

Consultation Response from KC Public Health**2023/93503 Land off, Roslyn Avenue, Netherton, Huddersfield, HD4 7EW****Outline application for residential development of 82 dwelling and associated works, with layout and access as considerations****Date Responded:****Responding Officer: Tom Mapplethorpe****Responding Ref: 2023/93503 PH****This response is from the Public Health Improvement Team.**

In Kirklees, the Public Health Improvement Team has developed a rapid health impact assessment (HIA) framework and guidance tool for planning applications. The purpose of this is to assess the broad health impacts of proposed developments. The rapid HIA is a material consideration in the Kirklees Local Plan and is listed in the Kirklees Validation List.

The Public Health Improvement Team will carry out its responsibilities, as a consultee for the Kirklees Planning Authority to:

- Apply an agreed rapid HIA screening [methodology](#) at the pre-application / application stage, to identify if a rapid HIA is required for a proposed development.
- Review and respond to a submitted HIA, focusing on the health improvement themes relevant to local and national planning policy and the public health priorities which impact on the immediate and surrounding areas of the proposed development.

The Public Health Improvement Team do not provide specialist technical advice or feedback on development proposals, such as around waste, noise or air quality. This responsibility lies with other council teams and their responses will be provided separately.

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Crosland Moor and Netherton Ward is one of the five most deprived wards in Kirklees, as ranked using data on Indices of Multiple Deprivation.

Local intelligence shows that the following health indicators for adults within Crosland Moor and Netherton Ward, where the proposed development is taking place, are higher than the Kirklees average.

- Levels of obesity (adults and children)
- Rates of adults feeling lonely or isolated – OVER 65
- Rates of adults feeling lonely or isolated – UNDER 65

The submitted rapid health impact assessment has been reviewed. The Public Health Improvement Team have identified further measures and considerations surrounding the development issues, as outlined in the table below, which look to enhance the proposed development and further improve health and wellbeing outcomes for people and place. We kindly request that the measures set out in the table for each development issue are

incorporated into the submitted Rapid Health Impact Assessment and implemented should the application progress.

Development issue	Further measures and considerations
Construction phase	<p>Details on the construction phase in the application are currently sparse, although it is understood that this is because the application is at an early 'outline' stage. Nevertheless, we would expect a full CEMP to be submitted in due course, outlining plans for the construction phase, highlighting any potential impacts to the local population and identifying mitigations to help manage these impacts. We note that an air quality impact assessment has already been completed and would expect the findings of this to be incorporated into the CEMP. It would also need to be informed by a consideration of other factors such as noise, light, odour and waste (as outlined in the rapid health impact assessment guidance). It should also reference personal safety measures and the provision of security on site outside of operating hours, as a mitigation measure to prevent anti-social behaviour and crime.'</p> <p>We welcome the commitment to sustainable construction methods made by the developer. We also welcome the statement of community engagement and encourage the developer to maintain a range of channels for comms and engagement with local communities throughout the construction phase and beyond. This will ensure that there continue to be opportunities for ongoing communication, to keep people informed, for them to raise any issues or concerns, and for these to be picked up and addressed by the developer.</p> <p>We recommend that the developer makes provisions to support the health and wellbeing of staff employed as part of the construction phase, including: -</p> <ul style="list-style-type: none"> - Provision for safe and secure cycle parking on site for staff wishing to travel actively during the construction phase. - Linkage into local health and wellbeing programmes / support services where appropriate and display of information for staff working on site, e.g., Kirklees Wellness Service (https://kirkleeswellnessservice.co.uk/) can provide support around smoking cessation, healthy weight, mental health, etc.

<p>Housing</p>	<p>Reference is made in a very general sense in the design and access statement to some of the underlying principles relating to this issue, e.g., there are general commitments in relation to housing mix, affordable housing and adaptable / accessible spaces. Reference is made to relevant SPD documents which set out local planning policy in relation to some of these issues. Energy efficiency, falls / injury, fire safety and indoor air quality are not currently addressed in the submitted documents.</p> <p>The developer has judged that there will be positive impacts in relation to all aspects relating to housing, despite no systematic consideration of potential health impacts, and it is unclear what the rationale for this is, as none is stated in the submitted HIA.</p> <p>We ask that the developer re-submits this part of the HIA with enough detail to evidence a <u>systematic assessment</u> of potential health impacts in all of the indicated areas and with a <u>clear and evidenced rationale</u> for judgments reached. Where content in other submitted documents is referred to, this needs to be cross-referenced in a way that makes it easy to find the information required (i.e., page numbers).</p>
<p>Active travel and sustainable transport</p>	<p>The travel plan included clearly evidences connectivity to local walking, cycling and public transport infrastructure. Ease of walking and cycling within the development is supported by the current proposed site layout. The design and access statement also makes reference to cycle storage as part of proposed dwellings, which is welcome. The travel plan includes provision for a travel plan coordinator, whose role it is to promote active and sustainable travel.</p> <p>The application could be strengthened even further in this area by inclusion of accessible walking and cycling maps / signage. These should detail any key destinations (e.g., local services and amenities), with distance and time to these destinations via walking, cycling and public transport. The designated travel plan coordinator should support and coordinate this activity.</p>
<p>Access to open and green spaces</p>	<p>It is clear from the submitted plans and design and access statement that the proposed development will be well served in terms of safe, secure and accessible open</p>

