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Consultation Response

TITLE: Mayor's London Housing Strategy

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Name: Gordon Deuchars
Email: gdeuchars@ageuklondon.org.uk

Research and preparation of draft response: Care & Repair England

Age UK London
6th Floor, Tavis House
1-6 Tavistock Square,
London
WC1H 9NA
T 020 7820 6770
E general@ageuklondon.org.uk
www.ageuk.org.uk/london

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About Age UK London

Age UK London raises the voice and addresses the needs of older Londoners. We promote and represent the views of older Londoners; we campaign on real issues that make a difference to older people; we work with older people's organisations across London to enhance services; we offer a range of products and services tailor-made for the over 50s (via Age UK London Trading). We are part of the national Age UK network and work in partnership with the national charity Age UK and with London borough Age UKs.

We also link to over 500 local older people's groups in all London boroughs, many of them volunteer led. We are currently funded by City Bridge Trust to build the resilience of these local age sector organisations and help them and older people to make their voice heard, as part of "The Way Ahead" initiative which the GLA is also part of.

1. Executive Summary

Age UK London has given high priority to responding to this consultation and we have co-produced our response with older people and local organisations through different formats of consultative event and an online survey targeted at local groups. We commissioned consultative research support from Care & Repair England.

We have called on the Mayor to make London an Age Friendly City in the range of domains identified by the World Health Organisation, of which housing is one.

We broadly welcome the central themes of the Strategy including: addressing the shortage of genuinely affordable homes, improving conditions in the private rental sector, providing quality homes and inclusive neighbourhoods.

Whilst noting the immediate pressures to act swiftly to build new genuinely affordable homes, we would put forward the case for focussing on quality as well as quantity, making all new homes good places to live for all ages, including in later life.

We emphasise the need for change to be led by the views and needs of older people regarding their housing, noting the diversity of older people, their situations and the serious inequalities affecting later life housing.

In our view, gaps or concerns in the proposed Strategy include:

- Strengthening the connection between housing, health and ageing, particularly the addition of housing policies and actions to improve health and reduce NHS costs;
- Insufficient attention to addressing substandard conditions in the existing housing stock, where most (older) Londoners will be living for the foreseeable future;
- Proposals for practical housing solutions to improve housing conditions for lower and middle income older homeowners living in older housing stock;
- The need for impartial, housing information and advice for older Londoners living in all tenures, including support where older people want to move home, with decisions driven by older people's wishes and real needs .

Our specific comments and proposals include:

Chapter 2

- In the section '*Economic and Social Costs*' (Clause 2.16 onwards), we would suggest that this section/clause should also refer to the health costs of inadequate/poor condition of housing. This health cost is especially important in the context of population ageing

Chapter 3

- Building more social housing with genuinely affordable rents, security of tenure and better quality accommodation should be a key priority with regard to new-build homes, Older people had concerns about the proposals to encourage Build to Rent (noting the many problems faced by older private tenants); older people consistently identified “more social housing” as a key priority
- It will be important to ensure that the Affordable Housing Programme identifies and responds to the needs of older people with a range of housing options. Chapter 4
- In Policy 4.3A: People taking up the Seaside and Country Homes programme need independent advice about the implications of doing so; health impacts should be added to the criteria for prioritising particular tenants who wish to move.
- An improved social housing allocation system, as well as practical advice and support for older people who do wish to move, is a necessary additional objective which needs to be added to the Strategy.

Chapter 5

- It is very important that the Strategy (and the London Plan) maintain the existing space and accessibility standards as a minimum-
- Policy 5.1A should be amended to say: *London's new and existing homes and neighbourhoods should be well designed to be safe, of good quality, accessible, age-friendly and environmentally sustainable.*
- The related proposal (**Clause 5.13**) to '*update and consolidate London's housing design standards into a single planning document*' should incorporate as a minimum lifetime homes standards for accessibility, and also designing homes and neighbourhoods to be age friendly
- Policy 5.1B (ii) should be amended to take account in particular of home hazards leading to falls, as well as fuel poverty and energy efficiency.
- There is a need to find solutions enabling lower income “asset rich and income poor” homeowners in non-decent homes to make home improvements/adaptations. Affordable, trusted handyperson services also need to be made available to all.
- In relation to Policy 5.2: In the **Section Good Growth by Design**, the range of ideas for encouraging the design and building industries to improve should be **amended** to specifically mention creating age friendly buildings and neighbourhoods, places that are inclusive, accessible and flexible to meet the diverse needs of the whole population across the life-course.

- The Strategy should have as an aim the provision of impartial information and advice about housing and care options, as well as related finance, in later life. This would include assistance with moving for those who needed it.
- We would recommend that the Strategy sets the objective of the Mayor taking the lead in promoting innovation, the application of best practice and the allocation of sufficient resources to adapt existing homes for an ageing population across London, including through the best use of Disabled Facilities Grant.
- We would propose as **an additional stated aim in the Strategy** to boost the provision of help to carry out essential repairs and maintenance for low income and vulnerable older home owners including access to affordable, trusted handyperson services and home improvement agencies, as a way to tackle disrepair, and reduce the resulting health impacts, in private sector housing.
- The Strategy should include a commitment to co-ordinate work with London Boroughs to address the issue of non-decent, hazardous and substandard homes, including targeted action to address Category 1 Hazards (especially cold/falls) in the homes of older people living in the private sector (homeowners and tenants).

