

# WHIASU response to Welsh Government Planning Bill Consultation

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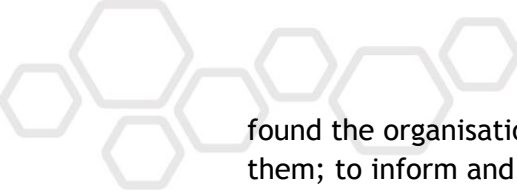




## Introduction

1. We welcome the opportunity to respond as part of the consultation on the Planning Bill for Wales and we have a number of comments.
2. Planning policies, Planning Departments and planning decisions can have a significant impact on health and well-being - both directly and through their influence on the wider determinants of health and wellbeing. They shape the environment we live in, make decisions about the siting and development of facilities (e.g. housing, green space, retail, leisure, employment, transport, energy and waste) and how we access and use these. Decisions can facilitate opportunities for healthy behaviour through, for example, the allocation and quality of green space for promoting physical activity, the availability of cycle paths and safe walking routes to encourage modal change and access to fresh, quality food to improve dietary choices or limit choices to do so (i.e. supermarkets in out of town retail parks that we drive to versus easy to walk or cycle to local shops). As obesity and associated ill health increases in Wales there is a need to make these connections more explicit.
3. Studies have shown that open spaces and well planned integrated people friendly urban centres can contribute to promoting physical activity and well being and can help to reduce being overweight and obesity by encouraging walking and cycling and can improve mental wellbeing for all age ranges. Well planned and integrated transport links can aid physical activity. It is essential in childhood for social development and in older people for increasing social interaction and mental wellbeing. At a community level, it has also been shown that green space and a well planned urban environment in a neighbourhood can similarly promote and increase social interaction and reduce social isolation. Green spaces in an urban area offer the opportunity for the community to find calmness, be sociable, take exercise and escape to the pressure of urban life. (Netherland Institute for Health Services Research Utrecht, 2006; Institute of Occupational Medicine, 2008; Institute of Rural Health and Countryside Council for Wales, 2008; Faculty of Public Health and Natural England, 2010). The importance of the link between the built and natural environment and being physically active is also recognised within the NICE public health guidance 8 - 'Promoting and creating built or natural environments that encourage and support physical activity' (NICE, 2008).
4. Despite this and until recently, not all local authorities have reflected the importance of health in planning decisions re green spaces, recreational areas or person centred built environments but this is now changing as obesity and associated ill health increases.
5. We recognise that as part of development planning processes, statutory Sustainability Appraisals (SAs) and Environmental Impact Assessments (EIAs) are conducted for certain types/thresholds of development and these are required to consider human and population health within them. However, these only routinely consider environmental health risks and not broader social and community health impacts nor any positive impacts or identify gaps for improvement.

6. The main vehicle for consideration of broad health and wellbeing is health impact assessment (HIA) (Wales Health Impact Assessment Support Unit, 2012). HIA is acknowledged as a systematic, yet flexible process. It provides a practical method of assessing both the potential positive and negative impacts of a proposal or plan on health and well-being and can provide ways in which opportunities for health gain can be maximized and risks to health minimised. HIA considers health in its broadest sense, using the wider determinants of health as a framework through which to identify these impacts via changes to lifestyles, community relationships, labour markets, public services and amenities and other aspects of the social and economic environment. It also highlights any inequalities in the distribution of these in the general population - and on vulnerable groups (such as ethnic minority groups, people with disabilities and older or young people) in particular. It has a number of benefits and can be used to support decision making and provide opportunities for health improvement.
7. Although there is no statutory requirement for HIA in Wales (or the UK) HIA is included as a requirement or advocated as best practice in more and more planning documents. Planning Policy Wales (Edition 7, July 2014) '*Chapter 2: Development Plans*' outlines a requirement for local authorities to undertake a sustainability appraisal as part of their LDP preparation and states that 'the several impacts of plans upon health and its determinants should be considered' as part of this. This process should take account of the impacts of plans on health and well-being and its determinants as well as other social considerations relevant to land use planning. It does not specify HIA by name but this has proved a good lever for it.
8. In addition Planning Policy Wales produced a Technical Advice Note 16 in January 2009, *Sport, Recreation and Open Space* (Welsh Government, 2009) which advises on the role of the planning system in making provision for sport and recreational facilities and informal open places in both the urban and rural environment.
9. There are currently a number of HIAs being, or which have been undertaken, in Wales with regard to land use planning and Local Development Plans in collaboration with WHIASU and PHW. The first HIA was conducted in 2008 and since then another six local authorities have embraced the process using differing levels of HIA. These have proved to be highly beneficial so far and are being completed alongside other assessments and integrated throughout the specific stages. LDP HIA work is currently being undertaken in the following local authorities - Cardiff, Flintshire, Wrexham, Swansea and Denbighshire. The Planning Departments within Denbighshire and Anglesey County Councils have particularly embraced HIA and have used the process to inform planning applications - the former for the 1,700 homes Bodelwyddan Key Strategic Site and the latter for a proposed Biomass plant, a proposed off shore wind farm development and Wylfa Newydd Nuclear Power Station Supplementary Planning Guidance.
10. These recent examples of integrating HIA into LDPs and associated local and regional planning processes have been mainly driven by PHW and the Wales Health Impact Assessment Support Unit (WHIASU) rather than local government Planning Departments and officers. However, once a HIA has been undertaken, these Departments have



