



FPH Healthy Places SIG NPPF Consultation

The Faculty of Public Health (FPH) is the professional home for public health in the UK and supports over 5000 members across the public health system. Our vision is for a healthier and fairer place where everyone deserves the chance to live a long and healthy life. This includes promoting policies and programmes that improve health and wellbeing and tackle health inequalities, and making health a priority for cross government action.

The FPH Healthy Places Special Interest Group (SIG) has been established to provide a forum for information sharing, collaboration and advocacy on issues surrounding the natural and built environments, urbanisation, and sustainability. We have a range of members including Local Authority, Academia, and Health. This consultation response represents the views of the breadth of experience and expertise in Healthy Planning from across the UK.

We welcome the opportunity to review and comment on the proposed approach to revising the National Planning Policy Framework in order to achieve sustainable growth in our planning system. Our comments particularly focus on the Promoting Healthy and Safe Communities Chapter, as our area of expertise.

Draft National Planning Policy Framework

Chapter 8 Promoting Healthy and Safe Communities

Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

The planning system should support the development of healthy, inclusive communities that support health and reduce health inequalities. In order to do this Chapter 8 of the NPPF should strongly and clearly define the elements of a healthy community with reference to the standards that should be achieved by developments. In addition to this, the NPPF should more clearly state that the role of planning is to improve population health and wellbeing.

We recommend that national planning policy is strengthened to provide system levers for healthier more sustainable communities by mandating for greater and more meaningful Public Health involvement in planning policy and decision making. Chapter 8 of the NPPF should have greater clarity about what a high quality (or standard), healthy community should be.

The FPH recommends a stronger requirement that enables LPAs to require HIA for proposed developments. This would provide greater weight to the current PPG and support councils bringing forward local trigger points for when HIA are required as part of planning application. Use of Health Impact Assessment as a tool to determine the anticipated positive, negative, and neutral health impacts on communities as a result of proposed legislation, policy or service interventions. Additionally, reference to principles and tools, such as the [TCPA's Healthy Homes Principles](#) to raise standards, [Active Design Principles](#) and the [Place Standard Tool](#) to support co-design and create better (or good) quality places, based on the



need, priorities and ideas for improvement from the communities who live, learn, work and regularly visit a particular area to improve their health and wellbeing.

In addition to this, the NPPF should refer to health inequalities explicitly (within the document but also as an addition to Paragraph 96) in order to galvanise action through the planning system to understand and reduce the unfair and unjust differences in health faced by different communities.

In addition to this, the voice of people in planning decision making and policy development should be prioritised so the system can benefit from the expertise and insight of people on where they live. Inclusion of locals should be two-fold: by co-creating with communities and residents and by ensuring inclusive design that cater for different community needs, backgrounds and demographics whether existing or future.

70 (b) tackling childhood obesity?

It is the [FPH's position](#) that food is a significant driver of health and well-being and is essential to population health. The quality, adequacy and accessibility of healthy food and healthy eating behaviours are critical to individual and community health and well-being and are vital factors in addressing health inequities. As part of the [FPH Vision](#) for the Public's Health to support "a health and sustainable diet and physical activity across the life-course", the FPH recommendation is to:

- Provide additional resources and a stronger role for local government in the governance and delivery of food at a local level, giving it more control over issues such as takeaways targeting schoolchildren.
- Create a strategic plan to shift the UK to a healthier, more sustainable dietary pattern that reduces inequalities of diet-related health and wellbeing, and
- Promote policies and incentives geared towards creating healthy, sustainable environments that promote active travel and greater physical activity levels across the life course, healthy ageing, and building the capacity and capability of the health and care workforce to promote physical activity in all settings.

In order to effectively support a healthier weight for children, including tackling inequalities in excess weight, a whole systems approach should be taken with local actors and communities. This is an approach that addresses the environmental, societal and cultural factors that influence both food and physical activity. It should also be noted that a range of societal factors influence weight in the population that can also link to the planning system, including mental health, poverty, and deprivation.

[A whole systems approach](#) to address childhood obesity should include action through the planning system to increase the availability of healthier food, restrict prevalence of unhealthier food (such as fast food and food high in Fat, Salt and Sugar (HFSS)), improving access to affordable physical activity through green space and recreational facilities and by creating environments where cars are not prioritised and it is safe, attractive and convenient to walk or wheel. Currently, many of our communities and high streets encourage excess calorie consumption, and car use, and tackling childhood obesity will require changes.



There is good evidence that Hot Food Takeaways are not only often higher in calories and less nutritious, but also that they can be more prevalent in areas of higher deprivation. Stakeholders in Public Health at a local level are working in partnership with planning teams to use local planning policy to create healthier food environments. We are seeing good examples of local planning policy being developed, but success is variable at the Local Plan examination and planning appeals stages. Stakeholders point to a lack of emphasis and clarity in relation to Hot Food Takeaways. National planning policy could support action to address this at a local level by providing greater clarity, stating that HFT applications should be refused if close to a school. These types of interventions have been found by recent research to be effective ([Rahilly et al., 2024](#)) and acceptable ([Keeble et al., 2024](#)).

