

Securing Healthy Homes at the local level

A guide for local government in England on adopting the Healthy Homes Principles

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About the TCPA

The Town and Country Planning Association (TCPA) works to challenge, inspire and support people to create healthy, sustainable and resilient places that are fair for everyone. To this end we aim to improve the art and science of planning in the UK and abroad and work to secure fresh perspectives on major issues, including planning policy, housing, regeneration, and climate change. Informed by the Garden City Principles, the TCPA's strategic priorities are to:

- Work to secure a good home for everyone in inclusive, resilient and prosperous communities, which support people to live healthier lives.
- Empower people to have real influence over decisions about their environments and to secure social justice within and between communities.
- Support new and transform existing places to be adaptable to current and future challenges including the climate crisis.

Campaign sponsor:



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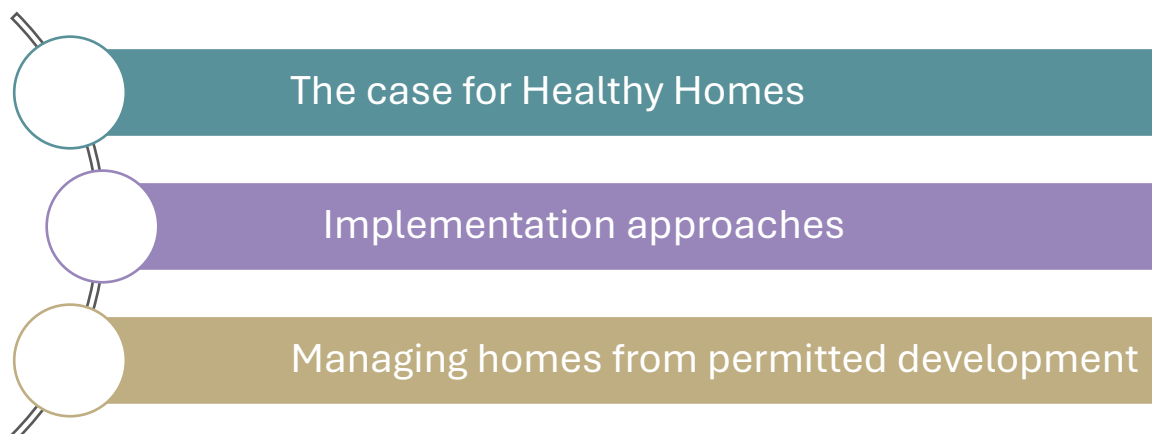
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1 Overview

Healthy homes are essential for people to live healthy, happy lives and to actively participate in society. There is a considerable body of evidence which shows how the quality of our homes and neighbourhoods directly and indirectly impacts our mental, physical and social health. Yet, one in ten people in the UK (over 6 million people) are living in poor quality housing.

The Campaign for Healthy Homes aims to transform the quality of our homes through promoting the adoption of 12 Healthy Homes Principles at national and local levels. The Principles were developed by a national coalition of housing development and health organisations. They are designed to support local authorities, as an attainable high-level framework to help clarify the central purpose of planning – delivering new homes and communities that promote physical, mental and social wellbeing.

This guide presents the rationale for embedding the Healthy Homes Principles in local policy and practice. It is particularly aimed at local authorities, but is also relevant to parish and town councils and neighbourhood forums. It addresses:



This guide outlines several ways to secure high-quality homes that will promote health and well-being. These include:

- A council motion;
- Corporate plan;
- Local Plans and policies;
- Supplementary Planning Documents ;
- Design codes;
- Neighbourhood plans; and
- Permitted Development tools.

The guide explores these approaches and illustrates good practice examples, as well as policies that can be adapted to fit local contexts . It includes contributions from the Building Research Establishment, Health Foundation and Royal College of Physicians.

Through adopting strong policies, local authorities can bolster the construction of new homes which proactively promote healthier outcomes for everyone.

2 The case for healthy homes

2.1 Why do we need healthy homes?

A healthy home is a home that is planned, designed, constructed, managed and maintained to be of good quality and situated in a good location that will positively promote the physical, mental and social wellbeing of everyone who lives in it.

Healthy homes are vital to give people a strong foundation to thrive in their daily lives and contribute to wider society. Yet, one in ten people in the UK (over 6 million people) are living in poor quality housing.¹ In addition, 3.7 million homes (15%) in England failed to meet the decent homes standard in 2022², and 2.6 million homes (11%) were found to be poor quality and 'hazardous' to occupants in 2021, according to the Building Research Establishment (BRE).³

People living in poor quality homes are twice as likely to have poor general health than people who do not (22% of people compared to 11%). Those from more disadvantaged groups are more likely to be living in poor quality housing – 22% of people in the lowest quintile income group live in poor quality homes, compared to 4% in the top quintile income group.⁴ This inequality is compounded by the cost of living crisis and lack of provision of genuinely affordable homes. The private rental sector remains the worst performing in terms of meeting the Decent Homes Standard in England, and there are significant regional disparities, as depicted in **Figure 1** below.

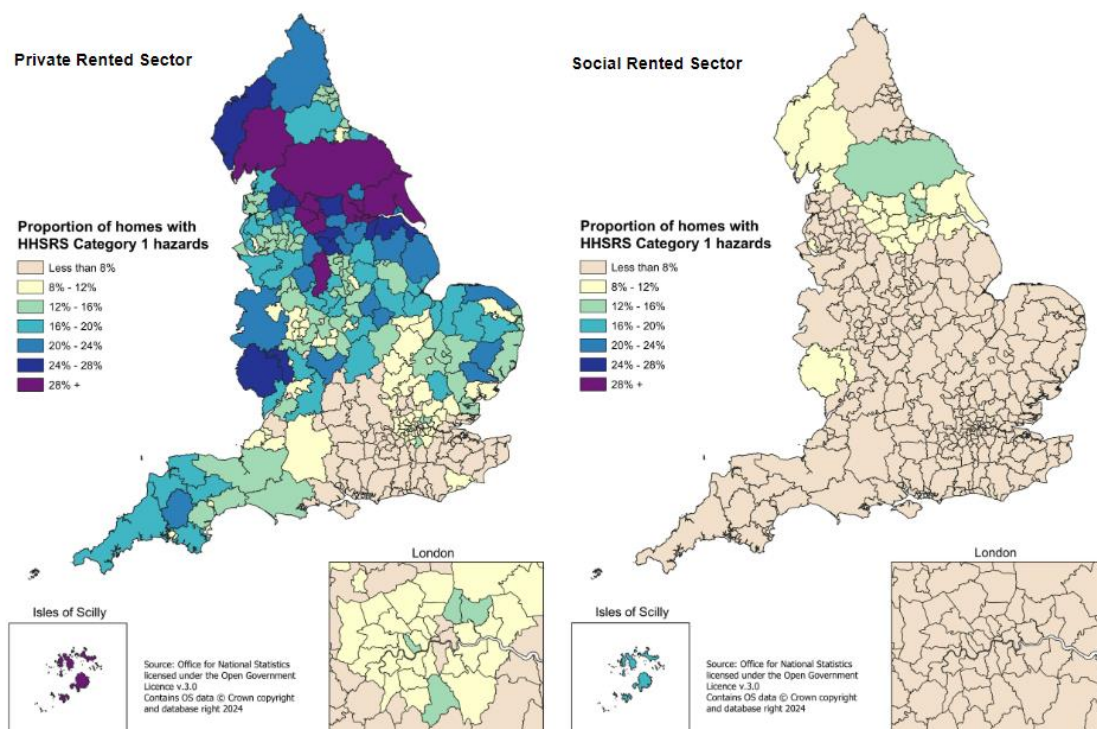


Figure 1. Proportion of on 'non-decent' homes (with HHSRS Category 1 Hazards) by local authority, 2020
(Source: English Housing Survey, 2023)

There is a wealth of evidence which shows how the quality of our homes and neighbourhoods directly and indirectly impacts our mental, physical and social health. The BRE estimates the health and 'societal cost' of poor quality homes, such as those relating to long-term care and loss of economic potential, is around £18.5bn a year.³ Poor quality homes increase the likelihood of respiratory, cardiovascular, and communicable diseases, along with a greater risk of mortality.⁵ Additionally, they increase the risk of severe ill health and disability during childhood.⁶ The proportion of children citing housing concerns as an obstacle to school attendance jumped from 11% in 2022 to 19% in 2023.⁷

Through strong policies and facilitating opportunities for community engagement and ownership, local authorities can support the construction of new homes which actively promote healthier outcomes for people. By ensuring good quality, genuinely affordable homes are well-connected to public transport, local amenities and nature, we can help create a strong foundation where people can thrive.



Image: The opening of Citizens House in Lewisham in 2023. Citizens House is a London Community Land Trust housing scheme, supported by the London Borough of Lewisham and the Greater London Authority. It provides 11 affordable flats for key workers who are based in the borough. Further information: <https://www.tcpa.org.uk/the-story-of-citizens-house> (Photo: Rosalie Callway)

The following box and infographic produced by the Royal College of Physicians further outlines why our health is so closely tied to the quality and location of our homes.

The connection between health and housing

By the Royal College of Physicians

Our health is largely a product of our environments and contexts. Some studies estimate that up to 80% of our health is determined by the wider determinants of health, including social factors, behaviours and the physical environment.ⁱ The places we live, the food and drink we consume, the places we work, and the air we breathe all impact our health. These factors also drive and exacerbate health inequalities, the avoidable differences in health and health outcomes across the population.

There is a clear link between our health, housing and the wider built environment. According to the Institute of Health Equity, one third of all households in the UK cannot afford a decent standard of living and are living in poorly insulated homes.ⁱⁱ The RCP 2023 census of UK consultant physicians found that 55% of respondents had seen an increase in patients with conditions caused or exacerbated by the wider determinants of health in the previous three months.ⁱⁱⁱ When asked to elaborate, poor housing was one of several themes, with respondents talking about heating costs, living in damp and mouldy environments, and air pollution. Improving the quality of housing would not only improve the health of our nation but reduce avoidable demand on health services.

Our health is affected not only by the way a building is designed, but also by where and how buildings are placed in a town or neighbourhood. The materials used, access to natural light, good ventilation, insulation and temperature control are just as important as the proximity of housing to transport routes, green and blue spaces, places to buy healthy food, and easy access to amenities such as health services and fitness centres. Living in a home that is free from harms and close to amenities is vital in promoting good health and happy lives, as well as tackling health inequalities. Every person deserves a safe, secure roof over their heads, as housing is a mandatory prelude to a healthy life.

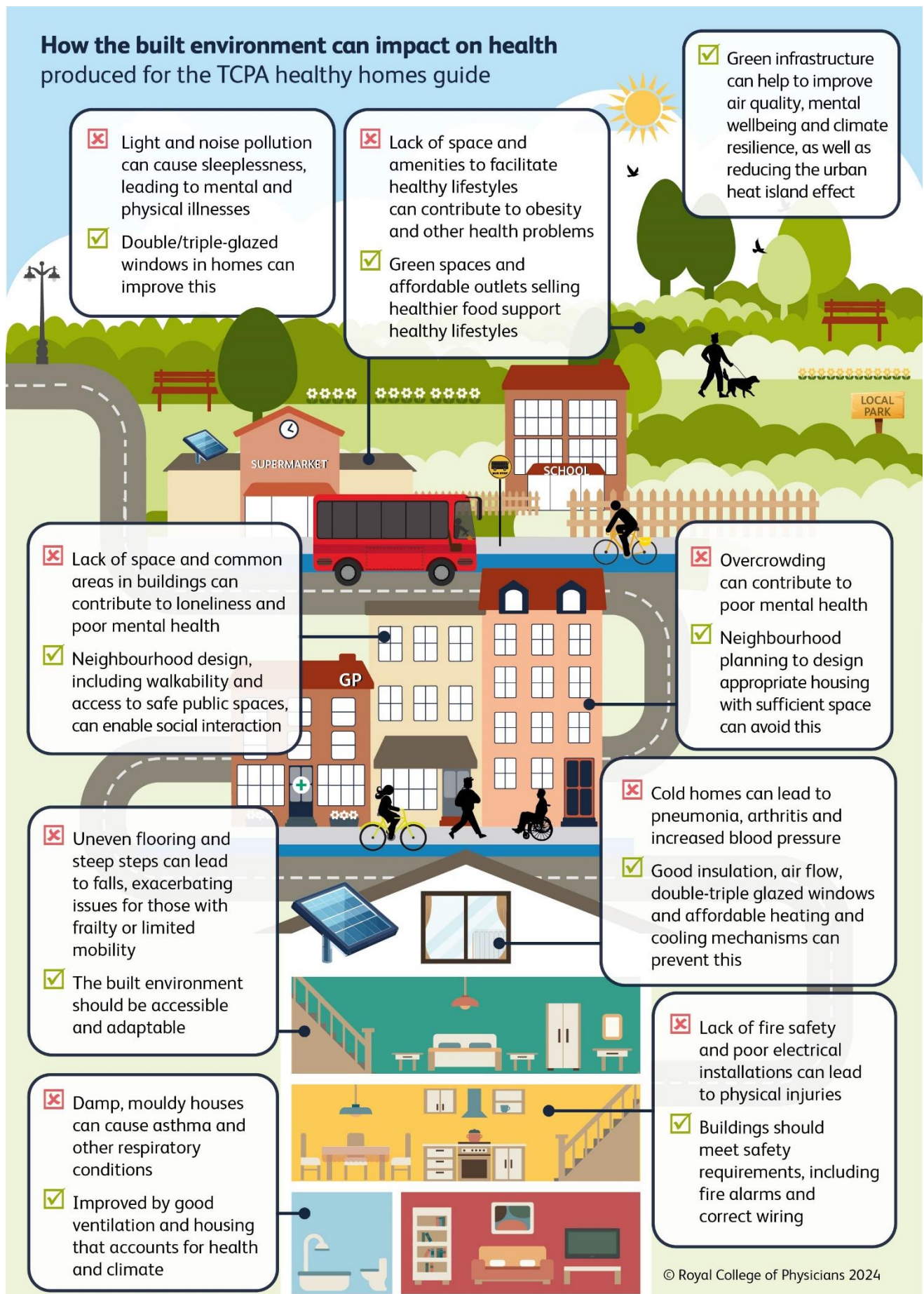
People spend on average around 80-90% of their time indoors^{iv}, meaning that health starts in the home. Building secure, affordable homes that are adaptable and meet the needs of its users will improve health and help to tackle inequalities. A healthy population is good for individuals, the economy, and society.

