

Consultation response form

This is the response form for the consultation on the draft revised National Planning Policy Framework. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (*)

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Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?*

Organisational response

If you are responding on behalf of an organisation, please select the option which best describes your organisation. *

Other (Please specify)

If you selected other, please state the type of organisation

Faculty of Public Health of the Royal Colleges of Physicians of the United Kingdom

Please provide the name of the organisation (if applicable)

Faculty of Public Health of the Royal Colleges of Physicians of the United Kingdom

Please see below for the full response from the Faculty of Public Health to the draft revised National Planning Policy Framework.



Faculty of Public Health

of the Royal Colleges of Physicians of the United Kingdom

Working to improve the public's health

Response to the Draft National Planning Policy Framework (NPPF)

1. About the Faculty of Public Health

1.1 The Faculty of Public Health (FPH) is a registered charity and membership organisation for nearly 4,000 public health professionals across the UK and around the world. Our role is to improve the health and wellbeing of local communities and national populations.

1.2 We do this by professionally supporting the current public health workforce and the development of a future workforce, encouraging and promoting new public health research and policy, and improving public health practice at a local, national, and international level by campaigning for change and working in partnership with local and national governments on specific public health projects.

2. Overall Comments

2.1. Our expertise relates to health and wellbeing and we are making our comments accordingly. We welcome the inclusion of a specific section within the framework covering the promotion of healthy and safe communities. We also recognise that throughout the draft NPPF there is mention of health and key health determinants such as sustainability, active travel and climate change. However, there are areas where this could be strengthened, and where the NPPF could support closer working between public health, planners and developers to deliver healthy and sustainable places and communities.

2.2. Our first concern is that in the current NPPF, paragraph 171, there is specific provision for health leads to be consulted in the planning process. This provision is not present in the draft of the proposed updated NPPF. Promoting health is stated as one of the objectives for the NPPF, and section 8 provides specific guidance on the promotion of healthy and safe communities. Achieving this will need planners to work closely with public health and health colleagues. We would therefore strongly recommend that the new NPPF includes a similar, explicit requirement for local public health and health leads to be consulted in the planning process.

- 2.3. Although there is wide mention of health and the promotion of health, there is less recognition in the draft NPPF of health inequalities, and the role of the planned and built environment in reducing inequalities and in promoting equal opportunities for everyone in the communities affected. We have identified areas where this can be strengthened in the final NPPF.
- 2.4. We have some concerns that some of the recommendations in the draft NPPF may not be based on the most up to date evidence for effectiveness in promoting health and reducing inequalities. Some of the recommendations made could contradict current recommendations and practice guidance. We would urge the Ministry of Housing, Communities and Local Government (MHCLG) to consider current evidence in their decision making, and we would be pleased to offer our help in developing the evidence base and in disseminating this to the relevant organisations and practitioners.
- 2.5. The current NPPF requires that local authorities consider whether opportunities for large scale development, such as new settlements or extensions to existing villages or towns, that follow the principles of Garden Cities, are 'the best way' of achieving sustainable development. The draft revised NPPF, published for consultation on 5 March 2018, has deleted reference to these important standards. Garden city principles promote sustainable and healthy developments and create beautiful places which offer a wide range of employment opportunities and genuinely affordable homes, while enabling more sustainable and healthy lifestylesⁱ.
- 2.6. Re-committing to the Garden City principles in the NPPF is the starting point to unlocking a new generation of highly sustainable places that meet housing, employment and quality of life needs while promoting innovation. We recognise the Prime Minister's personal commitment to building communities the nation can be proud of, and we urge the government to ensure the Garden City principles are reinstated in the NPPF.
- 2.7. We also have some concerns in regard to clarity and uncertainty throughout the document which we would be pleased to see resolved. We have noted our thoughts below. Thank you for your consideration of our comments.
- 2.8. A detailed response to each section of the draft revised NPPF is given below.

