

Royal Town Planning Institute

Response to NICE Draft Guideline on Outdoor Air Pollution

25 January 2017

In General

The guidance strengthens the links between public health, environmental health and planning to address issues for development, which is welcome. The RTPI has been calling for an integrated approach to public health issues at local level for example in our publication [Promoting Healthy Cities](#). While none of the implementations may have significant cost implications, it should be noted that there has been a 46% change in budgeted spend for planning and development in single-tier authorities and country councils from 2010-11 to 2013-14. The recommendations would take time and expertise to implement for planning departments that are under pressure.

It would be beneficial for planners to have examples of good practice around planning new developments and avoiding unintended adverse effects on air pollution, for instance new schemes where monitoring has suggested a reduction in motorised travel, or best design practice that avoided exposure of residents to air pollution in high-density environments.

Siting of Development

We strongly support “Siting new buildings and estates so that the need for motorised travel is minimised.” However we need to be very clear what “siting” means here. Our chief concern is that the right *locations* for development are chosen. For example within a county, are locations in and adjoining existing towns chosen, or are far flung locations chosen. Given that local planning authorities often control only part of functional economic areas, NICE is right to refer to “strategic planning” but this needs to be understood to embrace planning over wide areas involving a number of adjoining planning authorities. This can be very challenging indeed although steps are being made in the right direction in a number of places. The RTPI gives further insight in to this activity in its [policy paper](#) on this subject.

Current government policy in the National Planning Policy Framework (NPPF) can militate against this where the emphasis is on the speed of housing delivery and on providing a return to land owners and developers. Remote locations can be easier and faster to purchase and develop. Our [Location of Development research](#) is currently monitoring this issue for 165,000 housing permissions across England. To date the performance of the English planning system is reasonably satisfactory:

- 75% of homes within 10 km of a major employment cluster
- 13% within walking distance of a train or metro station
- 46% within an existing built up area

Close attention should be paid to any changes in the NPPF following the Housing White Paper expected in early 2017 which might alter the balance between sustainability objectives and maximising the number of housing permissions.

Urban Form

We are concerned that the approach NICE is taking runs contrary to urban design best practice. “Siting buildings away from busy roads” would encourage and perpetuate a long-standing and lamentable trend of car-based city design solutions which create unwelcoming urban environments with high degrees of separation between communities and discourage walking and cycling. Main roads may well be suitable locations for high density development which can take advantage of high frequency bus or tram services running along them, and of ample cycling and walking facilities. The aim should be to **change the characteristics** (and thus the pollution generated) of such private and polluting vehicles, not to drive buildings away from them. The DCLG and DfT [Manual for Streets](#) p 53 shows how wide roads can be very suitable places for siting buildings provided that their “business” is better managed. By reallocating road space a far greater number of useful social economic and health outcomes can be achieved. The priority should be to **reduce traffic emissions substantially, not to shape urban form so as to accommodate them.**

“Avoiding the creation of street and building configurations (such as street canyons)” could (if applied insensitively) damage the close relationship between building and street which is the foundation of good urban design. We would agree that the use of very tall tower like buildings in confined spaces can be undesirable for a variety of reasons (wind for example). But a reasonable building height in close proximity to the street is good practice because it enables good use of urban land, discourages “dead frontages” and encourages the use of streets by walking and cycling. The DCLG and DfT [Manual for Streets](#) (p 53) and the [Urban Design Compendium](#) from the Homes and Communities Agency illustrate best practice on road width to building height ratios. Generally speaking the wider the road the higher the building. **Again the priority must be to reduce emissions, not accommodate them.**

Schools

The location of schools is a very problematic issue in urban planning which involves consideration of a wide range of issues. We would agree that schools should not be located on busy roads. But also, they must be located in places where access by sustainable modes of travel is the obvious choice. Ideally therefore easy access to bus routes is critical, as is avoiding car dependent locations in remoter residential areas. Good urban design can address – and solve - these questions.

Implementation

Most **local plans** have now gone through the system, post publication of the NPPF. Although many local authorities have now published SPGs or SPDs on air quality, for a local planning authority to develop a SPD/SPG to address air quality, there should be a ‘policy hook’ in the Local Plan, which may not be present in each case.

We support the proposals around **travel plans**. The questions for practice are:

- Can this be achieved through a Section 106 agreement?
- Is there is a strong local plan policy to base this on?
- Will DCLG and the Planning Inspectorate will support *refusals* of permission in cases where developers are not prepared to make such plans? (According to the NPPF *development viability* is an overriding criterion in such cases.)
- How can they be enforced in a time of severe constraint in local planning departments resources?

Equality

Planning has an important role in tackling the inequality of access to services, as outlined in research published by the RTPi in May 2016 ([*Poverty, Place and Inequality*](#)). The location of new developments has also a range of social and economic as well as environmental impacts, which is the focus of the next report in our [*Location of Development work programme*](#).