

Director of Public Health

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Contact: 01992 556884

Date: 3 April 2018

Dear Felicity,

Re: Revised Application for the phased extraction of 1.25 million tonnes of sand and gravel at Land at Ware Park, Wadesmill Road, Hertfordshire.

We write to provide our Public Health response to this revised application.

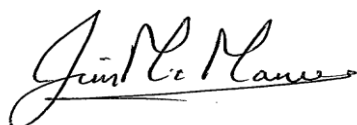
1. Our response to the original application stated that
 - a. On the face of the evidence and guidance available, we did not consider it likely there would be a significant impact on human health from a proposal such as this, provided it could be reasonably and safely assumed that modelling and impact assessments were robust, all identified mitigation measures were assured to be in place, were regularly reviewed, and were adhered to. This remains our view.
 - b. We raised concerns, however, on the Air Quality Assessment conducted by the applicants, which we outlined in our previous responses.
 - c. We also asked for a Health Impact Assessment to be undertaken
2. We note and accept the revisions to the air quality assessment. In view of the level of public concern we have, however, sought independent expert air quality advice on the revised application. The full advice is appended to this letter, but highlights that
 - a. The applicant has not developed a Dust Management Plan (DMP) as part of its proposed mitigation of dust impact.
 - b. The applicant should provide details of a suitable monitoring regime that accompanies the DMP.
3. We accept the advice of our independent experts that a Dust Management Plan as part of the mitigation of dust impact must be developed.
4. We previously requested that a Health Impact Assessment (HIA) was undertaken and this has not been done. We note that the appended expert advice takes the view that a full HIA is not necessary, however we would clarify that this is in relation air quality only.
5. We remain of the view that a Health Impact Assessment (HIA), properly undertaken, would be an important piece of work on a development of this size and scope. HIA is intended to look for all and any impacts including ways to improve opportunities for health and wellbeing as much as looking at negatives and risks. An HIA is broader than the scope of the

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submitted Environmental Statement, which is one of the reasons we recommended this, and could demonstrate a wider range of impacts, including a focus on any potential adverse impacts on vulnerable groups and health inequalities.

- a. For the avoidance of doubt, a Health Impact Assessment is not solely concerned with air quality and, when properly undertaken, has a depth and breadth in understanding the health impact of a given proposal that other assessments – including Environmental Impact Assessment – do not wholly encompass.
6. While we accept the Applicant's revised work on air quality, on the basis that a Health Impact Assessment, properly and robustly undertaken, has not been conducted, we still cannot be assured that all reasonable steps have been taken to consider, identify and minimise potential risks to human health. As a consequence we therefore object to this proposal.
 7. Should a suitable robust Health Impact Assessment be undertaken which robustly demonstrates to our satisfaction and/or that of Public Health England that there would be minimal health impact we would be minded to rescind our objection **provided that** the following conditions be applied to any approval:
 - a. That a Dust Management Plan is developed and adhered to as referred to above.
 - b. That air quality monitoring is provided as part of (a) to reassure the local community;
 - i. that it is put in place as soon as possible to allow for a pre-construction baseline to be developed; and has a plan for mitigation of poor air quality events
 - ii. that it is in place for the lifetime of site operations
 - iii. that it is appropriately located
 - iv. that it includes the monitoring of PM_{2.5}
 - c. That the applicant be required to establish for the lifetime of the development a Community Liaison Group to provide reassurance to the local community, be required to have regard to the Group and be required to take action to mitigate any impacts on human health which may arise including:
 - i. Communicating information regarding construction activities throughout the construction period
 - ii. Establish a community complaints procedure that is advertised widely and with clear timescales in which a response and resolution can be expected
 - iii. Ensure open communication and sharing of information including the display of emissions data on a website.
 8. The purpose of these requirements in our view would be to place the onus upon the operator to demonstrate as much as practicably possible that the operations of the proposed development do not have a detrimental health impact on the local community.

Yours sincerely



**Professor Jim McManus,
Director of Public Health**