

IPH response to Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022

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The Regional Planning Guidelines (RPG) for the Greater Dublin Area 2010-2022 (draft) is a policy document which aims to direct the future growth of the Greater Dublin Area over the medium to long term and works to implement the strategic planning framework set out in the National Spatial Strategy (NSS) published in 2002. A series of recommendations have been made to Local Authorities clearly linked to and supporting the national investment in transport, particularly public transport, under Transport 21. The draft was prepared and agreed for public consultation.

The IPH response to the consultation reports on how the RPG may impact on health and makes recommendations to maximise opportunities for health gain and minimise health loss.

[Access the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 \(Draft\)](#)

Access the full IPH response below

Introduction

The Institute of Public Health in Ireland (IPH) aims to improve health on the island of Ireland by working to combat health inequalities and influence public policies in favour of health. One of the ways it does this is by undertaking health impact assessments (HIA) on draft strategies and policies both within and outside the health sector.

This paper is a rapid HIA of the Draft Regional Planning Guidelines for 2010-2022 (RPG). HIA is a systematic process which identifies and examines potential positive and negative health impacts of a proposal during its planning stages. The aim is to provide decision makers with a basis to proactively address aspects of the proposal which are potentially damaging to health and to consider aspects which could be enhanced to bring about further health improvement. HIAs can be categorised as rapid or in-depth. A rapid HIA was conducted on these Guidelines due to the time and resources available.

The concept of health has been defined by the World Health Organisation as “... a state of complete physical, psychological and social well-being, and not simply the absence of disease or infirmity.” Health is influenced by many factors in the social and built environment including housing, employment status, transport and access to fresh food: these are all determinants of health. This paper thus identifies the effects which the proposed policy directions in the RPG may have on the determinants of health of people living and working in the Greater Dublin Area. In recognition that the effects of policy are not equally distributed across the population it also highlights where the health of some population groups may be impacted more than others. While the evidence base identifies areas where changes in health might occur, it does not provide quantifiable estimates of the magnitude of possible health effects.

This HIA report thus provides an evidence base on how the RPG may impact on health and makes recommendations to maximise opportunities for health gain and minimise health loss. The evidence presented in this paper is based on analysis of the strategic policy statements described in the RPG. The paper is presented in two parts: firstly key messages are outlined, secondly supporting information is provided, categorised according to the core topic areas in the RPG. IPH recommendations are highlighted in both sections.

Key messages

IPH recommends more explicit links to the potential health impacts of the RPG. Spatial planning policy affects our health in many ways but some of the biggest impacts are through influencing transportation, buildings and communities, homes and flood risk. Specific health risks associated with spatial planning include heart disease, respiratory disease, mental health, obesity and injuries. A quarter of all deaths and a quarter of ill-health can be attributed to environmental factors

IPH appreciate that the RPG is an overarching guidance document for regional development and this in itself is limiting as the Dublin and Mid-East Regional Authorities will not be responsible for the implementation of a number of key areas of the strategy. IPH calls for these authorities to pursue and where appropriate stipulate the need to assess the implementation of the strategy for potential health impacts when county and area plans are being developed. Future planning policies should address the added health burden from the effects of air and noise pollution, road traffic accidents, sedentary lifestyles, lack of safe community space or spaces with poor access, poor or unsafe access to a range of food shops and health services, poor access to local health

centres, poor land use mix failing to encourage local employment, poor housing/building design, flooding and cold and damp housing.

There is limited recognition on the distributional impacts at population level of regional development. Health inequalities describe the different outcomes in health experienced by different population groups. IPH calls for greater consideration within the RPG of the potential distributional impacts on health of key growth areas of regional development activity and put measures in place to ensure that current health inequalities are not further exacerbated. Good planning can play an important role in reducing health inequalities. The World Health Organisation's Commission on the Social Determinants of Health (CSDH) states governments should 'Ensure urban planning promotes healthy and safe behaviours equitably, through investment in active transport, retail planning to manage access to unhealthy foods, and through good environmental design and regulatory controls, including control of the number of alcohol outlets' .

There are a number of interlinking areas of the RPG. For example sustainable transport and sustainable communities emerge throughout. All of these policies will impact on health as well as on climate change mitigation strategies. IPH suggests these interlinking areas need to be acknowledged in terms of how they impact on a wider health agenda. It also has to be recognised that the RPG can impact on a number of cross government strategies e.g. the Sustainable Development strategy, Climate Change Strategy and the Smarter Travel strategy.

Supporting information

This is categorised according to the core areas of the RPG:

- Economic development
- Settlement strategy, population and housing
- Physical infrastructure
- Green infrastructure, heritage and environment
- Social infrastructure and sustainable communities
- Regional flood risk appraisal.

The area of Rural development was omitted from this review due to insufficient expertise in this area. Under each area reviewed, strategic policy statements are displayed followed by the evidence of potential impacts on health.

