

House of Lords Select Committee on National Policy for the Built Environment

Response by the Partnership for Active Travel, Transport and Health (PATTH)

About PATTH

1. The Partnership for Active Travel, Transport and Health (PATTH) is a collaboration of Professional Institutions and other partner organisations drawn from the specialisms of health, engineering, environment, architecture, planning and transport (listed in annex 1 to this evidence). PATTH offers a diverse range of expertise to assist in the development and delivery of effective, efficient planning and transport policies and measures, focused on the potential for improvements in public health.

General

2. PATTH welcomes the opportunity to respond to the House of Lords Select Committee on National Policy for the Built Environment. This is an issue of vital national importance as there are a number of challenges which can be strongly and positively influenced by the implementation of a robust policy for the built environment with a higher prioritisation of active travel. It is worth noting that the highway constitutes 80% of the public realm. Whilst the focus of this response is that of transport and mobility, this is set in the context of how this relates to the whole built environment.
3. The built environment shapes our behavioural patterns, which in turn largely determine our physical health, mental wellbeing, perceptions of and exposure to risk, security and productivity. Well over 80% of the UK population live in urban areas, yet the built environment has been neglected for decades in terms of its strategic importance to the health and productivity of the nation.
4. In England there is a legacy of automobile-centric development, after those responsible for developing policy for the built environment considered the automobile as the most efficient and effective mode of transportation for both people and freight. This approach can divorce people from their surroundings and promote a lack of physical activity with emerging large scale associated health impacts, social disintegration and unfulfilled economic potential. Urban design should be optimised to promote walking and cycling at the local scale and accessible public transport provided, therefore minimising reliance on personal road transport.
5. Healthy and vibrant, productive built environments require the movement of their inhabitants. Yet the nature, scale and mode of such movement is critical to the overall health of the communities working, visiting and residing in them. The fact that our environments effectively dissuade many people from incorporating physical activity into their daily lives impacts on each of them as individuals, but also on the national economy. The All Party Commission on Physical Activity noted a cost of £20 billion per annum arising from inactive lifestyles.
6. There is a wealth of evidence in existence which illustrates that enhancing opportunities for active travel is beneficial on a wide range of levels, often demonstrating large benefit: cost ratios. We commend to the Committee the [2014 report](#) of the Active Transport for Healthy Living Coalition (which has since become part of PATTH) which details some of this evidence.

Detailed responses to specific questions posed by the Committee

Policymaking, integration and coordination

Are the decisions that shape England's built environment taken at the right administrative level? What role should national policymakers play in shaping our built environment, and how does this relate to the work and role of local authorities and their partners?

7. Residents should be core to local development and infrastructure decisions as they may often be far better informed on the performance of their immediate environment than decision makers who

operate more centrally. In theory, decision making is set at appropriate levels with local decisions facilitated through the Government's localism agenda. However, leadership at a national level ultimately sets the policy framework to reflect the changing attitudes and aspirations of society.

8. The built environment and its communities are suffering from a market failure in which costs associated with poorly conceived and delivered development are borne by communities and not developers. It is unlikely that a profoundly deregulatory, market-driven approach favoured by the current Government will address these market failures. Indeed the current direction of policy, with further deregulation of the planning system (falling building standards, increased permitted development and Local Development Orders), is only likely to perpetuate recent trends.

How well is policy coordinated across those Government departments that have a role to play in matters such as housing, design, transport, infrastructure, sustainability and heritage? How could integration and coordination be improved?

9. The level of policy coordination referred to above does exist but not at the kind of level required to achieve high quality built environments, effective and efficient sustainable transport and healthy communities. Investment in effective coordination to properly achieve multiple benefits from development is highly likely to drive far greater economic benefit across a range of sectors (including health) in the longer term than a deregulated approach. Policy and delivery appraisal should be far more robust to consider whether these benefits are being achieved.

National policy for planning and the built environment

Does the National Planning Policy Framework (NPPF) provide sufficient policy guidance for those involved in planning, developing and protecting the built and natural environment? Are some factors within the NPPF more important than others? If so, what should be prioritised and why?