1. Introduction

1.1. No comments

2. Achieving sustainable development

2.1. Although we are pleased to see the inclusion of the three pillars of sustainability, we are disappointed that the UN sustainable development goals (SDGs) have been omitted. In 'Implementing the Sustainable Development Goals', published in December 2017, the Cabinet Office set out the UK commitment to delivery of the Sustainable Development Goals, and stated that;

*"The UK was at the forefront of negotiating the SDGs and will be at the forefront of delivering them"*ⁱⁱ

2.2. The omission of SDGs from the NPPF less than 3 months after the above quote from the Cabinet Office is therefore disappointing. A healthy and sustainable planned and built environment is essential to delivery of the SDGs. The new NPPF is an important opportunity to embed the SDGs in key policy, and we would strongly recommend that the SDGs are included throughout the final NPPF.

2.3. We recommend that paragraph 8.b is amended to include the following statements; *"By ensuring that a sufficient number and range of **affordable homes which provide a range of housing options across the social gradient** to meet the needs of present and future generations and reflect the current and future needs of people at all stages of their life; and by fostering a well-designed, **healthy** and safe built environment..."*

2.4. **Para 8.c** We support the approach in that it recognises the importance of protecting and enhancing the natural environment, including resource use, biodiversity, pollution and climate change. However, we recommend that air, land, water and noise pollution are explicitly referenced in this paragraph.

2.5. **Para 10** This paragraph, which introduces the presumption in favour of sustainable development (paragraph 11), should refer to a definition of sustainable development which includes delivery of the UN sustainable development goals.

2.6. **Paragraph 11** The presumption in favour of sustainable development needs to be more explicit in stating that sustainable development includes social and environmental objectives as well as ensuring sufficient housing. The NPPF includes words such as “significant and “severe” but there is insufficient explanation of what these terms mean and any associated thresholds. For example, whilst **Para 11 B(ii)** states that “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole” the extent of impacts outweighing benefits is not stated. Indeed, this sentence is concerning because although individual negative aspects of developments may be small, their cumulative effects can result in health and environmental problems.

3. Plan-making

3.1. **Para 20** The focus on strategic policies within the draft NPPF should be expanded to include other local strategic policies important for the health and wellbeing of local people. These should include;

- Joint strategic needs assessments, these are statutory local documents which provide evidence for those needs of the population which could be addressed through the planned and built environment.
- Joint Health and Wellbeing Strategies, the strategic plan for a local area for improving health and reducing health inequalities
- Local health delivery plans (e.g. Sustainability and Transformation Partnerships and Integrated Care Systems)

3.2. Public health and NHS partners need to be included throughout the development of local plans, not just as a consultee when the plans have been developed. This could be through public health being involved in working groups developing sections of the plan, or through working on the whole local plan document. Health and Wellbeing Boards provide a strategic forum where these partners come together with local politicians and wider partners. Consideration should be given for Health and wellbeing boards being included as a consultee on the development of local plans.

3.3. This paragraph should also include reference to reductions in health inequalities and improved health and wellbeing. We feel this is not the same as **Para 20(e)** which appears to refer specifically to healthcare facilities.

3.4. **Para 22** For strategic polices to anticipate and respond to long-term requirements and opportunities the need to be informed by a wider range of information including forecasts for population and demographic change and changes in health needs, for

example, an ageing population. This information is held by public health and therefore they need to be fully involved in the development of strategic planning policies.

- 3.5. **Para 27** The list of ‘relevant bodies’ should include public health and NHS bodies, for example, local council public health teams, Public Health England, Clinical Commissioning Groups, NHS England, and local sustainability and transformation partnerships.
- 3.6. **Para 28** ‘Where additional infrastructure is necessary’ – should explicitly include NHS and other health bodies.
- 3.7. **Para 31 – 32** The uptake of neighbourhood plans has been largely in more affluent and rural areas. To ensure equity and to support a reduction in inequalities, there needs to be more support for resident involvement in planning in urban areas, especially in areas of deprivation.
- 3.8. **Para 33** This paragraph states that local policies should be underpinned by relevant evidence, this should explicitly reference local assessments of need including local joint strategic needs assessments and joint health and wellbeing strategies.
- 3.9. **Para 35** The discussion of sustainability appraisal includes economic, social and environmental objectives. This needs to be expanded to include appraisal of health impact, including assessment of impact on health equity. This could be through a separate health impact assessment, though inclusion of health in existing statutory impact assessments may be more practical.
- 3.10. **Para 36** Includes discussion of an areas ‘objectively assessed needs’. This should go beyond housing need and explicitly state that local health needs are a consideration in this process. **Para 36(d)** states that this includes consistency with national policy. This should include reference to, for example, the Health and Social Care Act 2012ⁱⁱⁱ and the Equality Act 2010^{iv}.