ⁱ Hood CM, Gennuso KP, Swain GR, Catlin BB (2015). County Health Rankings: Relationships Between Determinant Factors and Health Outcomes. American Journal of Preventive Medicine.

ⁱⁱ Institute of Health Equity (2024). Left out in the cold: the hidden health costs of cold homes.

ⁱⁱⁱ Royal College of Physicians (2024). Census reveals more than half of doctors seeing more patients with illness due to avoidable social harms.

^{iv} Parliamentary Office of Science and Technology (2023). POSTbrief 54: Indoor Air Quality.



2.2 The Healthy Homes Principles: addressing a fragmented housing regime

Despite the clear need for healthy homes for all, the current approach to securing decent homes and communities is fragmented and spans building regulations, planning policy, the health and safety regime, environmental health protections, and other legislation. This complex array of policy and regulatory requirements can weaken health outcomes.

Building regulations broadly focus on prevention of harm from the worst hazards and do not cover many of the key built environment features that would help to positively promote human health and thriving. This is particularly the case for aspects that do not concern the structural fabric of buildings, such as access to public transport, active travel connections, health care and other services, and proximity to nature and good quality green spaces.

Planning policy and guidance can address these wider determinants of health, but it can be too easy to sidestep or water down these requirements as such policies are subject to planning discretion. Recommendations from a review of the Decent Homes Standard could start to address some of the worst issues for the private rental sector and poor quality homes.⁸ However, the Standard does not provide a comprehensive set of health requirements, including on climate resilience (e.g. overheating and flood risk), access to amenities, green spaces and transport, indoor and ambient air pollution, safety from crime and fire safety.

To ensure a more comprehensive approach to delivering better health outcomes, a set of **Healthy Homes Principles** has been established by a coalition of over 60 built environment and public health organisations as part of the TCPA's Campaign for Healthy Homes. The Principles aim to establish a clear quality benchmark for the creation of new homes (see **Figure 2**). These high-level Principles seek to embed health promotion as the overarching aim through the entirety of the housebuilding process.

Changes to Permitted Development Rights (PDR) since 2015 have undermined the discretionary and democratic local planning process. These regulatory changes were introduced to simplify and speed up development applications. However, by avoiding full planning scrutiny they are not framed with the intention to promote good quality homes and places.

The TCPA, with University College London, published a review of the policies and regulations around PDR and each of the Healthy Homes Principles.⁹ The review found that 11 of the 12 Principles are only partially addressed or entirely missed under the current regime. Worryingly, certain building regulations did not appear to apply when a building undergoes a 'material change of use' to residential use, including: structural safety (approved document A); resistance to moisture (C2); accessibility (M); risk of falling, collision or impact (K); and overheating (O). Furthermore, local authorities only have a limited range of levers to shape the quality of PDR conversions, such as through prior approval conditions and Article 4 Directions (see **Section 3**).

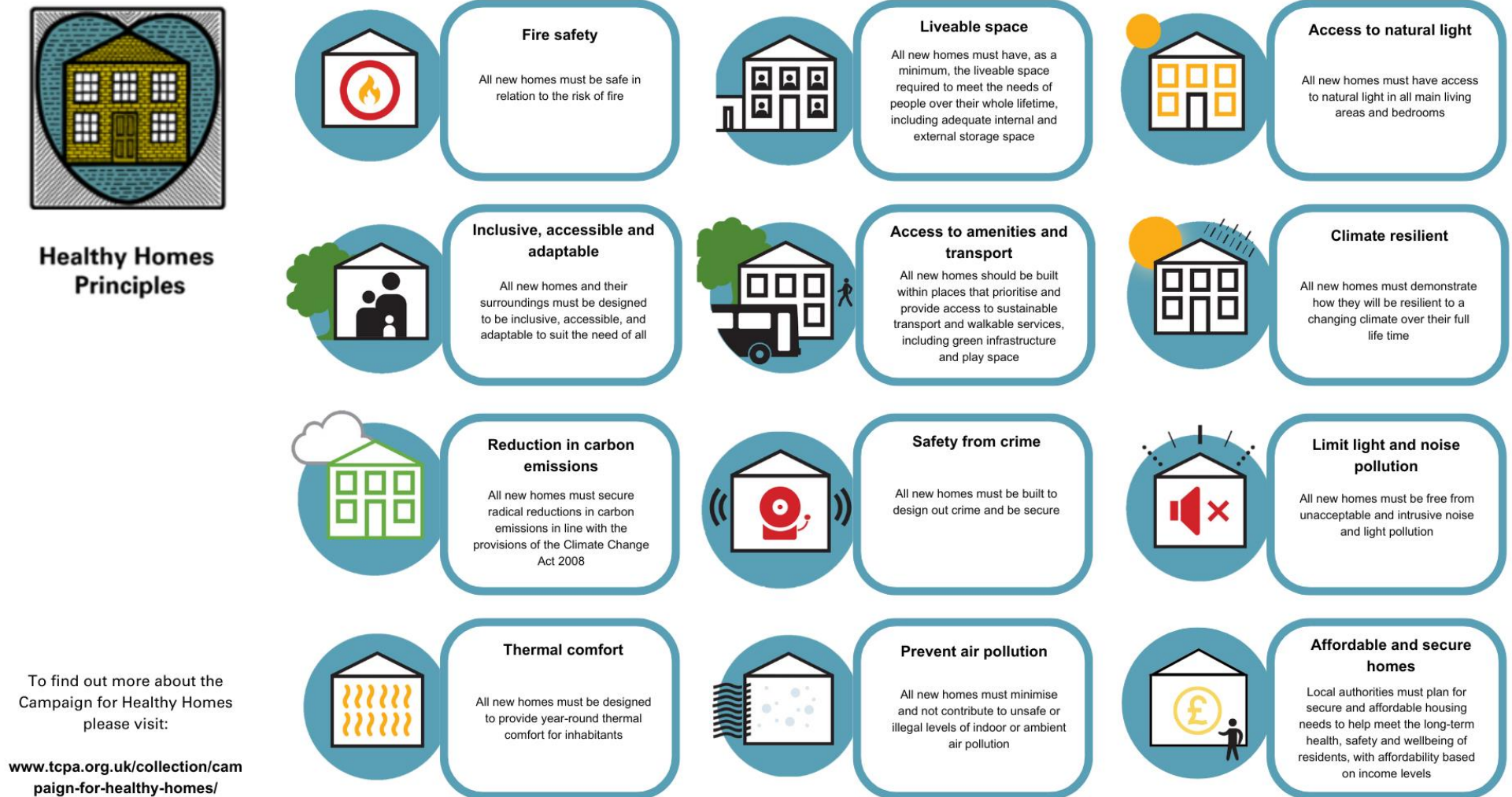


Figure 2. The Healthy Homes Principles

Some of the key national policies, regulations and guidance as they relate to each of the Principles are listed in **Table 1**.

Table 1. Key national policies, regulations and guidance applicable to the Healthy Homes Principles

Principle	Key policies / regs / guidance
Liveable space	<ul style="list-style-type: none"> • Housing Act 1985 - Part X Overcrowding Standard • Homes with Multiple Occupancy – Housing Act 2004, and Housing and Planning Act 2016 • The Town and Country Planning (General Permitted Development) (England) (Amendment) Regulations 2020 – Regulation 3*** • Nationally Described Space Standard (NDSS)* • National Planning Policy Framework (NPPF) Chapter 12. Achieving well-designed places* • National Design Guide and National Model Design Code*
Inclusive, accessible, adaptable	<ul style="list-style-type: none"> • Equality Act (2010) • Building regulations: Approved document M4 (1): access (<i>mandatory</i>)**, M4(2) use of buildings and; M4(3) Wheelchair Access (<i>both optional</i>) • National Design Guide and National Model Design Code* • Lifetime Homes / Neighbourhoods standard*
Fire safety	<ul style="list-style-type: none"> • Building Regulations: Approved document B: Fire safety • Construction (Design and Management) Regulations (CDM) 2015 • Building Safety Act 2022 – for ‘High Risk’ residential Buildings over 18 metres of seven stories • Planning Gateway One – Fire safety statement regarding access for emergency vehicles • Fire Safety (England) Act 2022
Access to natural light	<ul style="list-style-type: none"> • The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)*** • The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 • National Design Guide and National Model Design Code* • BRE daylight standard*
Access to amenities, transport and nature	<ul style="list-style-type: none"> • NPPF: Chapter 8. Promoting healthy and safe communities. Chapter 9. Promoting sustainable transport. Chapter 12. Achieving well-designed places. See also Developer contributions (S106 & CIL) • National Design Guide and National Model Design Code* • Building with Nature standard*
Reductions in carbon emissions	<ul style="list-style-type: none"> • Build regulations: <ul style="list-style-type: none"> ◦ Approved document L. Conservation of fuel and power; and new requirements • Climate Act 2008 • NPPF: Chapter 9. Promoting sustainable transport; Chapter 14. Meeting the challenge of climate change, flooding and coastal change* • The Future Homes and Building Standard (from 2025): All new homes will produce 75-80% less carbon emissions than current regulations • Part Z: Embodied carbon and whole life carbon emissions*
Safety from crime	<ul style="list-style-type: none"> • Building Regulations: Approved Document Q: Security • NPPF: Chapter 8. Promoting healthy and safe communities* • National Design Guide and National Model Design Code* • Secured by Design standard*
Climate resilient	<ul style="list-style-type: none"> • NPPF: Chapter 14. Meeting the challenge of climate change, flooding and coastal change* • National Design Guide and National Model Design Code* • PPG Flood Risk assessment
Prevent air pollution	<ul style="list-style-type: none"> • Ambient air quality: The Air Quality (England) Regulations 2000 • Indoor air quality: Build regulations: <ul style="list-style-type: none"> ◦ Approved document C: Site preparation and resistance to contaminants and moisture ◦ Approved document F: Ventilation • NPPF: Chapter 15. Conserving and enhancing the natural environment* • National Design Guide and National Model Design Code*

Limit light pollution	<ul style="list-style-type: none"> • The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended • NPPF: Ch. 15. Conserving and enhancing the natural environment* • National Design Guide and National Model Design Code*
Limit noise pollution	<ul style="list-style-type: none"> • Building regulations: <ul style="list-style-type: none"> ◦ Approved document E: Resistance to the passage of sound’; ◦ Approved document O: Overheating (impact of ambient noise and opening windows)** • Environment Act 1990 (Noise as a ‘statutory nuisance)
Thermal comfort	<ul style="list-style-type: none"> • Building Regulations: <ul style="list-style-type: none"> ◦ Approved document F: Ventilation ◦ Approved Document L: Conservation of fuel and power ◦ Approved document O: Overheating** • Decent Homes Standard (DHS)**** • National Design Guide and National Model Design Code*
Affordable and secure	<ul style="list-style-type: none"> • Developer contributions: <ol style="list-style-type: none"> 1. Section 106 agreement of Town and Country Planning Act 1990 (As amended); 2. Community Infrastructure Levy (due for reform under the Levelling Up and Regeneration Act 2023) • Homes (Fitness for Human Habitation) Act 2018 • Tenant rights – Renters Reform Bill (not yet passed) • NPPF*

*Not mandatory

**Not yet applied under ‘material change of use’ / PDR conversion to residential use

***Applies to PDR homes only

**** Does not apply to private rental sector

2.3 Local health context: addressing inequalities and targeting housing need

Life expectancy is significantly lower in England for people living in more deprived areas when compared to those living in less deprived areas.¹⁰ The high and growing cost of private rental and home ownership is contributing to widening wealth inequalities between high- and low-income groups, generations and ethnic groups.¹¹ Assessment of local housing need is not just about numbers but is also about the type of homes that are required to address the diverse needs of a local population, based on local demographics and health evidence. The local health context should inform local development and planning decisions made in that area.

The Office of National Statistics (ONS) National Well-being Dashboard provides 58 measures of wellbeing across the UK. The Health Foundation has also created a dashboard that allows authorities in England to access headline local health and health inequalities data that is divided by upper tier authorities – see the **Resource** below. At a local level, Joint Strategic Needs Assessments and local Health and Wellbeing Strategies help to clarify the specific local health priorities that need to be addressed, including through policies that target housing and place quality.

Resource: the Health Foundation's local authority dashboard

The Health Foundation's new local authority dashboard looks at the state of health and health inequalities in England. It shines a light on what builds good health by providing data and insights on how health is shaped by factors such as the quality of our housing, employment, and income and how these factors vary both between and within local authorities in England.



Source: <https://www.health.org.uk/evidence-hub/local-authority-dashboard>

3 Implementation approaches

The TCPA believes that democratic and strategic planning can offer enormous benefits to our society, environment and economy. However, for more than a decade, the English planning system has undergone a period of cutbacks, instability and deregulation. This has significantly undermined the ability of planners to deliver sustainable development and good place-making. All too often, this is producing outcomes which undermine people's mental and physical health¹².

These changes and uncertainty have posed notable challenges for local authorities in securing control over the quality of the development in their areas. The Healthy Homes Principles were designed with this in mind to support local authorities, as an attainable tool that clarifies the function and purpose of planning – to deliver place-making that promotes physical, mental and social wellbeing. When adopted at the local level, they can ensure that health is considered in the development process.

