/publications/health-profile-for-england-2018/chapter-6-wider-determinants-of-health>

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 and social wellbeing*. This has been retained from the previous NPPF and should be seen as an equal consideration to environmental and economic objectives. Paragraph 92 requires planning to aim to achieve healthy places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs (Para 92c).

Paragraph 93b 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. This is supported through the Welwyn Hatfield Local Plan Draft Submission which recognises healthy communities (Strategic Objective 3) and the need for well planned development that promotes healthy and active lifestyles (Policy SP1). Health and Wellbeing Strategy for Welwyn Hatfield Borough 2020-2024⁵, further sets out its aspirations for delivering health and wellbeing priorities through spatial planning.

Local Health Priorities

The health of people in the Welwyn Hatfield Borough is varied compared to the England average. Health inequalities exist; about 14% (2,800) of children live in low income families, whilst the difference in life expectancy between the most and least deprived areas of the Borough is 8.9 years. Across the Borough there are clear local health priorities, including reducing obesity and increasing physical activity⁶.

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.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.

The submitted Air Quality Assessment May 2022 is carried out as per industry standard guidelines and practice, with the National Air Quality Objectives (NAQOS) and their Limit Values forming the basis of the air quality assessment of the proposed development. The air pollution-human health landscape is changing however, not least with the evidence presented, and eventual outcome, of the recent Coroner's Inquest concerning the death of Ella Kissi-Debrah (December 2020). In particular, the reiteration from expert witnesses that air pollution is a public health risk regardless of legal threshold limits - whereas standard assessments are predicated by EU thresholds. To this end, and also, given that there is substantial inter-individual variability in exposure and in the response in a given exposure (as demonstrated by the recent Coroner's Inquest outcome), it is important to use the standard-setting

⁵ <https://democracy.welhat.gov.uk/documents/s13541/HWB%20Appendix%201%20Health%20and%20Wellbeing%20Strategy%20for%20Welwyn%20Hatfield%20Borough%201%20DRAFT.pdf>

⁶ <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000241.html?area-name=Welwyn%20Hatfield>

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

process during air quality assessment **with the overall aim of achieving the lowest concentrations possible** in the context of local constraints, capabilities and public health priorities.

Air quality assessments for planning purposes most often focus on mitigation of increased emissions generated by new development - and often by 'soft' measures. What often isn't considered is the mitigation of exposure of new communities to air pollution regardless of its source, nor the mitigation of exposure of existing communities to increased air pollution arising from the development itself.

With that in mind, the Public Health view is that as the development proposals for emerge, consideration is given to Public Health England's 2019 "net health gain" principles⁸ which, if adopted, intend to deliver an overall benefit to people's public health. In effect this means that any new development should be clean by design, incorporating interventions into design to reduce emissions, exposure to pollutants and contribute to better air quality management; applicable irrespective of air quality assessments.

Public Health recommend that these principles are considered in addition to standard methodologies.

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:** 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.
6. **Provision of healthy, affordable food:** We seek to encourage affordable, healthy food choices and a balance in the range of food outlets occupying the retail space to enable individuals to make healthy choices, whilst promoting local commercial diversity. The environment in which we live, work and play has a considerable influence on our food choices¹¹. Easy access to affordable, healthy food choices can help to support a balanced diet and prevent unhealthy weight in the

⁸ <https://www.gov.uk/government/publications/improving-outdoor-air-quality-and-health-review-of-interventions>

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

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

¹¹ <https://publichealthmatters.blog.gov.uk/2019/08/08/health-matters-addressing-the-food-environment-as-part-of-a-local-whole-systems-approach-to-obesity/>

- population¹². We look to the local planning authority to consider licencing restrictions for food outlets within this development to provide a balance of food choices available.
7. **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. No provision has been provided as part of this development to encourage active play. We recommend developer contributions are made to improve local play areas close to the proposed development.

Health Impact Assessment

We recommend that a Health Impact Assessment is undertaken for developments in excess of 100 residential units. Our view is that this is an essential assessment for any development proposal to demonstrate that it will not have negative implications for the physical health and mental wellbeing of both existing communities in the vicinity, as well as the future residents of the new development. Health Impact Assessment can also be a tool through which to demonstrate the opportunities of a proposal and how a development has been positively planned.

In November 2019, Herts County Council adopted a HIA Position Statement. This sets out when a HIA should be undertaken and frameworks to use for each stage of the HIA process. The Position Statement includes guidance on the quality assurance framework that will be used to assess HIAs that are submitted with planning applications. The HIA Position Statement and supporting appendices can be downloaded from the weblink below: <https://www.hertfordshire.gov.uk/healthyplaces>

Public Health notes that the developer has not submitted an HIA as part of the planning application and the health impacts have not been identified by the proponent. Public Health also acknowledges that to conduct an HIA at this stage may not be feasible by the applicant. Nevertheless, we are of a view that there is still scope for the developer to provide some reassurances that human health issues have been addressed, without going into excessive lengths in the process. To this end, Public Health would like to recommend for the planning authority to consider, as part of a planning condition, for the developer to provide a short statement to give assurances of how this site will promote good health and wellbeing.

A short statement of human health can include the impacts on health and wellbeing, both positive and adverse and show how the proposal would address any adverse impacts. This includes the impact on creating a healthy living environment (e.g. noise levels, air quality) as well as how the development supports people in making healthy choices (e.g. being more physically active, healthy eating and drinking) and that makes these choices easier.

Reason: To ensure that the impacts on health and wellbeing, both positive and adverse are 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 Borough.

If you would like to discuss the points raised, please do not hesitate to contact me (healthyplaces@hertfordshire.gov.uk).

Yours sincerely,

¹² <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=7166d749-288a-4306-bb74-10b6c4ffd460>

Irina Davis

Healthy Places Officer – Planning & Transport
Hertfordshire Public Health