



## **WRITTEN EVIDENCE: A SUBMISSION BY THE HOUSING LEARNING AND IMPROVEMENT NETWORK (LIN) TO THE GLA HOUSING STRATEGY DRAFT FOR PUBLIC CONSULTATION**

**6 December 2017**

### **Introduction**

- The Housing LIN (Learning and Improvement Network) is a sophisticated, national peer-to-peer network bringing together over 40,000 housing, health and social care professionals to exemplify innovative housing solutions for an ageing population, and to meet the needs and aspirations of disabled people, of all ages.
- The Housing LIN engages with its members via a number of channels, including online, and through a regional offer, which enables professionals to meet, learn, exchange knowledge and experience and develop innovative solutions to the shared challenges which face us. This includes an active London Regional Network.
- Overall, the Housing LIN welcomes the draft London Housing Strategy's commitment to developing accessible, well-designed homes, including for older and disabled people; to improving the supply of specialist and supported housing options for these groups; and to increasing the number of affordable homes available to Londoners.
- This consultation response will focus first on the specific chapter which addresses the needs of older and disabled Londoners, 'High Quality Homes and Inclusive Neighbourhoods', and will then make some general observations, comments and suggestions pertaining to the rest of the draft Strategy.

### **1. High Quality Homes and Inclusive Neighbourhoods**

#### **Accessibility, Adaptability and Design**

- As noted above, the Housing LIN supports the draft Strategy's emphasis on the importance of design, and on accessibility standards. As the Strategy recognises, these standards are essential across all types and tenures of housing, since as noted by the 2015 Mayor's Design Advisory Group's 'Ageing London' report, although London has a relatively young demographic overall, nevertheless '*older Londoners are the fastest growing demographic across the city*' – the vast majority of whom live, and will continue to live, in general needs housing. The needs of disabled Londoners of all ages are equally important, as noted by the draft Strategy.

- For the same reason, the Housing LIN would endorse the draft Strategy's focus on the importance of Disabled Facilities Grants, and indeed on practical measures to ensure that '*the maximum benefit is derived from DFG funding*', to enable existing homes to be adapted and improved to meet the needs of older and disabled citizens. There remain considerable issues for older and disabled leaseholders and people renting, whose landlords object to adaptations to properties. Some flexibility in this area could be promoted in the proposed work on leasehold arrangements outlined in the Strategy.
- We would also point out that there is currently no mention of HAPPI standards in the report. HAPPI stands for 'Housing our Ageing: Population Panel for Innovation' – and refers to a set of principles based on 10 key design criteria. As we stated in our oral evidence to the current CLG Select Committee on Housing for Older People, many are recognisable from good design generally - good light, ventilation, room to move around and good storage - but they have particular relevance to the spectrum of older persons' housing which needs to both offer an attractive alternative to the family home, and be able to adapt over time to meet changing needs. HAPPI standards are increasingly recognised across the industry and across the housing, health, care and planning sectors as representing the benchmark for quality design in older people's housing – and indeed, in ordinary housing which is designed to be 'age-friendly'. An example of this is the recent award winning senior community-led, co-housing scheme in High Barnet, Breaking New Ground featured in the following Housing LIN case study at: <https://www.housinglin.org.uk/Topics/type/Community-Building-for-Old-Age-Breaking-New-Ground-The-UKs-first-senior-cohousing-community-High-Barnet/>.
- The Housing LIN recommends that it would be helpful for the Mayor to recognise and reference HAPPI principles as an adjunct to his commitment to Lifetime Homes Standards, particularly in relation to planning for an ageing population, in his Housing Strategy. <https://www.housinglin.org.uk/Topics/browse/Design-building/HAPPI/>

### **Enabling older people to downsize**

- Research by Demos, *Top of the Ladder*<sup>1</sup>, has shown that many people across the UK are interested in moving in later stages of life to support wellbeing and reducing future care costs, with 29% of people aged over 55 interested in moving (the proportion increases to 63% of older people living in homes of 3 bedrooms or more).
- However, there is, nationally, a serious under-supply of affordable, high quality, attractive housing options in the right places, where older people want to live, and the same is true for London. As observed by the former Mayor's Design Advisory Group 'Ageing London' report (referenced above), '*new*

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<sup>1</sup> <https://www.demos.co.uk/files/TopoftheLadder-web.pdf?1378922386>

*urban housing tends to be focused on the 'first-time buyer' or 'buy-to-let' investment properties. This stock is not appropriate or flexible enough to meet the needs of older people'.*

