



The Association of Directors of Public Health Consultation Response

Levelling-up and Regeneration Bill - reforms to national planning policy (2023)

Objectives and Scope

The consultation 'Levelling-up and Regeneration Bill: reforms to national planning policy' was published by the Department for Levelling Up, Housing & Communities. The consultation seeks views on the Government's proposed approach to updating to the National Planning Policy Framework. The consultation is also seeking views on its proposed approach to preparing National Development Management Policies, how the Government might develop policy to support levelling up, and how national planning policy is currently accessed by users.

A fuller review of the Framework will be conducted in due course, and its content will depend on the implementation of the Government's proposals for wider changes to the planning system, including the Levelling-up and Regeneration Bill.

About ADPH

ADPH is the representative body for Directors of Public Health (DsPH), and is a collaborative organisation, working in partnership with others to strengthen the voice for public health, with a heritage which dates back over 160 years. We work closely with a range of Government departments, including UKHSA and OHID as well as the four CMOs, NHS, devolved administrations, local authorities and national organisations across all sectors to minimise the use of resources as well as maximise our voice.

We improve and protect the health of the population by:

- Representing the views of DsPH on public health policy
- Advising on public health policy and legislation at a local, regional, national and international level
- Providing a support network for DsPH to share ideas and good practice
- Identifying and providing professional development opportunities for DsPH

ADPH Position

Health is an important asset for economic productivity.¹ It is therefore important to ensure that public health is placed at the centre of future national planning policy to improve population health and wellbeing, reduce the social cost of poor health and deliver on the levelling up mission.

The built environment is a fundamental determinant of health across the life course. Social and commercial spaces in the neighbourhood determine our food environment, our choices of leisure activities and the

availability of community support. The availability of green spaces and infrastructures for active travel is important in improving air quality as well as physical and mental wellbeing. Housing supply and quality can also affect our health, as people exposed to cold, damp, overcrowded living conditions are more susceptible to a range of illnesses, including respiratory and cardiovascular disease as well as mental health problems. These are all important areas that could be influenced by national and local planning.

While many of the complexities to local plan preparation are not within the scope of public health, they nevertheless frame public health involvement in the plan-making process. Years of public health cuts has also limited public health staffing levels, resources and capacity to engage in this work even though DsPH and their teams are committed to working constructively with planners. It is therefore crucial to ensure enough public health funding and that the planning system enables public health professionals to have a say in the planning process, so that local public health and other health strategies can influence the planning processes and address identified health and wellbeing needs and priorities. It is also important that the planning system, its operators and users acknowledge and take proactive steps to support, not undermine, people's ability and desire to look after their health and wellbeing. This includes taking consideration of population physical and mental health outcomes in planning. This also includes ensuring that planning decisions will not disadvantage certain population groups or geographical areas over others, thereby exacerbating existing health inequalities. Having strong and explicit policies supporting actions on health improvement and reducing health inequalities will continue to be an important foundation for planning for health.

ADPH is therefore submitting a response to the 'Levelling-up and Regeneration Bill: reforms to national planning policy' consultation to emphasise the importance of public health in national and local planning. We believe health should be at the heart of levelling up as neither economic success nor wellbeing can be achieved in isolation.

Response to individual questions

Q 52. Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

Currently, local councils are required to provide the evidence base to advocate for different policy approaches. Nonetheless, this often leads to mixed results because of the different examination and decision-making processes. Therefore, ADPH supports the new National Development Management Policies which can help provide certainty for identifying national public health priorities that can be addressed through local planning. We also support the introduction of National Development Management Policies relevant to health which can enable local councils to create better local policies and guidance. We believe that public health should be placed at the centre of future national planning policy to improve population health and wellbeing, reduce the social cost of poor health and deliver on the levelling up mission.

Q 53. What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?

The Levelling Up White Paper includes four key aspects: 'empowering local leaders and communities, raising living standards, especially where they are lower, spreading opportunity and improve public services, especially where they are weaker, giving people the resources necessary to enhance the pride they feel in the place they live'. It recognises the intricate links between health, education and skills and the wider economy and supports a health-in-all policies approach. Therefore, in order to achieve the 12 levelling up missions in the Levelling Up White Paper, it is essential to ensure that health is at the centre of the new planning framework, and that measures are in place to reduce health, social and economic inequalities between people and communities. The pandemic has exposed and exacerbated inequalities across the UK and we believe bold action over the long-term should now begin to close these unfair gaps.

Health should be at the heart of levelling up proposals on the basis that neither economic success nor wellbeing can be achieved in isolation. Good health and economic success are linked, you cannot deliver one without the other. It is also the case that whilst we should aim to improve health overall, proportionate policy and funding must be directed towards reducing inequalities.

Q 58. We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

Land use activities have a huge impact on population health and wellbeing and could affect different populations differently. It is therefore crucial to ensure that planning decisions will not disadvantage certain population groups or geographical areas over others, thereby exacerbating existing health inequalities. We also suggest the government to do a Health Impact Assessment and encourage the use of Health Impact Assessment throughout the Planning Reform process so that considerations of health, wellbeing and disparities can inform the proposals.

Recent studies reveal that people living in the most deprived areas are expected to live two decades shorter in good health than those in the least deprived areas. People in the most deprived areas spend around a third of their lives in poor health, twice the proportion spent by those in the least deprived areas. Health inequalities that were exacerbated by the pandemic now risk being further engrained by the cost-of-living crisis if we do not consider public health in our levelling up mission. Therefore, having strong and explicit policies supporting actions on health improvement and reducing health inequalities should continue to be an important foundation for planning for health.

¹ Chief Medical Officer, Chief Medical Officer's Annual Report 2021 Health in Coastal Communities. 2021 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005216/cmo-annual_report-2021-health-in-coastal-communities-accessible.pdf [Accessed February 2023]