4. Decision-making

- 4.1. **Para 41** In the guidance regarding pre-application engagement the statement ‘where they think this would be beneficial’ should be expanded to make it a requirement to engage with local communities and statutory consultees. This must include public health and NHS consultees. This is an opportunity to develop public health involvement in pre-application discussions where there is the greatest potential to influence design to promote health and reduce inequalities.
- 4.2. **Para 44** The guidance on the information that should be involved in decision making should include information on the health needs of the local communities. The list of formal assessments should include an assessment of the health impact of the development, either as a health impact assessment or through the inclusion of health in existing statutory impact assessments (SIA and EIA).

5. Delivering a sufficient supply of homes

- 5.1. This section should cover the quality of future homes as well as providing sufficient housing to meet current and future needs. The adoption of a national New Build Healthy Homes Standard (based on work in the West Midlands covering energy performance and objectives to deliver a healthy home) could be stated in the NPPF text as being something that will appear as subsequent guidance. Further to this, although such standards are partially met by building regulations, the NPPF should make it possible for planning authorities to refuse applications where housing does not meet such healthy homes standards. Consideration is also needed of whether the NPPF should encourage the use of new construction methods which may have better design standards than traditional wet-build housing.
- 5.2. **Para 62-65** The concept of an “affordable home” needs defining, for example, in terms of income versus the local housing market, because so-called affordable homes on development sites can simply be cheaper homes which remain beyond the reach of people who might be considered to have modest incomes^v. Lack of access to decent homes in the right place for some people can lead to poor physical and mental well-being due to having to instead live in poor and sometimes costly housing. Also, the section should widen the need to provide affordable homes to the need for accommodating key workers in localities where the cost and availability of homes would otherwise prevent such people from living there.

5.3. **Para 69-70** Clarification on why at least 20% of the sites identified for housing in local plans need to be of half a hectare or less would be useful as, at the moment, it seems arbitrary. Perhaps a percentage range would better reflect the needs of different areas.

6. Building a strong, competitive economy

6.1. The role of health and its connection with planning to build a competitive economy is not sufficiently covered in this section. It should be stated that if all the positive aspirations of NPPF to enable better planning are adhered to then the result should be a healthier population (physically and mentally) that would rely less on healthcare, which would therefore require less wealth created from commercial activity to be directed towards it (or indeed less wealth to be created). This section could also be cross-referenced with **para 92c** of section 8 “Promoting healthy and safe communities”.

7. Ensuring the vitality of town centres

7.1. **Para 86** We welcome the statement that planning policies should “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”. We would recommend that there is also consideration of use class 5 (hot food takeaways) directing them sequentially in the hierarchy of centres. This is in line with the guidance from Public Health England in “Health Matters: Obesity and the Food Environment”^{vi}.

7.2. **Para 86 (b)** We welcome the recognition that planning policies should be clear on permitted uses for retail outlets. It would be helpful to have a more explicit statement about controlling certain uses, for example – hot food takeaways, gambling outlets, money lending services. This should provide clear guidance about limiting new hot food takeaways near to schools.

7.3. **Para 88, 89, 90** The guidance regarding edge of town and out of town retail and leisure developments needs more emphasis on accessibility to town centres, and especially edge of centre sites. This must include planning for promoting active travel and the use of public transport. This will support the objectives set out in section 9 – promoting sustainable transport.

7.4. Accessibility planning provides a mechanism through which the spatial elements can be seen and understood in relation to each other and to the communities and businesses. Poor accessibility planning will have a potentially negative impact on

sustainability and on health. Local developments in town centres are easily accessible through public transport and active travel such as walking and cycling. They can also provide accessible facilities such as employment and access to healthy food. Out of town centre developments often require use of a car and can limit access to facilities for the most disadvantaged people in communities.