10. PATTH considers that the NPPF provides much in the way of strong and positive policy guidance as described, for example paragraph 17 on sustainable transport and the way in which it references the significance of healthy communities (section 8). As health was one of the few new policies added to the NPPF (the development of which was generally focused on simplification and deregulation), it is a strong indication of the importance government intended health to have within planning, but local authorities generally lack confidence that this emphasis is fully accepted by the Planning Inspectorate.
11. Whilst the core policy principles (page 5) are strong, others such as those relating to viability are weakly defined. We are concerned that it is often easier for developers to argue that proper (good quality) development is unviable, than it is for them to find imaginative ways to comply with a certain planning condition. We consider that the role of strong government (at all levels) is fundamental here when there are so many interrelated factors to consider, a number of which are not properly reflected by the market. A good example of leadership is that in Wales with the Active Travel Wales Act 2013.

Is national planning policy in England lacking a spatial perspective? What would be the effects of introducing a spatial element to national policy?

12. The existence and present scale of challenges around health, housing provision, the economy and the environment is such that there is a very real need for development to be more carefully considered in the context of these strategic issues so that new and innovative solutions may be identified and implemented effectively.
13. National planning policy in England lacks a strategic component which makes the delivery of the overall policy aims of the NPPF (as well as wider government and social priorities) difficult to achieve. It means that development is too often considered out of the context of its impact on local, regional and national priorities (particularly smaller developments which may have minimal impact on such factors individually but when combined, cumulatively they can be highly significant). The system

should become more strategically-driven with the promotion of active travel as one of the strategic goals.

Is there an optimum timescale for planning our future built environment needs and requirements? How far ahead should those involved in the development of planning and built environment policy be looking?

14. Planning cycles across a range of different sectors are increasingly looking forward between 20 and 100 years to identify long-term (strategic) trends and priorities. Organisations which take this approach regularly are often most extensively informed, forward thinking and resilient. We consider that there is a need for future built environment needs (and the interaction of these with national strategic objectives) to be subject to this approach at both local authority and central government levels.
15. At the same time, the question is not necessarily the appropriateness of the time horizon chosen, rather it is the capacity of planning policy to react constructively to changes in societal need. Manifestly it is failing to do so at the present time, given the problems faced around shortages of housing supply, health problems associated with inactivity, and environmental damage. All too often the long term is seen as something that will happen in due course, however the longer a strategy will take to have effect, the more urgent it is to start addressing it immediately.
16. The Government's Foresight programme, with its 25- and 50-year horizons, is an admirable exception to the generally short-term approach to policy development enforced by the electoral cycle and party political priorities. The current 'Future of cities' study has looked at planning and the built environment and we commend this to the Committee. See in particular "[Active travel and the city of the future](#)".

Buildings and places: New and old

What role should the Government play in seeking to address current issues of housing supply? Are further interventions, properly coordinated at central Government level, required? What will be the likely effect upon housing supply of recent reforms proposed for the planning system?

17. The Government should encourage town centre sites and ensure that full use is made of the potential for locating housing at or close to bus stations and railway stations. It should not permit piecemeal erosion of greenfield sites and urban sprawl, but should instead expand rural settlements to enhance their own economic and community viability. New settlements should be designed to optimise walking and cycling at the local scale and provide accessible public transport to minimise reliance on personal road transport.
18. We are concerned that existing planning policy implementation and its recent reforms, together with the ongoing reduction in funding to local authorities will only facilitate the construction of poor quality houses in inappropriate locations dependent on road traffic. This will not assist the Government's aims to increase productivity and economic growth. A deregulatory, market-driven approach to the challenge of housing need is unlikely to achieve a satisfactory long-term outcome for society, if there is any ambition to ensure that any such provision does not perpetuate other important problems around health and the economy.

How do we develop built environments which are sustainable and resilient, and what role should the Government play in any such undertaking? Will existing buildings and places be able to adapt to changing needs and circumstances in the years to come? How can the best use of existing housing stock and built environment assets be made?

19. It is entirely possible to develop sustainable and resilient built environments and there are good examples internationally where this is being achieved (for example Malmö and Lund in Sweden, Freiburg in Germany). They should follow a number of principles relating to self-sufficiency and economic viability, health, activity and community integration. Because of the inherent market externalities which continue to impact the environment and sustainability, it will be necessary for the

Government to drive the required change through strong policy, implementation and an appropriate balance of regulation and incentives.

