To: GH Healthcare Inspector

From: Martin Hughes

Re: Film Foundations Consultation

A response to the Film Foundations Consultation should follow. Please note that this response is from the Public Health and Health Policy Directorate at NHS Lothian.

IMPORTANT:

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Dear Madam/Sir,

Firm Foundations: The Future of Scottish Housing
A Discussion Document

Thank you for the opportunity to comment on this consultation. This is a response on behalf of the Public Health and Health Policy directorate at NHS Lothian. The fact that housing and health and wellbeing are now linked within government is welcome recognition that housing is one of the most important determinants of health. Housing can have major positive and negative impacts on health so it is crucial that decisions about housing policy are subject to well-informed research and evidence. The Medical Research Council’s Social and Public Health Sciences Unit in Glasgow conducted a systematic review of literature about health and housing improvements in 2003. The evidence review informs this response to Firm Foundations.

Research into the impacts of housing on health has highlighted a number of key actions that can have an impact:

- increased availability of affordable housing is beneficial as this reduces the negative health impacts associated with homelessness and rooflessness. It also alleviates the risks associated with debt or financial hardship that can arise if rents or mortgages increase markedly;
- improving the quality of housing stock -- the impact on fuel poverty as a result of better insulation, heating and energy efficiency is linked to reduced preventable winter mortality among older and unwell people;
- in built safety features/potential for modifications to ensure housing suitable for young children/older people/disabled. Fire alarms, secure medicines and poisons storage, adapted kitchens and bathrooms are among measures that have clear health benefits;
- consideration of wider environment not just housing provision in isolation. In particular high quality, accessible greenspace, public transport, provision of and access to amenities and services, secure by design principles, general neighbourhood satisfaction are all have demonstrable health impacts;
- mixed tenures: there is evidence that health inequalities are exacerbated in areas with concentrations of poor people. Mixed tenure is one way to promote social inclusion.
communities. The Scottish Sustainable Communities Initiative and the greenspace quality assessment are recognition that sustainability and environmental quality are central to future housing investment in Scotland. Larger sites (more than 1500 homes) should be subject to a health impact assessment.

There is a lack of consideration of the needs of an ageing population, particularly needs linked to a population whose care requirements will largely be met in domestic settings. Apart from reference on page 15 to Homes for Life and building standards there is no attention to this topic. It is essential that strategic planning for housing takes into account this key issue. The Review of Older People's Housing (ROOPH) Working Group has produced work on sheltered housing and a literature review on this subject but future strategies must take into account the range of extra care housing that will be required.

Firm Foundations suggests a number of new grants, subsidies and schemes. There is evidence that increasing mortgages and rents can have harmful health impacts. There are, however, demonstrable health impacts associated with investment in housing quality and environmental modifications such as heating, insulation and safety features. Future housing policy should be based on financial stability and improved housing quality. It would make sense to monitor and evaluate all new grants and subsidies schemes to ensure any unintended effects (e.g., rise in house prices/benefits falling to landlords more than tenants/increase in arrears) are identified and picked up.

There is a crucial role for NHS boards in delivering good quality housing and neighbourhoods — notably in identifying housing needs and assessing health impacts of housing. To this end, it should be made clear in policy, legislation and regulation how NHS input will be sought as policies and plans are developed and implemented.

In addition to this cover letter, I have also provided brief responses to some of the specific questions included in the document itself. If you would like further information or clarification about any of the issues raised in this response, please do not hesitate to contact me.

Yours faithfully,

[Signature]

Dr Alison McCallum
Director of Public Health and Health Policy
RESPONDENT INFORMATION FORM

FIRM FOUNDATIONS: THE FUTURE OF HOUSING IN SCOTLAND

Please complete the details below and return it with your response to the above address. This will help ensure we handle your response appropriately. Thank you for your help.