8. Promoting healthy and safe communities

- 8.1. In our opinion, Chapter 8 has not been written with sufficient familiarity of how the planning system can affect health and wellbeing. The re-drafting of the NPPF is an excellent opportunity to make a difference to our communities, and this chapter would offer such an opportunity. Unfortunately, we feel that at present, more work is required. We would also like to note that we feel the chapter duplicates much of the NPPF, and somewhat feel that the entire document could be restructured accordingly.
- 8.2. It may be useful to amend the title of this section to “Facilitating and promoting healthy and safe communities” because it covers a combination of infrastructure and non-infrastructure measures to support the creation of healthy and safe communities.
- 8.3. The NPPF must also consider the health and wellbeing impacts of developments on all sections of the community. There is a risk of differential impacts across communities, and plans need to ensure that developments do not increase inequalities within and between communities. To deliver on the objectives within this section, public health and other relevant bodies must be involved throughout the development of plans. This includes pre-application discussions with developers, to ensure that health and wellbeing are built into the plans from the earliest point.
- 8.4. **Para 92** Physical characteristics of neighbourhoods identified as having a positive impact on health, wellbeing, physical activity and walkability which are not included within the draft NPPF include:
 - choice and diversity;
 - well-kept environments, including green space that is dementia friendly;
 - affordable and efficient public transport;
 - safe and sociable play areas;
 - pedestrian routes should be well-lit;
 - pedestrian routes for everyone – disabled, sensory impaired, elderly, children.

- 8.5. **Para 92b** This paragraph suggests that safety and accessibility is related to crime and disorder. Please note that this may not be evidence based. We feel the phrase ‘so that crime and disorder’ should be removed. Evidence suggests that the phrase ‘fear of crime’ is more appropriate and is in line with the current evidence base.
- 8.6. Evidence suggests that roads and traffic have an impact on safety and accessibility and should be reflected in this paragraph. Furthermore, evidence suggests that it is the fear of traffic and road safety that impacts on people’s decision making. Therefore, we suggest this paragraph should be re-written as ‘fear of traffic, road safety and crime’. It is well understood that people’s perceptions of an environment are different to the objective measurement, which influences their behaviour, quality of life and consequently health and wellbeing.
- 8.7. **Para 93a** We are unclear what is meant by the term ‘shared spaces’, and feel it requires some clarity. There are several different terms used within the sector. At present the evidence suggests that shared cycling and walking spaces are ineffective and may discourage physical activity due to people’s perceptions of safety^{vii}.
- 8.8. **Para 94** Alongside the social and economic benefits of estate regeneration there must be detailed consideration of the health and wellbeing impact of such regeneration, both for the resident population and for anyone who may be displaced by the regeneration. For this, local public health must be involved, and where appropriate, Public Health England. We would also recommend the use of health impact assessments to ascertain possible health impact and steps needed to mitigate any impact and to maximise health benefit.
- 8.9. **Para 95** We note that the proposals advise sufficient provision is made for school places. We are disappointed that a similar paragraph is missing for healthcare services and facilities, which are also required to meet the needs of existing and new communities. We would like to see a similar clear paragraph is provided for healthcare services and facilities. Section b of this paragraph could be continued as follows: “.....and put effective plans in place to mitigate against adverse impacts on localities, particularly in relation to the travel arrangements of school populations”. Then cross reference with section 9 “Facilitating and promoting sustainable transport”.
- 8.10. **Para 97 and 98** We are pleased to see the protection of open space and recreation is supported by the proposed NPPF. **Para 98(a)** should also include a

requirement for the consultation of local people to be undertaken as well as the need for an assessment by the local planning authority.

