



The Committee Clerk  
Environment and Sustainability  
National Assembly for Wales  
Pierhead Street  
Cardiff  
CF99 1NA

**National Office**  
**Swyddfa Genedlaethol**

7 November 2014

Dear Sir/Madam,

### **Consultation on the general principles of the Planning (Wales) Bill**

BMA Cymru Wales is grateful for the opportunity to respond to the consultation on the Planning (Wales) Bill.

The BMA represents doctors from all branches of medicine all over the UK; and has a total membership of over 150,000 including more than 3,000 members overseas and over 19,000 medical student members. It is the largest voluntary professional association of doctors in the UK, which speaks for doctors at home and abroad, and is also an independent trade union. BMA Cymru Wales represents some 7,000 members in Wales from every branch of the medical profession.

Whilst we do not intend to provide a detailed response to this consultation, we would like to ask that the committee gives consideration to two additional proposals we would suggest could be incorporated:

#### **Health Impact Assessments (HIAs)**

In the first instance, we would recommend the incorporation of a proposal for Health Impact Assessments (HIAs) within this legislation.

Health Impact Assessments have been researched, reviewed and promoted by the BMA across the United Kingdom in a variety of ways since 1994. The Association therefore has a long history and substantial literature on the effectiveness and feasibility of HIA.

HIAs would require all public bodies in Wales to properly assess the full health impacts of all new public sector policies, proposals, plans and strategies in all circumstances where the current statutory environmental assessment process applies, including in relation to larger-scale planning applications.

The intention of such an approach would be to:

- promote greater equity in health;
- increase awareness amongst policy and decision-makers across sectors of how decisions may affect health;
- identify the connections between health and developments in other policy areas;
- better co-ordinate action between sectors to improve and protect health;
- promote evidence and knowledge-based planning and decision-making;
- allow health benefits to be maximised and health risks to be minimised; and
- invest in more action to enable people to prevent ill health.

We note that as far back as 1999, the then Welsh Assembly Government committed to taking forward HIAs, and set out its approach in a document entitled 'Developing Health Impact Assessments in Wales'<sup>1</sup>.

<sup>1</sup> [http://www.wales.nhs.uk/sites3/Documents/522/developing\\_hia\\_in\\_wales.pdf](http://www.wales.nhs.uk/sites3/Documents/522/developing_hia_in_wales.pdf)

The idea of introducing HIAs in Wales on a mandatory basis was also consulted upon in the Welsh Government's 2012 Public Health Green Paper. The published summary of responses to that Green Paper stated that *"there was a high level of support for the concept of using Health Impact Assessment as a method for ensuring health issues are considered as part of policy making"*. It also stated that a clear majority of those who responded indicated that Welsh Ministers, Welsh Government departments and local authorities should be required to use HIAs whilst acknowledging that fewer respondents suggested other sectors should also be required to do so.

Despite such clear support having been expressed, particularly in relation to Welsh Ministers, Welsh Government departments and local authorities, we were therefore both surprised and disappointed to see that the more recently published Public Health White Paper dropped all mention of HIAs. In our view, not taking forward the previously considered proposal to place HIAs on a mandatory footing would represent a distinct loss of opportunity to bring forward legislation that would be regarded as both innovative and groundbreaking.

We note that the Minister for Health and Social Services, Mark Drakeford, recently expressed support for undertaking HIAs in relation to planning applications. During a plenary debate on an update statement on the Public Health White Paper on 8 October, he indicated: *"I would be very keen—I always have been—to be able to make the public health impact one of the considerations that local authorities are able to take into account in making planning and licensing determinations."*

Given this link between HIAs and the planning process which had clearly been recognised by Welsh Government, we would consider that the now published Planning (Wales) Bill therefore represents a further legislative opportunity to take forward the adoption of HIAs on a mandatory footing.

The Chief Medical Officer for Wales, Ruth Hussey, has also recently expressed her support for HIAs, telling the Health and Social Care Committee on 8 October 2014: *"...we should be using health impact assessments at the beginning of a process to ask how we can get the most health benefit from whatever proposals, policies or services we are developing, and to ask whether we can get added value."*

Adopting HIAs could make Wales an international exemplar in the field of public health, and we would therefore urge members of the committee to give consideration to advocating incorporation of the concept into this Bill.

### **Making Public Health Wales a statutory consultee for planning applications**

We would further propose that there is a strong argument from a health perspective for making Public Health Wales a statutory consultee for planning applications, to ensure health considerations are better able to be taken into account.

We would urge members of the committee to also give thought to adopting such a view, and thereby support our call for such a proposal to be incorporated into this legislation.

Yours sincerely,



Rodney Berman  
Senior Policy Executive