Chapter 6

- Policies 6.1 and 6.2 on improving the situation of private renters are of key importance for the growing number of older private renters.

We call on the Mayor to implement the recommendations of Age UK London's report "Living in Fear" and/or adopt them as asks to Central Government as appropriate. As a minimum, we would request that clauses are added to the Strategy that reflect the issues highlighted concerning the problems of older private tenants, and again, the link to health and health inequalities policy.

2. Basis of this response

2.1. This response to the Mayor of London's Draft Housing Strategy, subsequently referred to as "the Strategy", is based on:

- The views of older people from across London who have taken part in a series of interactive events about housing and ageing over the past 5 months.
- The results of an online survey of older people's views about specific aspects of housing and ageing in London.
- The wider experience of Age UK London about issues raised by older people concerning their housing through a range of programmes and projects.
- A thorough literature and data review, drawing on key government housing data sources (particularly the Department of Communities and Local Government (DCLG) English Housing Survey, Building Research Establishment and Census data) as well as academic and grey literature concerning housing and ageing.

- 2.2. In preparing its response to the Draft Strategy, Age UK London has worked with a range of partners to provide opportunities for older people to share their housing experiences and put forward their views. This includes:
- Organising a special housing conference - 'Homes for Older Londoners' – funded by the Hyde Foundation and in partnership with Positive Ageing in London (PAiL) which was addressed by a GLA official involved with production of the Mayor's Draft Housing Strategy.
 - Undertaking research and staging a related conference (supported by the Nationwide Foundation) on the specific subject of older people and private rented housing (this event also addressed by a GLA representative).
 - Working, again with PAiL, and funded by Hyde Foundation to set up an interactive outreach housing discussion events in a Good Neighbours centre in South London and at a drop-in session for older residents in Brent.
 - Drawing on the findings of an interactive housing event organised by Care & Repair England and Hackney Mobile.
- 2.3. The response is based upon a vision of ageing that is inclusive and positive, one which acknowledges the diversity of later life situations, including housing.
- 2.4. It highlights the inequalities experienced by older Londoners regarding their homes, wider living environments, financial circumstances, health, wellbeing and quality of life.
- 2.5. At a time of unprecedented demographic change the perspective underpinning this response is the importance of ensuring that homes and neighbourhoods are inclusive and 'future-proofed' i.e. planned/built in ways that will enable people to live independent, healthy lives, remaining economically active and involved with family, friends and their local community, across the life-course.

3. Overarching comments about the focus of the Draft Strategy

- 3.1. We repeat Age UK London's previous call on the Mayor to make London an Age Friendly City in all the areas identified by the World Health Organisation and others. These are: housing; outdoor environment and neighbourhoods; transport; social, cultural and civic participation; employment, skills and income; community support and health services; communication and information; and respect and social inclusion. The Mayor's roles and responsibilities give him a mandate to take this forward.

- 3.2. There is a broad welcome of the central theme of the Strategy to address the shortage of affordable homes and most of the proposals in the Strategy have been positively received.
- 3.3. Creating good quality new homes that are genuinely affordable, and particularly building secure, stable, affordable social rented homes was particularly well supported by older people involved in events and consultations.
- 3.4. There is also support for the aims in the Strategy to improve standards for Londoners renting privately, to help leaseholders get a better deal and make sure more is done to prevent homelessness and rough sleeping.
- 3.5. Whilst noting the immediate pressures to act swiftly to build new genuinely affordable homes we would put forward the case for focussing on quality as well as quantity.
- 3.6. The other key point raised by many of those involved in events was the importance of tackling the condition of the current housing stock, and it was noted that the Strategy had fewer proposed policies to address this issue, even though this is where the vast majority of Londoners live - and will continue to live for many decades to come.
- 3.7. Taking the long view, and drawing on older people's experience of seeing the (sometimes adverse) results of housing 'quick fixes,' provides a useful perspective when it comes to building new homes. Examples raised include mistakes made regarding mainstream housing (e.g. tower blocks that were subsequently demolished) as well as housing built specifically for older people (as a response to the perceived issue of 'under-occupation').
- 3.8. There was a rush to build small sheltered housing bedsits/small flats during the 1960s and 70s (primarily in social rented housing) many of which subsequently proved to be inaccessible, largely un-adaptable¹, and hard to let. The poor standards resulted in further public expenditure when such properties had to be remodelled or even demolished.
- 3.9. We would endorse the comment in Clause 5.2 of the Strategy about '*working on the assumption that the homes we build today will need to be fit to last for well over a century*', and recommend that all new homes are of good quality, with decent space and good design standards as this will result in long term benefits for future generations of occupants of all ages, including older people.
- 3.10. Building homes which are healthy places to live, with decent space standards, that are accessible, affordable to heat and environmentally sustainable will also result in long term financial and social benefits to

¹ Tinker A et al (1995) Difficult to Let Sheltered Housing, London HMSO

both occupants and the wider economy e.g. through improved health and hence lower NHS and care costs².