We recommend that the NPPF explicitly states that new hot food takeaways should not be supported within 400 metres (walking distance) of primary and secondary schools. Local stakeholders also report issues with other use classes, such as restaurants, providing HFSS food mostly for takeaway, demonstrating a need for the planning system to more clearly consider the health impact of other use classes.

We recognise that in addition to preventing over proliferation of food that is high in fat, salt and sugar, national planning policy should also promote access to healthier food retail such as markets and shops. We also recommend that new major developments should have access to a food shop or market within walking distance (generally thought to be 400m).

Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Yes, we agree with the change to a “Vision and Validate” model. The FPH aims to promote a [vision of a Transport system](#) that functions to improve health and reduce health inequalities by disseminating knowledge of the relationships between transport and health to health and transport professionals, relevant public bodies, and promoting transport policies which will improve the health of the people and reduce inequalities between populations and individuals.

We agree with the proposed changes to the NPPF, to move to an approach in transport planning supporting developments that prioritise active travel modes and provide comprehensive, available, reliable, affordable, accessible, and safe public transport. Currently, some communities are forced into car ownership, for example, through a rural geographical location or lack of local transport options and a just transition to less car dependent developments should also aim to create better active and public transport systems through area-wide planning policy. Future planning must consider any interdependencies between transport options whether existing, planned, or active in order to remove any unintended consequences on users and ensure transport options benefiting healthy people and the environment truly serve their intended purpose. Proposals should also consider future population projections and any knock-on effect to eliminate any unforeseen pressure, user stress or compensatory behaviour (e.g., opting to use cars instead of public transport due to overcrowding). More generally, any changes to transport options through improvements or additions should ensure that these don't ‘price out’ existing residents making it unaffordable for them.



The planning system can support healthier transport systems by clearly prioritising active travel infrastructure and good quality public transport over developments and infrastructure that are car dependent and by embedding active travel throughout existing infrastructure. Planning systems should require developments to demonstrate good design principles that promote green spaces, safer streets, and areas to socialise and play, rather than streets designed around cars. This can help increase physical activity and active travel and reduce the harms from motor vehicles including air pollution and traffic collisions. The use of good design codes fully incorporating active travel are therefore essential.

Transport plays a key role in building an inclusive and sustainable economy because good quality, reliable, affordable, accessible, and safe transport connects us to jobs, learning, shopping, and services, supporting individual incomes and local businesses. In addition to this, it enables people to do essential, often unpaid, activities that support our economy: caring for family or friends, volunteering and taking part in community work.

Stakeholders in local Public Health teams find it difficult to make the case for healthier transport when balanced against planning for meeting current car prevalence/dependency. The current policy position is too lenient in relation to cars and motor vehicles. In addition to the inclusion of a vision led approach, the NPPF could be clearer on the need to create communities and infrastructure that are not reliant on cars and where active and public transport is the first choice. This should run throughout the NPPF including: Paragraph 74: "... and supported by the necessary infrastructure and facilities (including good quality, convenient and accessible active travel and public transport infrastructure)." Paragraph 108 "c. designs prioritise walking, cycling and public transport use over motor vehicles". Paragraph 109 should be amended:

"the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

Chapter 3 – Planning for the homes we need

Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?

Yes

The housing system is complex with multiple factors having led to the current crisis, and it important that the planning system is not seen as the root cause of the failure to meeting housing need. Reforming and investing in the Planning system may be part of the solution but will not achieve the expected aims alone. An important long-term solution to this crisis, in addition to improving and better utilising existing buildings, to invest in good quality, healthy housing, especially homes for social rent.

Although providing sufficient housing to meet population needs is very important, the planning system should be sufficiently robust to prevent the development of unsuitable, poor



quality and energy inefficient homes to meet that need. Housing is an essential building block of our health, wellbeing, and prosperity. In turn, a healthy population is essential to inclusive economic growth. As such, in order to build a thriving economy and secure the country's future prosperity within climate boundaries, the quality of housing and communities should be paramount. In addition to this, the planning and housing system should be designed to reduce inequalities in health, income, and quality of life by promoting inclusive design and practices that do not leave behind our most disadvantaged communities and populations. National planning policy can support this by providing a stronger steer in relation to sustainable development that includes the role to improve health, equity and climate mitigation and adaptation.

The proposed 1.5 million future homes provide an opportunity for us to build homes that are an example of excellence in design, quality, innovation, and social justice (in that they meet the right of every family to have a safe, healthy home that meets their needs). It is important that a renewed focus on housing targets and the presumption in favour of development shifts the focus and goals away from unhealthy developments and back towards creating healthy, resilient, and sustainable residents, communities, and environments. To achieve this goal, an integrated approach to any planned developments becomes critical to ensure future houses are sustainable, healthy, and not damaging to people or the environment.

Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?

No.

