



# The Association of Directors of Public Health

## Housing White Paper: ADPH Consultation Response

The Association of Directors of Public Health (ADPH) is the representative body for Directors of Public Health (DPH) in the UK. It seeks to improve and protect the health of the population through collating and presenting the views of DsPH; advising on public health policy and legislation at a local, regional, national and international level; facilitating a support network for DsPH; and providing opportunities for DsPH to develop professional practice.

The Association has a rich heritage, its origins dating back 160 years. It is a collaborative organisation working in partnership with others to maximise the voice for public health.

### Preamble

ADPH welcomes the publication of this White Paper as it is vital that the current crisis in housing supply is addressed. However, the White Paper does not adequately recognise the importance of good housing for good health, and is a missed opportunity to bring the two closer together.

Health and housing are inextricably linked and housing is a key determinant of health. Houses are not just dwelling places but should be places of comfort and safety in which families are raised and people grow old. They are the main setting for health throughout people's lives; poor housing can have serious long term effects on both physical and mental health and wellbeing<sup>[1]</sup>. It is therefore disappointing that the White Paper does not take advantage of the opportunity to make existing homes and neighbourhoods healthier and does not adequately focus on the need to make new stock places where people can live healthier lives.

It is disappointing that there has not been consultation on aspects of chapters 3 and 4 in the White Paper, most notably the approach to homelessness. The latest statistics reveal that there were 14,420 households accepted as homeless in the last quarter of 2016. This is a reminder that the current housing system is failing the most vulnerable people in our population<sup>[2]</sup>. Temporary accommodation is often of a very poor standard, which leads to health problems and reinforces health inequalities.

We would encourage a closer look at the relationship between public health, housing and planning and how they can align more effectively. Rather than focusing on the design and conditions of houses in isolation, planners should be encouraged to deliver healthy neighbourhoods, which would assist and encourage people to live healthy lives.

### Q3. Do you agree with the proposals to:

**a) amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with needs, such as older and disabled people?**

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<sup>[1]</sup> Public Health matters, Public Health England, 'Bringing together housing and public health', 21 October 2015, available: <https://publichealthmatters.blog.gov.uk/2015/10/21/bringing-together-housing-and-public-health/>

<sup>[2]</sup> Homeless Link, 'Latest homelessness statistics are a star reminder that change is crucial', 23 March 2017, available: <http://www.homeless.org.uk/connect/news/2017/mar/23/latest-homelessness-statistics-are-stark-reminder-that-change-is-crucial>



ADPH fully supports guidance that places clearer expectations about planning to address the housing requirements of groups with needs, such as older and disabled people. We would also encourage the housing requirements of other groups to be considered, such as children and young people. Urban planning decisions have a key role to play in combatting rising levels of childhood obesity. Planning decisions should facilitate physical activity and mental wellbeing, for example through allowing children to have places to play with friends and walk or cycle safely to school. Additionally, it should be ensured that all homes can adapt through the life course of individuals and families.

**Q4. Do you agree with the proposals to amend the presumption in favour of sustainable development so that:?**

**a) authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?**

Yes. Ensuring that proposals are in favour of sustainable development will allow communities to live healthy lives. Health and wellbeing should be at the centre of the planning system. We recommend maximising the use of green spaces and open space in urban environments, as this many health advantages, such as a place for physical activity, recreation and community building.

There also needs to be consideration of not just planning green spaces but proximity to green spaces for each development that is not across a major road.

**Q7. Do you agree that national policy should be amended to encourage local planning authorities to consider the social and economic benefits of estate regeneration when preparing their plans and in decisions on applications, and use their planning powers to help deliver estate regeneration to a high standard?**

Yes. The social and economic benefits of estate regeneration must be considered when preparing plans. Many homes that belong to deprived groups of the community are in poor condition. Healthier homes must be built to tackle these health inequalities. Health and social care must be at the core of regeneration planning proposals. As well as regenerating estates, we would encourage redesign of the environment around these estates to allow for optimal health and wellbeing for residents and the wider community.

**Q9. How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?**

Streamlined planning procedures provide an opportunity for health to be integrated into new developments. The 10 Healthy New Towns that are being developed is an opportunity for local planners to be in control of the delivery of developments which are of high quality and can ensure that local people can lead healthier lifestyles.

**Q12. Do you agree with the proposals to amend the National Planning Policy Framework to:**

**b) make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) are expected to set out clear design expectations; and that visual tools such as design codes can help provide a clear basis for making decisions on development proposals?;**

Ensuring that clear design expectations are provided and providing proportionate evidence is necessary to support the development of the local plan. The JSNA would help ensure that appropriate and relevant health evidence is used when making decisions on development proposals.



**Q12. Do you agree with the proposals to amend the National Planning Policy Framework to:**

**c) emphasise the importance of early preapplication discussions between applicants, authorities and the local community about design and the types of homes to be provided?**

Preapplication discussions about the design and the types of homes to be provided needs to consider the health needs of the population. The direct relationship between a poor environment and chronic ill health was spelt out in a report by the Building Research Establishment, which estimated that the £3.5m homes in England blighted by damp, mould and pests has led to health problems that cost the NHS at least £1.4bn a year. Health and wellbeing must be at the centre of planning for new communities to ensure that further problems do not arise.

