

1 About the TCPA

The TCPA (Town and Country Planning Association) works to challenge, inspire and support people to create healthy, sustainable and resilient places that are fair for everyone. The TCPA is a charity and works across the UK and beyond. We have worked with Public Health England, universities and more than 60 councils to help planners and public health experts collaborate to create healthier places. We contributed to NHS England's Healthy New Towns project.

2 Healthy places and health inequalities

The TCPA welcomes the Committee's decision to focus on healthy places, and health inequalities, as two of the 10 topics the inquiry will cover. This submission focuses on healthy places, but is also relevant to the theme of health inequalities.

3 Why place matters for creating and maintaining health

It is widely assumed that the NHS creates good health and that a healthy place is one with lots of GPs and hospitals. However, evidence demonstrates that although the NHS is good at 'mending' people when they become ill, what keeps people healthy are the places and communities in which they live¹. Estimates suggest around 30-70% of the causes of good health lie outside the NHS. Good homes, clean air, jobs, parks and green spaces, and trusted friends and neighbours are all important determinants of population health.

Planning shapes the places in which people live, and so shapes their ability to live healthy lives. There is a compelling argument that national and local planning policy should be considered one of the 'determinants of health'. Speaking at the TCPA's conference in 2022, the Chief Medical Officer, Prof Chris Whitty, said:

'If you look back over the last 150 years, more has been done for public health by proper planning than almost any other intervention (except, perhaps, vaccination).'

4 Is there evidence about what health-supporting places are like?

Public Health England's '[Spatial Planning for Health – an evidence review](#)' identifies five aspects of the built and natural environment for which there is particularly robust evidence that they support good population health and the prevention of ill-health:

- Neighbourhood design
- Healthy homes
- Healthier food and the food environment
- Natural and sustainable environment
- Transport, including active travel infrastructure and public transport.

All these aspects can be looked at individually but they also all intersect. Benefits accrued in one domain often accrue benefits in the others as well, for example neighbourhood design impacts decisions about transport, which can lead to benefits or negative impacts on people's every day activity levels and the number of local short journeys and carbon emissions.

In addition, the World Health Organisation has been researching and publishing evidence about what makes a healthy place since 1986, through its [Creating Healthy Cities](#) project.

In summary, there is now plenty of robust evidence about what makes a healthy place. Consequently, the question to consider is: what is preventing healthy places being created?

5 What is preventing us from creating healthy places?

Throughout the English planning system, **health is not prioritised**. In England, all planning policy and practice is shaped by the [National Planning Policy Framework](#) (NPPF). However, it is not until paragraph 91 that the NPPF mentions health. The NPPF provides no strategic priority that planning and decision-making must create and maintain population health and reduce health inequalities.

National standards exist that aim to support healthy place-making, but these are not mandatory.

Examples include: the Nationally Described Space Standard (DLUHC); the National Model Design Code (DLUHC); Green Infrastructure Standards (Natural England); and the Decent Homes standard (DLUHC). Whilst policies in local plans are 'material considerations' for planning consent, they are not mandatory and subject to 'development viability' constraints which the NPPF requires local government to take into account when taking planning decisions. In other words, the standards can often be ignored if developers consider them too expensive to implement.

The Building Research Establishment (BRE) estimates that 2.4 million homes in England are failing to meet the Decent Homes Standard for 'category 1' hazards, resulting in poor health that costs the NHS over £1bn annually, and that is before considering the wider costs to society due to ill health, in terms of lost hours of work, poor school attendance, as well as missed carbon targets. Those on lower incomes are more likely to be living in poor quality housing (22% of people in the lowest quintile income group live in poor homes, compared to 4% in the top quintile). And people living in poor quality homes are twice as likely to have poor general health than people who do not (11% of people

compared to 22%)².

The government's strong focus on meeting housing targets has emphasised the quantity of homes delivered to the detriment of ensuring good quality homes and places³. Deregulation has exacerbated this, for instance through the expansion of 'permitted development rights' which allow old commercial buildings, such as offices and industrial units, to be converted into homes without applying for planning permission. Although this might sound sensible, the result is that these conversions missing out on the 'quality control' that is provided by having to meet planning requirements. For instance, homes are being created that are extremely small, are far from essential amenities such as shops and schools, or are difficult to reach on foot as there are no pavements (eg ex industrial units). For examples, [see here](#).