It is essential that the amendments to the presumption in favour of sustainable development do not open the doors to poorer quality developments by limiting the powers of local areas to expect high quality from developers. As such, any approach to development should be underlined by a coupled people-environment view. We recommend that that healthy development is also explicitly mandated by national planning policy utilising either Health Impact Assessment or Healthy Homes Standards, such as the TCPA Healthy Homes Principles [Healthy Homes Principles - Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk/healthy-homes-principles). It is also essential that affected communities are given a voice and the power to shape the communities that they and their families will live in. Local people have expertise in what works for their health and their communities, and they should be given the chance to influence decisions about what is built, and where. This must go beyond formal consultation opportunities and start very early in the development proposal process, consideration should be given to the use of community engagement tools such as the [Place Standard](#) and offer the opportunity to co-design to ensure sustainability. Where existing communities do not exist, e.g. the development of entire new estates, the views of neighbouring communities, parish/town councillors and ward councillors must be considered.



Chapter 5 – Brownfield, grey belt and the Green Belt

Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports? **Yes or no?**

Yes.

Although the focus on developing Brownfield land first can be appropriate, it is important to note that there can be health impacts associated to this and in that it might expose residents and those living in the vicinity to health risks. [Wang et al. \(2023\)](#) conducted a recent systematic review which found:

"significant positive associations between brownfield land proximity or density with at least one health relevant outcome, including poorer self-reported general health, increased mortality rates, increased birth defects, increased serum metal levels, and accelerated immune ageing"

This means that there must be a clear mandate in national planning policy that new development on brownfield, like all development, must meet high quality and design standards utilising accepted principles or methods of quality assurance. Good quality, meaningful community engagement, that is both accessible and inclusive for all, is also essential.

In addition to considering the overall quality of these developments it is important that groups who already experience [health inequalities](#) and disadvantage, such as ethnic minority communities are specifically considered in relation to development and new development should seek a net gain in health and wellbeing.

The current policy (Chapter 11) is too lenient in relation to design standards and quality. In order to ensure that brownfield development maintains the highest quality standards and does not negatively impact on health and wellbeing, Paragraph 124 should have the following addition:

"(planning polices and decisions should) refuse applications that do not meet high standards for design including light, outlook and space and should promote developments that reduce health inequalities and prioritise active and public transport, connections to health and community infrastructure, and meet high standards for green space.

See [Green Infrastructure Home \(naturalengland.org.uk\)](#) and [Green Infrastructure Principles \(naturalengland.org.uk\)](#)

Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Yes.



National planning policy can support the achievement of climate, biodiversity goals through nature and it is good to see that LPAs will be expected to draw upon the Green Infrastructure Framework as part of the golden rules proposed in this NPPF review through Paragraph 156., **the FPH believe that it can go further by mandating that developments should meet the Natural England green infrastructure principles.**

There are physical and mental health benefits of having access to greenspace close to home and many groups, such as certain ethnic minority groups and people in areas of high deprivation can have unequal access to green space ref: [Improving access to greenspace: 2020 review \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/86422/improving-access-to-greenspace-2020-review.pdf). Improving access to greenspace can support healthy behaviours, such as increased physical activity, sport and active travel. Green space can provide a buffer against pollutants, shade from the sun and relief from excess heat, and can provide flood protection in the form of sustainable urban drainage. Good quality, accessible and inclusive green space can provide places for people to meet and socialise. In addition to this, green space provides green jobs, community space and amenity. All of these things can save society and the NHS in the long term by improving health, mitigating against risks to health, and promoting stronger communities and local economies ([Yang et al.](#), [Defra](#), [Natural England](#)). It is important that the quality, accessibility and inclusivity of green space (particularly for underserved groups) is also considered.

Chapter 6 – Delivering affordable, well-designed homes and places

Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes.

We support the commitment to build more affordable housing and social rent by strengthening planning obligations to build more affordable homes and to support councils and housing associations to build more social rented properties. It is right that those who require social rent should be considered in housing requirements. It is key that developments respond to the needs of the community. An affordable home is an essential building block of a healthy life and a sufficient supply of affordable housing can not only support a healthy and thriving workforce, but can prevent serious social issues such as homelessness, housing insecurity and poverty.



Chapter 13 – Public Sector Equality Duty

Question 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

The FPH would recommend the use of the [Health Equity Impact Assessment \(HEAT\)](#) in order to identify and embed action on health inequity for groups with protected characteristics and [other domains of health inequality](#) impacting other groups, such as by geography, Inclusion Health, social class, income and deprivation.

Although, the allocation of responsibility to local authorities is a welcome change; it is critical that any changes proposed are matched with meaningful funding to ensure that authorities can undertake those changes to deliver healthy and sustainable communities.

The changes proposed may also lead to points of contention and conflict with local residents. Local authorities and public health professionals should be given meaningful authority to cater for residents' needs instead of overriding their voices. The NPPF should actively promote co-creation and consultation with residents from conception to the end to eliminate any conflicts and ensure developments work for local communities.