

24 January 2025

**Delivered by email**

Planning Policy Team  
Greater Cambridge Shared Planning  
Cambridge City Council  
PO Box 700  
Cambridge  
CB1 0JH

Dear Sir / Madam,

**DRAFT GREATER CAMBRIDGE HEALTH IMPACT ASSESSMENT SUPPLEMENTARY PLANNING DOCUMENT**

We (Turley Economics) write in response to the Draft Greater Cambridge Health Impact Assessment (HIA) Supplementary Planning Document (SPD) on behalf of our client, Vistry Strategic Land ('Vistry'), who have land interests in the Greater Cambridge area, specifically at Land at Fen Ditton.

The SPD is being prepared by Greater Cambridge Shared Planning (GCSP), comprised of Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC) ('the Councils'). The SPD seeks to supplement the policies in the Councils' adopted Local Plans, detailing requirement for HIAs accompanying planning applications for new major development in the areas.

These representations are directed for the attention of GCSP, and seek to provide a concise summary of those elements of the Draft HIA SPD that are supported by Vistry, as well as some elements of the SPD which we consider would benefit from further clarity or commitments.

Turley Economics is an experienced provider of HIAs, having produced assessments for schemes of all sizes in a wide range of built environment sectors across the country (including in Cambridgeshire). Turley Economics also has experience in the deployment of a range of methodological HIA frameworks, corresponding to type and scale of schemes and their socio-economic and geographic context; this includes those published by the NHS Healthy Urban Development Unit (HUDU) and the Wales Health Impact Assessment Support Unit (WHIASU), in addition to locally-produced/locally-specific guidance.

**Elements of the Draft Greater Cambridge HIA SPD which we support**

Vistry is generally supportive of core elements of the Draft Greater Cambridge HIA SPD; these are specified below.

***Agreement with overarching GCSP's HIA agenda and objectives***

Overall, it is affirmed that Vistry are supportive of Greater Cambridgeshire's overarching HIA agenda.

Level 5  
Transmission  
6 Atherton Street  
Manchester, M3 3GS  
T 0161 233 7676 turley.co.uk

It is agreed that HIAs can help support the achievement of key ambitions for new development, such as creating thriving and inclusive places that integrate all members of a community, securing a high quality of life and promoting positive health outcomes (para 1.1). Similarly, it is agreed that HIAs provide a suitable means of and framework for assessing and monitoring the prospective health impacts of development, including both how negative health impacts can be mitigated or prevented, and how health benefits can be maximised (para 3.2).

The Draft HIA SPD sets out that, where required, HIA should be undertaken as early as possible in the planning process to ensure that a development's design, layout and composition can be made to reflect relevant health priorities (para 3.4). This is also agreed as an important point, and reflects Turley Economics past experience in conducting HIAs.

Vistry are supportive of the three HIA objectives as defined in the SPD (para 3.5):

- **Objective 1:** Identify the potential positive and negative health and wellbeing impacts of the proposed development on planned new communities and existing communities in the vicinity of the development.
- **Objective 2:** Highlight any differences in health impacts on sub-population groups, particularly those with protected characteristics such as the BAME communities, LGBTQIA+ communities and disabled people.
- **Objective 3:** Make recommendations to mitigate against any potential negative health impacts and maximise potential positive health impacts, highlighting where possible the groups most affected by development.

#### ***Agreement with principle of the importance of HIA proportionality***

The fact that HIAs “*should be proportionate to the development proposal being considered*” (para 3.7) is considered by Vistry to be a key issue. Equally, it is agreed that “*selecting the appropriate type of HIA for a particular project will depend on the nature and scale of the proposal and the timescales involved*” (para 3.8).

It is considered that the above are particularly salient points in the context of ensuring that HIA requirements should not be so onerous so as to disincentivise development and/or cause unnecessary delays to the planning process, and that the provisions within the HIA SPD serve to support the UK Government's objectives to delivery of the housing, employment opportunities and economic growth that the country needs, whilst also bolstering the ongoing prosperity of Greater Cambridge.

Further comment on HIA proportionality is, albeit, provided below under ‘*Elements of the Draft Greater Cambridge HIA SPD which we recommend would benefit from further clarity or commitments*’.

#### ***Agreement with principle of the importance of early engagement with the Local Planning Authority***

The HIA SPD sets out that the most appropriate type of HIA for a development should be discussed with the Local Planning Authority (LPA) after the Screening stage to prevent complications during later stages of the HIA process (para 3.8). This is considered by Vistry to be an important issue, and, whilst the position set out in the Draft HIA SPD is one with which we agree in principle, it is also worthy of further comment below under ‘*Elements of the Draft Greater Cambridge HIA SPD which we recommend would benefit from further clarity or commitments*’.

#### ***Agreement with principle of topics to be covered by HIA***

Topics relevant to a HIA (para 3.12) are acknowledged, and it is agreed that the topics to be covered by any HIA will be determined on a case-by-case basis.

## **Agreement with principle of SPD's description of 'stages of a HIA'**

Section 5 of the HIA SPD sets out the 'Stages of a Health Impact Assessment'. The procedural steps involved in preparing an assessment are agreed in principle, and the flowchart at Figure 3 is considered particularly instructive by way of an overarching illustration of the process to be undertaken for the various forms of HIA.

## **Elements of the Draft Greater Cambridge HIA SPD which we recommend would benefit from further clarity or commitments**

We note a small number of points which – whilst not necessarily a point of disagreement – Turley Economics view could benefit from further clarity in subsequent drafts of the HIA SPD. These are set out in turn below.

