
The TCPA's initial responses to the NPPF consultation questions on healthy places and homes

September 2024

1 Introduction

The government published a consultation on proposed changes to the National Planning Policy Framework (NPPF) on 30 July. It included questions regarding a range of topics, many of which have implications for people's health and wellbeing. This paper sets out the TCPA's draft responses to questions concerning homes and neighbourhoods, and how they influence health, including the health of children. The responses draw on the TCPA's extensive work on [Healthy Place-making](#) and our campaign for [Healthy Homes](#).

The homes, places and communities in which people live have a profound influence on their ability to live healthy lives and make healthy choices. Consequently, there is a strong argument that national planning policy is one of the 'wider determinants of health'¹. The government has made commitments to improve health – particularly the health of children – and to reduce health inequalities. The government has a manifesto commitment to have a greater focus on preventing ill health and has said it will prioritise 'places of security, health and wellbeing that serve the needs of residents and their wider communities'².

The achievement of these objectives will be undermined unless national planning policy is re-focused to make it clear that creating places where people can live healthy lives is central to the purpose of planning. This means not only protecting people from harms such as pollution; it means positively supporting the creation of places that enhance health and wellbeing ('health creation') and help reduce health inequalities.

In addition to this paper, the TCPA has published a blog and draft responses regarding climate change, [here](#). Addressing the causes and effects of climate change is essential for supporting planetary and human health so those responses are relevant for re-shaping national planning policy to support people's health and wellbeing. These responses are being published prior to the consultation deadline of 24 September in case they are of benefit to other organisations with shared objectives.

¹ For evidence, see [Spatial Plans as a Critical Intervention in Improving Population Health. A Discourse Arising from a Health Census Review of the State of Current Local Planning Policy in England - Michael Chang, Neil Carhart, Rosalie Callway, 2024 \(sagepub.com\)](#)

² [Prime Minister's statement on Grenfell Tower Inquiry final report: 4 September 2024 - GOV.UK \(www.gov.uk\)](#)

2 Responses to question 70 and 71

From the perspective of healthy places and homes, the most important and overarching questions are questions 70 and 71, so here we respond to these first.

Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

- a. National planning policy would better support local authorities in promoting healthy homes and communities if health was set out in the NPPF as a strategic priority for plan-making and decision taking. The NPPF should start with a clear statement that the role of planning is to support population and planetary thriving with the explicit aims of creating health and wellbeing and reducing health inequalities, and that all planning policies and decisions must be directly influenced by local health priorities and strategies. Stating this at the start of the NPPF would ensure that everyone involved in planning – from local communities to planning inspectors – would be clear that creating places that support good health is an essential part of the purpose of planning and not a 'nice to have' option. This could be achieved by stating that planning, at all levels, must support the delivery of the UN Sustainable Development Goals³.

In Chapter 3, Plan-making, the NPPF should explicitly support local authorities to make plans that strategically, and in detail, respond to the health needs of their populations, positively promote health and wellbeing, and address local health inequalities.

The NPPF should also promote the delivery of good quality and genuinely affordable homes in order to address the extensively evidenced health harms and costs caused by poor quality, unaffordable and insecure housing⁴.

National planning policy should also include the importance of consulting directors of public health in the development of local plans and require the use of health impact assessments for developments that are considered significant for local public health.

- b. Childhood obesity is a complex problem with many drivers, including behaviour, environment, genetics and culture. The causes of obesity exist in the places where children live, learn and play, where they have limited autonomy due to their age and where food and the built environment often makes it difficult to make healthier lifestyle choices. Restricting hot food takeaway uses close to schools is one way that planning policy can support healthier weight environments, but planning and wider local authority policy can also influence: housing design policy, to ensure suitable kitchen, dining, food preparation and storage space; neighbourhood design that promotes walkability via safe routes to everyday facilities, including local shops selling healthy food options; green

³ [THE 17 GOALS | Sustainable Development \(un.org\)](https://www.un.org/sustainabledevelopment/)

⁴ [Campaign for Healthy Homes - Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk/campaign-for-healthy-homes/)

infrastructure policies that support parks, allotments, community growing and edible landscapes; policies that restrict advertising for unhealthy food.

Question 71: Do you have any other suggestions relating to the proposals in this chapter?

The planning system can and should do more to support the creation of healthy communities, including supporting healthy childhoods. Revisions to this chapter of the NPPF should:

- strengthen in detail the priority to consider health creation and reducing health inequalities in policy making and decision-taking, especially where this would address locally identified health and wellbeing needs and priorities (as identified in joint strategic needs assessments⁵ and local health and wellbeing strategies);
- require all new development to help achieve the government's statutory commitment⁶ that everyone should live within a 15-minute walk of green or blue spaces by following the national Green Infrastructure Standards Framework⁷; and local nature recovery strategies;
- encourage the creation of places that are complete, compact and connected⁸ so that most people can access the things they need for day-to-day living within easy walking, wheeling and cycling distance of their homes. Infrastructure to support active travel – for people of all ages and abilities, including children – should be prioritised over infrastructure for vehicles and development should follow Active Design principles;⁹
- require development to provide doorstep and public spaces, including streets that are safe and accessible for children and young people, with places for formal and informal play and socialising.

3 Responses to other questions, in numerical order

Planning for the homes we need

Question 14: Do you have any other suggestions relating to the proposals in this chapter?

