

National Institute for Health and Care Excellence

PUBLIC HEALTH GUIDELINES – Excess winter deaths and illnesses - Consultation on the Draft Guideline from 13th June – 25th July 2014 Comments to be received no later than 5pm on 25th July 2014

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Stakeholder Comments

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1. Please put each new comment in a new row.
2. Please insert the **section number** (eg 3.2) in the 1st column. If your comment relates to the document as a whole, please put '**general**' in this column
3. Please insert the **page number** (ie '7') in the 2nd column.
4. **Please note forms with attachments such as research articles, letters or leaflets will not be accepted. If forms are received with an attachment they will be returned without being read. Any resubmitted forms without attachments must be by the consultation deadline.**

Name:		Megan McFarlane
Organisation:		Building and Social Housing Foundation
Section number	Page Number	Comments
Indicate section number or ' general ' if your comment relates to the whole document		Please insert each new comment in a new row.
General		There are a range of direct and indirect health effects related to cold homes which cause particular concern for vulnerable groups such as older people and those with certain medical conditions. Acknowledging the potential impact of prevention through improving housing conditions is an important action that BSHF is keen to endorse.
General		BSHF would like to draw attention to the Housing for Health Guide available at http://www.housingforhealth.com/ . This resource is intended as a directory to support improvements in environment-related health issues. It provides detailed guidance on designing, building and maintaining the living environment to improve safety and health. The guide was developed from an Australian project working with the living environments and health of Indigenous Australians in urban, suburban, rural and remote areas. The project has been active for more than 20 years and the principles have been successfully applied in other locations. It is an interactive tool for professionals which will develop over time.

Please add extra rows as needed

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2 (Who should do what)	13	The draft guidelines refer to the private rented sector as having the lowest SAP ratings. Given the rapid growth of the private rented sector (PRS) over the last 20 years and the increase in the proportion of PRS households living in poverty BSHF would suggest clarifying the responsibilities of landlords and consider whether PRS landlords specifically should be named as actors in the list of recommendations and accompanying actions.
4 (Services and Policy)	27	Recommendations two and three refer to local health and housing services to be developed by health and well-being boards as well as a range of statutory and voluntary partners. Sustainable funding is later identified as a key concern in the provision of such services with a note that there are examples of Clinical Commissioning Groups providing funding in certain circumstances. It may be useful to provide more detailed information about such models.

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4 (Barriers)	28	In addition to the issue of sourcing funding for a referral service and 1-stop shop there is little reference to the costs involved in delivering the outputs needed to tackle cold housing. Such interventions might include insulation or the installation of heating systems, etc. Economic and financial barriers are identified as two of the main barriers in delivering 'nearly zero' homes in Europe. 'Nearly zero energy buildings' (nZEB) represents the new low energy building standard which all new buildings (in EU member states) must adhere to by 2021. Member states must also establish and apply minimum energy performance requirements for new and existing buildings, ensure the certification of building energy performance and require the regular inspection of boilers and air conditioning systems in buildings.

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Barriers (continued)	28	These requirements will necessitate funding for retrofitting and new construction. For more on the barriers to delivering nZEB homes please refer to pages 20 to 29 of Fair Energy Transition Towards Nearly Zero Energy Buildings European Public, Cooperative and Social Housing Providers Working for a Fair Energy Transition, which can be found here: http://bshf.org/published-information/publication.cfm?lang=00&thePubID=D030BD51-15C5-F4C0-99B9B5A8CC19FBFE
4 (Equalities)	19/25	BSHF notes that, as stated earlier in the document, there are additional groups who are particularly vulnerable to the cold including older people, young children, people with mental health conditions and pregnant women. The equalities section might benefit from making this explicit.

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5 (Recommendations for research)	29	Research recommendations could include monitoring innovations in improving housing conditions from an affordable warmth perspective, which could highlight possible financial savings or scalable solutions in the case of interventions (action to be carried out by Local Authorities, training organisations or the voluntary sector). For example see the 'skin' intervention to improve energy performance and other entrants to the Solar Decathlon (http://www.solardecathlon2014.fr/en/competition).

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