In May 2024, the Campaign for Healthy Homes launched the Healthy Homes Pledge, which asks individuals and organisations in the built environment sector to commit to going beyond bare minimum housing protections to ensure better outcomes for people and the environment. A growing number of organisations have signed up to the Pledge, committing to promote the Healthy Homes Principles in their work. This includes the Chartered Institute for Housing, the Good Homes Alliance, the Royal Institute of British Architects, and companies such as Wates.¹³ Further information on the Healthy Homes Pledge is available here: www.tcpa.org.uk/healthy-homes-pledge/

A growing number of councils have also signed up to the Healthy Homes Pledge, including the City of Doncaster, Lewes District Council, and Swale Borough Council. Additionally, several local authorities and place-based groups have endorsed the Principles through other policy routes, such as adopting a council motion. These include Arun District Council, Herefordshire Council, Hertfordshire Local Enterprises Partnership, London Borough of Hounslow, Norwich City Council, and Scarborough Borough Council.

Due to the scalable nature and the adaptability of the Healthy Homes Principles, there are several possible approaches that can be taken to incorporate them into local strategy and policy. These include:

- A council motion;
- Corporate plan;
- Local Plans and policies;
- Supplementary Planning Documents;
- Design codes;
- Neighbourhood plans; and
- Permitted Development tools.

These approaches are explored further within this section of the guide.

3.1 A council motion

A council motion is a legitimate course of action to take when national policy is lacking in areas that an authority would like to address. See **Annex 1**: Draft motion to council for a template Healthy Homes council motion. There are numerous examples of council motions on housing matters. In Oldham, a motion to protect private renters was approved in November 2023.¹⁴ As a result, the council resolves to take measures such as: ‘serving improvement notices for excess cold in homes that fail Minimum Energy Efficiency Standards’ and ‘helping private renters claim back rent through rent repayment orders when they are eligible to do so.’¹⁵ The London Borough of Tower Hamlets has prioritised housing concerns via a motion to council. In July 2021 the council resolved ‘to continue to proactively seek opportunities to maximise social and affordable house building, to help ease the pressures of the housing market on those with low and medium incomes.’¹⁶ This was a direct response to the concern over the UK’s economy and the implications it could have on the housing market and its affordability in the area.

Lewes District Council passed a motion to council in July 2021 that incorporates the Healthy Homes Principles into local policies and council housing programmes. The council has recognised the wealth of knowledge that people’s homes have direct impacts on their health and wellbeing. The COVID-19 pandemic further highlighted the importance of health creating environments and the basic human right to living in environments that do not harm our health. Lewes District Council adopted the Healthy Homes Principles to ensure communities secure better control over the quality of local homes. This is showcased in **Case study - council motion**.

Case study – council motion

Lewes District Council – Motion to July 2021 Full Council: Healthy Homes and Places

‘This Council resolves to:

- Strive to ensure that the principles of Healthy Homes and Places are met, in order to create the highest quality places for residents which will be a fitting legacy for future generations;
- Review related policies, processes and procedures as part of current Local Plan review, and develop and adopt new policies, to ensure that all new development is in line with the Healthy Homes and Places Principles;
- Make the Healthy Homes and Places principles through policies and design codes an integral part of Council decision making on housing and planning; and
- Ensure the next review of the corporate plan includes healthy homes and places as a priority.’

Since adopting the motion, the Healthy Homes Principles have been incorporated in various specific areas of work in Lewes:

- Included within the Council’s Employers Requirements for the direct delivery of new homes.
- Featured in the Council’s evolving ‘New Homes Principles’, which sets out the Council’s standards and aspirations for new Council homes.
- Supporting the Council’s new Corporate Plan in development for 2024-2028, with a continued focus on increasing housing supply.

Policies H2 and H1 of the emerging Local Plan Lewes Local Plan 2023 ([lewes-eastbourne.gov.uk](https://www.lewes-eastbourne.gov.uk)) and the use of a design code.

Source: <https://democracy.lewes-eastbourne.gov.uk/ieListDocuments.aspx?MId=3417>

3.2 Corporate plan

Councils can directly implement this approach and refer to healthy place-making and the Healthy Homes Principles in their corporate plan. Elected members can create action plans for the duration of the council in their strategic management and business planning. This is reflected in the corporate plan which is adopted by the council and sets out its priorities and objectives. Embedding healthy place-making as a theme within the corporate plan sets a consistent reasoning that policies can refer to in creating a cross-cutting approach that promotes embedding healthy housing in planning and policy. **Annex 2: Draft Local Plan policy** provides a draft template of a Healthy Homes policy.

Braintree District Council exemplifies this in the *Healthy Housing Strategy (2023-2028)* that uses the council's Corporate Strategy and its strategic priorities as a baseline.¹⁷ This includes the theme *Connecting people and places* which includes a strategic priority to 'deliver good quality affordable homes for local people.'¹⁸ This sets a precedent for the council to demonstrate how it will achieve this and thus encourages the creating of policy and guidance that can be used as a tool for implementation.

The impact of corporate application of the principles on development viability, planning and building control resources will be a concern for councils. The following **Case study – the Home Quality Mark**, demonstrates that operationalising the Principles can be a viable approach for affordable housing projects. The Home Quality Mark (HQM) was produced by BRE and has been applied by City of London and the London Borough of Lewisham in two housing schemes. HQM is a third-party verified standard which provides an evidence-based and comprehensive approach to embedding all the Healthy Homes Principles in housing development. Importantly, HQM also includes a post-occupancy evaluation requirement to help ensure follow-up of requirements once properties are in use.



Image: York Way Estate, Lewisham which has applied the Home Quality Mark
(source: Maccreeanor Lavington, illustrations by Pillar Visuals)

Case study – the Home Quality Mark

Home Quality Mark (HQM) is a national standard for new homes, developed by BRE. It provides a comprehensive framework to assess and certify the design, construction, and performance of new homes across a range of sustainability and quality metrics.

HQM goes beyond basic building regulations to drive the development of high-quality, sustainable, healthy homes and communities. HQM is independently verified by licensed third-party assessors, and certified on a scale of one to five stars, giving policy-makers, buyers and renters confidence in the sustainability credentials of their home. Used proactively, HQM can be a powerful tool for creating thriving, healthy communities.

How HQM relates to Healthy Homes

Whilst certifying holistic sustainability, a core aim of HQM is to ensure new homes support the health and wellbeing of occupants. Measures include indoor air quality, thermal comfort, noise, lighting, and access to green space. For example, HQM-certified homes must meet strict limits on indoor pollutants like VOCs, have good ventilation and daylight, and minimise overheating risk.

By driving improvements in these key areas, HQM helps create healthier indoor environments and encourages residents to lead more active lifestyles. This focus on health is critical given we spend 90% of our time indoors, and the growing evidence linking poor housing to chronic illnesses.

HQM's comprehensive audit framework, tracks sustainability from design to post-occupancy. It has been crucial in keeping the project objectives aligned despite external challenges. The emphasis on health and wellbeing, particularly through Post Occupancy Evaluation (POE) objectives, supports targeted solutions for delivering sustainable, community-focused housing.

How Local Authorities can promote HQM

Local authorities are increasingly incorporating HQM into planning policy to drive up the quality and sustainability of new housing. For instance, the City of London Corporation has integrated HQM into their Housing Design Guide, reflecting their commitment to delivering high-quality, sustainable social housing that promotes resident wellbeing.

Planners can use HQM to secure a wider range of community benefits from development. The standard rewards proposals that enhance ecology, provide community food growing, improve air quality, and more.

City of London Corporation and Lewisham: Sydenham Hill Estate and York Way Estate housing developments

The City of London Corporation, with the London Borough of Lewisham, is pioneering the use of HQM in the Sydenham Hill Estate and York Way Estate social housing developments, which commenced in 2021 and are expected to complete by 2026. The York Way Development is targeting a HQM 4.0 star rating, while Sydenham Hill Estate is aiming for a 3.5 star HQM rating. These projects aim to deliver over 200 new homes for social rent that set new benchmarks for quality and sustainable living.

By embracing HQM, the City of London Corporation ensures these developments not only meet but exceed sustainability goals, providing homes that benefit both residents and the broader environment. The focus on enhancing the landscape, greening, and ecology aligns seamlessly with HQM's benchmarks, significantly uplifting the environmental and social value of the developments. The City of London Corporation's early adoption of HQM offers a model for sustainable urban development, setting a benchmark for future endeavours in the social housing sector.

Source: <https://breeam.com/home-quality-mark>

The **Case study – going beyond minimum regulations** illustrates how the Hertfordshire Growth Board is promoting the BRE Home Quality Mark across the county’s district councils by creating and promoting a county-wide Development Quality Charter.

Case study - going beyond minimum regulations

Hertfordshire’s Development Quality Charter

The Hertfordshire Growth Board has prepared a county-wide Development Quality Charter, which encourages developers and councils to voluntarily sign-up to achieve more ambitious design and sustainability standards. The charter wants developers to go beyond building regulations in the promotion of good quality housing and wider development. It states that developers should identify a sustainability standard (such as BRE’s Home Quality Mark or Passivhaus) that exceeds current minimum building regulations as part of their planning application and then use an industry-recognised process to demonstrate compliance with that standard upon completion of their development.



It is hoped that councils that have signed the charter will use it to influence and frame planning policy using a positive and proactive approach that goes beyond reducing or minimising harm. Councils also have the option of incorporating the charter into their local plan policies, supplementary planning documents and other strategies. Some of the councils have also included the charter in planning performance agreements when working with private developers, as well as into tender specifications when selling public sector land or entering into joint development agreements.

Source: www.hertfordshiregrowthboard.com/hertfordshire-development-quality-charter/

3.3 Local Plan policies

When done well, a Local Plan will acknowledge the interconnection between people’s health and housing needs and be set up to respond to both. This should also include ensuring that provisions are made for healthy affordable housing and as well as housing for specialist needs that can be adapted for all stages of life.

In the Local Plan, the Healthy Homes Principles can be directly referenced in policy. This can be done through the creation of a specific Healthy Homes policy or by embedding the Healthy Homes Principles as a metric to be followed within a housing policy. For example, the London

Borough of Havering has created a policy, *Healthy Communities*, that follows many of the principles, see **Case study – healthy development in Local Plan policies**. Additionally, Plymouth and Southwest Devon set standards to safeguard the community health through protecting health amenity as shown in the second **case study – protecting health and amenity** below.

Case study – healthy development in Local Plan policies

London Borough of Havering – Policy 12: Healthy Communities

All major development proposals must be supported by a Health Impact Assessment (HIA);

- i. Directing new development to well connected locations to enable active travel (ref Policy 3);
- ii. Promoting well designed and safe places (refer to Policy 26);
- iii. Promoting the diversification of uses within town centres and managing the overconcentration of uses that can have a negative health impacts (refer to Policy 13);
- iv. Supporting the delivery of essential community services (refer to Policies 16 and 17);
- v. Providing and protecting open space, leisure and recreation facilities (refer to Policy 18);
- vi. Supporting measures to promote walking and cycling (refer to Policy 23);
- vii. Supporting the provision of multifunctional green infrastructure (refer to Policy 29);
- viii. Seeking environmental improvements, minimising exposure to pollutants and improving air quality (refer to Policies 33 and 34); and
- ix. Avoiding contributing to factors that affect climate change, and contribute to prevention measures that mitigate against the effects of climate change (refer to Policies 32 and 36).

Source: https://www.havering.gov.uk/download/downloads/id/5300/havering_local_plan_2016_-_2031.pdf

Case study – protecting health and amenity

Plymouth and Southwest Devon Joint Local Plan - Policy EV1: Protecting health and amenity

Development proposals will be required to safeguard the health and the amenity of local communities. In addition to measures set out in other policies of the plan, this will be through, as appropriate:

1. Ensuring that new development provides for satisfactory daylight, sunlight, outlook, privacy and the protection from noise disturbance for both new and existing residents, workers and visitors. Unacceptable impacts will be judged against the level of amenity generally in the locality.
2. Ensuring that developments and public spaces are designed to be accessible to all people, including people with disabilities or for whose mobility is impaired by other circumstances.
3. Requiring a Health Impact Assessment to be submitted as part of any Environmental Statement submitted in relation to planning applications with a likely significant health impact.

Source: <https://plymswdevonplan.co.uk/policy/so11/dev1>

3.4 Healthy Homes Principles – targeted local policies

Councils can embed the Healthy Homes Principles within their Local Plan policies (and for parish councils or Neighbourhood Forums in Neighbourhood Plans), using strong policy language that will promote all twelve principles. Targeted policies provide an opportunity to go into detail and tailor how they respond to each principle, to reflect the local context and needs and challenges within a local area.

There are many good examples of targeted policies relating to each of the Healthy Homes Principles that have been adopted in Local Plans across the country. The rationale underpinning the Healthy Homes Principles and examples of specific local policies are outlined below.

3.4.1 Liveable space

More than two million children in England live in overcrowded accommodation with little or no personal space, and over 300,000 share beds with family members.¹⁹ Nearly a third of adults in Britain (15.9 million people) have experienced mental or physical health problems due to the condition or lack of space in their home during the Covid-19 lockdown; 52% of those who said their homes weren't big enough suffered from health problems according to a YouGov survey.²⁰ Outside of PDR conversions, new developments are not legally required to comply with the standards.²¹ London is an exception, where the London Plan is a statutory development plan, and so planning decisions must be informed by the London Plan spatial standards.²² But local authorities can specify the application of the space standards in their Local Plan and many Local Plan housing policies refer to the Nationally Described Space Standards (2015) which sets out voluntary guidance that the minimum size of any dwelling should be 37 square metres^{23,24}.

Wakefield District Council has adopted clear policy language regarding space requirements under the policy *LP 3 Minimum Space Standards for Homes* which states: 'All new homes will comply with the Technical Housing Standard setting out the Nationally Described Space Standard for internal space in new dwellings'.²⁵ Cornwall Council also created space standards for its affordable housing stock under *Policy 13: Development standards* which requires: 'Sufficient internal space in housing for everyday activities and to enable flexibility and adaptability by meeting nationally described space standards for all affordable housing'.²⁶

3.4.2 Inclusive, accessible and adaptable

Building accessible homes is a vital part of ensuring that the nation's housing stock is sustainable and meets the needs of its residents. The Equality and Human Rights Commission lists mobility problems, indignity, poorer mental health, feelings of social isolation and anxiety as impacts of non-accessible homes and reports that those without accessible homes are four times less likely to be in work.²⁷

In 2018, data from the English Housing Survey showed that 91% of homes did not provide the four main features to be considered even 'visitable' for most people.²⁸ According to Habinteg, 70% of new homes built between 2020-2030 won't be required to meet any of the optional access standards necessary to improve accessibility and adaptability for older and disabled people.²⁹ Currently, 104,000 people in England are on waiting lists for accessible and adaptable homes.³⁰ The below **Case study** highlights how Hambleton, North Yorkshire has prioritised the delivery of multiple house types to reflect diverse and specialised needs of the local community.

