



# **Care & Repair England's response to the Mayor of London's Draft Housing Strategy**

**Submitted by Care & Repair England  
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## **1. About Care & Repair England**

1.1 Care & Repair England is an independent charitable organisation set up in 1986 which aims to improve older people's housing. Its vision is that all older people have decent living conditions in a home of their own choosing. It innovates, develops, promotes and supports practical housing initiatives and the related policy and practice which enable older people to live independently in their own homes for as long as they choose, particularly for older people living in poor or unsuitable private sector housing.

1.2 In developing our response, we worked closely with Age UK London who commissioned us to offer consultative research support for their response to the strategy. This work engaged older people across London and included a thorough literature and data review.

1.3 Our response is not only based on our extensive experience of working with and for older people in relation to their housing but has been enriched by this work. As a result, we have echoed the points made in the Age UK London response which we helped to develop, and which are welcomed.

## **2. Our vision**

2.1 Our response is based on a vision of ageing that is inclusive and positive, one which acknowledges the diversity of later life situations, including housing. It highlights the inequalities experienced by older Londoners regarding their homes, wider living environments, financial circumstances, health, wellbeing and quality of life.

2.2 In the context of significant population ageing there is also a pressing need develop a comprehensive strategy to address housing for an ageing population and to address demographic change in all housing and related policies. A strategy for an ageing population will include a mix of existing stock adaptation/modification for the majority and building new accessible, flexible mainstream homes plus specialist/ supported stock for the minority.

2.3 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. Executive Summary**

3.1 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.

### 3.2 Gaps in the 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 of the existing housing stock**, where most (older) Londoners will be living for the foreseeable future, including the need for practical housing solutions to improve housing conditions for lower and middle income older homeowners living in older housing stock. 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 sub-standard homes.
- 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. 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.

### 3.3 Specific comments/proposals are: -

- Chapter 2: include the health cost of poor housing in the section on *Economic and Social Costs* Clause 2.16 onwards.
- Chapter 3: Building more social housing with affordable rents, security of tenure and better quality should be a key priority.
- Chapter 3: Ensure links to transport are an important feature of new homes development.
- Chapter 3/4: The affordable housing programme should identify and respond to the needs of older people for a range of housing options.
- Chapter 4: People taking up the Seaside and Country homes scheme need access to independent impartial housing advice and information with health added as a key criterion for a move.
- Chapter 5: It is important that the Strategy (and the London Plan) maintain the existing space and accessibility standards as a minimum.
- Chapter 5: 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.
- Chapter 5: 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 designing homes and neighbourhoods to be age friendly
- Chapter 5: 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.
- Chapter 5: 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.

- Chapter 5: 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.
- Chapter 5: 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 for older people in all tenures. This would include assistance with moving for those who needed it.
- Chapter 5: 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.
- Chapter 5: 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.
- Chapter 5: 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: 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.
- Chapter 7: Increasing the supply of affordable social housing is a key step to addressing homelessness, with the need for support and care for those with particular needs is also endorsed.

#### **4. General comments about the focus of the Draft Strategy**

4.1 We welcome the central themes of the Strategy to address the shortage of genuinely affordable homes, improve conditions in the private rented sector, provide quality homes and inclusive neighbourhoods.

4.2 Whilst noting the immediate pressures to act swiftly to build new genuinely affordable homes we would put forward the case for focussing much more on quality as well as quantity. The Strategy had fewer proposed policies to address the issues of the condition of the existing stock where most older Londoners will live for the foreseeable future.

4.3 We 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.

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

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

## **5.Gaps identified in the Draft Strategy**

### **Strengthening the connection between health, housing and ageing**

5.1 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 sufficiently address this connection.

5.2 We would suggest that the Strategy needs to add in more references to the housing, health and population ageing connections 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).

5.3 Housing is acknowledged as a key wider determinant of population health. Poor housing costs the NHS more than £1.4 billion each year, with nearly half of this cost arising due to the impacts on older people. 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 health

5.4 The recently published figures from ONS 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 there were 3,400 excess winter deaths, over 90% (3,100) of them were of people aged 65+.

5.5 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 factors. Around a third of all people aged 65 and over fall each year, increasing to half of those aged 80 and over. A&E departments treat a disproportionate number older people, particularly those aged over 70, who have fallen in their home.

5.6 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).

5.7 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 sector.

### **Insufficient attention to addressing substandard conditions of existing stock**

5.8 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.

5.9 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 services that can help to extend safe, independent living at home for older people, particularly the growing population of lower income 'older old' (over 75s).

5.10 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**

5.11 We have some concern about the narrative in the Strategy around older people and their homes, with implicit value judgements being made e.g. that older people 'should' move or 'downsize' because they were 'under-occupiers', a term that we consider to be negative and potentially misleading.

5.12 Any focus on 'under-occupation' fails to recognise the variety of family and social circumstances of older people.

5.13 We know from a range of national data sources that most older people - around 80% - say that they don't want to leave their current home as they get older and the level of satisfaction with home and neighbourhood is highest (97%) amongst older people.

