



Association of Directors of Public Health (UK)

Association of Directors of Public Health – submission to CLG Technical consultation on planning, 2014

The Association of Directors of Public Health (ADPH) is the representative body for Directors of Public Health (DsPH) in the UK. It seeks to improve and protect the health of the population through DPH development, sharing good practice, and policy and advocacy programmes. www.adph.org.uk

Directors of Public Health (DsPH) are the frontline leaders of public health working across health improvement, health protection, and health care service planning and commissioning.

In April 2013, responsibility for public health transferred to Local Authorities in England (supported nationally by Public Health England), with the transfer of Directors of Public Health and their public health teams into local government.

ADPH has a strong track record of collaboration with other stakeholders in public health, including those working within the NHS, local authorities, government and other sectors.

ADPH response

ADPH is aware that the government wishes to reduce the burden of the planning system on developers. However, we are concerned that, despite the recent National Planning Policy Framework (NPPF) giving increased importance to the influence which planning can have on health and wellbeing, there is no mention in the document of health, nor any practical measures proposed for development control officers on how to achieve this. This could, for example, include criteria for the use of Health Impact Assessments in Chapter 5.

Through its collaborative work supporting active travel and active transport for healthy living, ADPH strongly supports the need to 'Health check' every transport and land use decision, focusing on the potential impact on levels of walking and cycling and other aspects of health; and to reject proposals whose impact on walking and cycling will not be positive. For example there is widespread concern that recent changes to planning policy may have the effect of encouraging more out of town development, increasing journey distances and restricting accessibility by non-motorised modes of transport. There is a risk that this may tend to suppress active travel. Two collaborative reports and the evidence supporting the need for a significantly increased level of priority to be attached to modes of active transport at all levels of government policy, planning and delivery can be found at:

http://www.adph.org.uk/wp-content/uploads/2013/08/Take_action_on_active_travel_progress_review_2012.pdf

<http://www.adph.org.uk/wp-content/uploads/2014/07/20140617-Active-Transport-FINAL.pdf>

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We would also highlight the use of Community Led Local Development as a tool for supporting sustainable and inclusive growth to support social inclusion, health and wellbeing. Linked to the EU Structural & Investment Funds, this can support local authorities, local communities and Local Enterprise Partnerships to work together to address the specific needs of their localities.

Question 2.1

ADPH is concerned that introducing permitted development rights for (i) light industrial (B1(c)) buildings and (ii) storage and distribution (B8) buildings to change to residential (C3) use, could mean that housing is developed within unsuitable areas and buildings. This could potentially have a detrimental impact on the health of future residents, for example, through increased levels of dust, noise, inadequate access to amenities and sustainable transport links. In turn, it may also undermine the creation of jobs and expansion of the local economy in light industrial areas such as this.

Question 2.9

ADPH welcomes and would strongly support the proposal that a planning application is required for any change of use to a betting shop or a pay day loan shop.

Further guidance in relation to how development control officers should determine planning applications for these uses (following any change to legislation) would also be welcomed, particular making reference to reducing clustering of these types of premises.

Knowsley Council's Public Health Team recently led on the commissioning of Liverpool Public Health Observatory to undertake research into the impact of problem gambling locally. The research report highlights the negative social and health impacts associated with some users of fixed odds betting machines, present in most betting shops. This includes devastating consequences for family life, relationships and employment, as well as financial impacts: <http://www.liv.ac.uk/media/livacuk/instituteofpsychology/publichealthobservatory/Problem,gambling,and,FOBT,use,across,the,Liverpool,City,Region.pdf>

Chapter 5

ADPH would recommend that that this section should include the use of Health Impact Assessments to ensure that the health and wellbeing of development proposals is properly considered alongside environmental impacts, in line with the refreshed NPPF guidance, 2014:

“Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making. Public health organisations, health service organisations, commissioners and providers, and local communities should use this guidance to help them work effectively with local planning authorities in order to promote healthy communities and support appropriate health infrastructure.”

ADPH strongly supports the need to 'Health check' every transport and land use decision, focusing on the potential impact on levels of walking and cycling and other aspects of health; and to reject proposals whose impact on walking and cycling will not be positive.

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