Economic development

EP1: That the Dublin Gateway is recognised as an international driver of enterprise within the

GDA and is supported by regionally designated strategic employment centres, serving the urban and rural hinterlands. These economic growth areas which take advantage of nationally important transport hubs and corridors, shall provide the focal point for diverse regional enterprise and economic clustering activity, by: steering population growth and economic critical mass to designated RPG strategic growth centres of the identified economic areas or gateway region; capacity building in skills, innovation and education; critical infrastructural investment in ICT, public transport, water services; integrating high quality social and amenity provisions to create an attractive landscape and working environment; providing energy security supported by green and renewable technologies; rationalised planning approaches to employment based land use zoning and enterprise objectives.

EP2: To seek sustainable economic growth across the GDA, by the promotion of identified core economic areas across the GDA in both the Dublin and Mid East Regions to facilitate new employment opportunities for existing populations and seek to reduce the volume of unsustainable long distance commuting.

Potential impacts on health

Given the strong links between income and health , IPH recognises that sustainability of current and future economic activity is an important element in protecting and promoting population health across the GDA. However emphasising economic growth without due regard for social and environmental consequences of such growth can have negative impacts on health both for the population as a whole and for groups within the population . IPH believes therefore that future economic activity should be placed more firmly in an overarching sustainable development framework.

Even within areas of economic development, job creation does not necessarily 'trickle down' to job opportunities for the long-term unemployed, and is neither a sufficient, nor necessary, condition for reducing long-term unemployment . Thus economic development needs to be targeted, both geographically and within population groups to ensure that it reduces and does not exacerbate social inequalities. IPH recommends that the RPG incorporate provision for promoting patterns of development which encourage equality of opportunity and improved access to employment. In particular, employment opportunities should be available to particularly vulnerable groups including those who are long-term unemployed and single parents.

IPH suggests that the RPG considers the type of employment opportunities sought in term of how it may impact on health. While employment is generally good for health, there can be negative impacts, usually related to the quality of the working environment and type of work undertaken .

The groups which face the highest risk of experiencing the adverse effects of unemployment appear to be middle-aged men, youth who have recently left school, the economically marginal such as women attempting re-entry to the labour force and children in families in which the primary earner is unemployed .

As workforce movements generate a vast amount of journeys, IPH welcomes the emphasis within the RPG on reducing long-distance commuting. More than one fifth of the population living in the Mid-East Regional Authority aged over 15 spend at least one hour commuting per day compared to a national average of 10% .: This suggests that urban form is one of the strongest influences on the length of journeys which people undertake Reducing the volume of long distance commuting by enabling people to work close to where they live will have positive impacts on road safety and mental wellbeing . IPH suggests a greater focus on encouraging and supporting active travel and public transport for commuting purposes within the RPG. Choosing active forms of travel will bring about some immediate health benefits for individuals primarily through increasing their levels of physical activity as well as potentially benefiting mental health. Further health benefits occur as more people adopt active means of travel including those associated with cleaner air, less noise and increased road safety .

Settlement strategy, population and housing

SP1: The delivery of new housing in the GDA shall support the NSS, Smarter Travel and the DoEHLG Guidelines on Sustainable Residential Development. The RPG Settlement Strategy encourages the focusing of new housing development on (i) consolidation within existing built footprint with particular focus on the metropolitan area; (ii) supporting the achievement of sustainable towns; (iii) supporting national investment in public transport services by focusing new development areas to key locations to achieve the integration of landuse and high quality public transport provision, and (iv) build up economics of scale for services in identified g growth towns.

Potential impacts on health

IPH supports the proposed settlement strategy's potential to reduce car dependency as the links between car dependency, urban sprawl and poor health are well documented Providing new homes within the existing built footprint will counteract further urban sprawl and enable more people to live in more compact, walkable neighbourhoods which is a key element of achieving higher levels of physical activity .

A critical aspect in supporting the achievement of sustainable towns is that jobs, homes and social facilities are combined in any settlements to prevent the new developments becoming isolated. Achieving better integration of land use and transport in new developments can also reduce car

dependency through providing healthier alternatives to travel between locations. Both can impact positively on health. IPH recommends that guidelines such as those produced by the National Institute for Clinical and Public Health Evidence (NICE) on how to improve the physical environment to encourage physical activity are followed when (re)designing communities. The guidance recommends that local governments: 'Ensure planning applications for new developments always prioritise the need for people (including those whose mobility is impaired) to be physically active as a routine part of their daily life. Ensure local facilities and services are easily accessible on foot, by bicycle and by other modes of transport involving physical activity. Ensure children can participate in physically active play' .