Name: Dr Alison McCallum
Postal Address: Health and Health Policy, NHS Lothian, Deaconess House, 148 Pleasance, Edinburgh EH8 9RS

1. Are you responding: (please tick one box)
   (a) as an individual go to Q2a/b and then Q4
   (b) on behalf of a group/organisation go to Q3 and then Q4

INDIVIDUALS

2a. Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government website)?
   Yes (go to 2b below)
   No, not at all
   We will treat your response as confidential

2b. Where confidentiality is not requested, we will make your response available to the public on the following basis (please tick one of the following boxes)
   Yes, make my response, name and address all available
   Yes, make my response available, but not my name or address
   Yes, make my response and name available, but not my address

ON BEHALF OF GROUPS OR ORGANISATIONS:

3. The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Government website). Are you also content for your response to be made available?
   Yes

SHARING RESPONSES/FUTURE ENGAGEMENT

4. We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Government to contact you again in the future in relation to this consultation response?
   Yes
QUESTIONNAIRE

FIRM FOUNDATIONS: THE FUTURE OF HOUSING IN SCOTLAND

Should you have any comments on any other aspects of this consultation document, or require additional space for your responses, please return this to us on a separate piece of paper with your name and organisation at the top.

Question 1: Do you agree that aiming to increase the rate of new housing supply in Scotland to at least 35,000 a year by the middle of the next decade is a sensible and realistic ambition, and that this will help set a necessary political context for acceleration in housing supply?

No comment

Question 2: Do you agree that, to give practical effect to the ambition, local authorities should co-operate regionally in setting realistic housing targets for housing market areas, and in enabling the delivery of these targets? If so, what arrangements should be put in place to support and provide incentives for such co-operation between relevant local authorities?

It is important to ensure that housing provision includes sufficient affordable housing and extra-care housing. Consequently, other partners, notably RSLs and NHS, should be involved formally in the process to ensure adequate provision.

Question 3: Is there a role for a specialist national function to provide expert support for local authorities in strategic planning for housing? What expertise do you think this function would require?

No comment

Question 4: Even when land has planning permission there are still blockages that prevent new housing being built. What additional arrangements would, or could, accelerate development on land with planning permissions to help ensure that future housing supply targets are met?

It is important that new housing is provided with appropriate neighbourhood resources, services and facilities. Speeding up planning permission should not be prioritised to the detriment of creating sustainable places or at the risk of undermining or overwhelming services in existing settlements.

Question 5: We have proposed that much expanded or new, stand-alone settlements may be a valid solution. How should we best encourage the development of new, sustainable communities that are sympathetic to Scotland's landscape and environment?

The development of new settlements must be holistic. As Firm Foundations recognises, new or refurbished housing is no guarantee of a sustainable community. There is increasing evidence about how such developments can be health promoting; many of the housing growth areas in south east and central England are subject to health impact assessments as part of the planning and development process. Larger sites (more than
1500 homes) should be subject to a health impact assessment. Local NHS Boards should be a key part of the planning process for decisions about new housing developments. Greenspace standards and the Scottish Sustainable Communities Initiative are welcome initiatives.

**Question 6:** How should different types of assistance within LIFT be targeted?

**Question 7:** How could the Government stimulate more innovative mortgage and related products and services to assist people in purchasing their first home?

**Question 8:** Should the Government provide direct cash grants to first-time buyers?

**Question 9:** How can the private house-building sector play a bigger role in providing, without public subsidy, increased provision of affordable starter homes?

Home ownership is correlated with better health. But there is clear evidence that shows that people who struggle to pay mortgages or rent also suffer negative health impacts. Although LIFT and other grant or loan initiatives may help achieve an overarching goal of increasing home ownership, this should not be pursued at the cost of encouraging people to accrue financial commitments they cannot afford to maintain over the long-term. It would make sense to monitor all new grants and subsidies schemes to ensure any unintended effects (e.g., rise in house prices, benefits falling to landlords more than tenants, increase in arrears) are identified and picked up.