9. Promoting sustainable transport

- 9.1. A brief description of how sustainable transport can support the economic, social and environmental sustainability objectives outlined in section 2 “Achieving sustainable development” would help developers and local authorities to better understand their obligations in these respects.
- 9.2. We recommend that the term transport is replaced with travel. ‘Transport’ is defined as requiring a vehicle, whereas ‘travel’ incorporates both vehicles, cyclists and pedestrians.
- 9.3. We feel that pedestrians are different user groups to cyclists, with correspondingly different requirements, and should therefore be considered independently. Whilst we understand that vehicles, cyclists and pedestrians all have their own travel requirements, we feel that this chapter is overly biased towards provision for motor vehicles. There is a sense that pedestrians and cyclists have been a last-minute addition to the chapter and inadequately considered. This could be addressed in several ways, but at present we feel consideration of active travel policies is insufficient.
- 9.4. In this section, the link between sustainable transport and improving air quality is not made explicit. Poor air quality is causing substantial harm to human health, especially in urban areas. The overall objective over the longer term should be to reduce the need for cars and to move towards a more sustainable transport system.
- 9.5. **Para 103** The objectives for promoting sustainable transport must include improving air quality, both particulate matter and NOx pollution.
- 9.6. **Para 104** We recommend that the words ‘public health’ are changed to ‘health and wellbeing’. This guidance must include planning for changes in transport infrastructure such as a move towards electric vehicles and autonomous vehicles. This will include provision of a robust infrastructure for the charging of electric vehicles. There also needs to be clear explanation of what is meant by ‘significant development’.

- 9.7. **Para 105(b)** As well as local highways authorities, other transport infrastructure providers, operators and neighbouring councils there should also be involvement of public health and wider council services to ensure new developments are aligned to existing strategic documents outside of planning, and to ensure developments support, or inform the implementation of, existing active travel initiatives.
- 9.8. **Para 105(d)** As noted above, cyclists and pedestrians have different requirements which need clarification. We feel this issue has not been reflected adequately and this paragraph may be a suitable opportunity to do so. We feel that the words ‘supporting facilities’ is inadequate and cycle parking standards requires its own policy. (See comments for para 106).
- 9.9. **Para 106** We feel this paragraph requires re-wording. At present parking standards appear to assume vehicle parking, but this not explicitly stated. The NPPF should include a policy for cycle parking standards. We would welcome the inclusion of such a policy. Whilst we are pleased to see proposed policy in relation to the provision of charging points for electric vehicles, it may be more suitable for this to be situated in Chapter 14 (climate change)
- 9.10. **Para 107** In our opinion, this paragraph should be separated into two separate paragraphs. The issue of ‘maximum parking standards’, should be split from the ‘accessibility for pedestrians and cyclists’. As noted earlier, pedestrians and cyclists have very different accessibility requirements and policy should reflect this. We do support the wider use of maximum parking standards at all types of developments to further encourage the use of active travel and public transport.
- 9.11. **Para 109** Parking standards used to be aligned with the gross floor area of developments which in themselves could be used to trigger the need for Transport Assessments, Transport Statements and Travel Plans. The NPPF broke this link in 2012 (and by further guidance in 2015) and instead requires planning conditions and obligations relating to transport to be based on mitigating against “severe” impacts. This approach is probably more appropriate and less restrictive, however “severe” has never been defined in NPPF, therefore a criterion for defining it should be outlined in the document, for example, what the effects of extra traffic would be over a given area around a development site (dependent on the extra traffic generated). How and when mitigation can be implemented and under what circumstances needs to be clarified.

- 9.12. **Para 110(a)** The extent to which pedestrian and cycling movements from a development site are connected with “neighbouring areas” needs to be clarified. The statement could state that the nearest town/local centre, supermarket, leisure, health centre, primary school and secondary school etc (whatever is appropriate to the site, ie residential, commercial etc) are connected by continuous and coherent cycle routes built to prevailing standards. This should be cross-referenced to section 8 “Promoting healthy and safe communities”.
- 9.13. **Para 110(c)** This paragraph contradicts paragraph 93.a, which refers to shared spaces. Evidence suggests that shared spaces leads to conflicts between pedestrians, cyclists and vehicles^{viii}. We urge some further consideration of evidence and uniformity in your draft to avoid confusion.
- 9.14. **Para 111** This paragraph feels confused. A transport statement is a simplified version of a transport assessment, and a travel plan is usually used to support a transport assessment. We feel the paragraph requires re-writing to reflect this. We have concerns that there is no definition of ‘a significant amount of movement’. Such a statement is open to interpretation. Furthermore, we would like to see that the words ‘suitable and sufficient travel plan’ are added to the paragraph and emphasise travel plans are a long-term management issue requiring regular monitoring and evaluation. We would also like to request a reference is made to the DfT guidelines for Travel plans to support the use of ‘suitable and sufficient’.

