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Built Environment  
Greater Cambridge Shared Planning  
Cambridge City Council  
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F:

Your ref:  
Our ref: CWB

Friday, 24 January 2025

Dear Sir/ Madam

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

Please see below representations to the above document on behalf of the following connected clients: -

- TLC Group
- Rockley Dene Homes Ltd
- The Fellows House Ltd
- SPK Residential Cambridge Ltd
- London Inn Hotels (Cambridge) Ltd

These companies have several development interests in the Greater Cambridge Area and are likely to make future applications for further development, which may include a range of housing typologies.

They offer the following comments on the draft SPD on Health Impact Assessments.

- Para 3.9 – it seems excessive that HIA's can only be prepared by those who are suitably qualified, if that is what is intended. Experience and knowledge are equally valid, and this firm prepared the previous HIA without anyone on the team involved having a formal IEMA qualification. The key is whether the HIA follows the required guidance rather than to focus unduly on the identity of who prepares it. The document will either be fit for purpose or it will not.
- Para 3.13 – the matters to be covered in the HIA appear to be comprehensive and appropriate.
- Para 4.5 – it would be appropriate for the Councils, in the SPD, to identify those locations that '*have a higher proportion of protected characteristic groups*'. The SPD is currently unclear on that point. Also, what is meant by '*areas with limited infrastructure or facilities*'? This needs to be clarified as it is too imprecise and will not be readily understood by all.
- Para 5.22 – it is good practice to involve stakeholders as development proposals emerge and HIA consultation should form part of the wider stakeholder engagement rather than being discrete,

potentially doubling up on activity. This is especially so as HIA's are generally required on larger schemes as part of the overall development / design process.

- Para 5.27 – it is also incumbent on the Local Authorities to ensure that there is adequate existing provision for existing and future residents. Development can do only so much, and existing areas lacking facilities should be the focus of local authority activity, using S106 and other funds.
- Para 5.34 – we welcome the recognition that – as ever – a balance needs to be struck between conflicting development considerations and design decisions at the local level which may impact the HIA process.

Overall, and in general terms, it has to be recognised that an individual site or development cannot address wider health impacts that are already 'at large' in the immediate or wider population so interventions need to be appropriate, proportional and viable. Any enhanced provision must meet the tests in Regulation 122 and planning obligations should only be sought where they meet the legal tests. It is important that new developments are not seen as a basis to remedy existing gaps in health, wellbeing or community provision and that the impact mitigated is that brought about by the proposed development.

Yours faithfully



**Colin Brown MRTPI**  
Partner

