

## Planning

### Introduction

The return of public health responsibilities to local authorities through the [Health and Social Care Act 2012](#), and changes to the planning system through the [Localism Act 2011](#) and the [National Planning Policy Framework 2012](#) (NPPF), have resulted in local government being required to give greater consideration to local health and wellbeing in formulating policies and making planning decisions.

The government's overarching objective for the planning system is that it should facilitate and promote sustainable patterns of growth. It should do more than merely regulate development. Local planning authorities should be place-shapers and place-enablers focussing equally on environment, community and prosperity.

This section looks at the role of the planning system in supporting and creating healthy communities. It has clear links with many other chapters of this JSNA, for example Housing and Active Travel, and so does not consider individual subject areas in detail. It gives an overview of the planning system and how it can influence the health and wellbeing of our community.

### Evidencing the links between health and planning.

The link between health and planning has always been acknowledged though it is only fairly recently that its profile has been raised and health and wellbeing has been explicitly reported in mainstream planning publications.

In 2008 Professor Sir Michael Marmot was asked by the then Secretary of State for Health to chair an independent review to identify the most effective evidence-based strategies for reducing health inequalities in England. The final report '[Fair Society: Healthy Lives](#)' was published in February 2010 and concluded that reducing health inequalities would require action on six policy objectives:

- Give every child the best start in life
- Enable all children, young people and adults to maximise their capabilities and have control over their lives
- Create fair employment and good work for all
- Ensure healthy standard of living for all
- Create and develop healthy and sustainable places and communities
- Strengthen the role and impact of ill-health prevention.

Nationally the government's Public Health White Paper, [Healthy Lives, Healthy People](#), cites the 2010 Marmot Review which states that:

*'There are gaps of up to 7 years in life expectancy between the richest and poorest neighbourhoods, and up to 17 years in disability-free life expectancy.'*

Following on from Sir Michael Marmot's work, in 2011 the Spatial Planning and Health Group (SPHAG) reported on its extensive review of evidence into spatial planning and health. SPHAG is made up of planning and health experts: academics, practitioners and community representatives seeking to improve public health through the positive use of town planning. In its report '[Steps to Healthy Planning: Proposals for Action](#)' SPHAG found evidence that the following 'planning' issues impact on physical and mental health:

- The location, density and mix of land uses
- Street layout and connectivity
- Access to public services, employment, local fresh food and other services
- Safety and security
- Open and green space
- Affordable and energy efficient housing
- Air quality and noise
- Extreme weather events and a changing climate
- Community interaction
- Transport.

The study concluded that formulating and implementing planning policies and development proposals based on how they affect human health is likely to improve our health. It is possible to 'design in' health to urban and rural environments in the same way that it is possible to 'design out' crime. Twelve actions are proposed by SPHAG along with a [Spatial Planning and Health Group Checklist](#). These provide a useful resource for both planning and health professionals.

In 2012 and in response to the new policy environment the Town and Country Planning Association (TCPA) commenced a '*Reuniting Health with Planning*' project. An output of this project is the handbook '[Reuniting Health with Planning – Healthier Homes, Healthier Communities](#)'. The handbook sets out how local areas can use the planning, health and social care reforms to better integrate planning and health.

In 2013 the project moved on to phase 2; to focus on advice to help planning and health practitioners work together to create healthier places and communities based on real life case study areas. A second report '[Planning Healthier Places](#)' was published by the TCPA in 2013 and draws on roundtable events in eight case study areas. It considers how local authorities and partners are putting this agenda into practice and looks at the challenges they are facing and how places can be shaped to respond to public health objectives.

December 2014 saw the publication of '[Planning Healthy-weight Environments](#)'; a practical resource for practitioners to use when working together to enable the creation of healthy-weight environments by setting out a framework of six 'planning healthy weight environment' elements; movement and access; open space, play and recreation; healthy food; neighbourhood spaces and infrastructure; buildings and local economy.

