



The Association of Directors of Public Health

APPG on Health and Housing Green Paper: 'Building our Future: Laying the Foundations for Healthy Homes and Buildings' Consultation Response

The Association of Directors of Public Health (ADPH) is the representative body for Directors of Public Health (DPH) in the UK. It seeks to improve and protect the health of the population through collating and presenting the views of DsPH; advising on public health policy and legislation at a local, regional, national and international level; facilitating a support network for DsPH; and providing opportunities for DsPH to develop professional practice. The Association has a rich heritage, its origins dating back 160 years. It is a collaborative organisation working in partnership with others to maximise the voice for public health.

ADPH is pleased that the APPG has produced this excellent Green Paper on this very important issue and welcomes the opportunity to respond to it.

1. Do you believe the Green Paper covers all the current issues caused by unhealthy homes and buildings? Are you able to provide any further evidence that you think should be included?

There is no mention of the role overcrowded housing plays in the spread of tuberculosis. This is a concern as data from the Office for National Statistics shows that homes with six residents are the fastest growing category of household and approximately three million people in the UK now live in a home with at least five other individuals. There is also not enough focus on the impact of poor housing on mental health and on the impacts of various kinds of tenure on health. In a recent survey by Shelter, one in five English adults (21%) said a housing issue had negatively impacted upon their mental health in the past five years.

The Green Paper underplays the role that local authorities and Directors of Public Health play in providing healthy homes and spaces. Local authorities play a vital role in housing as they are responsible for preparing Local Plans, granting planning permission and working with developers. They also enforce standards in rented accommodation and deal with environmental health. Local authorities are also responsible for providing suitable accommodation for the homeless, who are often vulnerable and may have specific housing needs. There is a lack of reference in the paper to the current issues around housing supply and homelessness. Large numbers of families are currently housed in temporary accommodation which may not be suitable for their needs or constitute a healthy home. The need for healthier buildings cannot be separated from the social context. There is not enough focus on improving existing housing stock to promote health and an over-focus on building new stock.

The document does not adequately address the importance of healthier spaces and places as well as healthier buildings. The Town and Country Planning Association has a range of criteria for healthy environments for a place which include movement and access, open spaces, play and recreation, healthy food environments, social and neighbourhood spaces, healthier design and layout of homes and commercial spaces, and town centre retail and food diversity. There is no mention of the importance of feeling safe and the importance of community safety for good health.



There is no reference to the impact of poor housing on health inequality. The Green Paper also does not discuss the role and importance of supported housing in supporting health and wellbeing for vulnerable people. Supported housing has been cited in Public Health England, NICE and NHS England guidance to local areas as a preventative intervention that should be considered as part of local plans for improving health and wellbeing and reducing demand on health and social care. There is little reference to the needs of our ageing population and those with learning difficulties and disabilities. There needs to be more emphasis on homes that are suitable for the whole life course. The section focusing on healthier workplaces does not consider the fact that there are also economic savings associated with healthier homes. Absenteeism is likely to be caused by unhealthy homes as well as unhealthy workplaces.

2. Do you believe the Green Paper has identified the main problems and solutions in creating healthy homes and buildings? Are you able to provide any further issues or solutions that you think should be included?

Planning is a vital part of delivering healthier homes but it gets a very limited mention in the paper under 'additional issues'. There should be more consideration of what planning for good health looks like. This could include consideration of Joint Strategic Needs Assessment data in the development of the Local Plan and having the public health team integrated into planning process. Guidance to help local authorities to improve standards and build healthy housing stock would not be a useful resource as local authorities already understand what makes a healthy home. There would be more value in providing a better basis for planners to ask for Lifetime Homes or BREEAM standards in developments. There should also be more focus on promoting safety and preventing accidents in the home through good design.

3. Do you support the recommendations made in the draft Green Paper? Are you able to provide additional recommendations, including specific recommendations for specific issue areas?

While helpful, the recommendations are very limited. Rather than establish a specific committee it would be more useful to effectively integrate health into other departmental policy. There is no mention of engaging proactively with developers. There would be benefits to public health professionals such as health visitors having a good understanding of healthy housing so that they can advise on this.

4. What actions do you believe are needed in order to achieve the recommendations in this paper?

A cross-departmental committee will require commitment from all departments to the agenda. At a time of reduced resources, it may be difficult to get the buy-in required to do this. Given the current move towards devolution it may be more valuable to establish leads at the city region level and grant them more housing power. On 'begin building the research and evidence' – it would be useful if a specific agency, i.e. NIHR, were identified to take this forward.

5. Do you wish to make any further comments on the draft paper or provide any further information, commentary or evidence?

Directors of Public Health would be happy to provide good practice examples of joined up work on health and housing for consideration.

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September 2017