Case study – inclusive, accessible, and adaptable homes

Hambleton District Council – Policy HG2: Delivering the Right Type of Homes

All new residential development should assist in the creation of sustainable and inclusive communities through the provision of an appropriate mix of dwellings in terms of size, type and tenure. In order to achieve these aims the Council will:

- a. Seek the use of good quality adaptable housing designs that provide flexible internal layouts and allow for cost-effective alterations to meet changing needs over a lifetime and reduce fuel poverty;
- b. Work with developers, registered providers, landowners and relevant individuals or groups to address identified local demand for self and custom build homes as identified in the Hambleton Self and Custom Build Register;
- c. Support proposals for the development of specialist accommodation in defined settlements (see policy S3: Spatial Distribution) that increase choice for older, vulnerable and disabled residents and would meet an identified need;
- d. Support the provision of shared accommodation for single people in defined settlements (see policy S3: Spatial Distribution); and
- e. Support proposals for the development of community-led housing schemes.

As such, a proposal for housing development will be supported where:

- f. a range of house types and sizes is provided, that reflects and responds to the existing and future needs of the district's households as identified in the Strategic Housing Market Assessment (SHMA) or successor documents, having had regard to evidence of local housing need, market conditions and the ability of the site to accommodate a mix of housing;
- g. all homes meet the National Described Space Standards (NDSS), or any successor standards/policy; and
- h. within a large scale major development, defined in the 'Glossary' ('Page 264'), 9% of market housing meet building regulation M4(3)a 'wheelchair adaptable dwellings' (or replacement standards) and 30% of affordable housing meet building regulation M4(3)b 'wheelchair accessible dwellings' (or replacement standards), subject to physical site conditions and other planning considerations.

Source:

democracy.hambleton.gov.uk/documents/s15267/Hambleton%20Local%20Plan%20Publication%20Draft.pdf

3.4.3 Fire safety

In the year ending September 2023, Fire Rescue Services attended nearly 600,000 incidents, of which there were 278 fire-related fatalities in England.³¹ With statistics like these it is imperative that all homes are built to be fire safe, meeting and exceeding regulations, including Building Regulations Approved Document B and the Building Safety Act 2022.

The Building Safety Act 2022 created a new regime for Higher-Risk Buildings (HRB) over 18 metres or seven stories in height which must be registered and examined by a new Building Safety Regulator (BSR) (see **Figure 3**).³² The regulator is a statutory consultee for 'Planning Gateway One' applications that all developers must undertake for new HRB. Gateway One requires developers to submit a comprehensive fire and structural safety report, outlining how the proposed building design meets the safety standards outlined in the act. The TCPA has

raised concerns however about how Gateway One applies to residential conversions under Permitted Development Rights (PDR), which do not require a full planning application.

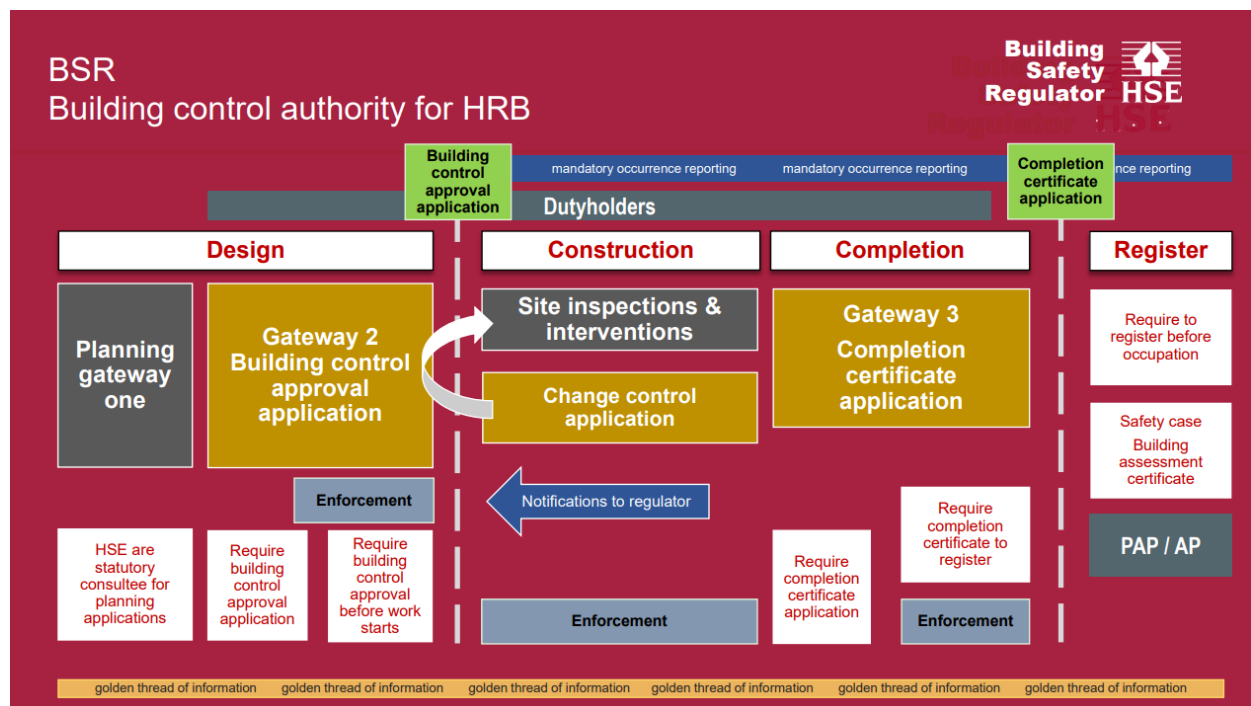


Image: Overview of building control procedures to address fire risk in 'High Risk Buildings' (Source: BSR, RIBA Fire Safety Conference, April 2024)

The London Fire Safety Guidance (2022) offers a local example that aims to go beyond Gateway One requirements. It requires clear demonstration of the specific fire safety elements that must be adopted in a project, as part of a planning application.³³ The guidance also seeks to clarify the link between fire safety, design and evacuation strategies. Furthermore, consideration of equitable evacuation options should be incorporated when reviewing applications, to ensure vulnerable people, such as disabled or elderly people, are considered in any evacuation plans.³⁴

3.4.4 Access to natural light

There is strong evidence that indoor access to natural light has a positive impact on mental health and circadian sleep cycles. Yet there is no mandatory requirement to ensure provision of windows in new homes. An analysis of 6,017 residents in eight European cities found that those with self-reported low levels of natural light were 1.4 times as likely to report depression and 1.5 times as likely to report a fall when compared to those satisfied with their home's light levels.³⁵ Access to natural light is a vital part of ensuring health and wellbeing in our homes.

Local Plan policies should require developers to apply clear standards regarding building and site layout, ensuring access to daylight and rights to light, as exemplified in the below **case study**. In addition, the guidance produced by BRE³⁶ sets out how daylight access can be measured and promoted in and around buildings.

Case study – access to daylight

London Borough of Havering - Policy 7: Residential design and amenity

Residential development should be of a high design quality that is inclusive and provides an attractive, safe and accessible living environment for new residents whilst ensuring that the amenity and quality of life of existing and future residents is not adversely impacted.

To protect the amenity of existing and future residents the Council will support developments that do not result in:

...ii. Unacceptable loss of daylight and sunlight; and

...To ensure a high quality living environment for residents of new developments, the Council will support residential developments that:

- iv. Meet the National Space Standards and the London Plan requirement for floor to ceiling heights;
- v. Are sited and designed to maximise daylight and sunlight;
- vii. Provide both balconies and communal amenity space in flatted schemes; and
- viii. Maximises the provision of dual aspect accommodation unless exceptional circumstances are demonstrated;

In any development affordable and market housing will be expected to have the same external appearance and equivalent amenity in relation to views, daylight, noise and proximity to open space.

Source: www.havering.gov.uk/download/downloads/id/5300/havering_local_plan_2016_-_2031.pdf

3.4.5 Reductions in carbon emissions

Energy use in homes accounts for 14% of total UK carbon emissions.³⁷ Homes with poor energy efficiency and insulation contribute to energy insecurity and even fuel poverty. Over 22 million homes in the UK do not have adequate insulation.³⁸ Nearly half households in the UK (13 million out of the 28 million) did not put on their heating during cold spells in 2022.³⁹ Poorly insulated, cold and damp homes exacerbate respiratory diseases and energy insecurity can affect people's sleep and levels of anxiety. It is therefore important for energy use and carbon reduction to be considered in new homes, for both the health of our planet and the health and wellbeing of our communities.

Local Plan policy should aim to accelerate the deployment of more affordable renewable energy sources for new housing to reduce household energy bills, reduce the exposure to economic volatility and energy price hikes, support emission reduction and support job creation. For example, the City of Bristol (see **Case study – creating a suite of climate policies**) has adopted a comprehensive suite of climate-based policies that cut across carbon emissions reduction, adaptation and resilience.

Case study – creating a suite of climate policies

City of Bristol – Net zero and climate topic paper

The city's policy approach provides a comprehensive approach to mitigating and adapting to climate change, taking account of operational and embodied carbon, adaptation to a changing climate and its associated risks and the need for renewable energy generation and energy efficiency improvements across the city. They support the council's ambition to make Bristol a net zero and climate resilient city by 2030. The policies include:

- NZC1: Climate change, sustainable design and construction. This policy provides an overarching approach to mitigating and adapting to climate change, and to meeting local and national climate objectives.
- NZC2: Net zero carbon development – operational carbon. This policy requires development to achieve net zero carbon through maximising energy efficiency, utilising sustainable heating and cooling systems and incorporating onsite renewable energy generation.
- NZC3: Embodied carbon, materials and circular economy. This policy sets out how development should minimise embodied carbon, utilise sustainable materials and incorporate circular economy principles.
- NZC4: Adaptation to a changing climate. This policy sets out the council's approach to ensuring development in the city is designed to cope with the effects of climate change, both now and in the future.
- NZC5: Renewable energy and energy efficiency. This policy sets out the council's supportive stance on renewable energy generation in Bristol, particularly in the Bristol Port and Avonmouth area. The policy is also supportive of applicants seeking to improve the energy efficiency and sustainability of existing buildings.

Source: www.bristol.gov.uk/files/documents/7601-tpc007-net-zero-and-climate-topic-paper-november-2023-incorporating-april-2024-addendum-regarding-written-ministerial-statement/file

3.4.6 Access to amenities, greenspace and sustainable travel

All homes should be designed with good access to public transport, the GP, schools, local shops and parks to support our health and wellbeing.⁴⁰ Public Health England found that neighbourhoods without active travel options (buses, trains, walking, wheeling and cycling routes) negatively impact mental wellbeing and increase the risk of Type 2 diabetes, cardiovascular disease and musculoskeletal diseases.⁴¹ Access to green and blue (water-based) infrastructure has also been shown to mitigate stress and promote healthy lifestyles. A survey of 406 adults in Scotland found that the amount of green space in a neighbourhood was a significant predictor of stress levels.⁴²

The following case studies on **sustainable and active travel** and **green and play spaces** provide examples for prioritising active travel and access to green space in Local Plan policies.

Case study – sustainable and active travel

Brighton & Hove City Council – DM33: Safe, Sustainable and Active Travel

The council will promote and provide for the use of sustainable transport and active travel by prioritising walking, cycling and public transport in the city. This will support the objectives, projects and programmes set out in the Local Transport Plan and other strategy and policy documents. New developments should be designed in a way that is safe and accessible for all users, and encourages the greatest possible use of sustainable and active forms of travel.



Image: Brighton's Marine Parade with protected cycle route. (Photo: Sally Roscoe)

Source: www.brighton-hove.gov.uk/sites/default/files/2022-10/CPP2%20Adoption%20Version%20October%202022%20DIGITAL%20version_0.pdf

Case study – green and play spaces

Plymouth & Southwest Devon Joint Local Plan – DEV27: Green and play spaces

The LPA's will protect and support a diverse and multi-functional network of green space. The following provisions apply:

1. Development that would result in an unacceptable conflict with the function(s) or characteristic of Strategic Green Spaces will be resisted. In these areas development will normally only be permitted where it enhances the value of the green space, for example through sports, allotment and play provision, lighting, cafes, educational uses and sustainable transport routes.
2. Existing open spaces, which also includes designated City Green Spaces and Neighbourhood Green Spaces, should not be built on unless it is demonstrated that the open space is surplus to requirements; or the loss will be replaced by equivalent or better provision in a suitable location; or the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss. In making this judgement regard will be had to evidence of the identified value of the green space's attributes as set out in relevant open space assessments and account will be taken of the plan's green space and play accessibility standards. Development will be resisted on sites where the functions and characteristics of the greenspace will be lost and mitigation is not possible.
3. The quality and quantity of accessible green space and play space should be improved in line with local targets and standards for the provision of greenspace and play space. This can be delivered through on-site provision or financial contributions to off-site provision where appropriate.
4. Local deficiencies in the accessibility and quality of green space and play space should be addressed in development, in line with local standards.

Source: <https://plymswdevonplan.co.uk/policy/so11/dev27>

3.4.7 Safety from crime

The Government's *Safer Places Guide* states that most crime reduction through the planning system is delivered through crime prevention.⁴³ When homes are purposely designed to build out crime, not only are communities safer, but our health and wellbeing benefits too. Studies confirm this, as neighbourhood crime can be a contextual predictor of mental health.⁴⁴

Incorporating policies that target minimising crime in development is an important step towards reducing crime in local communities. The London Borough of Waltham Forest does this throughout its Local Plan, and in particular *Policy 60 – Designing Out Crime*, as illustrated in the following **Case study – crime reduction through design**.

