

Director of Public Health

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Welwyn Hatfield Borough Council Planning Dept
Welwyn Hatfield Borough Council
By Email: w.myers@welhat.gov.uk

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Date: 6th August 2021

Dear William,

Application Reference: 6/2021/0181/MAJ

Location: Former Shredded Wheat Factory, Broadwater Road, Welwyn Garden City, AL7 1RR

Proposal: Hybrid planning application comprising: Detailed Planning Application for 399 Private Rented Sector (PRS) dwellings and 153 dwellings (Class C3), 250 units of residential care accommodation for the elderly (Use Class C2) with associated communal facilities, 15,247m2 of community and commercial hub (Use Classes E and F1) with associated cycling hub, car parking, access, landscaping, public art and other supporting infrastructure; and Outline Planning Application for up to 418 dwellings (Class C3) with all matters reserved except access.

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*.

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/phi-executive-summary.pdf>

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

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 schoolchildren⁵. We defer to Welwyn Hatfield Environmental Health to advise on the required mitigation measures.
2. **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).
3. **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.
4. **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. 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 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.

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

⁵ **Auditory and non-auditory effects of noise on health.** *Basner, M et al(2014).* *Lancet* 2014;383:1325-32

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,

Irina Davis

Healthy Places Officer – Planning & Transport
Hertfordshire Public Health