**Question 10:** What issues do you consider should be taken into account when considering the increased use of private sector lets to house low-income and homeless households?

Low income and homeless households are among the most vulnerable in the housing market. Safeguarding their rights by regulating rents may be necessary to avoid the negative health impacts that arise from excessive increases. It would make sense to monitor all new grants and subsidies schemes to ensure any unintended effects (e.g., rise in house prices, benefits falling to landlords more than tenants, increase in arrears) are identified and picked up.

**Question 11:** How should we ensure an appropriate balance between safeguarding tenants' rights and encouraging the private rented sector to achieve its full potential in Scotland's overall housing market?

No comment

**Question 12:** Do you think there is sufficient engagement between the public sector and private landlords? If not, what else should national and local government be doing?

No comment

**Question 13:** What other options should we consider for increasing the supply of private rented housing for low income and homeless households?

No comment

**Question 14:** How could more private landlords be encouraged to let to tenants on benefits and homeless households?
No comment

**Question 15:** What other schemes or incentives might help us to recycle empty properties more effectively?

No comment

**Question 16:** Do you agree that we should exempt new build social housing from the Right to Buy?

No comment

**Question 17:** Do you agree that we should subsidise local authorities in areas of need to use their prudential borrowing capacity to build new council houses?

No comment

**Question 18:** Do you agree that we should introduce large-scale competitions for subsidy?

No comment

**Question 19:** If not, how would you ensure that public subsidy is used to build as many good quality RSL houses as possible?

No comment

**Question 20:** Do you agree that we should subsidise the development of houses for mid-market rent?

No comment

**Question 21:** If so, should the subsidy be awarded as part of the competitive regime for awarding HAG that we are proposing?

No comment

**Question 22:** If not, how would you increase variety in social housing?

No comment

**Question 23:** Do you agree that we should encourage landlords to look at means of adjusting the mix of their stock in the interests of achieving more sustainable mixed communities?

Yes – health inequalities are more evident in areas which demonstrate extremes of wealth and poverty.

**Question 24:** Do you think that subsidies for development should be provided to bodies other than registered social landlords?

**Question 25:** What sorts of protections should be offered to tenants in these circumstances?

No comment
Question 26: Do you think that the Scottish Government should vary Right to Buy discounts by (a) locality and/or (b) type of property?

No comment

Question 27: Do you agree that ALMOs can provide a satisfactory alternative to stock transfers?

Question 28: Do you think that additional help from Government to enable landlords to meet the SHQS should be linked to improvements in a landlord's performance?

SHQS targets remain a key measure in ensuring that rented housing is not harmful to health; tenants are often those with poorer health. Adequate warmth, energy efficiency and safety features such as smoke alarms and secure doors and common areas are fundamental to tenant's health and wellbeing. If they are introduced, ALMOs should be charged with continuing to pursue rigorous enforcement of the standard across the social housing sector.

Question 29: If so, what measures do you think would be beneficial? If not, why not?

Question 30: Do you agree that we need to find new ways of focusing on the quality of place/open space and greenspace within deprived neighbourhoods?

High quality open and greenspace is essential to neighbourhood wellbeing. It is also important to ensure that a variety of greenspace is provided eg. range of children's play areas, sports facilities, allotments

Question 31: Do you have suggestions for approaches that are not resource intensive and that include stakeholders?

Question 32: Do you agree that the lead role (and recipient of any resources) to undertake this work should be open to a range of stakeholders?

Question 33: Do you agree with the features and principles we have set out here for a modernised regulation framework?

We have concerns that plans to reduce baseline inspections of landlords may lead to a reduction in housing quality. For example, it is essential that SQHS are maintained. If a self-reporting system is introduced, there should be an independent process allowing tenants to report their feedback too.

Question 34: How would you like social housing regulation to be organised? (For example, should it be a separate organisation or part of a group of other regulators?)

No comment