10. Supporting high quality communications

- 10.1. Recent, and emerging, changes in communication technology are supporting a rapid change in how people communicate. This includes wider use of virtual meeting technology, teleconferences and webinars. Local plans, especially for urban centres, are starting to feature policies on smart cities. In the future it is likely that the need to travel for work will decrease, so long term planning needs to consider these changes.

11. Making effective use of land

- 11.1. **Para 122** The NPPF should refer to a healthy homes standard, to be provided as separate guidance, which outlines appropriate densities and what should be provided at developments, or alternatively what should be available nearby, to

achieve positive health outcomes. This should recognise that high density housing can be supported if the design quality is of a good standard.

11.2. **Para 123(c)** We recommend that consideration be given to a process whereby a local planning authority can refuse an application which they consider fails to make efficient use of land. The NPPF should state that this should be done in the context of a healthy homes standard (see comments for section 5) in terms of both internal and external space.

11.3. There is some concern over the “flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site”. A supporting statement should follow stating that compromises should not be made in relation to the prevailing standards on the basis that the physical and mental well-being of residents could be affected. The adoption of a healthy homes standard would not allow such a situation to arise (see comments for section 5).

12. Achieving well-designed places

12.1. We welcome and support the stated aspirations set out within this section, however we do have comments and recommendations for how these could be best delivered. This section does not sufficiently identify the links between well designed places and health, therefore it should be cross-referenced to section 8.

12.2. **Para 128** We do not feel that the Building for Life framework is suitable for recommendation in national planning policy. Firstly, we do not feel that car parking should be accessible and likely to be well used, as this is likely to encourage driving. This in turn will increase air pollution, reduce physical activity and contradicts para 110a, which recommends giving priority to cycle and pedestrian movements. Evidence suggests that where car parking is less accessible, communities are likely to be more sustainable, socially connected and healthy i.e. the overarching aim of the NPPF. Furthermore, we are not aware of evidence supporting play areas in front of peoples’ homes. This paragraph references design review panels, we recommend that the guidance states that these panels will include public health representation.

12.3. **Para 131** The public safety aspect of some roadside advertising is not taken seriously enough by the planning process. A specific statement relating to the possibilities for advertisements to distract drivers, aimed at motorway users in

particular, should be included to raise the profile of this problem. The precautionary principle resulting from studies into this argues that there is a social responsibility to protect the public from exposure to harm when scientific evidence has found a plausible risk. This should result in proposals, for digital advertising in particular, to be refused on public safety grounds because they do not make a positive contribution to road safety.

13. Protecting Green Belt land

- 13.1. **Para 133** This paragraph lists the purposes of green belt land. This list needs to be expanded to include another purpose, to provide opportunities for people to access high quality green and open space for leisure and physical activity. The NPPF needs to recognise the development of toolkits for measuring and developing natural capital, for example the Natural England natural capital maps.^{ix}

14. Meeting the challenge of climate change, flooding and coastal change

- 14.1. We fully support the objective to move to a low carbon future in a changing climate. We recognise that the draft NPPF includes both reduction of carbon emissions and mitigation of the impact of climate change.
- 14.2. However, the NPPF could be stronger in support of the development of renewable energy infrastructure. There should be explicit statements that provides clarity over the urgency of moving towards a low carbon economy, and that supports the development of renewable energy provision as a matter of priority.
- 14.3. **Para 147** The NPPF should emphasise the need for the facilitation and promotion of sustainable transport (cross referenced with section 9) and briefly describe the potential impact on health as a result of not minimising greenhouse gas emissions from and in relation to developments, for example, extreme weather events resulting in overheating, cold homes and flooding (cross reference with section 8).
- 14.4. **Para 149(b)** This should refer to the need for a healthy homes standard (section 5).