found the organisations and HIA Steering Group members to be a valuable resource for them; to inform and influence; to provide evidence and access to it; and strengthen their Plans and proposals. In addition they have recognised the value of the HIA process in meeting the requirements on them to engage and consult with the community on both the development of plans and implementation. Increasingly Welsh government places requirements on public bodies to involve and consult communities during the development of policies, plan and projects. The HIA process is, in part, a participatory engagement tool and can be an effective vehicle through which to consult with communities and key stakeholders including Local Authorities, Local Health Boards and Public Health professionals.

11. Conducting an HIA within planning processes and related sectors can confer considerable benefits and contribute to healthy public policy and urban and rural planning. Not only will HIA assess the potential positive and negative impacts but it will highlight any potential improvements which could be made to maximize health and wellbeing and identify and mitigate for any detrimental impacts or unintended consequences. HIA can make more explicit the links between land use and associated planning decisions, the way that we live and the key health and wellbeing issues today - including obesity, lack of physical activity and the associated risk factors and illnesses.
12. It directly involves the local key organizational and community stakeholders and those who have local knowledge and understanding of how the project, plan or proposal will have a direct and indirect impact on local populations. A HIA can give context to a decision or plan. This includes how a community interacts with its physical and built environment and can facilitate physical health promotion and health improvement by encouraging cycle paths, pedestrian friendly towns, more active travel, open and green space allocation for recreation and sport in LDPs and housing developments and access to the growth and purchase of fresh and affordable food.
13. We believe that the connection to health and wellbeing and HIA should be strengthened and made explicit as part of the proposed Planning Bill. This could significantly influence local authority Planning Departments and associated organisations. It would advocate for health and wellbeing from within Welsh Government Planning itself.
14. At a strategic level, this would strengthen and ensure consistent, joined up and sustainable connections are made with other policy areas i.e. the proposed '*Wellbeing for the Future Generations of Wales Bill*' (2014) (which proposed the introduction of a number of impact assessments); the '*Public Health White Paper*' (2014) (which makes specific reference to 'health impact' within it - paragraph 3.15 - in relation to the planning system); and '*Vibrant and Viable Places (VVP): A New Regeneration Framework*' (2013) (which recommends the use of HIA). It would reinforce the current movement in Welsh Government towards the integration of a '*Health in All Policies*' (HiAP) approach to policy making within the delivery of plans at all levels of national and municipal government. The publication of '*Making the Connections*' (Welsh Assembly Government, 2004) aimed to support the integration of health across all

sectors and promote a consideration of ‘*Health in all Policies*’ (HiAP) (World Health Organisation, 1999; Welsh Government, 2014) which has again recently been reinforced by the *Future Generations Bill*. A focus on integrating ‘*Health in All Policies*’ has led to HIA being seen as a key element in raising awareness of health and wellbeing in Wales throughout other sectors and supporting the health promotion and ill health prevention agendas. This approach ensures that the wider determinants of health, wellbeing and inequalities are considered and connections made with traditionally ‘non-health’ domains such as planning sectors and its stakeholders.


15. Having laid out the important relationship between planning decisions and impacts on health and well being and the role HIA can play within the development and implementation of those plans we would recommend the following:
  
16. That Health Impact Assessment, which considers the wider determinants of health (including, but not restricted to, access to public toilets, exercise, active travel, green space for wellbeing), becomes a statutory requirement within Developments of National Significance, Strategic Development Plans and Local Development Plans (LDPs).
  
17. That a HIA be completed as part of the drafting and preparation of the new National Planning Framework with WHIASU and PHW as named consultees.
  
18. Furthermore we would recommend that more explicit connections are made to broad health and wellbeing and inequalities and that it is reinforced that Public Health Wales act as consultees within the preparation processes that are associated with the development of a new National Planning Framework for Wales, Developments of National Significance, cross boundary Strategic Development Plans (SDPs) and Local Development Plans (LDPs) and their adoption.
  
19. More information on HIA in Wales, the Wales Health Impact Assessment Support Unit (WHIASU) and its recently updated HIA Guidance - ‘HIA: A Practical Guide’ (WHIASU, 2012) can be found on the WHIASU website [www.whiasu.wales.nhs.uk](http://www.whiasu.wales.nhs.uk). LDP HIA reports for Anglesey, Cardiff, Swansea, Blaenau Gwent and Wrexham are also published here.

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