A significant body of evidence shows that homes converted from non-residential uses to residential using permitted development rights can be poorly located, of poor quality, damaging to the health of their residents, and cut vital financial contributions to the wider community¹⁰. Councils must be able to shape neighbourhoods to support good health, support their local communities, local businesses, as well as affordable housing needs. The burdensome NPPF policy test for the use of Article 4 Directions to remove permitted development rights (paragraphs 54. a-c and 55) must be reviewed to enable this to happen.

⁵ [Joint Strategic Needs Assessment and joint health and wellbeing strategies explained. - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

⁶ [In the Environment Act 2021](https://www.gov.uk)

⁷ [Green Infrastructure Home \(naturalengland.org.uk\)](https://www.naturalengland.org.uk)

⁸ [The 20-minute neighbourhood - Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk)

⁹ [Active Design | Sport England](https://www.active-design.org.uk)

¹⁰ [Permitted Development - Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk)

Delivering affordable, healthy homes and places

Question 47: Do you agree with setting the expectation that local planning authorities should consider the needs of those who require social rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes, the needs of those requiring social rent should be explicitly considered. However, we are concerned that the government is focusing mainly on delivering affordable housing through developer contributions. While such contributions have an important role, we believe that government investment will also be needed to truly boost supply.

Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes, we welcome the emphasis on seeking to boost the supply of social rent.

However, the definition of local needs (paragraph 66) for affordable housing also should be amended to reflect genuinely affordable rental and home ownership as defined by the ONS – based on average and below average levels of disposable income^{11, 12}. See also response to question 57.

Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes. Places with a mixture of tenures and types of housing enable people, with diverse and life-long needs, to remain in the same place as their housing needs change throughout their lives and support mixed and more stable communities.

Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Yes, but the government also needs to consider how local authorities can better seek to address the needs of people who are homeless and require temporary accommodation.

Question 56: Do you agree with these changes? [Strengthening support for community-led development]

Yes.

Question 57: Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

The definition of affordable housing should be amended to reflect household ability to pay for home ownership and rental costs, according to average and below average income levels. The

¹¹ [Housing Purchase Affordability, UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/housing-purchase-affordability-uk)

¹² [Private rental affordability, England, Wales and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/private-rental-affordability-england-wales-and-northern-ireland)

ONS defines affordable home ownership according to annual disposal household income, differentiated by deciles, regions and UK countries¹³. Similarly, in terms of rental affordability, the ONS have defined this as equivalent to 30% or less of household monthly income being spent on rent¹⁴. The ONS definitions should be adopted throughout the NPPF.

Delivering community needs

Q69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF? [transport planning – changing from ‘predict and provide’ to ‘vision and validate’]

Yes. Motor vehicle transport influences people’s health in many ways, including: discouraging the everyday physical activity that is essential for good health and is a government objective¹⁵; contributing to poor air quality (a major cause of ill-health¹⁶) by creating particles through exhaust emissions and tyre wear; and contributing to carbon emissions and therefore climate change (which in itself undermines human health in various ways).

Evidence shows that building roads can result in an increase in vehicle traffic (a phenomenon known as ‘induced demand¹⁷’), while the provision of safer and good quality paths for walking and wheeling benefit active travel and health¹⁸. The discredited¹⁹ ‘predict and provide’ method of planning for transport needs is likely to contribute to induced demand and undermine efforts to support a ‘modal shift’ away from motor transport and towards active travel and public transport. The ‘vision and validate’ method is more likely to support the creation and normalisation of the active travel and public transport infrastructure necessary for healthy, active environments.

Public Sector Equality Duty

Q106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

In its manifesto, the government committed to raising ‘the healthiest generation of children in our history’. This laudable objective will be undermined unless the homes, streets and neighbourhoods in which children develop, live and play are planned with their needs in mind, and with their views properly considered²⁰.

¹³ [Housing Purchase Affordability, UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

¹⁴ [Private rental affordability, England, Wales and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

¹⁵ [Physical activity guidelines - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

¹⁶ See [Chief Medical Officer’s Annual Report 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

¹⁷ [Induced travel demand: an evidence review - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

¹⁸ [Enabling active travel and public transport - NIHR Evidence](https://www.nihr.ac.uk)

¹⁹ See this by Phil Goodwin, Emeritus Professor of Transport Policy, UCL: <https://www.itf-oecd.org/sites/default/files/docs/beyond-predict-and-provide-goodwin.pdf>

²⁰ Using tools such as the [Voice Opportunity Power](https://www.voiceopportunitypower.org) youth engagement toolkit.

The NPPF barely mentions children and young people²¹. Omitting the needs of children and young people in national policy appears to be:

- indirect discrimination of a group of people with the protected characteristic of age;
- contrary to the Public Sector Equality Duty; and
- contrary to the United Nations Convention on the Rights of the Child (UNCRC), ratified by the UK in 1991.

The principles of the UNCRC guide English law and practice and should influence and shape national planning policy.

Negative impacts on the rights of children and young people in the planning system and the built environment could be mitigated through an explicit reference in the NPPF that their needs and voices must be considered in plan making and decision taking.

4 For more information contact:

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²¹ Paragraph 63 of the NPPF includes a reference to 'families with children' and 'looked after children' in the context of housing. There are no other references to children, and no reference at all to young people or to babies.