- 3.11. The specific proposed policies in the Strategy are addressed in Section 5.

4. Gaps identified in the Draft Strategy

Strengthening the connection between health, housing and ageing

- 4.1. Whilst endorsing the overall direction of the Strategy, we note that Clause 1.7 of the Strategy states that '*There is a strong inter-relationship between the London Housing Strategy and the Mayor's other strategies*'. We agree with this statement, and therefore suggest that there needs to be a stronger link made between this Housing Strategy and the Mayor's Health Inequalities Strategy. This is because housing is a major determinant of health, and as it stands the current draft Housing Strategy does not sufficiently address this connection.
- 4.2. With regard to older Londoners' housing we would suggest that the Strategy needs to add in more references to the connections between housing, health and population ageing and include more specific proposals for policies and measures to address poor, substandard and/or hazardous housing that impacts on health and health inequalities, particularly for older Londoners (and which go further than the current proposals in Chapter 5).
- 4.3. Housing is acknowledged as a key wider determinant of population health³. Poor housing costs the NHS more than £1.4 billion⁴ each year, with nearly half of this cost arising due to the impacts on older people⁵. There are well documented, significant direct impacts of cold/ hard to heat homes on a wide range of the chronic health conditions that are more prevalent in later life (respiratory diseases, heart disease, incidence of stroke, arthritis) as well as hazards/risk features in the home (which contribute to falls in later life), and housing has a significant impact on mental health⁶.
- 4.4. The recently published figures from ONS⁷ show that in the winter of 2016-17 there were 31,800 excess winter deaths (up from 20,800 in 2015-16), and a third were caused by respiratory disease. In London

² Code for Sustainable Homes evidence base <https://www.sustainablehomes.co.uk/research/>

³ Professor Sir Michael Marmot, et al, The Marmot Review Team (2010) Fair Society, Healthy Lives: The Marmot strategic review of health inequalities in England post-2010. The Marmot Review London Institute of Health Equity

⁴ Nicol S, Roys M, & Garrett H (2015) *Briefing paper: The cost of poor housing to the NHS*, Building Research Establishment Bracknell BRE

⁵ Adams S (2016) *Off the Radar: Housing disrepair & health impact in later life*, Nottingham, Care & Repair England

⁶ Garrett H & Burris S, (2015) *Homes and ageing in England*, Building Research Establishment Bracknell BRE

⁷ ONS Excess winter mortality in England and Wales: 2016 to 2017 (provisional) and 2015 to 2016 (final)

there were 3,400 excess winter deaths, over 90% (3,100) of them were of people aged 65+.

- 4.5. Falls are the most common cause of injury and death in the older population and most falls take place in older people's own homes, with housing one of the recognised causal factors⁸.
- 4.6. Around a third of all people aged 65 and over fall each year, increasing to half of those aged 80 and over⁹. A&E departments treat a disproportionate number of older people, particularly those aged over 70, who have fallen in their home.
- 4.7. There are 255,000 falls-related emergency hospital admissions in England per year among people aged over 65. Hip fracture is the most common serious injury in older people (65,000 presented to hospitals in UK in 2016)¹⁰.
- 4.8. Whilst the highest *proportion* of non-decent homes are in the private rented sector (the lowest proportion/number is in the social rented sector), the greatest *number* of non-decent homes occupied by older people is in the owner-occupied sector⁴.
- 4.9. Older people at the events expressed many concerns about repairing and maintaining their homes. Homeowners had worries about costs, finding trustworthy (let alone affordable) traders and being 'ripped off', whilst tenants reported many problems with landlords (both social and private) failing to undertake essential repairs. Across all tenures older people reported problems with how to get small but essential jobs around the home carried out (including tenants for works that fall outside the landlord's responsibility).
- 4.10. We recommend that the Strategy includes a specific proposal to co-ordinate work with London Boroughs to address the issue of non-decent, hazardous and substandard homes, including targeted action to address Category 1 Hazards (especially cold/falls) in the homes of older people living in the private sector (homeowners and tenants).
- 4.11. In particular, there is a need to boost the provision of help to carry out essential repairs and maintenance for low income and vulnerable older home owners. There is an unmet need for help from home improvement agencies offering independent housing information, advice and practical help to improve homes (including for older people using their own financial resources), alongside affordable handyperson services¹¹ that can help to extend safe, independent living at home for

⁸ Gillespie L D, Robertson MC et al Interventions for preventing falls in older people living in the community Cochrane Database Syst Rev 2012, CD007146

⁹ National Institute for Health and Care Excellence (2013) Falls in older people: assessing risk and prevention. Guidance and guidelines. NICE Internet www.nice.org.uk/guidance/cg161

¹⁰ Royal College of Physicians, National Hip Fracture Database Annual Report 2017 www.nhfd.co.uk/2017report

¹¹ DCLG (2012) National Evaluation of the Handyperson Programme London: HMSO

older people, particularly the growing population of lower income 'older old' (over 75s and over 85yrs).

- 4.12. Whilst acknowledging the limitations of the Mayor's powers, we note the approach proposed described in Chapter 7 to co-ordinate work to address homelessness, including a Task Group to drive co-ordinated action in this field. A similar approach would be appropriate to address housing, health, ageing and disrepair and to co-ordinate practical action across London Boroughs.