New housing developments for both private and public tenure can create social divisions especially if there is segregation between private and public tenure. Poor design and layout housing may lead to increased stress and depression among residents, prompting violent behaviours and contributing to longer term mental health problems. Poor design and layout may also inhibit child development . The quality of housing stock is also an important issue for health. Numerous studies link poor housing conditions with poor health . IPH supports the Best Practice Guidance on Health Issues in Planning which recommends that planning frameworks for large residential developments should identify the potential impacts on surrounding areas and how these should be dealt with to ensure there are no unintended distributional impacts.

Physical infrastructure - transport

PIP1: Future investment in transport in the GDA shall serve the needs of the GDA by: (i) providing efficient and effective and sustainable means of moving people and goods for business, family and leisure purposes which minimises the environmental impact and the social and economic cost to users; (ii) allows for the development of a landuse strategy that supports sustainable development; and (iii) supports growth and efficiencies in economic activity for both the GDA and the State.

Potential impacts on health

The provision of efficient, effective and sustainable transport systems can impact positively on health. As indicated in the RPG, transport's primary function is to enable access to people, goods and services. In so doing transport also promotes health indirectly through the achievement and maintenance of social networks and by enabling people to access employment opportunities. IPH calls for a greater recognition within the RPG of the potential health impacts of transport. Some forms of transport, such as cycling and walking, promote health directly by increased physical activity and contributing to reduction of obesity. However heavy reliance on car transport can impact negatively on health: the combined health impacts from road traffic injuries and transport

related air pollution are responsible for a major contribution to morbidity and mortality. Traffic volume also affects social networks and limits children's sense of independence and personal mobility.

IPH suggests that the RPG has a key role to play in addressing obesity by ensuring regional development facilitates active travel. Planners have a crucial role in determining whether cycling and walking are obvious and realistic options. Many of the journeys we take are short and could be replaced by walking or cycling. Car owners walk less, very few children walk or cycle to school and very few commuters cycle.

Disadvantaged urban areas can be characterized by high traffic volume and poor access to private transport: people in these areas often experience the negative impacts of increased levels of air and noise pollution and higher rates of road traffic accidents without experiencing the benefits of access to private transport. Furthermore certain population groups experience lack of access to transport disproportionately: these include women, children and disabled people, people from minority ethnic groups, older people and people with low socio-economic status. These groups find they have limited access to services such as shops and health care and they tend to spend a higher proportion of their resources on transport. . IPH suggests transport planning considers distributional impacts and accessibility issues.

Green infrastructure, heritage and environment

GIP6: To ensure the protection, enhancement and maintenance of the natural environment and recognise the economic, social, environmental and physical value of green spaces through the development of and integration of Green Infrastructure (GI) planning and development in the planning process.

Potential impacts on health

The health and wellbeing of individuals is greatly affected by the communities in which they live and the nature of their physical environment. A key element of sustainable communities is access to space as environments which lack public gathering places can encourage sedentary living habits . Open space provision can improve levels of exercise in a community which can impact on obesity and can improve social interaction and community activities which can contribute to reducing stress-related problems . IPH supports the RPG's endeavours to protect, enhance and maintain the natural environment but suggests that the added value to health be factored into the benefits of such policy.

Social infrastructure and sustainable communities

SIP1: That Local Authorities work with the relevant state agencies in ensuring that an integrated approach is taken to both planning for the communities who live within the GDA either in planning for growth, for change or regeneration in communities; that the needs of particular elements of society are identified and responded to and that the most vulnerable are valued as part of the community.

SIP2: That quality of life forms a central part of planning policy in supporting good spaces, good places and that social activities and the arts form a core part in making good places

Potential impacts on health

Social capital is the links between individuals that bind and connect people within and between communities. It provides a source of resilience, a buffer against risks of poor health, through social support which is critical to physical and mental well-being and through the networks that help people find work, or get through economic and other material difficulties. The extent of people's participation in their communities and the added control over their lives that this brings has the potential to contribute to their psychosocial wellbeing and then to other outcomes .

Creating environments conducive to community cohesion can impact on health. Supporting sustainable patterns of housing development promotes integration within settlement areas for re-use of previously-developed land and higher density housing. Developing brownfield sites can support a more sustainable population density . IPH acknowledges that there are a wide range of organisations responsible for delivering sustainable communities e.g. the Department of the Environment, Heritage and Local government and at local authority level. It is essential that plans developed by these organisations are health proofed to ensure there are no unintended negative health impacts.

Regional Flood Risk Appraisal

FP1: That flood risk be managed pro-actively at all stages in the planning process avoiding development in flood risk areas where possible and by reducing the causes of flooding to and from existing and future development.

Potential impacts on health

The health effects of flooding have been well documented . As well as mental health effects and the risk of drowning, flooding also brings other risks to health such as increased risk of water borne disease. Particularly within the context of climate change flooding is likely to become of greater concern in the future. IPH recommends that potential health impacts are factored into flood

risk and flood management plans.

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