Case study – crime reduction through design

Waltham Forest Local Plan – Policy 60: Designing Out Crime

To improve community safety and cohesion Waltham Forest will work with partners to:

- A. Minimise opportunities for criminal behaviour by requiring all forms of new development to incorporate 'Designing out Crime' and Secured by Design, and require all major developments to apply for Secured By Design accreditation via the Secured by Design scheme;
- B. Co-ordinate land uses to minimise the likelihood of an increase in crime and disorder;
- C. Promote safer streets and public realm improvements throughout the Borough, where necessary in liaison with the Metropolitan Police Counter Terrorism Security Advisors (CTSAs), Traffic Management Unity (TMU) and with the British Transport Police (BTP).

Source: www.walthamforest.gov.uk/media/971

3.4.8 Climate resilient

Since 2016, 570,000 new homes have been built that are not resilient to short term high temperatures.⁴⁵ Heatwaves cause higher rates of mortality, and those most likely to suffer are the very young, the elderly and people with conditions like asthma.⁴⁶

Homes also need to be resilient to increased risk from flooding and storms which have a significant financial cost, as well as negative impact on the mental health of people whose homes are affected.⁴⁷ The Environment Agency estimates that 5.7 million properties in England are at risk of flooding.⁴⁸ Only 200,000 of them will benefit from flood defences according to the reviewed 2021-2027 capital programme.⁴⁹

The City of Bristol's Local Plan policies (**Case study – creating a suite of climate policies**) in section 3.4.5 provide a comprehensive approach to addressing climate resilience and adaptation alongside mitigation policies. The TCPA has also produced guidance for local authorities that illustrates climate policy examples in the *Climate Guide: Case Study Hub*: www.tcpa.org.uk/resources/climate-guide-case-studies/

3.4.9 Prevent air pollution

Ambient and indoor air pollution in the UK is associated with approximately 28,000 to 36,000 deaths and costs the NHS £43 million each year.⁵⁰ Between 2017 and 2025, the total estimated

NHS and social care cost from treating sickness linked to outdoor air pollution will be at least £1.6 billion in England.⁵¹

Poor indoor air quality has been linked to lung diseases and increased risk of heart disease and stroke.⁵² Provisions must be made to ensure new homes minimise air pollution, ensure good ventilation and do not contribute to unsafe pollution levels.

The **Case study – promoting improvements in air quality** provides an example by Brighton and Hove of how air quality can be addressed through a Local Plan policy.

Case study – promoting improvements in air quality

Brighton and Hove: DM40 Protection of the Environment and Health – Pollution and Nuisance

Planning permission will be granted for development proposals that can demonstrate they will not give rise nor be subject to material nuisance and/or pollution that would cause unacceptable harm to health, safety, quality of life, amenity, biodiversity and/or the environment (including air, land, water and built form). Proposals should seek to alleviate existing problems through their design.

Proposals liable to cause or be affected by pollution and/or nuisance will be required to meet all the following criteria: ...

- b) support the implementation of local Air Quality Action Plans and help support the local authority meet the Government's air quality and other sustainability targets;
- c) provide, when appropriate, an Air Quality Impact Assessment to consider both the exposure of future and existing occupants to air pollution, and, the effect of the development on air quality. Air quality improvements and/or mitigation must be included wherever possible;
- d) have a positive impact, where practicable, on air quality when located within or close to an Air Quality Management Area and not worsen the problem;
- e) assess the impacts of emissions from transport, flues, fixed plant, and heat and power systems. New biomass combustion and CHP plants associated with major developments will not be acceptable in or near an Air Quality Management Area and sensitive receptors such as the Royal Sussex County Hospital due to the need to comply with nitrogen dioxide limits; ...

When a proposal, including the remediation measures, invokes the need for an Environmental Impact Assessment the findings of the assessment must be appropriately taken into account.

Source: www.brighton-hove.gov.uk/sites/default/files/2022-10/CPP2%20Adoption%20Version%20October%202022%20DIGITAL%20version_0.pdf

3.4.10 Limit light and noise pollution

Findings by the World Health Organisation (WHO) state that noise is the second largest environmental cause of health problems, just after air pollution, and it can result in increased risk for cardiovascular disease, sleep disturbance, cognitive impairment, and permanent hearing impairment.⁵³ In 2018, 100,000 years of good health were lost in England due to road traffic noise. Most of these losses were due to chronic annoyance and sleep disturbance, followed by stroke, ischemic heart disease and diabetes.⁵⁴ Light pollution is also damaging to human health as it impacts our circadian cycle. CPRE: the countryside charity reports that

prolonged exposure to light pollution can lead to depression, sleeplessness and heart and blood problems.⁵⁵

To address the concerns that arise from light and noise pollution, Local Plan policy can include measures to limit excessive noise in local areas. This is highlighted in the following case studies: ***minimising noise pollution*** and ***minimising light pollution*** below.

Case study – minimising noise pollution

Bracknell Forest Council – Policy NE11: Noise Pollution

Within the district, areas of tranquillity; nationally designated landscapes; designated nature conservation sites and occupants of residential properties, will be protected from unacceptable levels of noise as a result of development.

Development proposals for noise sensitive uses are required to clearly identify any likely adverse noise impacts on the sensitive receptors that are intended to use or occupy the development from existing nearby sources of noise.

Development proposals for noise generating uses are required to clearly identify any likely adverse noise impacts arising from the proposed development on existing nearby sensitive receptors, including the natural environment.

Planning applications will be required to include a Noise Impact Assessment where consideration under (2) and (3) indicates the potential for Observed Adverse Effect Levels of noise. The Assessment must be undertaken by a suitably qualified person and consider the relationship in detail.

...Development proposals will be supported where:

- a) Development is located and designed to minimise the impact of noise on areas of tranquillity and where residential properties / occupants will not be exposed to an unacceptable noise impact that adversely affects the amenity of existing or future users;
- b) Good design is used to improve and enhance the acoustic environment and reduce the impact of noise generated by the development; and
- c) The impact of noise on the surrounding environment and noise sensitive receptors is satisfactorily mitigated through noise attenuation measures.

Where there will be an unacceptable adverse effect on sensitive receptors which cannot be adequately prevented, avoided, and/or mitigated, planning applications will be not be supported.

Planning conditions will be used to ensure that mitigation measures are satisfactorily implemented.

Source: <https://consult.wealden.gov.uk/kpse/event/2726CE98-03BA-4520-8558-361BAA45F784/section/s170903021859211>

Case study – minimising light pollution

Cheshire East Council – Policy ENV 14: Light pollution

Lighting schemes will be permitted provided the following criteria are met:

1. the amount of lighting is the minimum required for security, safety and/or operational purposes;
2. light spillage and glare will be minimised to an acceptable level;
3. the lighting is as energy efficient as possible; and
4. there will be no significant adverse effect individually or cumulatively on: residential amenity; pedestrians, cyclists and other road users; the character of the area; nature conservation; heritage assets; specialist facilities; and individuals and groups.

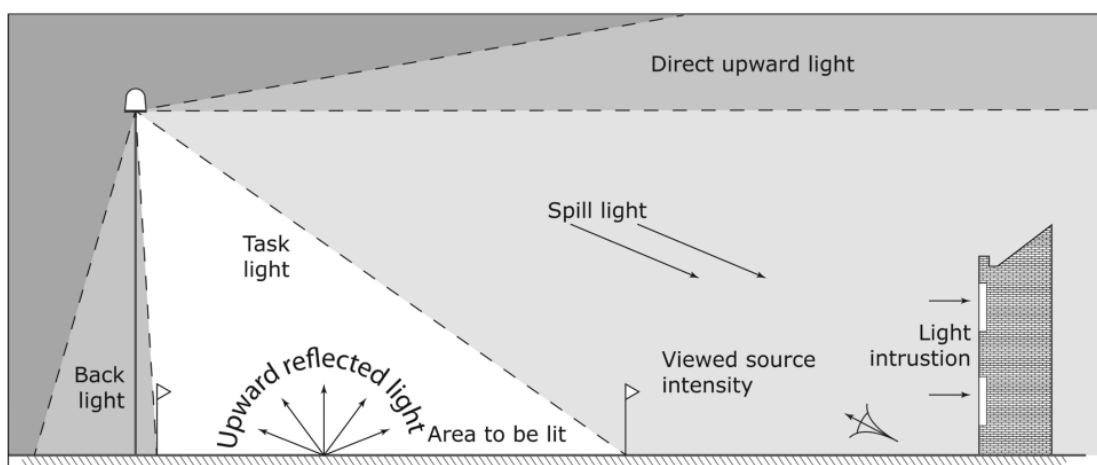


Image source: *Guidance Notes for the Reduction of Obtrusive Light* (2021), Institute of Lighting Professionals: <https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021>

Source: www.cheshireeast.gov.uk/planning/spatial-planning/cheshire_east_local_plan/site-allocations-and-policies/env-14.aspx

3.4.11 Thermal comfort

With the changing climate and increased occurrence of extreme weather events, it is imperative that new homes provide year-round thermal comfort for residents. Poor thermal comfort undermines sleep quality and exacerbates cardiac, pulmonary and respiratory conditions.^{56,57} Over 700,000 homes in England were found to be 'excessively cold' in the winter⁵⁸, with the NHS spending over £540m a year treating people affected by the worst properties. Following the decision to remove subsidies for loft and wall insulation, more than 70,000 excess winter deaths were caused by living in consequently cold, damp housing conditions over the last ten years.⁵⁹ Poor insulation and limited ventilation also mean that many homes are overheating in the summer. Over half of the UK housing stock (55% or 15.7 million homes) currently fails the bedroom overheating criterion⁶⁰, and an estimated 791 excess deaths are associated with overheating every year in England and Wales.⁶¹

The below **Case study – overheating** showcases how Richmond Upon Thames considers the implications of climate change and how to adapt to overheating in new and existing homes.

Case study – overheating

London Borough of Richmond Upon Thames – Policy LP 20: Climate Change Adaption

A. The Council will promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property.

B. New development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy:

1. minimise internal heat generation through energy efficient design
2. reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls
3. manage the heat within the building through exposed internal thermal mass and high ceilings
4. passive ventilation
5. mechanical ventilation
6. active cooling systems (ensuring they are the lowest carbon options).

C. Opportunities to adapt existing buildings, places and spaces to the likely effects of climate change should be maximised and will be supported.

Source: www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf

3.4.12 Affordable and secure tenure

The Healthy Homes Bill calls for local authorities to plan for affordable housing needs to secure the long-term health, safety and wellbeing of residents. In particular, to assess affordability based on average and below-average household income levels, rather than tied to market rates. Genuinely affordable homes support many social objectives that help people to thrive, including reducing health inequalities. Affordable housing can contribute to improved reported health and life satisfaction, crime reduction, better labour market, and improved educational outcomes.⁶²

This also applies to ensuring security of housing tenure. This refers to the need for legal protections for residents against harassment, forced ‘no-fault’ evictions, excessive tenancy fees, uncertain duration of tenancies and other threats. One review found that greater tenure security can ‘boost economic mobility, improve housing and environmental conditions, including reduced exposure to pollution, create safer and better resourced communities, and improve physical and mental health’.⁶³

This is illustrated in the **Case study – affordable housing** that shows how the London Borough of Ealing considers the provisions of affordable housing in its Local Plan policy. Additionally, the **Case study – security of tenure** provides an example of promoting tenant security by Wakefield District Council through its ‘Build to rent’ Local Plan policy.

Case study – affordable housing

London Borough of Ealing – Policy HOU: Affordable Housing

A. Affordable housing contributions must address identified needs in Ealing and will be based upon: (i) A strategic target of 50% as set out by the London Plan (ii) A split of 70% affordable rent to 30% intermediate provision (iii) An appropriate mix of tenures and unit sizes.

B. Development that adversely affects affordable housing provision, tenure, or mix will be refused. It extends to the full boundary of the LSIS. (i) It meets objectively assessed industrial needs. (ii) It achieves a high quality of built environment and delivers any necessary supporting infrastructure, affordable housing, and affordable workspace contributions.

C. The Fast Track route in Ealing will only apply to provision of 40% affordable housing or above and will depend upon meeting Ealing's preferred housing mix and tenure.

D. Provision should be made on site, and units secured in perpetuity for affordable use will normally be preferred.



Source: www.ealing.gov.uk/download/downloads/id/18477/local_plan_-_chapter_5_development_management_policies.pdf

Case study – secure tenure

Wakefield Metropolitan District Council – Policy SP 8: Build to Rent Housing

The development of build to rent schemes will be supported, particularly in Wakefield sub-regional city and the Principal Towns, usually as part of larger mixed tenure schemes. They will provide a mix of unit sizes and types to meet local needs. Evidence of need will be set out in Strategic Housing Market Assessments and associated studies. Build to Rent Schemes will require a legal agreement setting out that:

1. The whole development is and remains under common ownership and management control for a minimum of 20 years;
2. Operators must offer tenancies of three years to all tenants, with tenants having the option to terminate at one month's notice, after the first six months, without a break fee being payable.

Where a tenant requests a shorter tenancy this should be accommodated;

3. Operators must offer rent certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked;
4. On-site management will be provided with a daily presence;
5. Operators must have a complaints procedure in place and be a member of a recognised ombudsman scheme and a member of the Council's Responsible Landlord Scheme.
6. An annual statement must be submitted to the Council setting out the approach being used to let affordable units, their ongoing status and demonstrating how the scheme is meeting the overall affordable housing level required by the planning permission.
7. All the homes must remain as Build to Rent under a covenant for at least 20 years;

Source: www.wakefield.gov.uk/media/cezexgd0/volume-1-development-strategy-strategic-and-local-policies.pdf

3.5 Supplementary Planning Documents

The role of Supplementary Planning Documents (SPDs) is to provide more detailed guidance on the adopted policies in a Local Plan. They are not part of the development plan and so they cannot introduce new planning policies; instead, they act as material consideration in the decision-making process.⁶⁴ They can expand on the detail for implementing the policies in a Local Plan which relate to healthy place-making, and the Local Plan can point developers to the relevant policies within the SPD. It must be noted however that due to planning reform, it is expected that SPDs will change to be called 'supplementary plans' as of June 2025 and will then form part of the development plan.

