



Chartered Institute of
Environmental
Health

Sefydliad Siartredig
Iechyd yr
Amgylchedd

Response to the Draft Heatwave Plan for Wales

March 2009

Sefydliad Siartredig Iechyd yr Amgylchedd

Fel **corff proffesiynol**, rydym yn gosod safonau ac yn achredu cyrsiau a chymwysterau ar gyfer addysg ein haelodau proffesiynol ac ymarferwyr iechyd yr amgylchedd eraill.

Fel **canolfan wybodaeth**, rydym yn darparu gwybodaeth, tystiolaeth a chynghor ar bolisiau i lywodraethau lleol a chenedlaethol, ymarferwyr iechyd yr amgylchedd ac iechyd y cyhoedd, diwydiant a rhanddeiliaid eraill. Rydym yn cyhoeddi llyfrau a chylchgronau, yn cynnal digwyddiadau addysgol ac yn comisiynu ymchwil.

Fel **corff dyfarnu**, rydym yn darparu cymwysterau, digwyddiadau a deunyddiau cefnogol i hyfforddwyr ac ymgeiswyr am bynciau sy'n berthnasol i iechyd, lles a diogelwch er mwyn datblygu arfer gorau a sgiliau yn y gweithle ar gyfer gwirfoddolwyr, gweithwyr, rheolwyr busnesau a pherchnogion busnesau.

Fel **mudiad ymgyrchu**, rydym yn gweithio i wthio iechyd yr amgylchedd yn uwch ar yr agenda cyhoeddus a hyrwyddo gwelliannau mewn polisi iechyd yr amgylchedd ac iechyd y cyhoedd.

Rydym yn **elusen gofrestredig** gyda dros 10,500 o aelodau ledled Cymru, Lloegr a Gogledd Iwerddon.

The Chartered Institute of Environmental Health

As a **professional body**, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners.

As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines, run educational events and commission research.

As an **awarding body**, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, wellbeing and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners.

As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a **registered charity** with over 10,500 members across England, Wales and Northern Ireland.

Dylid cyfeirio ymholiadau am yr ymateb hwn at:

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The Chartered Institute of Environmental Health (CIEH) is pleased respond to the invitation to comment the Draft Heatwave Plan for Wales.

We endorse the ambitions of the plan and agree that it is necessary that Wales should have such a plan in place to deal with the consequences of a heatwave. We feel that there are parts of the plan that could be strengthened, as discussed below and also make some suggestions as to how Wales could take steps to tackle the issue of effects of excessive heat.

In the view of CIEH the document is strong where it considers building such as hospitals and care homes, but is weakened by the failure to refer to schools and nursery schools. Children, particularly babies, and young people are vulnerable to heat and schools and nurseries should be included in the premises to which Alter and Readiness actions and Heat Wave actions apply is a weakness of the plan. We note that local authorities are partners in the plan and some of the actions are addressed to them, and that they could expand their activities to include schools and nurseries, however even were they to do so private education establishments and nurseries would remain out side the plan. We therefore suggest that public and private sector education providers at all levels should be included in the list of premises to which alters are sent and of which Heatwave Actions are required.

The questions posed at page 39 of the draft document are answered in the order of listing.

1. Do you agree with the Plans's preparedness and response actions?

The CIEH generally agrees with the preparedness and response actions, however would suggest a number of additions.

In Long Term Planning we agree with the actions listed, however feel that these could be strengthened. We suggest that all new developments should be required, through the mechanism of making provision for extreme heat episodes a material planning consideration to make provision for shade and for heat reduction. This is particularly important for public buildings, such as hospitals, and care homes and also for schools and nursery schools. A requirement that developers and planners take account of provisions for extreme heat conditions in new developments is more effective that seeking to make alternation to the premises once built. We further suggest that all large developments should be required to take account of the suggested material planning consideration and to highlight the provisions proposed when the planning application is submitted.

CIEH agrees with the suggestion that Utility Companies should be encouraged to ensure that no NHS facility, care home or public household have their water or power supply removed during a heat wave episode, but suggests that schools and nurseries should be added to the list of premises.

When cycling and walking are promoted as suggested as alternatives to the use of public or private transport to reduce poor urban air quality (page 10) it is important that the promotional messages include advice to those individuals who will be walking or cycling that they take steps to protect themselves from heat exhaustion and from sunburn.

2. Do you foresee any difficulties in implementing any of the Plan's preparedness and response actions – do you think that they are achievable?