This was followed in 2015 by the publication of '[Public Health in Planning; good practice guide](#)' which brings together and signposts existing guidance on the

planning process. It highlights existing good practice examples and first-hand advice from Councils about working relationships between public health and planning.

In March 2016 [Building the Foundations: tackling obesity through planning and development](#) was published. This is a practice based report and is the result of a workshop series in 2015 demonstrating innovative practice from fourteen local authority areas across England and their partners on how to tackle obesity and other problems by using planning policy and in making decisions on new housing and mixed use developments.

Looking forward to 2017 the TCPA is proposing two further projects:

**'Developers and Well-being: gaining a business perspective on building healthy places'** Project. This project builds on the successful and widely disseminated Planning Healthy Weight Environments (2014) and Building the Foundations: tackling obesity through planning and development (2016). There is already a greater appreciation and understanding of the role of the planning system to tackling obesity with the support and alignment to public health objectives from practitioners to elected members. In this project the TCPA intends to take it to another level to engage with the development industry and provide insight which can not only help Local Authorities better engage with developers, but also for developers to take greater consideration of their schemes of potential health impacts and benefits. It will seek to follow a successful model of delivery from previous projects of collaborating with local partners during the process to ensure local buy-in and maximise outreach and support. The outputs will be case studies-based drawing from good practice on developments and regeneration places.

**'15-Year Forward View: Healthcare needs in planning and development'** Project. This project builds on the feedback from practitioners about the lack of and consistent planning guidance around planning for healthcare needs in the planning and development process. There are a number of current legal and policy requirements such as the Duty to Cooperate on Local Planning Authorities and CCGs which are not being implemented consistently across the country. This can result in 15-year local plans and planning decisions which do not account for the population's health needs and miss opportunities to lever in development finance to support infrastructure and service needs. This project will obtain practitioner views, provide practical guidance on building a shared local evidence base, inform policy development and commissioning processes, and highlighting meaningful approaches to collaborating with health providers in plan-making and on development proposals. The outputs will be a series of workshops with local planning and commissioning organisations resulting in a planning guidance publication.

The TCPA offers the view that *'These are formative times for the health and planning agenda. There is pressure to act on a range of public health topics, from providing sufficient affordable housing, to restricting the spread of betting shops, to improving access to healthy food. New organisations and policies will influence planning for*

health. Evidence on the solutions the planning system can help to implement will continue to evolve.'

In their policy rainbow (below), Hugh Barton and Marcus Grant present a diagram which reflects the relationships between people, their local and global environments and the determinants of health and wellbeing.

What is evident from this diagram is the breadth of other policy areas that planning can influence. Planning is distinctly different from many other strategic needs assessment chapters because it is the way that our environments are planned and delivered that determines how successfully we address health and the health inequalities described in detail elsewhere in this JSNA.

By creating health-promoting environments we can improve the health and wellbeing of people living within them and reduce health inequalities. By taking effective action and investing in prevention we may also be able to reduce costs to health and social care services.

For example, one study in Bristol found that switching from commuting by car to an active travel mode could create annual health budget savings from £1,121 (cycling) to £1,220 (walking) per person because of increased health benefits. But such options will only be taken up where safe and direct routes have been planned in.

The links between the health and planning agendas are beyond question.



Hugh Barton and Marcus grant 2006 - -The Health Map or Policy Rainbow

## National Policy

[The National Planning Policy Framework 2012](#) (NPPF) is a relatively short statement setting out the Government's approach to planning issues. It is supplemented by the [National Planning Practice Guidance](#) (NPPG); an on-line resource expanding the NPPF's principles and setting national good practice. Locally produced plans, i.e. local plans produced by local authorities such as Bedford Borough Council and Neighbourhood Plans produced by parish councils and other neighbourhood forums must comply with the policies and guidance in NPPF and NPPG unless local circumstances justify an alternative approach.

In the terms of the NPPF, there are three dimensions to sustainable development; economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy. (Para 7).

All three dimensions have significant health components and implications.

One of the NPPF's core planning principles is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. (Para 17).