Healthy neighbourhoods, rather than just healthy homes, need to be developed. The NHS Healthy New Towns project attempts to shape the health of communities and aims to rethink how health and care services can be delivered. The aim of the programme, to build strong communities and healthy places to live, should be at the core of planning proposals for new developments as well as estate regeneration.

Good urban and housing design promotes healthy lifestyles and can help prevent illness. It can also keep older people independent and healthy, supported by the latest technology to live in their own homes rather than in care homes. The pre-planning stage needs to incorporate the results of the Health Impact Assessment, so that the community can consider the health impacts.

**Q12. Do you agree with the proposals to amend the National Planning Policy Framework to:**

**e) recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles – and make clear that this should be reflected in plans and given weight in the planning process?**

Building for Life is a useful design standard. However, there should be opportunities for planners and health officers to have more discussion and collaboration on where good design enables health and wellbeing. This should be integrated into policies and planning documents. It is important that all new homes are easy to adapt, and homes that are wheelchair friendly and accessible should be built. Reducing restrictions on planning constraints would assist with enabling this.

**Q13. Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:**

**a) make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?**

Many of the successful cities with high rates of walking and cycling can be attributed to higher densities of people and housing, and access to green spaces is vital to maintaining good health. There are numerous health benefits associated with access to public open space and parks. Access to green spaces such as parks, open spaces and playgrounds has been associated with better overall health, reduced stress levels and reduced depression. A healthy environment should be at the core of the design process. Walkable neighbourhoods, delivering improved infrastructure for safe active travel and more accessible public transport need to be created, and easy access to healthy and affordable food in the local area should be available.



**Q13. Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:**

**b) address the particular scope for higher density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?**

There is strong evidence that overdevelopment is harmful for people's wellbeing, due to issues such as lack of access to daylight, overcrowding or restricted access for the disabled. There is also likely be higher levels of air pollution in places of high density housing due to easy access to transport links and less distance from busy roads. This would create an increased demand on existing health and community facilities. Density policies in local planning documents should be made available to health professionals as it must be ensured that such policies are appropriate when considering the wider health of the local population.

**Q13. Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should: c) ensure that in doing so the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs?**

It is imperative that the nature of local housing needs is considered. The housing market varies across the country and housing needs differ between local authorities. This is not adequately reflected in the White Paper.

**Q17. In taking forward the protection for neighbourhood plans as set out in the Written Ministerial Statement of 12 December 2016 into the revised NPPF, do you agree that it should include the following amendments:**

**b) that it is subject to the local planning authority being able to demonstrate through the housing delivery test that, from 2020, delivery has been over 65% (25% in 2018; 45% in 2019) for the wider authority area?**

Health professionals must work with the Local Planning Authority to ensure that policies in local planning documents ensure optimal health for the residents and local community. Local health needs need to be considered and these needs should be regularly updated and reviewed accordingly.

**Q19. Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?**

Yes. Individuals and communities are rapidly adopting digital approaches and mobile and smart devices are now commonly used. The quick increase in digital approaches to healthcare, such as through social media channels, mobile applications, and digital ways of engaging with healthcare providers, means that it is now more important than ever that the inclusion of digital infrastructure is a key part of planning policies. High quality digital infrastructure provides a strong platform for people to manage their own health and care and would allow people to work from home, thus having a positive impact on reducing air pollution, as well as a positive impact on isolation.

**Q35. Do you agree with the proposals to amend national policy to:**

**a) Amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures?**



Local plans must incorporate and plan for the scale of severe weather predicted in future years. Rising temperatures will have huge impacts on human health and wellbeing, particularly for vulnerable groups. Planners should work with health professionals to ensure that development proposals are planned to be resilient to climate change impacts, and resilience into existing health and care services and facilities should be built, based on evidence in the JSNA.

It is imperative that climate change and the sustainability of products used is considered, and policies to reduce the impact of poor air quality need to be implemented. This will include minimising car parking spaces, as well as creating more opportunities for public transport, safe walking and walking streets.

**Q35. Do you agree with the proposals to amend national policy to:**

**b) Make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change?**

Yes. Parks and green spaces help create human and energy efficient cities that can help slow down the process of global warming. Pathways enabling cycling and walking and transforming areas into green spaces are a priority. Separate cycle ways should be built rather than focusing solely on incorporating cycling lanes on new roads. Trees significantly help fight global warming by reducing the amount of greenhouse gases in the atmosphere. Trees and vegetation in urban parks offer lower cost and natural solutions to address air pollution.

**Q36. Do you agree with these proposals to clarify flood risk policy in the National Planning Policy Framework?**

Yes. The effects of flooding on health are extensive, and can include death from drowning, injuries, infectious diseases and mental health problems. There are also significant health impacts which may occur during the restoration process especially as severe flooding may lead to the displacement of populations. Flooding cannot be prevented entirely but it can be managed to reduce its social and economic consequences. Climate change is expected to worsen the situation.

The harmful effects of flooding can be reduced by legislation to relocate structures away from flood-prone areas, planning appropriate land use and migration measures.

**Q37. Do you agree with the proposal to amend national policy to emphasise that planning policies and decisions should take account of existing businesses when locating new development nearby and, where necessary, to mitigate the impact of noise and other potential nuisances arising from existing development?**

ADPH agrees that businesses wanting to grow should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established. Additionally, when locating new development nearby, it is necessary to consider the impact that noise from existing businesses such as pubs, music venues and churches will have on the residents. Excessive noise can disturb sleep, cause cardiovascular and psychophysiological effects and may cause changes in social behaviour.