East Suffolk have created a Healthy Environments Supplementary Planning Document (SPD) to support healthy place-making in the local area and aid in its delivery. The *Healthy Homes design guidance* section of the SPD states that the '*Healthy Homes Principles provide the overall framework for this section and are recommended to be reviewed before considering the more detailed recommendations included in this section.*'⁶⁵ Bradford District Council has also adopted a design-based SPD with health outcomes a central aim. This is described further in the **Case study – Supplementary Planning Documents**.

Case study – Supplementary Planning Documents

Homes and Neighbourhoods: a guide to designing in Bradford

Bradford District has a population of over half a million, and over 124,000 people under 16 making it the youngest city in the country. The district also has an increasing number of older people which mean a significant number and range of new homes will be required to meet the district's needs by 2035. The district faces significant health challenges, including some of the highest rates of childhood poverty and illness in the UK, and serious concerns over air quality in certain areas. Bradford is the 11th most deprived district in England.

To respond to these pressing housing and health needs, Bradford council, working with the design practice Tibbalds, created a district-wide design guide SPD. This has been followed more recently with a detailed design code, to help plan and create places where people can flourish, not just in their homes but also creating successful neighbourhoods.

The design guide is founded on core vision for creating healthy neighbourhoods and homes. It sets out guidance and illustrations across three elements, outlined below.

Design guidance section	1 DEFINING A BRIEF	2 CREATING A NEIGHBOURHOOD	3 MAKING A HOME
Summary of the section's contents	This section sets out a method for thorough site and context analysis. This is critical to understanding key opportunities and constraints, such as local character, identity and topography, before moving on to design. It also sets out the key ingredients that make a successful place for people.	Using the brief created in Section 1, this section explains how to define the strategies for a robust and justified concept, masterplan and neighbourhood. This section considers the macro scale, encouraging applicants to resolve the issues here, before designing the home in Section 3.	This guidance sets out the detail design guidance for homes. The design should respond clearly to the design brief created in Section 1, and develop from the scheme concept, masterplan and neighbourhood principles in Section 2.
What design topics does it contain?	<ul style="list-style-type: none"> 1.1 Establish a project brief 1.2 Site and context analysis 1.3 Responding to character 1.4 Making places for people 1.5 Prioritise the environment 	<ul style="list-style-type: none"> 2.1 Define a concept 2.2 Density and scale 2.3 Movement 2.4 Green streets 2.5 Safe and characterful streets 2.6 Open space 2.7 Water and drainage 2.8 Landscape 2.9 Biodiversity 2.10 Play 2.11 Housing mix 2.12 Topography and ground conditions 2.13 Roofs and building forms 2.14 Key buildings and corners 2.15 Parking 2.16 Waste 2.17 Making inclusive places 	<ul style="list-style-type: none"> 3.1 Flats and apartments 3.2 Internal layout 3.3 Storage 3.4 Light and ventilation 3.5 Outdoor space 3.6 Privacy 3.7 Elevations 3.8 Materials and details 3.9 Energy efficient

Source:

[www.bradford.gov.uk/Documents/SupplementaryPlanningDocuments/Adopted%20SPDs/Homes%20and%20Neighbourhoods%20Design%20Guide%20SPD//Homes%20and%20Neighbourhoods%20-%20A%20guide%20to%20designing%20in%20Bradford%20SPD%20\(print%20version\).pdf](http://www.bradford.gov.uk/Documents/SupplementaryPlanningDocuments/Adopted%20SPDs/Homes%20and%20Neighbourhoods%20Design%20Guide%20SPD//Homes%20and%20Neighbourhoods%20-%20A%20guide%20to%20designing%20in%20Bradford%20SPD%20(print%20version).pdf)

3.6 Design codes

In line with the latest National Planning Policy Framework and National Model Design Code, local authorities will need to produce design codes at various scales and levels of detail to shape the quality of place. These codes may be council-wide, topic or site specific. The Office for Place defines a design code as follows, 'A design code is a set of design requirements for the physical development of a site or area. It is made up of rules that are clear, specific and unambiguous, and it should normally include extensive graphical illustrations.'⁶⁶ This provides an opportunity for local authorities to include the Healthy Homes Principles within their design codes to ensure that development embeds the healthy promotion within the future design of new homes and neighbourhoods.

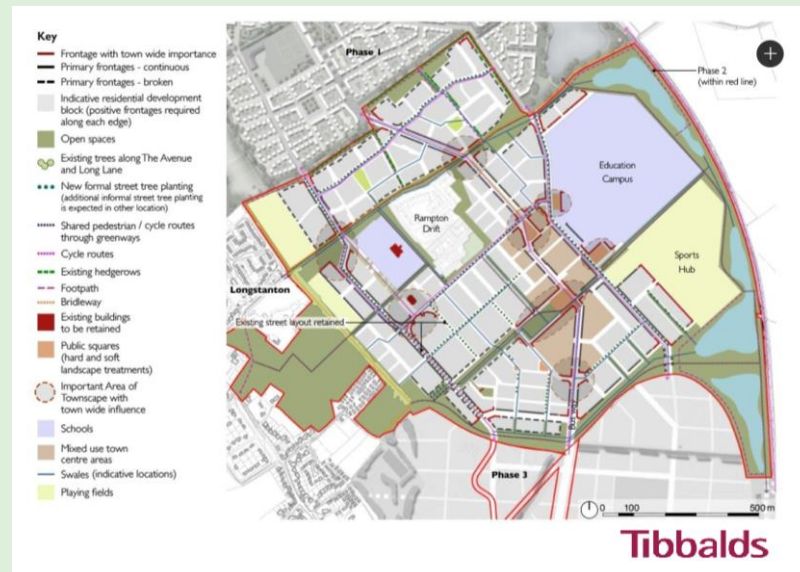
Building for a Healthy Life 12, written in partnership with Homes England, NHS England and NHS Improvement, integrates the findings of the three-year Healthy New Towns Programme. It visually depicts 12 design areas and key attributes that should be applied to promote better health outcomes.⁶⁷ A health-led approach was adopted for a masterplan design code applied in Northstowe, Cambridgeshire, as outlined in **Case study - healthy masterplan design code**.

Case study - healthy masterplan design code

Northstowe Healthy New Town, Cambridgeshire

Northstowe will be a new community of 25,000 people. The masterplan design code developed by Tibbalds, specifically focuses on the health and wellbeing objectives, including reducing obesity and promoting wellbeing of older people. It aims to help people to make healthy choices via environmental change. The design code goes beyond the usual active travel elements by seeking to embed best practice in placemaking and healthy living principles in mandatory guidance for future developers.

The first families moved into Northstowe in May 2017. By 2040 the Northstowe community will have 10,000 new energy efficient houses and apartments. The plans include a town centre, sports pavilions, and a well-designed play park 'Pioneer Park' with a basketball area, outdoor free gym, sports pitches and bowls green. Local amenities include primary and secondary schools and a heritage building showcasing the area's history and finds from archaeological works.



Sources: www.tibbalds.co.uk/work/projects/northstowe-design-code and www.northstowe.com/the-place

3.7 Neighbourhood plans

Neighbourhood planning is an important tool for local communities to have their say in shaping the quality of development in their areas and, overall, the future design of where they live. Neighbourhood Plans are a statutory part of their local development plans and can include policies on housing such as: housing mix, density, quality, design, and location, amongst other matters.

Ivers Parish Council in Buckinghamshire adopted a Neighbourhood Plan in 2023 which aims to protect and enhance its character and natural environment, and also promote sustainable development. To achieve improved energy efficiency, Policy IV14 PassivHaus Buildings seeks to incentivise meeting the Passivhaus, or equivalent, standard. This policy is outlined further in the **Case study – neighbourhood planning**.

Case study – neighbourhood planning

The Ivers Parish Council – Neighbourhood Plan: Policy IV14: PassivHaus Buildings

A. All developments should be ‘zero carbon ready’ by design to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and landscaping.

B. Wherever feasible, all buildings should be certified to a Passivhaus or equivalent standard with a space heating demand of less than 15KWh/m²/year. Where schemes that maximise their potential to meet this standard by proposing the use of terraced and/or apartment building forms of plot size, plot coverage and layout that are different to those of the character area within which the proposal is located, this will be supported, provided it can be demonstrated that the scheme will not have a significant harmful effect on the character area.

C. All planning permissions granted for new and refurbished buildings should demonstrate that they have been tested to ensure the buildings will perform as predicted and will include a planning condition to require the provision of a Post Occupancy Evaluation Report to the Local Planning Authority within a specified period, unless exempted by Clause B. Where the Report identifies poor energy performance and makes recommendations for reasonable corrective action, the applicant must demonstrate that those actions have been implemented before the condition will be discharged.

D. All planning applications for major development are also required to be accompanied by a Whole Life-Cycle Carbon Emission Assessment, using a recognised methodology, to demonstrate actions taken to reduce embodied carbon resulting from the construction and use of the building over its entire life.*

E. An Energy Statement will be submitted to demonstrate compliance with the policy (except for householder applications). The statement will include a passive design capacity assessment to demonstrate how opportunities to reduce the energy use intensity (EUI) of buildings over the plan period have been maximised in accordance with the energy hierarchy. Designers shall evaluate the operational energy use using realistic information on the intended use, occupancy and operation of the building to minimise any performance gap.

*Major development as defined in Annex 2 of the NPPF

Source: www.iversparishcouncil.gov.uk/wp-content/uploads/sites/55/2023/07/IPNP-Final.pdf

For further information on neighbourhood planning and supporting active, healthy environments, see the *Neighbourhood Planning and 20-Minute Neighbourhoods Toolkit*: www.tcpa.org.uk/wp-content/uploads/2023/09/FINAL-NP_20MN_Toolkit_14_Sep.pdf

4 Managing housing quality from permitted development

The original purpose of permitted development rights (PDR) was to allow minor extensions for individual households, and small building conversions, without requiring a planning application. Since 2013 the government has made it possible to convert a range of commercial buildings into homes using PDR.

The TCPA is not against converting unused office spaces into housing, especially as the demand for homes is so high. However, the TCPA believes that this must be done properly to ensure that the necessary safeguards and regulations for the promotion of health and wellbeing are followed.

Homes that are created through PDR are not subject to national and local planning policies or guidance; the quality of these homes relies almost entirely on building regulations and a limited list of set conditions. Additionally, the current rules for permitted development are highly complex, and challenging to understand and therefore implement.⁶⁸ It is very difficult for local authorities and regulators – whose oversight over PDR is already highly limited – to influence the quality of homes.



Image: The cover of 'These are homes' photobook, depicting an office to residential conversion through PDR at Terminus House in Harlow. Link: www.tcpa.org.uk/these-are-homes-photobook (Photo: Rob Clayton)

This following section examines the few regulatory levers that can be applied locally to try and shape the quality of homes produced under PDR, in particular:

- Article 4 directions.
- Prior Approval conditions.
- Section 257 of the Housing Act 2004.

4.1 Article 4 directions

PDR can be constrained or removed by the Secretary of State and local planning authorities (LPAs), by means of an Article 4 direction, as referred to in the Town and Country Planning (General Permitted Development) (England) Order 2015.⁶⁹ Essentially, Article 4 directions are a part of planning legislation that allow LPAs to remove PDR in a specific area, thus requiring planning permission for developments within that area.

In recent years, national government has altered legislation on Article 4 Directions. The 2021 update to the National Planning Practice Framework (NPPF) added new requirements on Article 4 directions to constrain how they are used by LPAs. It states that Article 4 directions should *'be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area [...]'* and in all cases, their application must be *'based on robust evidence, and apply to the smallest geographical area possible.'*⁷⁰

Additionally, in 2021 then Secretary of State for Housing, Communities and Local Government, Robert Jenrick, created a Written Ministerial Statement (WMS) limiting the scope stating: *'Article 4 directions should be very carefully targeted, applying only to those locations where they are necessary to avoid wholly unacceptable adverse impacts.'*

Despite these changes, implementing Article 4 direction remains a powerful tool for LPAs to limit PDR to areas where it can be demonstrated that requiring planning permission would prevent harm to local wellbeing and/or amenity. Various London Boroughs, such as Barking and Dagenham⁷¹, Merton⁷² and Richmond⁷³ have applied Article 4 direction to key locations within their respective local areas, requiring a full planning application for proposals to convert buildings in certain high streets, HMOs, adding additional stories to existing buildings, as well as agricultural and industrial areas.

4.2 Prior approval conditions

Prior approval refers to specific conditions that local authorities can apply in relation to some PDR applications to ensure that these developments will not have 'unacceptable' impacts. The scope of conditions is limited by central government, as defined by the Town and Country Planning (General Permitted Development) (England) Order 2015.⁷⁴ They relate to areas such as: building design, appearance, transport and highway impacts, noise, contamination, flooding, or the impact of the amenities in the area. The prior approval conditions which are allowed to apply varies according to different (former) use classes of building, see **Table 2**.

Authorities can only apply and enforce prior approval conditions that fall within the scope of the 2015 Order. Local design codes and guidance, noise mitigation, transport and flood risk strategies are therefore important in helping to clarify the application of those conditions for homes produced through PDR.