Acknowledging the variety of housing needs and preferences of a diverse older population

- 4.13. A key theme which has emerged from the events and consultations that took place to inform this response to the Strategy is the importance of older people being the ones who choose and control where and how they live. There were some concerns expressed about the narrative in the Strategy around older people and their homes. Whatever the exact terms used in the Strategy, some participants considered that implicit value judgements were being made e.g. that older people 'should' move or 'downsize' because they were 'under-occupiers', a term that was seen as negative and potentially misleading.
- 4.14. Policy and practice in this area must recognise the variety of family and social circumstances of older people. Many reported needing all the rooms in their homes to look after grandchildren, to provide a home for other family members who were in unstable housing situations and often needed a place to stay (particularly young people in the insecure and expensive private rented sector).
- 4.15. Others were caring for friends as well as family members and again, needed space for people to sometimes stay with them e.g. if there was a worsening of a health condition.
- 4.16. A range of national data sources¹² indicate that the majority of older people – up to around 80% in one survey¹³ - say that they don't want to leave their current home as they get older. On the other hand there is also evidence that a substantial proportion of older people would be interested in moving in the right circumstances.¹⁴
- 4.17. Whilst the events clearly demonstrated support for the building of a range of new housing options, both supported and mainstream homes across all tenures that are age friendly, the debates also reflected this national picture of many people wanting to stay in their current home as they age, many describing the importance of their established social networks in their immediate neighbourhoods and widespread support for intergenerational homes and neighbourhoods.

¹² Lloyd, J. (2015), Older Owners Research on the lives, aspirations, and housing outcomes of older homeowners in the UK. London: Strategic Society Centre

¹³ Later life in 2015: an analysis of the views and experiences of people aged 50 and over'. London: Centre for Ageing Better

¹⁴ The Top of the Ladder, Demos (2015)

- 4.18. It was noted that many of the housing issues in the Strategy are common to all generations (affordability, safety, security, housing stock condition and health impacts). It was also highlighted that older people are part of families and/ or with social networks that straddle generations. They are part of diverse communities and the housing issues raised at events and consultations reflect older people's wider concerns about the whole communities' housing situations and needs.
- 4.19. However, there are also some housing issues that are specific to older people. Again, individuals' experience varies, but some relevant factors are more prevalent in later life e.g. the loss of mobility/physical functional decline which impacts on activities of daily living, risk of poor health and accidents, especially falls, reduced income, loss and isolation. All of these have a housing connection and thus are reflected in this response.

5. Commentary on Specific Chapters and Policy Proposals in the Strategy

Chapter 2: Housing in London and the Mayor's vision

- 5.1. The vision that every Londoner should have access to a good quality home that meets their needs at a price they can afford in a '*City for all Londoners*' with an emphasis on affordable housing was widely supported, particularly the focus on genuinely affordable.
- 5.2. The summary of London's housing crisis analysis and priorities for addressing the challenges was broadly welcomed, with several specific suggestions for improvement as follows.
- 5.3. In the section '*Economic and Social Costs*' (Clause 2.16 onwards), in the light of evidence cited above (4.1- 4.6) we would suggest that this section/clause should also refer to the health costs of inadequate/poor condition of housing. This health cost is especially important in the context of population ageing.
- 5.4. Mental health impacts of the housing crisis are also widespread and have an economic cost to the NHS as well as to individuals. Clause 2.20 comments on the strains that the housing crisis puts on families and communities, but we would suggest that the health costs/impacts/resulting health inequalities (including impact of housing on healthy life expectancy) are specifically stated.
- 5.5. The headline top five priorities for the Strategy (Clause 2.33) are all welcomed, albeit noting the comments below regarding the subsequent detail for each of the 5 priorities.

Chapter 3: Building homes (Policy 3.1 – 3.3)

- 5.6. There is broad agreement that it is important to build more homes, with a strong emphasis on building genuinely affordable, good quality homes (for the reasons noted above).
- 5.7. Considerable concern was expressed about the current housing market as this appears to result in building homes for sale most of which are far beyond the means of the vast majority of Londoners, and are often bought as investments, not as homes. Older people felt that action was needed to prevent this.
- 5.8. There is a resulting impact on older people when their families can no longer afford to live nearby and are forced to move further away, resulting in less informal care and support across the generations (both parents/grandparents helping with childcare and younger generations assisting older relatives).
- 5.9. In the light of the experience of older private renters and the findings of the Age UK London research into this sector¹⁵, significant concerns were expressed by older people about the proposal to encourage more purpose built private rental homes - these concerns about private rental shortcomings are further detailed in the comments on Chapter 6. If Build to Rent is to be encouraged then strong practical expression needs to be given to the Mayor's stated aim of linking it with high quality rental, affordability and longer leases.
- 5.10. At all events and in the consultation responses, building more social housing with genuinely affordable rents, security of tenure and better quality accommodation emerged as a key priority regarding new-build homes, whilst also noting that there was an undersupply of suitable mainstream homes for owner occupiers that are affordable and well designed to be suitable for ageing. Intergenerational housing developments were strongly supported.
- 5.11. With regard to the release of Mayoral land/other publicly owned land, there is support for focussing on building new homes as long as these are genuinely affordable and of decent space/accessible/environmental design standards, and which are going provide good quality, healthy homes for Londoners of all ages i.e. the release of public land should result in long term public benefit.
- 5.12. Relating to Proposed **Policy 3.2 B**, the link that is made between transport infrastructure policy and new housing was strongly endorsed. Older people are particularly reliant on (accessible) public transport and transport is an important determinant of whether people can live independently and well at home in later life.
- 5.13. With regard to **Clauses 3.86 to 3.93**, which concern the Mayor's support for councils and housing associations to build new homes,

