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Sukhdeep Jhooti
Welwyn Hatfield Borough Council Planning Dept
Welwyn Hatfield Borough Council
By Email: planning@welhat.gov.uk

Email: publichealth@hertfordshire.gov.uk

Date: 28th January 2021

Dear Sukhdeep,

Application Reference: 6/2020/3222/MAJ

Location: Volkswagen Van Centre Comet Way Hatfield AL10 9TF

Proposal: Demolition of existing buildings and construction of new building comprising 118 residential apartments, layout of parking areas, landscaping, electricity substation and ancillary development.

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 and social wellbeing*. This has been retained from the previous NPPF and should be seen as an equal

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>

consideration to environmental and economic objectives. Paragraph 91 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 91c).

Paragraph 92b 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.

Local Health Priorities

The health of people in Welwyn Hatfield is varied compared with the England average. About 14% (2,800) of children live in low income families, which is significantly higher than Hertfordshire average.⁵ Life expectancy for both men and women is higher than the England average. Life expectancy is 8.9 years lower for men and 8.9 years lower for women in the most deprived areas of Welwyn Hatfield than in the least deprived areas.⁶

Health indicators in the Local Health Profile for Welwyn Hatfield are generally similar to the Hertfordshire averages – there are some exceptions which have been highlighted below. Life expectancy at birth for males is 80.7 years and 84.6 years for females (slightly higher than Hertfordshire average).⁷ 12% of people report having a limiting long-term illness or disability (which is lower than the Hertfordshire average); 18% of children in reception have excess weight.⁸

These health and wellbeing challenges can be significantly influenced by the built environment to benefit the residents of the proposed development and existing residents in the local area.

Specific Comments on the Proposal

In terms of the development design, there are some points for consideration detailed below:

1. **Noise:** exposure to excessive noise can have a detrimental effect on mental and physical health. Evidence of the non-auditory effects of environmental noise exposure on public health is growing. Observational and experimental studies have shown that noise exposure leads to annoyance, disturbs sleep and causes daytime sleepiness, affects patient outcomes and staff performance in hospitals, increases the occurrence of hypertension and cardiovascular disease, and impairs cognitive performance in schoolchildren⁹. We seek clarification to some of the points raised in the Noise Assessment (November 2020) to be reassured new and existing residents will not be exposed to excessive levels of noise:
 - a) On page 11 of the Noise Assessment, it provides suggested wording for a planning condition in relation to the internal noise levels in the new units. There doesn't appear to be any suggested planning conditions to mitigate against excessive exposure to noise for existing residents. We seek assurance that planning conditions will cover mitigation requirements for both new and existing communities. Given the evidence that environmental noise can have a detrimental effect on children's academic performance (particularly those with special educational needs), and the existence of nursery near the development, the proposed Noise Impact Assessment could have some focus on this.
We defer to Welwyn Hatfield Environmental Health to advise on the required mitigation measures.
2. **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.¹⁰ 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

⁵ <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000241.html?area-name=Welwyn%20Hatfield>

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

⁷ <https://www.hertshealthevidence.org/documents/thematic/HealthProfiles-Hertfordshiredistricts-Hertfordshire-2019-07.pdf>

⁸ <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000241.html?area-name=Welwyn%20Hatfield>

⁹ **Auditory and non-auditory effects of noise on health.** *Basner, M et al(2014). Lancet 2014;383:1325-32*

¹⁰ https://www.researchgate.net/publication/221917185_Impact_of_Air_Pollution_on_Public_Health

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 November 2020 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 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" principles¹¹ 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.

3. **Indoor air quality:** Exposure to poor indoor air quality can impact negatively on health¹². The National Institute for Clinical Excellence (NICE) have recently published guidance on indoor air quality (NICE guideline NG149)¹³.
4. **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).
5. **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.
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 choices¹⁴. Easy access to affordable, healthy food choices can help to support a balanced

¹¹ <https://www.gov.uk/government/publications/improving-outdoor-air-quality-and-health-review-of-interventions>

¹² <https://www.nice.org.uk/guidance/ng149/resources/visual-summary-pdf-7022755693>

¹³ <https://www.nice.org.uk/guidance/ng149>

¹⁴ <https://publichealthmatters.blog.gov.uk/2019/08/08/health-matters-addressing-the-food-environment-as-part-of-a-local-whole-systems-approach-to-obesity/>

diet and prevent unhealthy weight in the population¹⁵. 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. **Disabled car parking provision:** The proposed development includes wheelchair accessible apartments. Only 16 accessible car parking spaces will be provided on site – if additional spaces are required, how far away from the development are they and how accessible are they?
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. 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.
9. **Parking overspill near the development:** Anti-social parking often discourages walking, cycling and informal play. How will the planning authority enforce parking restrictions to avoid overspill to surrounding areas?
10. **Car parking provision:** The proposed development includes provision for 100 parking spaces in accordance with the Councils' SPD Guidance: Parking Standards (2004), which set out maximum requirements only. The total forecast parking required for the proposed development is 89. Given the amount of parking allocated in this well connected by public transport location, it is not clear how such approach can be considered sustainable, and thus failing to facilitate active travel, reduce harmful pollutants from traffic and thus people's exposure to air pollution.
11. **Car club:** We would like to see the developer making a contribution to setting up a car club.
12. **Encourage use of stairwells instead of lifts:** To promote positive behaviours to increase physical activity levels, we recommend the planning authority seeks innovative design solutions which encourage active behaviours. This will provide an intervention to build physical activity into daily life and contribute towards increasing physical activity levels. It is acknowledged residents may not use the stairs to climb to the higher levels. However, over time, they may be able to climb more flights of stairs as fitness levels increase before using the lift.

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 re-assurances 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.

¹⁵ <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=7166d749-288a-4306-bb74-10b6c4ffd460>

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 (publichealth@hertfordshire.gov.uk).

Yours sincerely,

Irina Davis

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