Table 2. Classes of buildings within the scope of permitted development for conversion to residential use under the Town and Country (General Permitted Development) (England) Order 2015 and further amendments

Building class	Type	Scope of prior approval conditions
Class L – small HMOs to dwelling-houses & vice versa	<ul style="list-style-type: none"> Houses in Multiple Occupation 	None
Class M – certain uses to dwelling-houses	<ul style="list-style-type: none"> Launderettes Betting offices Pay day loan shops Hot food takeaways Mixed-use, combining residential with one Class M use 	(a) transport and highways impacts of the development; (b) contamination risks in relation to the building; (c) flooding risks in relation to the building; (d) whether it is undesirable for the building to change to a use... because of the impact on (i) adequate provision of services (shops and financial services) ... (ii) the sustainability of a shopping area; and (e) the design or external appearance of the building.
Class MA / Class E – commercial, business and service uses to dwelling-houses (PD applied to this class since 2021)	Class E buildings: <ul style="list-style-type: none"> Financial, professional or betting offices Pay day loan shop 	a) transport impacts of the development, particularly to ensure safe site access; (b) contamination risks in relation to the building; (c) flooding risks in relation to the building; (d) impacts of noise from commercial premises on the intended occupiers ..; (e) where— (i) the building is located in a conservation area, and (ii) ..the impact of that change of use on the character or sustainability of the conservation area; (f) the provision of adequate natural light in all habitable rooms of the dwelling houses* (<i>amended in 2020</i>); (g) the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses; and (h) where the development involves the loss of services provided by— (i) a registered nursery, or (ii) a health centre maintained under section 2 or 3 of the National Health Service Act 2006(2)....
Class N – specified sui generis uses to dwelling-houses	<ul style="list-style-type: none"> Amusement arcade or centres Casinos 	(a) transport and highways impacts of the development; (b) contamination risks in relation to the building; (c) flooding risks in relation to the building; and (d) the design or external appearance of the building; and (e) the provision of adequate natural light in all habitable rooms of the dwelling-houses (<i>amended in 2020</i>).
Class O – offices to dwelling-houses	<ul style="list-style-type: none"> Offices 	(a) transport and highways impacts of the development; (b) contamination risks on the site; and (c) flooding risks on the site.
Class P – storage or distribution centres to dwelling-houses	<ul style="list-style-type: none"> Storage warehouses Distribution centres 	(i) impacts of air quality on the intended occupiers of the development; (ii) transport and highways impacts of the development, (iii) contamination risks in relation to the building; (iv) flooding risks in relation to the building; (v) noise impacts of the development; and (vi) ... whether the introduction of, or an increase in, a residential use of premises in the area would have an adverse impact on the sustainability of the provision of those [industrial or distribution] services.
Class PA – premises in light industrial use to dwelling-houses	<ul style="list-style-type: none"> Light industrial uses (including agricultural uses) 	(i) transport and highways impacts of the development; (ii) contamination risks in relation to the building; (iii) flooding risks in relation to the building; and (iv) ...whether the introduction of, or an increase in, a residential use of premises in the area would have an adverse impact on the

(PD applied from 2017-2020, then applied under Class MA in 2021)		sustainability of the provision of those [services or storage or distribution] services.
Class Q – Agricultural (PD applied in 2015 and increased in size in 2018)	<ul style="list-style-type: none"> • Barns • Agricultural buildings 	(a) transport and highways impacts of the development; (b) noise impacts of the development; (c) contamination risks on the site; (d) flooding risks on the site; (e) whether the location or siting of the building makes it otherwise impractical or undesirable for the building to change; (f) the design or external appearance of the building; and (g) the provision of adequate natural light in all habitable rooms of the Dwellinghouses (<i>amended in 2020</i>).

4.3 Section 257 of the Housing Act 2004

Residential PDR conversions for houses in multiple occupation (HMOs) can be subject to the requirements set by Section 257 of the Housing Act 2004.⁷⁵ This means that local authorities can apply licencing fees and management requirements on landlords managing HMO properties that were created using PDR.

Section 257 requirements apply if:

- a building or part of a building has been converted into, and consists of self-contained flats;
- building work undertaken in connection with the conversion did not comply with the appropriate building standards and still does not comply with them; and
- less than two-thirds of the self-contained flats are owner-occupied.⁷⁶

Although it is unclear how widely these requirements are applied, there are case studies of LPAs who have implemented these requirements. For example, the London Borough of Harrow has set requirements for landlords of these HMOs to apply for an additional licence under Section 257.⁷⁷

Glossary

Article 4. Article 4 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) allows local planning authorities and the Secretary of State to issue directions withdrawing permitted development rights for certain works in a specified area.

CDM – Construction (Design and Management) Regulations 2015. The regulations set out various duties for key actors, including commercial and domestic clients, principal designers, contractors and workers. Duties include ‘plan, manage, monitor and coordinate’ health and safety to reduce or control any risks that may arise before and during construction, as well as maintenance once a building is in use.

CIL - Community Infrastructure Levy. CIL is a legally enforceable fee that applies to new development, where a CIL policy is in place, to contribute towards local infrastructure such as roads, transport, and new schools. The CIL was introduced by the Planning Act 2008.

DHS - Decent Homes Standard. This is a technical standard for social housing which aims to provide a minimum standard of housing conditions. At the time of publication, a review is considering whether to apply the standard to the private rental sector.

Developer contributions. The financial contribution made by developers associated with a planning application to mitigate the impact of a development on local infrastructure, amenities and affordable housing needs. This can be in the form of Community Infrastructure Levy or Section 106 agreements.

General Permitted Development Order 2015 – GPDO 2015. A statutory instrument in England, which grants planning permission for certain types of development without the need for approval from the local planning authority.

HHSRS – Housing Health and Safety Rating System. This is an assessment system based on 29 criteria to help LPAs / LHAs identify and assess potential hazards and their risk in housing. It is a requirement for social housing to meet the standard but not currently the private rental sector. HHSRS has undergone a review, and new regulations are required to enact the proposed revisions.

HMO – Housing in Multiple Occupation. Residential properties where 'common areas' exist and are shared by more than one household e.g. shared bathrooms.

HRB – Higher-Risk Buildings. Defined in the Building Safety Act (2022) as buildings with two or more residential units, and of 18 metres or seven stories in height.

MCU – Material Change of Use. A term used in relation to building regulations referring to the conversion of a building from one ‘use class’ to another use e.g. changing from an office to residential use.

NDSS - Nationally Described Space Standard. A set of national standards for the spatial requirements of homes. It is not a regulatory requirement but is a technical standard regarding bedrooms, storage and floor to ceiling heights, and sits within the planning system.

NPPF – National Policy Planning Framework. The government’s planning policies for England.

PDR – permitted development rights. PDR (as outlined in planning law) allow certain building works and changes of use to be carried out without having to make a full planning application, subject to certain limitations and ‘prior approval’ conditions.

Prior approval. Prior approval refers to conditions attached to some PDR applications to ensure developments do not have unacceptable impacts. It refers to a limited set of matters such as building design, appearance, transport and highways impacts, noise, contamination, flooding, or the impact on the amenity of the area, defined in the GPDO (2015). LPAs cannot determine what is required through the prior approval process, only central government can specify this.

PPG - the Planning Practice Guidance. The PPG is government guidance about the application of planning policy, bringing together and interpreting the NPPF and a range of other policies, and development orders.

Section 106 agreements. These agreements are planning obligations that are negotiated between local authorities and developers. They are attached to a planning permission to mitigate against the impact of a development and make a development acceptable which would otherwise be unacceptable in planning terms.

Use classes. The Town and Country Planning (Use Classes) Order 1987, as amended, groups common uses of land and buildings into classes e.g. ‘hotels’, ‘dwelling-houses’, ‘general industrial’. Changing a building from one use class to another usually requires planning permission, unless exempted through GPDO.

Annex 1: Draft motion to council

This council notes:

- The powerful evidence which demonstrates the link between people's homes and their health, well-being and life chances.
- That there is a universal need for healthy environments which provide space for recreation, children's play and walkable streets; and this has only been further demonstrated by the Covid-19 pandemic.
- That well-designed homes that meet all our citizens' needs over their lifetimes can radically reduce costs to NHS and social care budgets.
- That people have a basic right to live in environments free from unacceptable pollution.
- That homes must be affordable to heat and built to zero carbon standards.
- The deregulation of planning is creating thousands of substandard homes through the conversion of existing buildings into homes without planning permission,
- The creation of low quality homes undermines resident wellbeing and is done with little consideration for local needs.
- That this council is determined to create the highest quality places for residents which will be a fitting legacy for future generations.

This council agrees to:

- Adopt the following Healthy Homes Principles to signal its commitment to the fact that:
 - all new homes should be safe in relation to the risk of fire,
 - all new homes should have, as a minimum, the liveable space required to meet the needs of people over their whole lifetime, including adequate internal and external storage space,
 - all main living areas and bedrooms of a new dwelling must have access to natural light;
 - all new homes and their surroundings should be designed to be inclusive, accessible, and adaptable to suit the needs of all with particular regard to protected characteristics under the Equality Act 2010,
 - all new homes should be built within places that prioritise and provide access to sustainable transport and walkable services, including green infrastructure and play space,
 - all new homes must secure radical reductions in carbon emissions in line with the provisions of the Climate Change Act 2008,
 - all new homes should demonstrate how they will be resilient to a changing climate over their full lifetime,
 - all new homes should be secure and built in such a way as to minimise the risk of crime,

- all new homes should be free from unacceptable and intrusive noise and light pollution,
 - all new homes should not contribute to unsafe or illegal levels of indoor or ambient air pollution and must be built to minimise, and where possible eliminate, the harmful impacts of air pollution on human health and the environment, and
 - all new homes should be designed to provide year-round thermal comfort for inhabitants.
 - Genuinely affordable and secure housing provisions are necessary to meet the long-term health, safety and wellbeing of residents. Assessing affordability should be based on average and below-average household income levels.
- Review and use the powers at its disposal to ensure, as far as possible, that new homes meet the requirements of the principles. Present an action plan by [DATE] detailing how the town council will deliver on the requirements of the principles.
 - Review any strategies or business plans for the town council to ensure the 'Healthy Homes Principles' are a priority.
 - Make the principles an integral part of activity throughout the council, including all decision making on housing, planning and place making more widely.
 - Investigate ways to influence [AUTHORITY]'s emerging planning policy is in line with the 'Healthy Homes Principles' at the earliest possible date.



Annex 2: Draft Local Plan policy

All new homes must meet the Healthy Homes Principles as described below:

- all new homes should be safe in relation to the risk of fire,
- all new homes should have, as a minimum, the liveable space required to meet the needs of people over their whole lifetime, including adequate internal and external storage space,
- all main living areas and bedrooms of a new dwelling must have access to natural light;
- all new homes and their surroundings should be designed to be inclusive, accessible, and adaptable to suit the needs of all with particular regard to protected characteristics under the Equality Act 2010,
- all new homes should be built within places that prioritise and provide access to sustainable transport and walkable services, including green infrastructure and play space,
- all new homes must secure radical reductions in carbon emissions in line with the provisions of the Climate Change Act 2008,
- all new homes should demonstrate how they will be resilient to a changing climate over their full lifetime,
- all new homes should be secure and built in such a way as to minimise the risk of crime,
- all new homes should be free from unacceptable and intrusive noise and light pollution,
- all new homes should not contribute to unsafe or illegal levels of indoor or ambient air pollution and must be built to minimise, and where possible eliminate, the harmful impacts of air pollution on human health and the environment, and
- all new homes should be designed to provide year-round thermal comfort for inhabitants.
- Affordable and secure housing provisions should be incorporated into proposals (as outlined in **XX** Local Plan policy), to secure the long-term health, safety and wellbeing of residents. Assessing affordability will be based on average and below-average household income levels.



References

- ¹ English Housing Survey 2021 to 2022: headline report. (2022, December 15). GOV.UK. <https://www.gov.uk/government/statistics/english-housing-survey-2021-to-2022-headline-report/english-housing-survey-2021-to-2022-headline-report>
- ² Housing Act 2004. <https://www.legislation.gov.uk/ukpga/2004/34/part/6/chapter/4>
- ³ BRE Group (2021) BRE report finds poor housing is costing NHS £1.4bn a year. (11 November 2021). https://bregroup.com/web/bre-group/press-releases/bre-report-finds-poor-housing-is-costing-nhs-1.4bn-a-year?p%20back_url=https%3A%2F%2Fbregroup.com%2Finsights%2Fbre-report-2021-poor-housing-costs-nhs-14-bn
- ⁴ Trying times; Resolution Foundation. (2023, April 14). Resolution Foundation. <https://www.resolutionfoundation.org/publications/trying-times/>
- ⁵ Health Equity in England: The Marmot Review 10 Years On - The Health Foundation. (2020, February). The Health Foundation. <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>
- ⁶ Chance of a lifetime - the impact of bad housing on children's lives - Shelter England. (2006, September). Shelter England. https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/chance_of_a_lifetime_-_the_impact_of_bad_housing_on_childrens_lives
- ⁷ Weale, S. (2023, May 15). Poor housing a growing barrier to school attendance in England, charity reveals. The Guardian. <https://www.theguardian.com/education/2023/may/14/poor-housing-a-growing-barrier-to-school-attendance-in-england-charity-reveals>
- ⁸ DLUHC, MHCLG. Decent Homes Standard: Review. Information on the review of the Decent Homes Standard . 2021. Available from: <https://www.gov.uk/guidance/decent-homes-standard-review>
- ⁹ Permitted development, housing and health: a review of national policy and regulations - Town and Country Planning Association. (2024, February 22). Town and Country Planning Association. <https://www.tcpa.org.uk/resources/permitted-development-housing-and-health-a-review-of-national-policy-and-regulations/>
- ¹⁰ What is happening to life expectancy in England? – The King's Fund (2024, April 10). <https://www.kingsfund.org.uk/insight-and-analysis/long-reads/whats-happening-life-expectancy-england#inequalities-in-life-expectancy-and-healthy-life-expectancy>
- ¹¹ Alice Munro, Jessica Allen and Michael Marmot, Evidence Review: Housing and Health Inequalities in London: Institute of Health Equity (2022). <https://www.instituteofhealthequity.org/resources-reports/evidence-review-housing-and-health-inequalities-in-london/full-report.pdf>
- ¹² The Raynsford Review of Planning - Town and Country Planning Association. (2022, March 18). Town and Country Planning Association. <https://www.tcpa.org.uk/resources/the-raynsford-review-of-planning/>
- ¹³ Campaign for Healthy Homes - Town and Country Planning Association. (2024, May 8). Town and Country Planning Association. <https://www.tcpa.org.uk/collection/campaign-for-healthy-homes/>
- ¹⁴ Oldham Metropolitan Borough Council. (2023, November 1). Actions from Council. Retrieved May 17, 2024, from <https://committees.oldham.gov.uk/documents/s142386/Actions-from-Council-1st%20November-2023.pdf>
- ¹⁵ A fair deal for private renters. Local Government Association. <https://www.local.gov.uk/lga-libdem-group/motions/fair-deal-private-renters>
- ¹⁶ Tower Hamlets Borough Council. Urgent Full Council Motion – Housing Market Crisis. Retrieved May 17, 2024, from

<https://democracy.towerhamlets.gov.uk/documents/s207304/Urgent%20Full%20Council%20Motion%20to%20replace%20Administration%20Motion%20for%20Debate.pdf>

¹⁷ Braintree District Council. Healthy Housing Strategy. Retrieved May 17, 2024, from <https://www.braintree.gov.uk/downloads/file/481/housing-strategy>

¹⁸ Braintree District Council. Our Corporate Priorities 2024 to 2028 – Braintree District Council. Retrieved May 17, 2024, from <https://www.braintree.gov.uk/council/corporate-priorities-2024-2028/2>

¹⁹ Overcrowding in England. National Housing Federation. Retrieved 17 May 2024, from <https://www.housing.org.uk/resources/overcrowding-in-england-2023/>

²⁰ Poor housing causing health problems for nearly a third of brits during lockdown. (2020, July 1). National Housing Federation. <https://www.housing.org.uk/news-and-blogs/news/poor-housing-causing-health-problems-for-nearly-a-third-of-brits-during-lockdown/>

²¹ Understanding the UK's Minimum Space Standards for New Homes (2024 Update). Retrieved January 4, 2024 from: <https://www.britishdwelling.co.uk/posts/understanding-the-uksminimum-space-standards-for-new-homes>

²² Greater London Authority Maria. The London Plan . 2021. <https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-londonplan/london-plan-2021>

²³ Raffo M, Appolloni L, D'Alessandro D. Housing spaces in Europe: a comparative analysis of standards in nine European Countries. Eur J Public Health. 2020 Sep 1;30(Supplement_5):ckaa166.126.