¹⁵ 'Living in Fear: The experiences of older private renters in London' (2017), Age UK London

again, there is strong support for the building of more affordable housing in general, with a wider, more innovative range of housing options for older people. both mainstream and specialist/supported.

- 5.14. Some older people taking part in the events reported concerns about finding suitable housing with care should their health decline, with mobility loss (e.g. for people living in multi-story blocks with no lift) and dementia being of specific concern. Encouraging some of the smaller, specialist housing associations (**Clause 3.93**) to innovate and build better housing for ageing was generally welcomed.

Chapter 4: Delivering genuinely affordable homes (Policy 4.1 – 4.3)

- 5.15. As already noted above, the issue of creating new homes that are genuinely affordable, particularly social housing, was a top priority for older people responding to the survey and for many taking part in events. The range of proposals in this chapter to increase the supply of truly affordable homes is therefore generally welcomed.
- 5.16. It will be important to ensure that the Affordable Housing Programme identifies and responds to the needs of older people with a range of housing options. Too often the assumption is that only young people are looking for an affordable home to buy/rent/ purchase under shared ownership, but with an ageing population there are many people who are retired or rapidly approaching retirement who will struggle to continue to live in their current home e.g. living in the private rented sector paying a high rent that will become unaffordable after retirement. Age UK London's research estimates that the number of private renters aged 65+ in London may double to 122,000 households by 2039.
- 5.17. With regard to the specific proposals (**Policy 4.3 A**) concerning the Seaside and Country Homes scheme (reported to assist around 150 social tenants a year move from London to bungalows or flats in desirable seaside and countryside locations outside the capital) there was a view that it would be of the utmost importance to provide prospective movers with totally impartial, independent advice about making such a move.
- 5.18. Potential movers will need to consider all the financial, social and practical implications of such a move in later life, including the impact of moving away from friends, family and wider social networks (and hence potential loss of access to informal care) and that it will be virtually impossible to return to London if they don't like where they move to.
- 5.19. Whilst understanding the rationale of giving priority to applicants for housing moves who wish to downsize (**Policy 4.3 A**), again health impacts should be a factor too. There was a view that this policy should not result in pressure being put on tenants who are judged to be the 'worst' under-occupiers to move, and that impartial advice is critical to making an informed decision, noting that the landlord is not an impartial party to give such advice, given their likely priority is to encourage the older person to move.

Chapter 5: Quality homes and inclusive neighbourhoods (Policy 5.1 to 5.3)

- 5.20. Noting that, as **Clause 5.2** states, '*most of the homes that London will have in 2050 are already built*', there was widespread agreement amongst older people involved in the debates that more must be done to improve the existing stock so that it is in a fit state to meet current and future needs. The proposals in Chapter 5 were broadly welcomed, but with a number of provisos that are detailed below.
- 5.21. It is due to past Mayors' Housing Strategies (which have specified minimum space standards and the building of all new homes to Lifetime Homes Standards) that the reported improvements in space standards and accessibility of homes built since around 2000 (**Clause 5.3**) have taken place. It is therefore very important that this new Strategy maintains those standards as a minimum for all new homes (across all tenures).
- 5.22. Much of the overarching statement about older people and housing in **Clause 5.7** was welcomed, in particular endorsing the underlying principle that London's housing should enable older and disabled Londoners to lead independent and fulfilling lives.
- 5.23. The recognition that more older people choose to remain in their own homes rather than move into 'residential institutions' (also **Clause 5.7**) is welcomed. Designing homes to meet changing needs for a lifetime is strongly supported.
- 5.24. Many of those taking part in the events/consultation needed adaptations or expected to adapt their homes as they aged, rather than move (albeit that a significant minority did express some interest in moving to a more suitable home should such a property be available in their neighbourhood).
- 5.25. It was also reported by a number of social housing tenants that even though they wished to move (and some were living in exceedingly unsuitable properties such as living in multi-story blocks of flats with no lift with rapidly declining mobility), they had not been able to gain enough points to even be considered for a housing transfer or were put off by the 'bidding' systems.
- 5.26. An improved social housing allocation system, as well as practical advice and support for older people who do wish to move, is a necessary additional objective which needs to be added to the Strategy.
- 5.27. There were however concerns expressed about the focus on 'under-occupation' in this section - noting the explanation in above paras. 4.11-4.13. The view that older people should not be forced to move out of their homes, and that they should be the ones to decide when and where they move, was widely expressed.

- 5.28. With regard to the need for more supported housing for ageing, this was endorsed by a proportion of older participants at events, but practical support to live well through adapting/maintaining/repairing the current home was a higher priority for more people.

