

# National planning rules must prioritise healthy homes and neighbourhoods

TCPA Parliamentary Briefing

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**The TCPA is concerned that the draft NPPF misses an opportunity to create healthy homes and neighbourhoods.**

The Healthy Homes campaign has consistently advocated for legal minimum housing standards to secure people's health and wellbeing. Calls for a comprehensive legislative approach to health improvement, led by Lord Crisp, have been resisted by successive governments on the grounds that they are best dealt with through policy. During the passage of the 2025 Planning and Infrastructure Act the Government repeatedly reassured MPs that policies promoting health improvement would be addressed in national policy. However, the draft National Planning Policy Framework (NPPF) undermines local action and fails to prioritise improving people's health and reducing health inequalities. It is vital that the final version clearly prioritises all the determinants of health, including the importance of healthy homes.

## 1. The NPPF must prioritise housing standards as a key determinant of people's health

The NPPF policy HC1 makes no reference to **housing quality** as a means to promote healthy communities. Policy HO5 on **accessibility** will mean that 60% of new homes will not meet people's lifelong needs. Further, policy PM13 Setting Standards does not permit LPAs to exceed Building Regulations in order to proactively support health improvement. For example, setting ambitious targets on the **energy performance** of homes is vital to mitigate the health impacts of climate change: to reduce exposure to excess cold, overheating, and fuel poverty; to reduce flood risk; and to support meeting net zero targets.

This is confusing given that housing standards are necessary to meet the health requirements in the English Devolution and Community Empowerment Bill (Clause 44) and the Planning and Infrastructure Act (PIA) 2025, (Clause 58). The final NPPF should make reference to these legal requirements and support their implementation. We therefore recommend the following changes:

- *Policy HC1 must refer to good quality housing as a key determinant of health.*
- *Policy HO5(1)(b) must require 100% of new homes to be delivered to M4(2).*
- *Policy DM7(2), PM6(c) and PM13 should permit ambitious LPAs to exceed national minimum standards for the long-term benefit of their communities.*

## 2. Ensuring reducing health inequalities is central in the planning system

The draft NPPF has no requirement to undertake a health impact assessment or health equity impact assessment (HIA / HEIA) to ensure planning policies and development decisions will

contribute to reducing health inequalities and promote health improvement. This should be rectified through HIA being included in the information requirements outlined policies DM2, PM8 and in Annex C. Furthermore, policies S4 and S5 - outlining development principles within and outside settlements - set too narrow a definition of what can be described as an 'unacceptable' or 'adverse' impact that does not include consideration of whether development might have a negative impact on people's health. We therefore recommend the following changes:

- *Policies DM2, PM8 and Annex C must require Health Impact Assessment for SDSs, LDPs and major developments.*
- *Policies S1(1)(a)(ii); S3; S4 must include harms to health as adverse impacts.*

### **3. The NPPF restricts the ability of councils to control poor quality conversions**

Permitted development rights (PDR) have been shown to result in the production of very poor quality housing, risking resident health, limiting access to essential amenities, and cutting developer contributions towards affordable housing – an estimated 28,000 affordable homes have already been lost due to PDR. NPPF policy DM10 makes it extremely difficult for local councils to remove PDR via Article 4 Directions, in order to protect people's health. We therefore recommend:

- *Policy DM10(1)(a) must refer to local health impact and DM10(1)(c) should be deleted.*

### **4. Affordable housing should be defined according to people's ability to pay**

Recognising the undersupply of genuinely affordable homes in key parts of the country, it is disappointing that the NPPF does not create a meaningful definition of affordable housing. This should be based on people's ability to pay, as defined by the Office of National Statistics (ONS) regarding affordable rental and affordable home ownership. We therefore recommend:

- *The NPPF glossary definition of affordable housing should reflect the ONS definitions of affordability.*

## **Building a healthy foundation for present and future generations**

The final version of the NPPF will provide the gateway test for the future quality of our homes and neighbourhoods. It is therefore vital that the government seizes the opportunity to reunite health and planning, to reduce health inequalities and build a strong legacy of healthy and affordable homes.

## **Further information**

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