Another is to take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs (para 17).

Section 4 of the document is given over to promoting sustainable transport. The NPPF recognises that transport policies have an important role to play in facilitating sustainable development and also in contributing to wider sustainability and health objectives (para 29).

Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing local plans, local planning authorities should support a pattern of development which, where

reasonable to do so, facilitates the use of sustainable modes of transport (para 30).

All proposals for development that are likely to generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment and possibly a Travel Plan. These documents will consider the likely impact of additional traffic on the local area (and possibly beyond) and ways of reducing that impact (paras 32-36).

Section 8 of the document is about promoting healthy communities. It explains that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. In order to do this the preparation of plans and decisions on planning applications should aim to involve all sections of the community. Plans that enable new development should promote interaction between members of the community through positive design measures such as active frontages. Safe and accessible environments should be created which encourage the active use of open areas (para 69).

The NPPF also explains that existing open spaces should generally not be built upon and that new open spaces should be created as an integral part of new developments (paras 73-78).

#### Health Impact Assessment

The National Planning Practice Guidance explains that a health impact assessment may be a useful tool to use where significant impacts may arise as a result of a development proposal.

A health impact assessment helps to ensure that health and wellbeing are being properly considered. Whilst health impact assessments can be carried out at any stage in the development process they are best done at the earliest stage possible. They can be stand-alone assessments or part of a wider sustainability appraisal or environmental impact assessment. The process looks at both positive and negative impacts as well as indirect implications for the wider community. The aim of the health impact assessment is to identify the main likely negative impacts and prompt discussion about how they might be resolved or mitigated. The assessment should also look at how the good consequences for health can be enhanced. Health impact assessments can be 'full', 'rapid' or 'desktop' depending on the depth of the study required.

The [HIA Gateway](#) is operated by Public Health England and it gives access to a range of documents related to health impact assessment. It identifies six steps in the process of carrying out a health impact assessment. They are:

- Decide whether a proposal requires assessment by HIA – often called screening.
- Clarify the questions to be answered by the HIA and how the assessment will be carried out – often called scoping
- Decide what the health impacts will be and how big by considering each pathway by which the proposal could impact on health – often called appraisal and assessment.
- For each option make recommendations as to how good health

consequences could be enhanced how bad health consequences could be avoided or minimised and how health inequities could be reduced.

- Communicate the findings of the HIA to the decision makers.
- Evaluate the quality of the HIA highlighting lessons for future HIAs. Monitor which proposals and if possible assess whether any predictions made were correct.

### **Bedford Borough Council as place-shapers and place-enablers**

#### **The Sustainable Community Strategy 2009-2021**

This is a core document for the Council when exercising its duty to promote wellbeing under the Local Government Act 2000. It provides the framework for the policies and objectives of the local plan, for example in relation to quality of life, safer communities and improving healthy living. It was produced by the Bedford Borough Partnership in 2009 and its vision challenges everyone within the Partnership to work together around seven themes, which each have specific aims, to explain how the Strategy will be delivered. The seven themes are:

- Thriving:– A strong local economy
- Greener – Supporting a natural environment that is valued and enjoyed by all and contributes to the development of a low carbon community
- Aspiring – Children and Young people may lead safe, healthy and happy lives and are provided with life opportunities
- Healthy – Everybody has access to high quality health and social care services when needed
- Safer – People live without the fear of crime
- Inclusive – People whatever their background feel part of the wider community. Inequalities are reduced
- Sustainable – The supply and quality of housing is capable of supporting the anticipated increased population. Housing and economic growth are built on sustainable improvements to related infrastructure.

#### **Bedford Borough Council Corporate Plan 2012-16**

The Council's Corporate Plan explains what the Council will itself do to meet the objectives of the Sustainable Community Strategy. Four themes are identified and within each theme a number of distinct objectives are explained. The four themes are:

- Theme 1: Providing a Healthy Future
- Theme 2: Protecting and Preserving the Local Environment
- Theme 3: Brighter Futures for Children
- Theme 4: Serving Customers Effectively.