²⁴ UK Government. Technical housing standards – nationally described space standard. Retrieved September 11, 2023 from: <https://www.gov.uk/government/publications/technical-housingstandards-nationally-described-space-standard/technical-housing-standards-nationally-describedspace-standard>

²⁵ Wakefield District Local Plan - Wakefield Council. <https://www.wakefield.gov.uk/media/cezexgd0/volume-1-development-strategy-strategic-and-local-policies.pdf>

²⁶ Cornwall Council. (2016, November). Cornwall Local Plan Strategic Policies 2010 - 2030. Retrieved May 17, 2024, from <https://www.cornwall.gov.uk/media/ozhj5k0z/adopted-local-plan-strategic-policies-2016.pdf>

²⁷ Equality and Human Rights Commission. Housing and disabled people: Britain's hidden crisis . Retrieved May 17, 2024, from https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-britains-hidden-crisis-main-report_0.pdf

²⁸ English Housing Survey 2018-19. Retrieved May 17, 2024, from https://assets.publishing.service.gov.uk/media/5f044f27e90e075c53dfcf01/2018-19_EHS_Adaptations_and_Accessability_Fact_Sheet.pdfEnglish Housing Survey 2018-19

²⁹ Habinteg. (2021, January). Forecast for Accessible Homes 2020. Retrieved May 17, 2024, from <https://www.habinteg.org.uk/download.cfm?doc=docm93jjm4n2829.pdf&ver=3554>

³⁰ McRae, I. (2023, April 14). We just want our homes not to hurt us: Disabled people trapped in temporary accommodation. Big Issue. <https://www.bigissue.com/news/social-justice/disabled-people-homes-hurt-them/>

³¹ Fire and rescue incident statistics: England, year ending September 2023. (2024, January 25). GOV.UK. <https://www.gov.uk/government/statistics/fire-and-rescue-incident-statistics-year-ending-september-2023/fire-and-rescue-incident-statistics-england-year-ending-september-2023>

³² Fire safety and high-rise residential buildings (from 1 August 2021). (2021, August 20). GOV.UK. <https://www.gov.uk/guidance/fire-safety-and-high-rise-residential-buildings-from-1-august-2021>

- ³³ Greater London Authority. (2022, February). London Plan Guidance Fire Safety. Retrieved May 17, 2024, from https://www.london.gov.uk/sites/default/files/fire_safety_lpg_consultation_version_-_planning_11_feb_22.pdf
- ³⁴ Why high-rises need an equitable evacuation plan. (2023, March 16). Journals | RICS. <https://www3.rics.org/uk/en/journals/built-environment-journal/high-rise-residential-buildings-equitable-evacuation-plan.html>
- ³⁵ Brown MJ, Jacobs DE. Residential light and risk for depression and falls: results from the LARES study of eight European cities. Public Health Rep.(2011 May-Jun). <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3072912/>
- ³⁶ Daylight and Sunlight : BRE Group. <https://tools.bregroup.com/certifiedthermalproducts/page.jsp?id=3792>
- ³⁷ UK housing: Fit for the future? - Climate Change Committee. (2023, January 30). Climate Change Committee. <https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/>
- ³⁸ Bolton P. (2024, February 9). Energy efficiency of UK homes. House of Commons Library. Retrieved May 17, 2024, from <https://commonslibrary.parliament.uk/research-briefings/cbp-9889/>
- ³⁹ Institute for Health Equity & Friends of the Earth. (2024, February). Left Out in the Cold: The Hidden Cost of Cold Homes. Retrieved May 17, 2024, from <https://www.instituteofhealthequity.org/resources-reports/left-out-in-the-cold-the-hidden-impact-of-cold-homes/read-the-executive-summary.pdf>
- ⁴⁰ The 20-minute neighbourhood - Town and Country Planning Association. (2023, August 17). Town and Country Planning Association. <https://www.tcpa.org.uk/collection/the-20-minute-neighbourhood/>
- ⁴¹ Public Health England. (2018, November). Cycling and walking for individual and population health benefits. Retrieved May 17, 2024, from https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757756/Cycling_and_walking_for_individual_and_population_health_benefits.pdf
- ⁴² Ward Thompson C, Aspinall P, Roe J, Robertson L, Miller D. (2016 Apr 22). Mitigating Stress and Supporting Health in Deprived Urban Communities: The Importance of Green Space and the Social Environment. Int J Environ Res Public Health. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4847102/>
- ⁴³ Office of the Deputy Prime Minister. (2004, February). Safer Places: The Planning System and Crime Prevention. Retrieved May 17, 2024, from https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7784/147627.pdf
- ⁴⁴ Baranyi, G., Di Marco, M. H., Russ, T. C., Dibben, C., & Pearce, J. (2021, August 1). The impact of neighbourhood crime on mental health: A systematic review and meta-analysis. Social Science & Medicine. <https://doi.org/10.1016/j.socscimed.2021.114106>
- ⁴⁵ Climate Change Mitigation. UKGBC. <https://ukgbc.org/our-work/climate-change-mitigation/>
- ⁴⁶ McKie, R. (2021, August 25). Heatwave deaths set to soar as UK summers become hotter. The Guardian. <https://www.theguardian.com/environment/2021/may/30/heatwave-deaths-set-to-soar-as-uk-summers-become-hotter>
- ⁴⁷ Flooding and health: national study. (2020, August 14). GOV.UK. <https://www.gov.uk/guidance/flooding-and-health-national-study>
- ⁴⁸ Managing Flood Risk. (2021, February 26). Parliament.uk. Retrieved May 17, 2024, from <https://publications.parliament.uk/pa/cm5801/cmselect/cmpubacc/931/93106.htm#:~:text=On%20the%20>

basis%20of%20a%20Report%20by%20the,properties%20in%20England%20are%20at%20risk%20of%20flooding.

⁴⁹ Flood resilience eroded by poorly maintained defences with Government in the dark on progress - Committees - UK Parliament. (n.d.). <https://committees.parliament.uk/committee/127/public-accounts-committee/news/199357/flood-resilience-eroded-by-poorly-maintained-defences-with-government-in-the-dark-on-progress/>

⁵⁰ NICE impact respiratory conditions. NICE. <https://www.nice.org.uk/about/what-we-do/into-practice/measuring-the-use-of-nice-guidance/impact-of-our-guidance/nice-impact-respiratory-conditions>

⁵¹ Wentworth, & Blake. (2023, January 23). Urban outdoor air quality. Retrieved May 17, 2024, from <https://post.parliament.uk/research-briefings/post-pn-0691/#:~:text=It%20is%20responsible%20for%2029%2C000-43%2C000%20UK%20deaths%20annually,will%20be%20at%20least%20%2C%20A31.6%20billion%20in%20England.>

⁵² Air pollution at home. (2023, February 28). Asthma + Lung UK. <https://www.asthmaandlung.org.uk/living-with/indoor-air-pollution/home#:~:text=Indoor%20air%20pollution%20includes%20dust%2C%20dirt%2C%20or%20gase,s.to%20increased%20risk%20of%20heart%20disease%20and%20strokes.>

⁵³ Environmental noise guidelines for the European Region. (2019, January 30). <https://www.who.int/europe/publications/i/item/9789289053563>

⁵⁴ Noise pollution: mapping the health impacts of transportation noise in England. (2023, June 29). <https://ukhsa.blog.gov.uk/2023/06/29/noise-pollution-mapping-the-health-impacts-of-transportation-noise-in-england/>

⁵⁵ How light pollution affects our health - CPRE Avon and Bristol. (2022, January 19). CPRE Avon and Bristol. <https://www.cpreavonandbristol.org.uk/news/how-light-pollution-affects-our-health/#:~:text=The%2024%20hour%20day%2Fnight,and%20heart%20and%20blood%20problems.>

⁵⁶ Jessel, S., Sawyer, S., & Hernández, D. (2019, December 12). Energy, Poverty, and Health in Climate Change: A Comprehensive Review of an Emerging Literature. *Frontiers in Public Health*. <https://doi.org/10.3389/fpubh.2019.00357>

⁵⁷ Wang, C., Wang, J., & Norbäck, D. (2022, June 16). A Systematic Review of Associations between Energy Use, Fuel Poverty, Energy Efficiency Improvements and Health. *International Journal of Environmental Research and Public Health/International Journal of Environmental Research and Public Health*. <https://doi.org/10.3390/ijerph19127393>

⁵⁸ BRE Group (2021) BRE report finds poor housing is costing NHS £1.4bn a year. (11 November 2021). https://bregroup.com/web/bre-group/press-releases/bre-report-finds-poor-housing-is-costing-nhs-1.4bn-a-year?p_l_back_url=https%3A%2F%2Fbregroup.com%2Finsights%2Fbre-report-2021-poor-housing-costs-nhs-14-bn

⁵⁹ Richards, P. (2024, March 13). Activists build cemetery from insulation boards outside Parliament warning “cold homes cost lives.” Greenpeace UK. <https://www.greenpeace.org.uk/news/activists-build-cemetery-warning-cold-homes-cost-lives/>

⁶⁰ ARUP (2022) Addressing overheating risk in existing UK homes. <https://www.theccc.org.uk/publication/addressing-overheating-risk-in-existing-uk-homes-arup/>

⁶¹ Gasparri A. et. al (2022, July). Small-area assessment of temperature-related mortality risks in England and Wales: a case time series analysis. [https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(22\)00138-3/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(22)00138-3/fulltext)

⁶² Ibid.

⁶³ Baumgartner J, Rodriguez J, Berkhout F et al. Synthesizing the links between secure housing tenure and health for more equitable cities [version 2; peer review: 1 approved, 2 approved with reservations]. Wellcome Open Res 2023, 7:18 (<https://doi.org/10.12688/wellcomeopenres.17244.2>)

⁶⁴ Plan-making. (2021, October 4). GOV.UK. <https://www.gov.uk/guidance/plan-making>

⁶⁵ Healthy Environments Supplementary Planning Document. (2024). Retrieved June 19, 2024, from <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Healthy-Environments/Healthy-Environments-SPD-Adoption-version.pdf>

⁶⁶ Office for Place (2023, June 12). Creating a design code. GOV.UK. <https://www.gov.uk/guidance/creating-a-design-code>

⁶⁷ Building for a Healthy Life. Urban Design Group. (2020, August 19). Urban Design Group. <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>

⁶⁸ TCPA. (2024, February). Permitted development, housing and health: a review of national policy and regulations. Retrieved May 17, 2024, from <https://www.tcpa.org.uk/wp-content/uploads/2024/02/PD-Housing-and-health-National-policy-review-FINAL.pdf>

⁶⁹ Use of planning conditions. (2019, July 23). GOV.UK. <https://www.gov.uk/guidance/use-of-planning-conditions>

⁷⁰ Department for Levelling Up, Housing & Communities. (2023, December). National Planning Policy Framework. Retrieved May 17, 2024, from https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

⁷¹ Article 4 directions. London Borough of Barking and Dagenham. <https://www.lbbd.gov.uk/planning-building-control-and-local-land-charges/planning-guidance-and-policies/article-4>

⁷² Article 4 directions removing permitted development rights. Merton Council. <https://www.merton.gov.uk/planning-and-buildings/permitted-development-and-prior-approval/article-4>

⁷³ Article 4 Directions removes permitted development rights to change from B1(a) offices to C3 residential. Maps where this Article relates to within the Borough is listed. London Borough of Richmond Upon Thames. <https://www.richmond.gov.uk/services/planning/conservation-and-urban-design/conservation-areas/article-4-directions/article-4-directions-offices-to-residential>

⁷⁴ Use of planning conditions. (2019, July 23). GOV.UK. <https://www.gov.uk/guidance/use-of-planning-conditions>

⁷⁵ Housing Act 2004. <https://www.legislation.gov.uk/ukpga/2004/34/section/257>

⁷⁶ Ibid.

⁷⁷ Licences for Houses in Multiple Occupation (HMO) – London Borough of Harrow. <https://www.harrow.gov.uk/licences/licences-houses-multiple-occupation-hmos>