DEVELOPMENTS OF NATIONAL SIGNIFICANCE

Consultation by Welsh Government

Response from BMA Cymru Wales

10 August 2015

INTRODUCTION

BMA Cymru Wales is pleased to provide a response to the consultation by the Welsh Government on ‘Developments of national significance’.

The British Medical Association 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.

The BMA is the largest voluntary professional association of doctors in the UK, which speaks for doctors at home and abroad. It is also an independent trade union.

BMA Cymru Wales represents some 7,000 members in Wales from every branch of the medical profession.

RESPONSE

During consideration of the Planning (Wales) Bill last year, we called for the incorporation of a requirement for mandatory Health Impact Assessment (HIA) to be undertaken prior to the determination of certain larger-scale planning applications and were disappointed that this was not in fact agreed.

HIAs 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.

The intention of requiring the use of HIA in appropriate circumstances would be to:

• promote greater equity in health;

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• 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.

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’.

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.

We note that the Minister for Health and Social Services, Mark Drakeford, expressed support last year for undertaking HIAs in relation to planning applications. During a plenary debate on an update statement on the Public Health White Paper on 7 October 2014, he said: “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.”

The Chief Medical Officer for Wales, Ruth Hussey, has also expressed her support for HIAs, telling the Assembly’s 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.”

In considering a new process for the determination of developments of national significance, we would note that this presents a further opportunity to consider introducing a mandatory requirement for the use of HIA prior to determining this new category of larger-scale planning applications. Whilst we might wish for HIA to apply a little more widely in relation to planning applications than those which would be classed as developments of national significance, we would nonetheless consider that this could be an excellent starting point.

Requiring the use of HIA for developments of national significance could not only ensure that negative impacts on health and well-being are able to be identified and potentially therefore mitigated against prior to such developments being approved, but also provide scope to identify ways in which positive health benefits could maximised in the way these developments are implemented.

It should be noted that HIA can also provide added benefits in relation to any developments of national significance which may already be subject to an environmental impact assessment (EIA). Even though there may be a requirement within EIA to consider human health, this is currently undertaken in a manner which is much narrower in scope than that which would be required through an HIA. As currently undertaken in Wales, EIA only looks at negative risks and implications for health and only those which may be caused by environmental determinants. As we have already indicated, an HIA would also include considering how health benefits could be maximised. In addition, it would look at the impact of a wider range of health determinants than just those which would be classed as environmental – including social and community factors; access to services; and economic and environmental factors.