20. It is important to encourage the use of new technologies, such as earth-sheltering, green roofs and green walls, roof gardens, and light pipes. These make it possible to find acceptable solutions to problems which might otherwise have required a choice between conflicting important considerations, for example more housing versus the protection of greenspace.
21. Well-designed and connected development is likely to be inherently more sustainable, resilient and adaptable than that which is of poor design. Existing buildings will need to be adapted to meet changing needs and circumstances. The alternative - large scale replacement - would be cost prohibitive. Much existing building stock is appropriate and adaptable but equally it is important to recognise where some is of poor design and replacement would be the more appropriate solution. This discussion emphasises the importance of good quality design and conception.
22. It is worth noting that academic evidence is beginning to demonstrate that cities which seek to design physically active living into their built environment may also benefit in terms of global profile and economic competitiveness. See for example studies by [Active Living Research](#) in the USA, or the sophisticated analysis in the KPMG 'Magnet Cities' project.

To what extent do we make optimum use of the historic environment in terms of future planning, regeneration and place-making? How can more be made of these national assets?

23. There is also much that can be learnt from the historic environment. Historic environments are often attractive to residents and visitors alike because they are often characterful and, because they pre-date the automobile, are often inherently people-centric in terms of their design resulting in a quieter and safer environment. Given the shift in the global population towards urban living and the considerations around carbon emissions and climate change, some of the best models for future urban living may be well designed, compact historic cities which were highly self-sufficient and walkable.
24. It is important to maximise all features and contexts when place-making. Not only historic and apparently valuable assets. Careful design and sensitive development will make places attractive, setting context, retaining interest, yet making space for the new and innovative. This is where policy and legislative frameworks can support, obliging designers and developers to seek out features that will make even the most mundane place attractive. For example, carefully considered and designed streets and features can be both functional and attractive, within reasonable budgets.
25. In other contexts, there may be opportunities to subsidise heritage railways to offer fuller commuter and community services which would usefully expand the rail system, albeit on a small scale.

Skills and design

Do the professions involved in this area (e.g. planners, surveyors, architects, engineers etc.) have the skills adequately to consider the built environment in a holistic manner? How could we begin to address any skills issues? Do local authorities have access to the skills and resources required to plan, shape and manage the built environment in their areas?

26. There are a number of professional institutions involved with PATTH and we consider that the appropriate skill sets do exist within the relevant professions and professional institutions are key in developing and transferring these skills and knowledge to a wider range of professionals to consider the requisite issues in a sufficiently holistic manner. However awareness may be lacking within the professions on how their work impacts on public health and how to optimise public health benefit.
27. A greater issue is that of local authority access to such skills and resource as they are limited by their own available resource. To consider the range of issues in a properly integrated way is no small task but with present levels of investment is unlikely to occur and developer contributions may be insufficient to bridge this gap.

Are we using the right tools and techniques to promote high quality design and ‘place-making’ at the national level? How could national leadership on these matters be enhanced?

28. Quality can be promoted through policy and legislation and some championing by politicians and leaders is required. PATTH considers organisations must be required to show strong design principles, which address all social requirements (not just short term economic ones) to win funds and contracts.
29. Although evidence is available and being assembled continually, the case for good urban design is already proven and requires leadership and appropriate investment, not further research. It is important to bear in mind that people will walk further if the walk is pleasant and so aesthetically attractive designs, incorporating greenery, artwork or interesting architecture actually have a health value.
30. Good economic assessment tools exist. The WHO [Health Economic Assessment Tool](#) allows calculation of the benefit values from schemes to increase walking and cycling (and has informed the development of the Department for Transport’s own Transport Assessment Guidance). Transport for London has recently produced its Valuing Urban Realm Toolkit.

Community involvement and community impact

Do those involved in delivering and managing our built environment, including decision-makers and developers, take sufficient account of the way in which the built environment affects those who live and work within it? How could we improve consideration of the impacts of the built environment upon the mental and physical health of users, and upon behaviours within communities?