Policy 5.1: Well designed, safe and good quality homes: *London's new and existing homes and neighbourhoods should be well designed, safe, good quality and environmentally sustainable.* [Part A]

- 5.29. Based on the feedback and also evidence of the wider social benefits of making homes and neighbourhoods accessible and age friendly^{16 17} this Policy should be amended to include ... **accessible**... and **age friendly**... i.e. *London's new and existing homes and neighbourhoods should be well designed to be safe, of good quality, accessible, age-friendly and environmentally sustainable.*
- 5.30. The related proposal (**Clause 5.13**) to '*update and consolidate London's housing design standards into a single planning document*' would be fully supported if it incorporated, as a minimum, lifetime homes standards for accessibility and designing homes and neighbourhoods to be age friendly.
- 5.31. **Policy 5.1 Part B** *The Mayor will work with councils, Government, and others to improve the quality and standards of London's existing homes.*
- 5.32. Whilst the proposals in **Policy 5.1 Part B** concerning improved fire safety and measures to address fuel poverty and energy efficiency are useful, they miss out other key current housing stock condition issues that impact on health/ health inequalities and which need to be addressed as a matter of urgency with regard to an ageing population living in a poor quality homes.
- 5.33. In particular measures are urgently needed to address the impacts on older people's health, and resulting health inequalities, of home hazards, noting that falls at home are the major cause of death and injury amongst the older population - see paras 4.5 and 4.6. above). There is a pressing need to take concerted action to reduce excess winter deaths (para 4.4 above), over 90% of which are amongst the older population and are housing related. We would suggest that these aims are added into the Strategy.
- 5.34. With regard to **Existing homes – action on repairs (Policy 5.1)** the Strategy states that around half of London's homes are almost one hundred years old and estimates the total cost of meeting the basic repairs needs of London's housing stock at around £6 billion. However, it makes few comments either about how such disrepair is impacting on the health of Londoners, or how a more concerted effort is needed to tackle disrepair, particularly for disadvantaged older householders.

¹⁶ Dept. for Communities and Local Government (2008) *Lifetime Homes, Lifetime Neighbourhoods: A national strategy for housing in an ageing society* London DCLG

¹⁷ <https://www.AgeUK.org.uk/our-impact/politics-and-government/age-friendly-places/>

- 5.35. Noting that ...'*half of London's homes are owner occupied, and it is important to ensure that homeowners are incentivised to undertake home improvements....*'. there is an absence of any recognition that many older owner occupiers are 'asset rich and cash poor' and that current mechanisms to support/enable people to maintain/repair homes are inadequate.
- 5.36. Incentivising through VAT changes or changes to planning requirements will have little or no effect on this sector.
- 5.37. Feedback from older people in this situation, alongside national data, shows that the majority of non-decent homes lived in by older people are in the owner-occupied sector (78%), clearly indicating that a more innovative approach is required to address this issue and we would recommend that this objective is added to the Strategy.
- 5.38. For smaller, but essential repair and maintenance jobs for low income older people, particularly 'older old' (75+/85+) people, usually living alone, predominantly female, there is a pressing need to deliver affordable, trusted handyperson services, alongside home improvement agencies to offer support and assistance with medium and larger works (many of which will be self-funded either through savings or use of housing equity).
- 5.39. We would propose inclusion of this provision as **an additional stated aim in the Strategy** as one way to tackle disrepair, and the resulting health impacts, in private sector housing lived in by low income older people.

Policy 5.2: Meeting London's Diverse Housing Needs

- 5.40. The general principle for this policy is welcomed. With regard to **Policy 5.2 A i** the principle of creating accessible homes is strongly endorsed.
- 5.41. In the **Section Good Growth by Design**, the range of ideas for encouraging the design and building industries to improve should be **amended** to specifically mention creating age friendly buildings and neighbourhoods, places that are inclusive, accessible and flexible to meet the diverse needs of the whole population across the life-course.
- 5.42. The importance and value of such an age friendly approach has been extensively documented by the World Health Organisation¹⁸. There is a wish to see London at the forefront of this field, committed to creating good places to live for all older Londoners.
- 5.43. The proposal in **Clause 5.32** that 10% of homes should be wheelchair accessible and the remaining 90% accessible and adaptable was broadly welcomed, noting the constraints of national government policy in relation to setting such standards and particularly the problems with

¹⁸ <http://www.who.int/ageing/projects/age-friendly-environments/en/>

the viability test, which is making it harder for councils to enforce the principles of building new homes to decent standards, including accessibility.