- 14.5. **Para 153** When determining planning applications for renewable and low carbon developments there should be an explicit ‘presumption in favour of sustainable development’ for renewable energy infrastructure.

15. Conserving and enhancing the natural environment

- 15.1. This section requires review to make the guidance more consistent and clear. We feel that the words ‘natural environment’ are not appropriate because this term also comprises climate change. Furthermore, the issues discussed, including pollution, also impact on the built environment. Therefore, we suggest removing the word ‘natural’. We would like to see some consideration of the health impacts of conserving and enhancing the environment. This can include the positive impacts.
- 15.2. We feel that the subtitles do not adequately reflect the content and there is a lack of clarity in relation to pollution (Environmental Protection). For example, ‘Ground conditions and pollution’ give the wrong impression, in that the section comprises land, air and noise pollution. We suggest giving the title Environmental Protection in line with the legislation used to deal with pollution. On the other hand, Environmental Protection may be better situated in its own chapter, particularly given the importance and current high profile of air quality. The NPPF could then be used as evidence to show how the Government is seeking to address air quality issues.
- 15.3. **Para 178(c)** We recommend that light pollution receives a specific policy paragraph, rather than a sub section.
- 15.4. **Para 179** To improve clarity, we suggest that this paragraph is separated into three different policy paragraphs: Air quality limits; opportunities to improve; new Air Quality Management Areas. Similarly, dust, steam and odour should also be included. This will support those interpreting policies to apply policy to developments more appropriately. This section also needs to be cross-referenced with section 9 “Facilitating and promoting sustainable transport” because the existence of an air quality management area, clean air zone or air quality hot-spot would provide the reason for the robust facilitation and promotion of sustainable transport.
- 15.5. **Para 180** To improve clarity, we recommend this paragraph be separated into two different policy paragraphs: Integration of new developments and Mitigation of statutory nuisance. This will also support those interpreting policies to apply policy to

developments more appropriately. We would also like to see further description to footnote 52 ‘and other relevant law’ in line with footnotes throughout the NPPF.

- 15.6. **Para 181** We recommend the inclusion of a footnote referring to the relevant Environmental Permitting legislation. We feel the paragraph would benefit from rewriting, as it is currently unclear. Please note that although a premises complies with an environmental permit, this does not preclude a statutory nuisance occurring. Such a statutory nuisance would be mitigated through the planning process.

16. Conserving and enhancing the historic environment

- 16.1. No comments

17. Facilitating the sustainable use of minerals

- 17.1. No comments

ⁱ Town and Country Planning Association (2016) Garden City Principles:

<https://www.tcpa.org.uk/garden-city-principles>

ⁱⁱ Cabinet Office (2017) Implementing the Sustainable Development Goals:

<https://www.gov.uk/government/publications/implementing-the-sustainable-development-goals/implementing-the-sustainable-development-goals>

ⁱⁱⁱ Department of Health (2012) Health and Social Care Act 2012:

<https://www.legislation.gov.uk/ukpga/2012/7/contents>

^{iv} Legislation.gov.uk (2010) Equality Act 2010:

<https://www.legislation.gov.uk/ukpga/2010/15/contents>

^v Shelter (2015) Starter Homes: will they be affordable?

https://england.shelter.org.uk/_data/assets/pdf_file/0011/1183790/Starter_Homes_FINAL_w_Appendix_v2.pdf

^{vi} Public Health England (2017) Health Matters: Obesity and the Food Environment:

<https://www.gov.uk/government/publications/health-matters-obesity-and-the-food-environment/health-matters-obesity-and-the-food-environment--2>

^{vii} Lord Holmes of Richmond MBE (2015) Accidents by design: the Holmes report on “shared space” in the United Kingdom: <http://chrisholmes.co.uk/wp-content/uploads/2015/07/Holmes-Report-on-Shared-Space-.pdf>

^{viii} Imrie, R (2012) Auto-disabilities: the case of shared space environments. Environment and Planning A: Economy and Space. 44(9)

^{ix} Natural England (2017) Natural England Natural Capital Maps:

<https://eip.ceh.ac.uk/naturalengland-ncmaps>