### **Further clarity requested on HIA form and proportionality by scheme size**

The HIA SPD's definitions of the following various forms of HIA (para 3.7) that would be expected to support the planning applications for schemes of various scales (paras 4.1 – 4.3) is noted, with comment provided below:

- **Extended Screening or Desktop HIA:** Required for schemes in South Cambridgeshire (but not Cambridge) for developments between 20 to 100 dwellings or 1,000 sqm to 5,000 sqm<sup>1</sup>.
  - *Whilst it does not appear to be specified in the SPD, Turley Economics assumes that this form of HIA would be suitable for schemes towards the lower end of this size band in South Cambridgeshire. Clarity on this point would be beneficial.*
- **Rapid HIA:** Required for schemes in South Cambridgeshire (but not Cambridge) for developments between 20 to 100 dwellings or 1,000 sqm to 5,000 sqm.
  - *Whilst it does not appear to be specified in the SPD, Turley Economics assumes that this form of HIA would be suitable for schemes towards the upper end of this size band in South Cambridgeshire. Clarity on this point would be beneficial.*
- **Comprehensive or Full HIA:** Required for developments of 100 or more dwellings, or 5,000 sqm or more floorspace across Greater Cambridge.
  - *Turley Economics note that there does not appear to be an explicit distinction made between the HIA requirements for development at the lower end of the threshold (e.g. 100 homes), in comparison with that for a far larger development of a strategic nature (e.g. with upwards of many hundreds – or even several thousand – homes).*

Therefore, whilst, as set out previously, the Draft HIA SPD's general principles regarding proportionality is agreed, it is also considered that further clarity would be helpful in order to provide more detailed guidance on the following points:

- The threshold at which a scheme is required to prepare an Extended Screening / Desktop HIAs in comparison with that of a scheme that would require a Rapid HIA.

---

<sup>1</sup> We note the distinction in requirements for Extended Screening or Rapid HIAs between proposals in the administrative boundaries of SCDC and CCC; namely that they are a requirement for schemes in the former but not the latter geography, on the basis that the health and wellbeing impacts of development can be greater in smaller settlements, particularly where access to infrastructure, community and healthcare facilities, and public transport services can often be limited. This distinction and rationale is understood and agreed with.

- The differing requirements for schemes just above the threshold for a Comprehensive or Full HIA (e.g. a scheme of just over 100 homes) in comparison with that of a far larger strategic development (e.g. with potentially several thousand homes).

Turley Economics acknowledges that the Draft HIA SPD's Appendix 4 ('Local Authority Review Matrix for HIA Reports') confirms that "*a proportionate approach to stakeholder engagement*" should be agreed with the appropriate LPA officer with regard to HIA. It is understood that the scope and depth of stakeholder engagement would be a key point of difference between HIAs of varying scales of schemes (and would, for example, account for a notable point of difference between the 'Full/Comprehensive' HIA prepared for e.g. 100 home development and the 'Full/Comprehensive' HIA prepared for e.g. a 2,000 home scheme). If this assumption is correct, then this is welcomed, and Turley Economics would view that greater prominence should be given to such distinction within the main text of the SPD (e.g. Section 4: '*When is a HIA Required?*') to provide further clarity for applicants.

As set out above, it is re-iterated that HIA requirements should be considered on a proportionate basis, so as to ensure that HIA requirements should not be so onerous so as to disincentivise development and/or cause unnecessary delays to the planning process. As such, as much detail as possible with regard to HIA requirements and forms for various size of schemes would assist in providing applicants with as much certainty as possible at an early stage.

#### ***Request for LPA commitment to engage with applicants and to be informed about HIA requirements***

As noted above, the Draft HIA SPD states that applicants should seek to engage with LPAs on HIA scopes and requirements. Whilst supportive of this in principle from the point of view of applicants, we would note that this will also require positive engagement in the HIA consultation process on the behalf of the relevant LPA officers; we would therefore request LPA commitment to:

- Engage positively with applicants upon being consulted on HIA matters; and to
- Be informed about HIA requirements and processes so as to provide effective and efficient advice.

#### **Summary**

Overall, Vistry are supportive of the overarching framework and aims of the Greater Cambridge Draft HIA SPD in terms of pursuing sustainable development that supports positive health and wellbeing outcomes in the area. This includes agreement on the SPD's proposed methodologies through which to conduct HIAs, and the identification of key health and wellbeing topics for consideration.

Whilst references in the Draft HIA SPD to proportionality of approach (i.e. the scope of HIAs in relation to scale and impacts of schemes) and of the importance of early engagement with LPAs are welcomed and supported in principle, it is also considered that further detail could be provided with regard to these elements.

Regarding proportionality, this includes providing further information on the thresholds at which certain assessments should be conducted, and further guidance on how HIA processes could differ based on various scales and impacts of schemes.

Equally, we would affirm that positive engagement in the HIA consultation process on the behalf of the relevant LPA officers is required to ensure that the HIA process is conducted efficiently. We would therefore request for LPA commitment to engage positively with applicants upon being consulted on HIA matters, and for officers to be informed about HIA requirements and processes so as to provide effective and efficient advice.

We hope that these representations have been helpful in formulating GCSP's HIA policies, and we would be happy to meet with the Councils if there are any aspects that you think would be worthwhile to discuss further.

Yours faithfully,



Tom Ellis  
**Associate Director, Economics**

