Response to the consultation on the Green Paper from the APPG on Healthy Homes and Buildings

The Faculty of Public Health (FPH) is the standard setting body for specialists in public health in the United Kingdom. Our mission is to promote, for the public benefit, the advancement of knowledge in the field of public health, and to develop public health with a view to maintaining the highest possible standards of professional competence and practice.

FPH is a strategic body which works collaboratively with a wide range of external organisations to identify and foster the conditions in which people can live healthy lives for as long as possible. Housing is a fundamental "determinant of health": we welcome the publication of this Green Paper, which recognises the importance of homes and buildings that promote mental and physical health and wellbeing.

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?

The green paper starts out ambitiously by stating in the introduction that that *the APPG wants to encourage holistic and innovative solutions to make sure that everyone has the right to live in homes, which are healthy and contribute to their wellbeing.* Furthermore, it defines healthy homes "*as those where there are not simply a lack of ill health, but homes that promote physical, mental and social wellbeing".* The infographic – with one exception - is an excellent summary of what is needed. However, the remainder of the paper focuses narrowly on some of the *design & material aspects* of buildings and the better known factors contributing to physical ill-health, (eg due to fuel poverty) but does not mention:

- affordability, or security of tenure. A recent study found that one in five English adults said a housing issue had negatively impacted upon their mental health in the last five years (Shelter 2017); nor

- the current shortage in housing supply and the high levels of homelessness.

There is little consideration of the health-promoting aspects of housing:

- not enough focus on healthy neighbourhoods and communities, key factors in healthy homes;

- no mention of access to green space, nor good quality footpaths and cycle routes;

- no reference to supported housing and its role in supporting health and wellbeing for vulnerable people; and

- no recognition of the links between energy efficient housing, reduced carbon emissions, mitigation of climate change and thus avoidance of the many adverse health impacts of climate change.

We are disappointed that the 'ideal home' picture has a car in the garage. Health-promoting homes should be located in mixed developments, where most destinations are easily accessible on foot, by bicycle or by public transport.

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?

Problems not identified sufficiently include the importance of communities, and car use as a problem for local residents, through its major contributions to air pollution and road danger. It is not just an issue of supply. Healthy housing will not be delivered because of the imperative to build more houses in large numbers simplify to satisfy numbers. There are about 25

million liveable spaces in the UK and around over 27 million households (families and individuals) needing to be housed. There is no mention of the affordability of housing, which is surely becoming one of the most important issues

- There is now as much concern about affordability as there is about supply. Local authorities should be encouraged to require 35% affordable housing in new developments and this should be non-negotiable, to create a level playing field and allow the cost to come out of land value.

  More social housing can bring direct benefits to the Treasury. The higher the government's capital subsidy to support social housing, the lower the annual housing benefit bill, currently around £25bn.

There is a need to regulate the private rental sector (PRS) better:

- Many households - especially families with children—prefer stable, long-term housing but are unable to access either owner-occupation or the social rented sector. The existing PRS model of short-term tenancies and unregulated rents serves them poorly.

- In addition, currently around £9 billion of housing benefit goes directly to the PRS. There should be some way to use the leverage this provides to ensure housing standards in this sector are improved.

There is only limited recognition of the importance of Local Planning, which is mentioned only under 'additional issues': "*improved planning and procurement practices which consider health and wellbeing are also required".*

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?

We agree that housing should be an infrastructure priority. Given the potential for societal benefits, savings to the healthcare system, and an increase in overall population health and wellbeing, we hope that the APPG will recommend that government will place health at the core of its housing policy. We believe that a cross-departmental committee is unlikely to achieve real change. It would be more useful to effectively integrate health into other departments' policies. One way to achieve this might be to have a housing minister with explicit responsibility for co-ordinating housing and health.

In addition to the need for building standards that are not just minimum standards, there is a need for appropriate inspection and enforcement. We already have quite an amount of evidence to inform standards for new buildings. Further research might focus on improving standards in existing buildings, and on how social aspects of the external housing environment (and alternative development models such as co-housing) can be health promoting.

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

To enable people to live healthy lives, we need national policy which sets the framework for the provision of housing to meet the population's need for good quality, affordable and well designed homes, placed firmly in the context of sustainable development and planning for healthy neighbourhoods. Public health professionals are well placed to contribute to such plans, both at national and local levels.

Local Authorities need more resources to carry out their roles, for example in designing and planning healthy and sustainable places or tackling rogue landlords. They also need the ability to raise funding for social housing.