New homes created through permitted development do have to comply with building regulations and it is sometimes assumed that this is enough to ensure that they will support the health of their residents. However, building regulations are insufficient to ensure homes are healthy and resilient for the future (and were never intended to achieve this). For example, Approved Document L of Building Regulations does not meet the new 2035 and 2050 net zero carbon targets. Over half UK homes (55% or 15.7 million homes) currently fail the bedroom overheating criterion⁴, and an estimated 791 excess deaths are associated with overheating each year in England and Wales⁵. The evidence around current poor housing quality across all tenures only further highlights how essential it is to get the quality of our homes right from the outset as the cost of retrofitting is so harmful both to human and planetary health⁶.

New and converted developments are being created in locations that bake-in car dependency, reducing active travel, increasing air pollution and climate impacts. The failure to properly regulate and invest in healthy homes that are connected to their communities now will cost the NHS at least £135.5bn over the next 30 years, according to the latest BRE report⁷.

Weak national policy and non-mandatory standards mean that areas with the lowest land values, often the same areas with the highest levels of inequality and deprivation, are the least likely to achieve high-quality, health-promoting development⁸. Developers argue that to deliver homes in a viable way costs must be kept to a minimum. **The current system is exacerbating health inequalities in the most deprived places⁹.**

6 What needs to change?

There is overwhelming evidential justification for an immediate change to the NPPF to insert health promotion as a central purpose for planning - planning must create and support population and planetary health and reduce health inequalities.

Health creation, and mitigating poor health outcomes, must be front and centre of national and local planning policy.

The evidence on what contributes to healthy places is clear and national standards set this out in practical and implementable ways, but these **standards must be made mandatory**. England needs good quality homes to avoid health costs both now and in the future.

³ [12506 CaCHE Delivering Design Main Report IA.pdf \(housingevidence.ac.uk\)](#)

⁴ [Addressing overheating risk in existing UK homes - Arup 2022](#)

⁵ [Small-area assessment of temperature-related mortality risks in England and Wales: a case time series analysis, 2022.](#)

⁶ [HH-principles-and-evidence-2.pdf \(tcpa.org.uk\)](#)

⁷ [The cost of poor housing to the NHS - BRE Group](#)

⁸ [Land Value Capture \(parliament.uk\) \(2018, p18\)](#)

The TCPA is campaigning for a Healthy Homes Bill to create a statutory duty to ensure eleven Healthy Homes Principles are applied across all housing tenures, to protect everyone. Different aspects of sustainability are considered throughout the Healthy Homes Principles, with topics including: fire safety; accesses to amenities and green spaces; adaptability and inclusivity; and cutting carbon and climate resilience. These principles will set a benchmark for all new homes that enable our housing to better promote more inclusive health outcomes.

7 Why the government should act now

As the pandemic recedes, it is clear the UK is struggling with poor health far more than comparable countries. In 2022 Andy Haldane, former Bank of England economist, gave a lecture called '[Health is Wealth](#)'. 'People reporting as long-term sick have risen by about a third since 2010,' says Haldane. 'Around 17%, or 1 in every 6 UK workers now report as long-term sick. These are staggeringly high levels of reported ill-health.' Haldane suggests a number of policy areas in which investment could support better population health: one of them is 'placemaking', which is itself determined by planning policy.

England now lags behind both Scotland and Wales: both have national planning policies that explicitly state the role of planning in supporting population health and in supporting the reduction of health inequalities¹⁰.

Despite the evidence that what is required is stronger standards and less deregulation, the government is now [July 2023] consulting on **increasing** the scope of permitted development, not reducing it¹¹. The evidence suggests that this is likely to result in more poor-quality homes, likely to be lived in by people with little choice, who already tend to have the worst health.

8 Useful links:

Healthy Homes campaign

- [Healthy Homes amendments to Levelling Up and Regeneration Bill: link here](#)
- Evidence and rationale underpinning the eleven Healthy Homes principles: [link here](#)
- Further information and guidance about the Healthy Homes campaign: [link here](#)
- Further information about 20 Minute Neighbourhoods: [The 20-minute neighbourhood \(tcpa.org.uk\)](#)

9 Further information

For further information please contact:

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¹⁰ For Scotland see National Planning Framework 4; for Wales see Future Wales: the national plan 2040 and Planning Policy Wales.

- 11 Consultation on additional flexibilities to support housing delivery, the agricultural sector, businesses, high streets and open prisons; and a call for evidence on nature-based solutions, farm efficiency projects and diversification
- GOV.UK (www.gov.uk)

July 2023