

# Plan-making reforms: consultation on implementation

A briefing from the TCPA for public health and aligned health professionals to the open consultation by the Department for Levelling Up, Housing and Communities

October 2023

## 1 Summary

The Town and Country Planning Association (TCPA) acknowledges the need for an effective plan-led planning system which reflects the aspirations of local communities to secure a sustainable future. We believe that the key barrier to these goals remains the need for the system to be adequately resourced and we are concerned that the additional burden the implementation of the new local plan system will place on local planning authorities will exacerbate rather than alleviate this problem.

However, to achieve the goal of beautiful and sustainable development, local plans must reflect the aspirations of local communities including creating places that create and support good health. Plans should be well-evidenced and clearly expressed but they must also reflect the complexity of how real places work as interactive systems.

On the matter of planning and creating healthy places, the TCPA has significant concerns about the proposals for local plan making because the consultation fails to explain how the evidence base for health and well-being will be prioritised and embedded in local plans.

We are concerned that there is **only one reference to health in the consultation and that it is framed as ‘protecting’ health** e.g. ‘maximising opportunities to protect the environment and human health’<sup>1</sup>. This, and the text as a whole, suggests that while the Government has some appreciation of the role of planning in ‘health protection’ (i.e. protecting populations from harms) it is oblivious to the powerful role that planning plays in ‘health creation’ (i.e. shaping places in which it is easy for everyone to thrive). This is a huge omission.

The built and natural environments are now widely recognised as important ‘determinants of health’<sup>2</sup>. The NHS, through its 42 new Integrated Care Boards, is putting increased emphasis on the need to improve the determinants of health in order to prevent illness. Other government departments and agencies – including the Department of Transport, Defra, Natural England, Sport England and Active Travel England – recognise the role they need to play in shaping places to support good health. DHLUC, which through planning policy has the most powerful

<sup>1</sup> See consultation section ‘Speeding up the process for preparing a plan’.

<sup>2</sup> See ‘Spatial Planning for Health – an evidence review.’ Public Health England. (2017)

influence over our built and natural environment, looks increasingly isolated in its refusal to prioritise creating places where people can easily live healthy lives. At a time when 2.5 million people are out of work due to long-term sickness<sup>3</sup>, this lack of focus on creating healthy places seems negligent and likely to add to the low productivity and poor economic performance of the country that economists<sup>4</sup> recognise is linked to poor population health.

## 2 Suggested area for consultation response

### 2.1 Plan content (chapter 1, question 1)

The TCPA strongly supports the objective of visionary local plans. It is the role of government guidance to encourage ambition and innovation in the way we meet community needs as well as how we address national priorities around health, housing, local economies, and climate change.

National guidance on the contents of plans should set out minimum requirements but in no way restrict the scope of plans to deal with the full range of spatial challenges, including local health challenges that confront communities. Guidance should make clear the areas of local plan content which are required by law (i.e. sustainable development, climate change mitigation and adaptation, good design and net gain for biodiversity). It should also make clear those areas where the Government would encourage flexibility and innovation.

National guidance on the content of local plans must make clear the importance of comprehensive evidence and detailed policy in the following areas **not** identified in the consultation document:

- **Health and well-being**, including tackling the wider determinants of health through the built and natural environment by, for example, the promotion of active travel and walkable neighbourhoods and the promoting positive mental health outcomes through the provision of green infrastructure and access to nature.
- **Tackling health inequality** by ensuring local plans highlight spatial inequalities in health and consider the impacts of development on those living with the highest levels of deprivation.

Health creation, maintenance, *and* protection should be a core principles in local plans.

Consultation responses must be made [here](#) by 18 October 2023.

## 3 About the TCPA

The Town and Country Planning Association's (TCPA's) vision is for homes, places and communities in which everyone can thrive. Our mission is to challenge, inspire and support people to create healthy, sustainable and resilient places that are fair for everyone.

Informed by the Garden City Principles, the TCPA's strategic priorities are to:

- Work to secure a good home for everyone, in inclusive, resilient and prosperous communities which support people to live healthier lives.

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<sup>3</sup> ONS. 26 July 2023. 'Rising ill health and economic inactivity because of long-term sickness UK 2019-2023.'

<sup>4</sup> See 'Health is wealth', lecture by Andrew Haldane for the Health Foundation (2022)

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- Empower people to have real influence over decisions about their environments and to secure social justice within and between communities.
- Support new and transform existing places to be adaptable to current and future challenges, including the climate crisis.

The TCPA is a charity and company limited by guarantee.

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