Planning policy documents must deliver the objectives of the Corporate Plan. It is expected that the Council will be able to identify clear paths between the broad

nature of its corporate objectives and its specific planning policies and proposals.

### **A growing population**

With a rising population and increasing demand for jobs and housing, planning policy documents have a very important role to play in explaining how the growth needed to meet the local needs of Bedford Borough will be achieved.

There is a lot of factual information about Bedford Borough in the [Population and Place chapter of the JSNA](#).

### **Working in partnership**

Preparing a new local plan containing planning policies that direct and shape growth must take account of these facts and trends and also of evidence of future change over the plan period. It must be an inclusive process. A sound plan can only be achieved if a wide cross section of the community has had appropriate opportunity to help shape it. Information and evidence contained in other chapters of this JSNA will also influence the plan's policies and proposals.

In order to judge inclusivity, the Council regularly gathers information during consultation events to see whether responses have been received from a representative sample of the Borough's residents. It has been difficult to draw any meaningful conclusions from these exercises because most people choose not to complete the optional personal information sheet. However, we are aware that organisations representing hard to reach groups or those with protected characteristics do not often respond to our invitations to get involved in plan making. This is a concern and requires further investigation.

The statutory duty to co-operate requires us to work with nearby councils and other public bodies to consider strategic cross-boundary issues. Included in this list are the Clinical Commissioning Groups and National Health Service Commissioning Board who are required to work positively with the council in the preparation of its plan. Arrangements are in place to ensure that the duty to cooperate is carried out in an effective way.

In 2013 Bedford Borough Council updated its [Statement of Community Involvement](#); a document setting out when and how people and organisations are encouraged to get involved in the plan making process and in the determination of planning applications. This has helped to raise awareness of the different opportunities there are for people to become involved in preparing plans and other policy documents.

Without an up to date local plan the Council will not be able to guide when, where and how development takes place. The best way to deliver sustainable growth that meets the needs of communities is to prepare and adopt a relevant and up to date plan.

## A Local Balance

There are many tensions in the planning system. For example:

- The Government would like to see local plans prepared quickly yet the need for a robust evidence base, consultation and effective engagement, along with the complexities of the duty to cooperate all add to the timetable.
- In particular political sensitivities and the re-apportionment of growth across boundaries through the duty to cooperate (in Bedford's case potentially from Luton and London) take time to resolve.
- Nationally there is clear evidence of a housing shortage yet locally many people are reluctant to support growth near to where they live. This is especially so in countryside and village locations where the local context is particularly valued and change is often resisted.
- Early work on the Local Plan 2035 shows that there is a reluctance to support additional growth without a guarantee that local infrastructure will be provided or improved. This may include open spaces, sports pitches and health facilities to support growing communities.
- The costs of infrastructure add to the overall costs of development and in difficult economic circumstances may make it unviable. This means that unless the costs associated with development are reduced, development will simply not happen. The difficult choice may then be between no new housing or housing delivery with reduced infrastructure provision.
- The development of brownfield sites is preferred by many people to the development of greenfield sites but the supply of available brownfield sites in Bedford Borough is small. Most of the older outdated industrial sites in Bedford and Kempston have now been re-developed, predominantly for housing. Those that remain undeveloped have complex and costly issues to resolve. Brownfield sites in villages are hard to find and maybe similarly constrained.
- The most sustainable location in the borough is the urban area of Bedford and Kempston yet opportunities for development (not already identified) are few. Congestion, and in some places air quality, is a concern and new or intensified development would potentially make the situation worse.
- Locations away from the urban area are less sustainable and likely to lead to reliance on the car for essential journeys, unless the location and design make more sustainable modes more attractive.
- New settlements, perhaps garden villages, may provide a sustainable alternative to the expansion of existing communities. However these are complex to plan and deliver with the first new dwellings being built many years after sites are first identified for consideration. Alone these will not satisfy the need for housing growth.