- 5.44. Maintaining current space standards (**Clause 5.14**) as a minimum is also supported. Adequate space for possessions and living well in later life, with room for equipment and adaptations as well as carers, is key to making homes adaptable for a lifetime.
- 5.45. **Policy 5.2 A ii.** *increasing opportunities for older homeowners to move to accommodation more suitable for their needs...* and the associated Clauses bring us back to the discussion on downsizing, where older people expressed some concerns (see our paras. 4.13 – 4.17 above).
- 5.46. We agree with the part of the statement **in Clause 5.34** to promote *'planning for new homes that meet the distinct and varied housing needs of older Londoners'*, and welcome the proposal that ... *'the Mayor will consult on benchmarks for older people's housing requirements'*. However, older people themselves are best placed to decide what constitutes housing that is 'more suitable for their needs'.
- 5.47. Undoubtedly there is a cohort of better off older people, or those in particular situations who, given attractive alternative options, would wish to move. However, given the rest of the Strategy's focus on lower income and more disadvantaged groups, there is a clear gap in the thinking in the Strategy concerning lower income older home owners who are at or close to the 'bottom of the housing ladder'. If they wished to move, their housing equity would not be enough in many instances to buy commercial retirement housing, nor even a better quality mainstream home.
- 5.48. A clear need for impartial information and advice about housing and care options, as well as related finance, in later life for older people in all tenures was evident at the consultation events. This would include alternative housing options advice and assistance with moving for those who needed it. The impacts, cost benefits and wider social values of such provision (including savings to the NHS and social care) have been well documented¹⁹. We propose that a pan-London comprehensive service is urgently required and that leading the creation and co-ordination of such provision is added to the Strategy.
- 5.49. There is strong support for the principle of **Policy 5.2 B** i.e.....*to ensure that Londoners who need it are provided with support so that they can live independently.*
- 5.50. However, whilst the additional funding for supported housing is welcomed, it is noted that most older Londoners who need some support to live independently receive this help at home i.e. in mainstream housing, and again, the key housing policy needed is to

¹⁹ Cambridge Centre for Housing and Planning Research (CCHPR) at the University of Cambridge FirstStop Evaluation (July 2014) Summary to DCLG, CCHPR

make sure that those homes are safe, warm and adapted to enable independence.

- 5.51. Concerning **Clause 5.33**, the recognition that "*Many of London's existing homes need to be adapted or improved so that they are more accessible to Londoners*" is welcomed and reflects the priorities of many event delegates.
- 5.52. The Strategy recognises that there is an increasing number of older and disabled people (**Clause 5.6**) "*more than one in 10 Londoners is aged 65 or over, with the number projected to rise by 24 per cent over the next decade, as well as disabled people (who account for around 14 per cent of the population)*" but the commentary on the solution to this demographic change is disappointing.
- 5.53. We welcome proposals in the Strategy to increase the maximum Disabled Facilities Grant for London and, as the Strategy indicates, there has also been an increase in national Government Funding for Disabled Facilities Grants. However, it needs to be made clear that the national block grant was never intended to be the sole source of funding for home adaptations and for many years there was a mandatory requirement on housing authorities to match their national funding allocation.
- 5.54. Similarly, through the transfer of the DFG funding route to Better Care Funds, there was an expectation that housing, health and social care would all contribute to creating an adequate local DFG funding pot. This has largely not taken place, and in many places the doubling of the national DFG grant has been absorbed by reducing the local contributions.
- 5.55. A further impact on the adequacy of the local DFG funding pot is the increasing use of DFG to fund adaptations in social rented housing, particularly in housing association stock, with some Registered Providers now telling their tenants to apply for a DFG where they might once have undertaken the adaptation themselves²⁰.
- 5.56. The diversity of experience of older people who had sought help with home adaptations/applied for a DFG was very marked at the consultation events. We would recommend that the Strategy sets the objective of the Mayor's office taking the lead in promoting innovation, the application of best practice and the allocation of sufficient resources to adapt existing homes for an ageing population across London.
- 5.57. We welcome the intention in **Clause 5.36** of meeting the needs of diverse communities, including LGBT people in supported housing settings where discrimination is known to be a problem. We have also had some feedback about LGBT people experiencing discrimination in the private rented sector.

²⁰ Mackintosh SC & Leather P (2016) *The Disabled Facilities Grant: Before and after the introduction of the Better Care Fund* Glossop Foundations

Policy 5.3: Community Support for Homebuilding

- 5.58. This policy is broadly welcomed. Engagement with communities relating to plans for home building, community led housing schemes, linked infrastructure improvements, transparency and protection for those affected by regeneration projects were particularly endorsed.
- 5.59. Including older people in active engagement and community led housing schemes for innovative approaches to older people's housing were especially welcomed.
- 5.60. Protection for older residents affected by regeneration should be a key consideration, alongside ensuring that any programmes of refurbishment/remodelling should take that opportunity to create more accessible, inclusive and age friendly homes and neighbourhoods.

Chapter 6: A fairer deal for private renters and leaseholders

- 5.61. Age UK London has recently undertaken a piece of work focussed on the experiences of older private tenants which provides useful data and intelligence (documented in the report *'Living in Fear: The experiences of older private renters in London' (2017)*, Age UK London in connection with this Chapter of the Strategy and the associated proposed policies.
- 5.62. The Mayor's vision of improving the lives of private tenants in London was welcomed, particularly in the light of the very negative experiences of many older private tenants revealed by the study cited above and also reported during the related conference.
- 5.63. In particular, whilst the tenure insecurity of private tenants is problematic at all ages, it becomes even worse for those who are older as well as disabled.
- 5.64. Cost of private renting is a great worry, especially as people reach retirement and are often then living on limited incomes. Rent controls were favoured as a way to halt rent cost escalation.
- 5.65. The poor condition of a high proportion of the private rented stock is increasingly problematic for older tenants. As people get older they are both more likely to have many of the chronic health conditions that are exacerbated by poor housing, and also spend more time at home. Getting repairs done was reported as one of the major problems with private rented housing.
- 5.66. The limitations on the powers of the Mayor are noted, and the proposed actions within **Policy 6.1 Improving standards for private renters** are welcomed as far as they go in terms of encouraging better standards and enforcement action, but there are more fundamental issues with the private rented sector and population ageing that need to be noted and highlighted in the Strategy.

