

Consultation Response from KC Public Health

2023/91405 Part of former St Luke's Hospital site, Blackmoorfoot Road, Crosland Moor, Huddersfield, HD4 5RA

Erection of foodstore (class E) with associated access, parking, servicing area and landscaping

Date Responded: 07/06/23

Responding Officer: Tom Mapplethorpe

Responding Ref: 2023/91405 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. It should be noted that the document submitted was not in Kirklees Council's standard [rapid health impact assessment for spatial planning template](#). Although the applicant has clearly laid out the methodology used to draft the document submitted, it does not systematically consider all of the development areas that are covered by our own in-house template. Where there are gaps in the submitted rapid health impact assessment, this is noted below. Some of these gaps are covered by other documents submitted separately as part of the application and it is also noted below where this is the case. It should also be noted that the choice of impact area in the document is weighted towards the south of the district geographically speaking, as opposed to being evenly distributed around the development site, which is more in line with what we would have expected. Whilst this will not necessarily impact on the conclusions drawn, it may have the potential to skew the Indices of Multiple Deprivation (IMD) data used in the analysis, which bears consideration.

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>The applicant has submitted air quality and noise impact assessments, as well as an external lighting design statement. These are comprehensive and identify required mitigations to manage any potential health impacts related to these matters from the construction phase of the development.</p> <p>Further to this, the applicant should ensure that any Construction Environmental Management Plan (CEMP) and related comms incorporate 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 would also recommend that the developer makes provisions to support the health and wellbeing of staff employed as part of the construction phase more broadly, including: -</p> <ul style="list-style-type: none"> - The applicant to make provision for safe and secure cycle parking on site for staff wishing to travel actively during the construction phase. - The applicant and appointed site contractors to link in with local health and wellbeing programmes / support services where appropriate and display information for staff working on site. For example, Kirklees Wellness Service (https://kirkleeswellnessservice.co.uk/) provide support around smoking cessation, healthy weight, mental health, etc.'
Housing	Not applicable to this development.

<p>Active travel and sustainable transport</p>	<p>This development issue is not covered by the submitted rapid HIA but is covered by submitted transport statement and travel plan, which are comprehensive.</p> <p>The data shared suggests a low risk of negative impacts on traffic congestion and road safety in the vicinity as a result of the development. However, a number of submissions from local community representatives have raised concerns around access and congestion and we would welcome the developer giving further consideration to these concerns as part of ongoing dialogue and engagement with local communities.</p> <p>Local active travel and public transport options are sufficient to support sustainable travel options for consumers. The site is accessible and navigable by foot or bike and bike parking options will be provided.</p>
<p>Access to open and green spaces</p>	<p>This development issue is largely not applicable to the development. We note from the submitted ecological impact assessment that the proposals will lead to a net loss of biodiversity at the site and welcome further consideration from the applicant of how this will be mitigated through landscaping on site where possible and offset through contributions off site where not.</p>
<p>Access to healthy and affordable food</p>	<p>We note the contribution that the proposed development will make to the local retail mix and the potential for it to provide improved access to low-cost options for healthy food, which will be of particular benefit to those on lower incomes.</p> <p>This potential could be further supported through the interior design and layout of the store and the placement of various food options and promotional offers. For example, we would recommend that careful consideration is given to the placement of and promotional offers for products that have the potential for negative health impacts, e.g., less healthy food options (such as confectionary), alcohol beverages, etc. We would welcome more prominent displays of healthy food and removal of less healthy options from eye level or till point displays.</p>

	<p>More info on how supermarkets can contribute towards healthier lifestyles and improved health and wellbeing can be found in this document: - https://www.rsph.org.uk/static/uploaded/5ec3d502-2e94-47c0-ad1bbe1d4a74218c.pdf.</p>
<p>Community and personal safety</p>	<p>This development issue is not covered by the submitted rapid HIA but is covered by submitted design and access statements, external lighting design statement and transport statement, which are comprehensive.</p> <p>Proposed design of the site and of lighting will help promote line of sight and natural surveillance, which should in turn help to promote anti-social behaviour and crime.</p>
<p>Employment and economic vibrancy</p>	<p>We welcome the detailed consideration of this development issue as part of the submitted rapid HIA and the employment, skills and economic benefits that the development has the potential to bring. We particularly welcome the applicant's commitment to ensuring that these benefits are felt by local people and communities, in an inclusive and sustainable way.</p> <p>To further supplement this, we would recommend that the applicant also considers the following measures: -</p> <ul style="list-style-type: none"> - To liaise with local skills, training and employment programmes led / commissioned by Kirklees Council, to support local labour opportunities. - To consider local labour and supply chain opportunities (e.g., through Meet the Buyer events) from the construction phase onwards. - Where supply chains are in place, to request all contractors / sub-contractors support positive employment opportunities and encourage health and wellbeing in the workplace.'
<p>Community cohesion and social support</p>	<p>This development issue is largely not applicable to the development. However, we acknowledge the work done to engage with and address the concerns of local communities and recommend</p>

	<p>that this level of engagement continues throughout the construction phase, using a mixture of channels. This will ensure that there continue to be opportunities for ongoing communication with local communities to keep people informed and for them to raise any issues or concerns, and for these to be picked up and addressed by the applicant.</p>
<p>Climate change</p>	<p>This development issue is not covered by the submitted rapid HIA but is covered by the submitted design and access statement and energy use and sustainability statements, which are comprehensive.</p> <p>Energy efficiency and renewable energy are all considered as part of the application and appropriate measures identified to maximise the sustainability of the development and minimise climate-related impacts. Likewise, air quality, noise and light impacts in the operational phase are duly considered as part of the relevant documents (already referenced above).</p> <p>Further to this, we would recommend that the applicant seeks opportunities for the donation of surplus construction/building materials to local projects and considers recycling of waste materials as appropriate. We would also encourage the applicant to consider implementing a cycle to work scheme for employees, which will help to promote positive health and wellbeing for employees and to reduce negative impacts from road traffic associated with the site.</p>