The challenge for the local plan process is to consider these and other issues and create and deliver a strategy that provides sustainable growth in the best place to meet local needs.

## **What are we doing?**

### **Local planning documents**

The NPPF reinforces the plan-led system as the starting point for making decisions on planning applications. This means that it is important that the Council has up to date local planning documents to set out the locally agreed development needs and priorities of the area.

Bedford Borough Council has a number of documents that together make up what is known as the statutory development plan. All current planning policies are contained in these documents. They are :

- [Saved Local Plan 2002 Policies.](#)
- [The Core Strategy and Rural Issues Plan \(2008\).](#)
- [The Bedford Town Centre Area Action Plan \(2008\).](#)
- [The Allocations and Designations Local Plan \(2013\)](#)
- [Saved Minerals and Waste Local Plan policies \(2005\)](#)
- Adopted Minerals and Waste Local Plan (2014) (this is the web link)  
<http://www.centralbedfordshire.gov.uk/planning/minerals-waste/framework/policies.aspx>

These documents make allocations for development to meet identified needs up to 2021. The Council is currently preparing a replacement local plan that will look forward to 2035. More information on the progress of that plan can be found on the Council's [web site](#).

The Localism Act 2011 introduced a new tier of statutory planning documents. For the first time neighbourhood areas can be identified for which local groups can prepare a neighbourhood plan. This tier of plans sits below the Local Plan and must be consistent with it. It can however go into far more detail than a borough-wide plan can and can address issues that are important locally. Concerns about the health of local residents could help to shape the policies in a neighbourhood plan.

A neighbourhood plan must be prepared in accordance with regulations prepared under the Localism Act and will be scrutinised to ensure it is capable of being adopted and implemented. A local council or neighbourhood forum is responsible for preparing the neighbourhood plan but Council Officers will provide appropriate help and guidance. The Council has a web page explaining more about [neighbourhood planning](#) in Bedford Borough.

### **Development Management; making decisions on planning applications.**

Planning decisions on proposed development are made in accordance with the policies of the development plan (the documents listed above).

Design and access statements continue to play an important role in getting

developers to think about design early on in the development process. Where appropriate these statements can be used by public health colleagues as the basis for evaluating the health and wellbeing impact of a proposed development.

In particular people's health and wellbeing are influenced by their access to and quality of housing, including affordable housing. There is more about this in the Housing chapter of this JSNA.

### **What do we need to do?**

We need to:

- Review saved planning policies and draft new planning policies taking account of the impact that they can have on health, both positive and negative. Use the JSNA and Health and Wellbeing Strategy to assist this process.
- Use the checklists in '[Reuniting Health With Planning](#)' (TCPA) (section 4) and [Steps to Healthy Planning](#) (SPHAG) to guide the development of the Local Plan 2035.
- Work in partnership with CCGs and Public Health colleagues in preparation of the local plan.
- Consider the need for a cross-boundary policy approach to address health issues under the Duty to Cooperate.
- Consider health issues as part of the [Community Infrastructure Levy](#) list of priority infrastructure (Regulation 123 list) when it is reviewed.
- Agree the extent to which and how Health Impact Assessment (HIA) is to be used both in plan making and development management .
- Arrange HIA training for Development Management and Planning Policy staff.
- Related to this, consider whether the articulation of the health impacts of development proposals should be an integral part of the determination of planning applications.
- Consider whether it would be appropriate to add 'assessment of health impacts' in all planning committee reports and prepare standard answers from which to select.
- Monitor the use and effectiveness of HIAs and consideration of health in the development management process through monitoring of relevant planning policy in Local Plan 2035.
- Keep up to date with best practice and help to shape national guidance where possible through responding to government consultations.
- Continue to improve engagement, especially with hard to reach groups.

### **This chapter links to the following chapters in the JSNA**

- Housing
- Active Travel
- Natural Environment
- Air Quality
- Climate Change and adaptation
- Food environment Improvement
- Anti-social behaviour



- Population and Place.