

## Director of Public Health

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Ms Clare Howe  
Planning Dept  
Welwyn Hatfield Borough Council  
By Email

**Email:** [publichealth@hertfordshire.gov.uk](mailto:publichealth@hertfordshire.gov.uk)

**Date:** 28<sup>th</sup> January 2021

Dear Clare,

**Location:** Hatfield Business Park, Frobisher Way, Hatfield AL10 9SL.

**Proposal:** Outline planning permission for a large-scale mixed use development including 1,100 new homes and supporting infrastructure including a primary school, local centre and open space with all matters reserved.

**App. No:** 6/2018/2768/OUTLINE

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>, Public Health England's Spatial Planning for Health evidence resource<sup>2</sup> and the NHS England 'Putting Health into Place, 10 Principles' Guidance document 2019<sup>3</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>4</sup>, 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*

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

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

*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>5</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.

### *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>6</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>7</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 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.

### *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.<sup>8</sup> 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,

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<sup>5</sup> [http://www.welhatsports.org.uk/uploaded/files/WHBC\\_Strategy\\_2015\\_draft\\_final.pdf](http://www.welhatsports.org.uk/uploaded/files/WHBC_Strategy_2015_draft_final.pdf)

<sup>6</sup> [https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E10000015?place\\_name=Hatfield&search\\_type=place-name](https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E10000015?place_name=Hatfield&search_type=place-name)

<sup>7</sup> <https://www.hertshealthevidence.org/documents/thematic/wardprofiles-welwynhatfield-district-rug-2018-01.pdf>

<sup>8</sup> [https://www.researchgate.net/publication/221917185\\_Impact\\_of\\_Air\\_Pollution\\_on\\_Public\\_Health](https://www.researchgate.net/publication/221917185_Impact_of_Air_Pollution_on_Public_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 October 2018 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" principles<sup>9</sup> 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.

### *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

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<sup>9</sup> <https://www.gov.uk/government/publications/improving-outdoor-air-quality-and-health-review-of-interventions>

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 health issues in Chapters 7,8 and 9, the proposed development has the potential to promote good health and wellbeing.

It is positive to see the developer has submitted a Human Health Technical Note (November 2020) as part of the EIA. The Human Health Technical Note aims to address the requirements of the 2017 EIA Regulations in terms of the consideration of human health and summarises how this has been achieved throughout the various technical chapters (mainly environmental health chapters, e.g. air quality, noise, dust) of the 2018 Environmental Statement and 2020 Addendum as appropriate.

However, despite the Human Health Technical Note submitted, there is still insufficient information to enable us to understand in more depth how the development might influence the wider (socio-economic) determinants of health related (but not limited) to:

- Housing mix, affordable housing allocation
- 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

Furthermore, after completing a quality assurance review of the submitted Human Health Technical Note, Public Health has identified several areas where the Note could be strengthened that the developer may wish to address (please refer to Annex 1).

Until the above wider determinants of health are explored further, and the areas listed in Annex 1 are addressed, Public Health cannot be satisfied that these issues have been considered robustly as part of the application.

Public Health, however, notes that the developer has attempted to address our previously made concerns regarding the lack of consideration to human health via submitted Human Health Technical Note as part of the planning application. 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 sufficiently 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 attached to the Human Health Technical Note, on how the development might influence the wider (socio-economic) determinants of health and how the areas identified by Public Health in Annex 1 have been considered.

Reason: To ensure that the impacts on health and wellbeing, both positive and adverse are adequately 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](mailto:HealthyPlaces@hertfordshire.gov.uk)).

Yours sincerely,

**Irina Davis**

Healthy Places Officer – Planning & Transport  
Hertfordshire Public Health

## Annex 1 Human Health Technical Note Quality Assurance

### Strengths

- HIA has considered the health of the existing population of the surrounding areas.
- WHO definition of health has been used.
- HIA identified health impacts distinguished between the construction phase, the operational phase and where relevant the decommissioning phase.
- The nature of the potential health effects should be detailed.

### Weaknesses

- No attempt has been made to use the Wales Health Impact Assessment Support Unit (WHIASU) HIA methodology as specified in the Herts County Council HIA Position Statement (2019)<sup>10</sup>.
- Expertise of the assessor has not been stated in the HIA. In order 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.
- National policy context is given but it is limited to NPPF only.
- The identification of potential health impacts in HIA have not considered the wider determinants of health such as:
  - Housing mix, affordable housing allocation
  - 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 lifecycle
- HIA has not included references to the priorities and issues identified in the local Health and Wellbeing Strategy.
- The public health profile has not established an information base from which requirements for health protection, health improvement and health services can be assessed for the area affected by the development.
- The HIA has not described the screening and scoping stage of the HIA and the methods used in these stages.
- A description of how the quantitative evidence was gathered and analysed was not given and its relevance to the HIA has not been justified.
- No constraints or limitations in preparing the HIA have been explained.
- The report does not identify and justify the use of any standards and thresholds used to assess the significance of health impacts.
- Inequalities in the distribution of predicted health impacts have not been adequately investigated and the effects of these inequalities has not been stated.

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<sup>10</sup> <https://www.hertfordshire.gov.uk/media-library/documents/public-health/health/hia-position-statement.pdf>