	<p>and green space, including provision of playable spaces that incorporate both play equipment and opportunities natural play. Whilst the main open and green space is situated at the very South of the development and so is somewhat less accessible to residents in the North, this is somewhat mitigated by access to green space outside of the development to the North, including ancient woodland. It is also noted that proposal are in line with the Open Space SPD.</p> <p>In line with the national Tobacco Control Plan, we would encourage the developer to include appropriate signage to be erected by designated play areas to promote a voluntary code of no smoking / no vaping as part of the smokefree environment work supported in Kirklees. There is currently smokefree signage in existing playing areas in Kirklees and public health welcome the opportunity to provide input if this would be helpful.</p>
<p>Access to healthy and affordable food</p>	<p>It is clear from the design and access statement and travel plans that there is ease of access to local food retailers via sustainable modes of travel. Plans also include fruit bearing trees and some dedicated space for community growing.</p> <p>We would also recommend that any welcome pack for residents includes details of the local food offer (e.g., supermarkets, convenience stores) and how to reach this via sustainable and active travel options.</p>
<p>Community and personal safety</p>	<p>The range of indicated documents show that aspects such as traffic management, lighting, clear and accessible off-road networks and safe and secure play areas have been adequately considered. Likewise, consideration also seems to have been given to safe and inclusive environments and prevention and of crime and anti-social behaviour, although more specific detail on these points in the HIA submission itself would have been welcome to highlight the key mitigations identified. We note that plans have been informed by the Designing Out Crime Officer during pre-app advice.</p> <p>Welcome packs for new residents should include information and guidance on personal/community safety, including key support services and helplines to report any concerns. They could also include information on local elected members and how to contact them, e.g., by</p>

	<p>going to https://democracy.kirklees.gov.uk/mgMemberIndex.aspx.</p> <p>There is no reference to suicide or self-harm prevention in the documents and no rationale given for the judgment of positive impacts reached. Information needs to be provided by the developer to evidence due consideration of this aspect and conclusions reached.</p>
<p>Employment and economic vibrancy</p>	<p>We welcome the economic and employment opportunities outlined in the submission, as well the developer's commitment to ensure that the benefits of these opportunities are felt by local communities, in an inclusive and sustainable way.</p> <p>To support this commitment further, we would recommend the following: -</p> <ul style="list-style-type: none"> - Consider local labour and supply chain opportunities (e.g., through Meet the Buyer events) from the construction phase onwards. - Liaise with local skills, training and employment programmes led / commissioned by Kirklees Council, as well as local apprenticeship schemes. - Request all (sub) contractors to support positive employment opportunities and support health and wellbeing in the workplace.
<p>Community cohesion and social support</p>	<p>We welcome the approach to community cohesion outlined in the HIA and the statement of community involvement shows a clear intention to meaningfully engage with local communities. On reviewing the community representations received at the time of writing (21st Dec 23) it is clear that a large number of concerns have been raised re: the suitability and viability of this development and these should be meaningfully addressed as part of the developer's approach going forwards. One option to help facilitate this, would be for the applicant to hold a public meeting with local communities, to address concerns raised.</p> <p>We would recommend that dialogue with the local community is kept open throughout the development process so that feedback and insight from local communities can continue to be used to improve the quality of the development and its suitability in terms of meeting the needs of the local population.</p>

Climate change

Air quality and flood risk have been addressed through the relevant submitted documents.

There are gaps around consideration of noise, lighting, odour and waste, as identified by the applicant, and potential health impacts in relation to these do need to be systematically considered and appropriate mitigations identified where required. In addition, green infrastructure and low carbon / renewable energy do not seem to have been addressed in the submitted documents and these should also be considered in light of health impacts as above.

The developer has judged that there will be positive impacts in relation to the above gaps despite no systematic consideration of potential health impacts, and it is unclear what the rationale for this is, as none is stated in the submitted HIA.

We ask that the developer re-submits this part of the HIA with enough detail to evidence a systematic assessment of potential health impacts relating to these gaps above and with a clear and evidenced rationale for judgments reached. Where content in other submitted documents is referred to, this needs to be cross-referenced in a way that makes it easy to find the information required (i.e., page numbers).