- 5.67. In particular regarding **Policy 6.2: *Improving affordability and security for private renters*** making private rented homes more affordable and secure is absolutely critical in the light of the issues raised in the research and the predicted large increase in the number of older private renters.
- 5.68. The number of private-renting households for those aged 45-64 has more than doubled in the last ten years and recent estimates suggest that the number of private-renters in London aged 65 and over could double between 2014 and 2039.
- 5.69. As a minimum, we would request that clauses are added to the Strategy that reflect the issues highlighted concerning the problems of older private tenants, and again, the link to health and health inequalities policy.

Recommendations from the report *Living in Fear The experiences of older private renters in London* (2017) Age UK London

1. Abolishing section 21 notices whereby AST tenants can be evicted without reason.
2. Landlords need encouragement to provide tenancies with longer terms to give older tenants the stability to make the place in which they live truly feel like their home.
3. Rents need to be genuinely affordable and there needs to be a degree of proportionate rent-stabilisation to act against sudden increases that can harm the well-being of older private-tenants.
4. Local councils need to be provided with the means to meet housing repair needs. The private-rented sector is growing and London has an abundance of old stock.
5. Local councils need to be adequately resourced to implement necessary adaptations to meet the needs of an ageing population who will be self-managing at home. Landlords also need to be reimbursed for removal of adaptations at the end of a tenancy should they adversely affect re-letting potential.
6. Local councils need to be adequately resourced to effectively find and enforce against landlords who fail to keep their property in a good condition.
7. Landlord-licensing needs to be developed and implemented as far as possible so that it can effectively support regulation that safeguards older tenants' interests. Revenue from such initiatives can then be used to support other outcomes.
8. New homes that are being developed as 'buy-to-let' properties need to meet lifetime homes standards (or the equivalent) in currently accepted standards.
9. There needs to be a significant commitment to getting older people back into employment to ensure that older private-renters are not adversely affected by longer periods of time between periods of employment.
10. There is a clear need for older private-renters to be better informed of their rights. More support for information and advice (including a legal aid role) needs to be provided so that it is available in all boroughs.
11. There is a need for more housing – this includes social-housing or genuinely affordable housing for rent as well as good quality, affordable, specialist and supported housing for older people who need it.

5.70. The recommendations in the report '*Living in Fear*' are included in full in the box above. We would request that these be considered for incorporation into the Strategy and/ or taken account of by the various working and task group actions mentioned in Chapter 6 and/or taken up by the Mayor as asks to Central Government where not within the Mayor's remit to implement.

POLICY 6.3: Reforming and Improving Leasehold

- 5.71. There is support for the principle of the policy to reform leasehold and provide better advice and support for existing leaseholders, particularly if these policies specifically address some of particular issues that impact on older leaseholders, e.g. those living in leasehold retirement and specialist housing as well mainstream leasehold homes.
- 5.72. With regard to **Policy 6.3 A**, noting the range of problems reported by older leaseholders (both in the private and social rented sectors) there is support for wholesale reform of this tenure and a shift to commonhold and regulation of managing agents.
- 5.73. The proposal in **Policy 6.3 b** concerning better information and advice is particularly necessary in this area. With regard to older people, there is a pressing need for specialist information, advice and support to enforce rights not only concerning the technical leasehold housing issues but also the interconnections with care, support, specialist housing leasehold charges, pensions and welfare benefits. An additional comment in the Policy with regard to these connections and proposal for a specialist, integrated information and advice service (as highlighted in section 5.49 of this submission) would be very useful.
- 5.74. We recommend that the Mayor works closely with bodies who have been working for some considerable time on issues for older people in leasehold property and have considerable experience and knowledge about the problems and potential solutions in this particular area, including the Law Commission, Elderly Accommodation Counsel and Age UK.

Chapter 7: Tackling homelessness and helping rough sleepers

- 5.75. There was widespread concern amongst older people at events about the rise in homelessness and rough sleepers. People also noted their concerns about hidden homelessness, the many people who are moving around, temporarily staying with family and friends and 'sofa-surfing', as noted in Clause 7.2.
- 5.76. The interconnection between insecure and unaffordable private rented housing and homelessness was also noted.
- 5.77. Increasing the supply of affordable social housing was widely put forward as the key step to addressing homelessness, with the need for support and care for those with particular issues also endorsed.
- 5.78. **Policy 7.1: Preventing and addressing homelessness** was supported as a key priority.
- 5.79. It was noted that although most rough sleepers are young people, there is a growing number of older rough sleepers (50yrs +) many of whom have been on the streets for a long time and who need targeted support. This also needs to be recognised in any practical actions that are taken to address the problems of rough sleepers.