Much of the plan is deliverable as it requires NHS bodies and local authorities to deliver relatively simple actions and to implement relatively easily achieved interventions.

Whilst CIEH applauds the suggestion that Utility Companies should be encouraged not to suspend delivery of power or water to NHS facilities, care homes and public households (to which list we would as noted include schools and nurseries) we question whether Utility Companies will acceded to this request. We further note that whilst the Utility Companies are asked to refrain from disconnecting this group of properties during heatwave conditions we see nowhere in the plan an indication that these companies will be advised that the conditions being experienced constitute a heat wave as defined. If the Utility Companies are to be asked to refrain fro disconnections during a heatwave there must be a formal notification mechanism in pace so that these companies are aware that the conditions being experienced constitute a heatwave as defined, rather than it be a question for them to determine whether they feel that conditions are such that disconnections should not be pursued on a temporary basis.

3. Are there any aspects of heatwave planning that you think are insufficiently covered by the Plan or for which you would like to see further guidance provided?

As noted the CIEH view is that schools and nurseries are not specifically mentioned, and should be included in the plan.

It is further the CIEH view that where reference is made to design of new or adaptations to existing buildings the requirement for inclusion of provisions to cope with abnormal temperature events should be a material planning consideration to ensure that developers adequately take account of the same and that planners are given an opportunity to consider the suitability of the proposed provision. The view of CIEH is that these recommendations should be strengthened, particularly as any provision will be made for the long term and must be fir for purpose and adequate.

4. Do you foresee any difficulties in incorporating this Plan into other relevant workstreams and policy areas?

There may be issues of resource availability, however these issues are for those directly affected by the plan to comment upon, and CIEH makes no comment other than to raise the issue.

We do not foresee any difficulty in incorporating the requirement that developers make provision in respect of extreme weather episodes when designing new development or adapting existing buildings into Planning Guidance Wales since this is an issue that is wholly within the remit of Welsh Assembly Government and can be done by amendment to the existing Guidance.

5. Page 8(National level preparedness) explains that the Welsh Assembly Government will issue statutory guidance to NHS bodies and local authorities. Do you feel that the strength of the wording adopted in this Plan setting out action for those bodies is appropriate?

The form of wording consistently used throughout the Plan is the obligatory i.e. 'should' with no differentiation between those actions considered to be more important than others. We suggest that those actions considered to be those most important, being those which should be implemented or carried out in an extreme heat episode should be directives, i.e. 'must', and thosewhicha re considered of secondary importance should be prefaced in the obligatory . This will enable parties to prioritise actions where resources may be an issue and

not all of the items listed can be carried out, or all of the items cannot be carried out immediately.

6. Page 8 (National level preparedness) recommends a national project group be established to develop epidemiological surveillance systems. Your views are sought on this proposal and how this may be best implemented.

CIEH strongly support this suggestion. It is extremely important that we have data available to us on a national basis that shows the effect of extreme heat episodes on morbidity and mortality as this will highlight those areas in which we should target efforts and resources. Such data could also be used to allow pre-emptive interventions to be effected which is particularly important as the draft report acknowledges more death occur in the first days of a heat wave than as the heat wave progresses.

CIEH points to the COPD pilot project currently taking place in Rhondda Cynon Taff through a collaboration of Rhondda Cynon Taff LHB and the Met Office, where COPD sufferers received a telephone or text message advising them of an extreme weather event to ensure that they have sufficient medication available to them, which message is backed up by a message to their GP. This is an excellent example of such a system in practice and appears to be highly cost effective, figures suggesting it can result in a reduction of acute COPD hospital admissions of 50%.

We also point to the 'Nowcasting' traffic surveillance system in places currently in Swansea and operated by the Environmental Health Department of the City and County of Swansea, which automatically redirects urban traffic away from areas of high air pollution during particular weather events, thereby reducing local air pollution and risk to individuals suffering from respiratory and cardio vascular conditions.

The quoted interventions are examples of meteorological data being used to reduce exposure of individuals to the consequences of particular weather conditions based on predictive weather reports. CIEH suggests that the use of such interventions could be extended across Wales.

It will be necessary to evaluate the value of and the combined effect of such interventions in addition to such other interventions as are available and to determine which should be used to provide the Epidemiological Surveillance System for Wales. Whilst we make no comment as to which systems and which in combination should be used it is our view that the system should be effective on an All-Wales basis.

CIEH would be happy to expand upon any of the comments provided in this response or to provide such further comments as may be considered helpful.