5.14 We note that while many of the housing issues in the Strategy are common to all generations (affordability, safety, security, housing stock condition and health impacts) there are also some housing issues that are specific to older people. While individuals' experience varies, 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. These have a housing connection and thus are reflected in this response.

## **6. Commentary on Specific Chapters and Policy Proposals in the Strategy**

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

6.1 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 is supported, particularly the focus on genuinely affordable housing.

6.2 The summary of London's housing crisis analysis and priorities for addressing the challenges could be improved as follows:

6.3 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.

6.4 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.

6.5 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)**

6.6 We welcome the plan to build more homes, with a strong emphasis on building genuinely affordable, good quality homes (for the reasons noted above). Building more social housing with genuinely affordable rents, security of tenure and better quality accommodation is a key priority.

6.7 Relating to Proposed Policy 3.2 B, the link that is made between transport infrastructure policy and new housing is endorsed. Older people are particularly reliant on public transport (which is also accessible) and transport is an important determinant of whether people can live independently and well at home in later life.

6.8 With regard to Clauses 3.86 to 3.93, which concern the Mayor's support for councils and housing associations to build new homes, again, we strongly support 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.

6.9 Encouraging some of the smaller, specialist housing associations (Clause 3.93) to innovate and build better housing for ageing is to be welcomed.

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

6.10 As already noted above, the issue of creating new homes that are genuinely affordable, particularly social housing, must be a top priority. The range of proposals in this chapter to increase the supply of truly affordable homes is therefore generally welcomed.

6.11 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.

6.12 Regarding 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) we consider that it would be of the utmost importance to provide prospective movers with impartial, independent advice about making such a move.

6.13 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.

6.14 Whilst understanding the rationale of giving priority to applicants who will 'free up' the most bedrooms should they move home (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)**

6.15 Noting that, as Clause 5.2 states, 'most of the homes that London will have in 2050 are already built', 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 are broadly welcomed, but with several provisos detailed below.

6.16 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).

6.17 Much of the overarching statement about older people and housing in Clause 5.7 is welcomed, in particular endorsing the underlying principle that London's housing should enable older and disabled Londoners to lead independent and fulfilling lives. 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.

6.18 Many older people need adaptations or expect to adapt their homes as they aged, rather than move (albeit that some are interested in moving to a more suitable home should such a property be available in their neighbourhood).

6.19 We are however dismayed at 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 is what we would expect.

6.20 Both supported housing for ageing and practical support to live well through adapting/maintaining/repairing the current home is needed in the London Housing Strategy.

*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]*

6.21 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.

6.22 The related proposal (Clause 5.13) to 'update and consolidate London's housing design standards into a single planning document' would be fully supported by Care & Repair England if it incorporated, as a minimum, lifetime homes standards for accessibility and designing homes and neighbourhoods to be age friendly.

*Part B The Mayor will work with councils, Government, and others to improve the quality and standards of London's existing homes.*

6.23 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 poor quality homes.

6.24 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.

6.25 Regarding *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 repair 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.

6.26 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.

6.27 Incentivising through VAT changes or changes to planning requirements will have little or no effect on this sector.

6.28 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.

6.29 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).

6.30 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**

6.31 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.

6.32 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 older 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.

6.33 The importance and value of such an age friendly approach has been extensively documented by the World places to live for all older Londoners.

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

6.35 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.

6.36 However, Policy 5.2 A ii. increasing opportunities for older homeowners to move to accommodation more suitable for their needs.... and the associated Clauses give some cause for concern.

6.37 Whilst agreeing with the part of the statement in Clause 5.34 that states 'planning for new homes that meet the distinct and varied housing needs of older Londoners', and welcoming the proposal that ... 'the Mayor will consult on benchmarks for older people's housing requirements', who decides what constitutes housing that is 'more suitable for their needs' must remain the decision of older people themselves.

6.38 We note there is little evidence from the more reputable research literature that most older people living in owner occupied housing are keen to move or that they need to be 'incentivised' to do so.

6.39 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'. Their housing equity would not be enough in many instances to buy commercial retirement housing, nor even a better quality mainstream home (even if they wished to move).

6.40 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 documented. 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.

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

6.42 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.

6.43 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.

6.44 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.

6.45 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.

6.46 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 themselves.

6.47 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.

### **Policy 5.3: Community Support for Homebuilding**

6.48 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. Including older people in active engagement and community led housing schemes for innovative approaches to older people's housing were especially welcomed.

6.49 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**

6.50 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.

6.51 The Mayor's vision of improving the lives of private tenants in London is welcomed, particularly in the light of the very negative experiences of many older private tenants revealed by the study.

6.52 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

6.53 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.

6.54 We would call on the Mayor to implement the recommendations of Age UK London's report to tackle tenure insecurity, cost and poor housing condition.

### **POLICY 6.3: Reforming and Improving Leasehold**

6.55 We support 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 the particular issues that impact on older leaseholders, e.g. those living in leasehold retirement and specialist housing as well mainstream leasehold homes.

6.56 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 earlier in this submission) would be very useful.

6.57 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**

6.58 Increasing the supply of affordable social housing is a key step to addressing homelessness, with the need for support and care for those with particular needs is also endorsed.

6.59 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.

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