31. Health should be strengthened as a material consideration in planning applications and more attention should be paid to comments relating to the impact upon public health. This requires a strategic national and local perspective to achieve the health and wellbeing benefits that the built environment can provide. Ultimately this will translate into more considered urban design, including layout, public space provision, attractiveness and pedestrian friendliness of streets and integration with sustainable transport options.
32. Improving the impacts of the built environment on health and wellbeing requires policy emphasis and that this is actively enforced through development control. It is such considerations which often risk being omitted or reduced in developments, or compromised over time via permitted development, on the grounds of commercial viability. Quite simply this is about the prioritisation of policy and its implementation. More benchmarking and post-delivery appraisal is vital but must be allied to consequence, for example identified failures should lead to improvement and good practice should be required.
33. Evaluation of the health benefits investment brings could better influence funding decisions. The local planning system should take account of health in its decision making. Relevant government departments should work together on guidance promoting health and wellbeing and subsequently informed local decisions (through Health and Wellbeing Boards, Local Enterprise Partnerships and Clinical Commissioning Groups) on the approach to the built environment can be made.
34. Authorities are often put off asserting the primacy of these goals by the fear that the Planning Inspectorate will take a different view and award costs against the authority. The law only provides for the award of costs on a planning appeal against an authority when the authority has acted unreasonably. We would suggest that it can never be unreasonable for an authority to reject an application, or attach conditions, if the genuine reason is health grounds supported by its Director of Public Health.

How effectively are communities able to engage with the process of decision making that shapes the built environment in which they live and work? Are there any barriers to effective public engagement and, if so, how might they be addressed?

35. The Localism Act 2011 and the Neighbourhood Planning Process in principle provides communities with the opportunity to play a very active role in shaping their local built environment. However in practice this is subject to communities' ability to mobilise themselves and to the skills they may have at their disposal to produce a plan to the required timescales. The process is potentially open to undue influence by vested interests and therefore the opportunities presented to communities may be quite difficult to realise beyond some relatively exceptional cases.
36. Public projects are generally well consulted yet private sector developers may often be more cautious in engaging with local communities, depending on the nature and size of the project. We consider that there should be a greater role for appropriately skilled planning professionals to assess proposals, facilitate informed public engagement and to direct development in a direction which is in the best interests of local communities and their place in a larger spatial and strategic context.
37. Governments, both local and national, are elected to act in the best interests of society and given that most people's local environment has the greatest bearing on their health and wellbeing, optimising the quality of local environments should be a primary priority for the Government.

Financial measures

Are there fiscal or financial measures potentially available which would help to address current issues of housing and land supply? Are there financial or other mechanisms that would encourage better design and place-making by private sector developers?

38. There are a range of market externalities which result in insufficient priority being attached to many factors which are of most social benefit within the built environment. These externalities are well understood so we consider it is appropriate to provide fiscal measures to help shift the market towards healthier development and provide additional funds to invest in properly resourced development control and social and affordable housing. It is important that these externality charges are not considered to be "just taxes" but that they are legitimate market correction tools for the public benefit.
39. Crowd-funding may have a role in leveraging local businesses investment into street and place making. This would build a partnership between the residents/users and the local businesses, to provide a high quality and sustainable built environment.
40. Other opportunities might exist in the context of developing new communities and their transport infrastructure together, with one supporting the other as was the case with the North London suburbs and the Metropolitan Railway. This might offer a valuable way to start the process of developing the rail/cycle combination as a major transport mode in its own right. There have been some recent rail schemes in Canada in which capturing the benefit of enhanced land value has been more prominent than fare revenue in the actual business case.

Appendix 1. Membership of PATTH

Members of PATTH are taken from the following organisations. Their naming below does not constitute formal approval of this response in every instance.

The Association of Directors of Public Health (ADPH)

The British Medical Association (BMA)

The Chartered Institution of Highways and Transportation (CIHT)

The Institution of Civil Engineers (ICE)

The Chartered Institution of Water and Environmental Management (CIWEM)

The Transport and Health Study Group (THSG)

The Royal Institute of British Architects (RIBA)

New London Architecture (NLA)

The Royal Town Planning Institute (RTPI)

The Town and Country Planning Association (TCPA)

The Faculty of Public Health (FPH)

Sustrans

The Chartered Institute of Logistics and Transport (CILT)

The Chartered Institute of Environmental Health (CIEH)

The Transport Planning Society (TPS)

Living Streets (LS)

British Heart Foundation (BHF)

MacMillan Cancer Support (MacMillan)

UK Health Forum (UKHF)