

## Director of Public Health

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Gerry Ansell,  
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By Email

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Date: 21 December 2018

Dear Gerry,

**Re: 6/2018/2768/OUTLINE/ Outline planning application for 1,100 dwellings etc, including 31 elderly persons extra care units on land at Hatfield Business Park**

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 Guidance<sup>1</sup> and Public Health England's Spatial Planning for Health evidence resource<sup>2</sup>. 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<sup>3</sup>, and would demonstrate that an application for development has been *positively prepared*.

### *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 activity<sup>4</sup>.

The proposed application sits within the Hatfield Villages Ward, however this may not be representative of the potential development population, which is likely to share population characteristics with the Hatfield Central Ward. Ward level data<sup>5</sup> suggests that there are some areas in Hatfield where general health and levels of long term illness or limiting disability are significantly worse than the Hertfordshire average. Overcrowding, general health and child obesity, are also

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

<sup>2</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/625568/Spatial\\_planning\\_for\\_health\\_an\\_evidence\\_resource.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/625568/Spatial_planning_for_health_an_evidence_resource.pdf)

<sup>3</sup> <https://www.gov.uk/government/publications/health-profile-for-england-2018/chapter-6-wider-determinants-of-health>

<sup>4</sup> [https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E1000015?place\\_name=Hatfield&search\\_type=place-name](https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E1000015?place_name=Hatfield&search_type=place-name)

<sup>5</sup> <https://www.hertshealthevidence.org/documents/thematic/wardprofiles-welwynhatfield-district-rug-2018-01.pdf>

notable challenges for some wards more than others. Such health and wellbeing challenges can be significantly influenced by the built environment, with opportunities to proactively tackle the challenges through positive planning.

#### *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 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. 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). Welwyn Hatfield Borough Council's Public Health and Wellbeing Strategic Framework (2014), and its 2015-2018 revision<sup>6</sup>, further sets out its aspirations for delivering health and wellbeing priorities through spatial planning.

A development of this size and location will influence the health and wellbeing of both the new occupants and existing local communities. It is surprising, therefore, that the Environmental Statement submitted by the Applicant does not acknowledge or reference either national NPPF guidance or local policy in relation to the development of healthy places and communities.

#### *EIA and Health Impact Assessment*

As you will be aware, following changes to Environmental Impact Assessment (EIA) regulations in 2017, all EIAs are now required to consider impact on human health. The regulations are not prescriptive on how impact on human health is assessed, however the Public Health position is that Health Impact Assessment (HIA) is a tool that can assist development applications in meeting the human health requirements.

The nature of HIA differs to EIA in that it seeks to identify positive outcomes and, crucially, does not solely focus on environmental factors but also socio-economic and cultural influences a development may have on the health and wellbeing of new and existing communities. This can therefore offer an important opportunity to demonstrate that the application for development has been positively prepared.

It is unfortunate, therefore, that the Applicant chose not to undertake an Environmental Scoping Opinion which would have allowed much earlier engagement; had this been undertaken, the Public Health advice would have articulated that it was in the Applicants interest to have undertaken an HIA as an appropriate assessment for a development of this size. Our advice would have stated for clarity our opinion that to meet the requirement of the EIA regulations, consideration must also be given to the wider determinants of health, not solely limited to environmental public health concerns.

#### *Information provided*

Noting the emphasis the Applicant places on sustainable travel, green infrastructure and open space, and the attention to environmental public health issues in Chapters 7,8 and 9, the proposed development has the potential to promote good health and wellbeing.

However, on the basis of the documentation submitted, there is insufficient information to enable us to understand in more depth how the development might influence the wider determinants of health related (but not limited) to:

- Housing mix, affordable housing allocation

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<sup>6</sup> [http://www.welhatports.org.uk/uploaded/files/WHBC\\_Strategy\\_2015\\_draft\\_final.pdf](http://www.welhatports.org.uk/uploaded/files/WHBC_Strategy_2015_draft_final.pdf)

- Housing quality and design standards
- Parking and shared space management
- Infrastructure delivery phasing
- Green/open space design and management
- Promotion of informal outdoor play through design
- Road safety through design
- Development accessibility across the lifecourse

Further to this, our reading of the information submitted leaves us with further queries in relation to:

- the rationale behind some of the conclusions reached in the air quality assessment and the transport assessment;
- the omission of any reference to a number of known local concerns, including:
  - an existing S106 provision for Ellenbrook Park, which the County Council wishes to pursue and which would deliver against local health priorities;
  - existing public concerns in relation to Bromate contamination known to be present at the former Hatfield aerodrome site, adjacent to the proposed development.

Until we have explored these further, we cannot be satisfied that these issues have been considered robustly as part of the application.

#### *Conclusion*

At this point in time, Public Health therefore *objects* to this application on the basis that:

1. It has not fulfilled, in our opinion, the requirements of the 2017 EIA regulations in its consideration of human health;
2. There has been no consideration of how the proposed development may influence the wider determinants of health for both the new and existing communities; and
3. There is not enough information to reach a view on whether the development overall is likely to offer positive benefits for local health and wellbeing.

Further engagement by the Applicant would be welcomed in order to explore further the issues raised above.

Yours sincerely,

**Bethan Clemence**

Strategic Lead – Healthy Places  
Hertfordshire Public Health