- Therefore, the Housing LIN strongly supports the draft Strategy's intention to *'increase opportunities for older homeowners to move to accommodation more suited to their needs, which could include them choosing to downsize.'*
- The draft Strategy signals the Mayor's intention to *'encourage Government to consider how incentives could be used to assist older under-occupiers wanting to downsize'* and to *consult on benchmarks for older people's housing requirements in his draft London plan'*.
- The Housing LIN is in a strong position to offer advice and supporting information to aid the Mayor, the GLA and local authorities in London in these considerations, including knowledge of many examples of innovation and best practice, specific expertise, and access to a huge range of resources and evidence sources. Following the Local Government Association's recent report, *Housing our Ageing Population. Learning from councils meeting the housing needs of our ageing population*<sup>2</sup>, we are also currently working with several local authorities outside London as part of their housing advisors programme to help develop their housing for older people strategies. We would similarly welcome any opportunity to work with the Mayor and the GLA to support the Mayor's work in this area in future months and years.
- In terms of delivering the supply of housing options needed, as noted by the draft Strategy, the mainstream house building sector also has a key role to play in achieving these outcomes, across all types of housing and tenure, supporting health and wellbeing outcomes and unlocking the housing market.
- It is suggested that one constructive intervention, to this end, for which the Mayor could offer his support, would be for the Government to address the difficulties that many general planning policies cause for the older people's housing sector. This includes the distinction between the C2 (residential institutions) and C3 (dwellings) use class categories, the lack of clarity on how these should be applied to purpose build older people's housing schemes, and the disincentives to delivery arising from some attempts to apply affordable housing policies to retirement communities. More resources on these topics can be found on the Housing LIN's planning portal pages at: <https://www.housinglin.org.uk/Topics/browse/Planning/>
- Overall, it is important to note that meeting older people's diverse housing needs is crucial to unlocking the entire housing market. As identified in the most recent Demos report, *Unblocking the housing market: Helping first time*

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<sup>2</sup> <https://www.housinglin.org.uk/Topics/type/Housing-our-Ageing-Population-Learning-from-councils-meeting-the-housing-needs-of-our-ageing-population/>

*buyers by helping later life buyers*<sup>3</sup>, this is because supplying positive housing choices which encourage older people to move – especially those who are currently ‘under-occupying’ - will have the effect of freeing up family homes, across all tenures, for those who need them.

- In our view, the Seaside and Country home initiative will only ever meet the aspirations of a very small number of older Londoners, most of whom have strong ties to the City and a preference for being close to services and familiar communities.

### **Supported Housing**

- The Housing LIN would strongly endorse the Mayor’s emphasis on the key role of supported and specialist housing, both purpose built extra care and retirement housing, and also supported housing for a range of other vulnerable groups and those with particular needs.
- The Housing LIN welcomes the announcement that the Mayor will be investing £75m in supported housing for older and disabled Londoners
- In recent years, the Housing LIN has also played a role in supporting the Department of Health’s (DH) ‘*Care and Supported Specialised Housing Fund programme*’, including advising the GLA on the accompanying prospectus, recording GLA allocations on a web-based directory of DH funded schemes<sup>4</sup>, and through its dissemination, knowledge and information exchange opportunities both online and at numerous regional and national events. This includes the London Regional Housing LIN, an active network which has shone a light on, and explored the lessons from the CASSH-funded development sites within the London region on many occasions. The Housing LIN looks forward to continuing this important work.  
<https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/FundingExtraCareHousing/DHCapitalFundingProgramme/>

### **Planning for London’s diverse housing needs**

- The Housing LIN supports the Mayor’s focus on the importance of meeting the housing needs of London’s diverse population, including BME communities, particular faith groups, and LGBT groups, for example.
- However, the Housing LIN would suggest that a cross-sectoral view should be taken of these needs, recognising for example that BME and LGBT communities and groups are equally affected by the changes associated with population ageing, and indeed are equally likely (and in some cases more likely) to be affected by disability and poor health, and with the resulting consequences for their current and future housing needs.

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<sup>3</sup> <https://www.demos.co.uk/project/supply-and-demand/>

<sup>4</sup> <https://www.housinglin.org.uk/Topics/ECHScheme/search/>

- The Housing LIN has developed a range of resources over the years looking at these issues, We are also currently engaging in an active dialogue with our 40,000 members across the country (including London) in order to identify the key housing issues faced by older and disabled people from minority communities, and exploring how the Housing LIN might work with partners to understand and highlight these issues for a wider audience.  
<https://www.housinglin.org.uk/Topics/browse/HousingOlderPeople/MinorityGroups/>

### **The Implications for Social infrastructure**

- The Housing LIN welcomes the Mayor’s intention to ‘*show leadership on an issue that is a major and legitimate influence on the views of local communities on new homebuilding*’ – i.e. the additional pressures placed on existing social infrastructure as the local population increases, even though (as the draft Strategy states) the Mayor does not control many of these services. The Strategy highlights ‘health’ as one of these key areas, and indeed, the Housing LIN would support this focus, and would also suggest adult social care to be another (related) area for which local population increases create additional pressures. Collaboration across these areas are critical – both in terms of managing future demands, but also recognising the crucial role of good quality housing in reducing future demands on health and social care. The Housing LIN has published a selection of evidence reviews that demonstrate the health and social care ‘dividend’ in investing in housing, including its recent *report, Demonstrating the Health and Social Cost-Benefits of Lifestyle Housing for Older People*<sup>5</sup>.
- Indeed, the need for health, social care, housing and planning collaboration reflects the fact that the supply of suitable, well designed housing stock is a critical factor in enabling healthy ageing, while being equally important in meeting the holistic needs of people of all ages with disabilities, and in enabling disabled people to live active, independent, self-determined lives.
- This key role which housing plays as a determinant of health (for people of all ages) has been affirmed in recent policy and legislation. The statutory guidance to the Care Act 2014 states that: “*Housing is... a crucial health-related service which is to be integrated with care and support and health services to promote the wellbeing of adults and carers and improve the quality of services offered.*” As a consequence, the Care Act 2014 requires councils to have regard to ensuring sufficient capacity and capability to meet anticipated needs, including housing needs, for all people in their area who require care and support. The forthcoming government green paper on adult social care is expected to offer further guidance on government expectations in this area.

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<sup>5</sup> <https://www.housinglin.org.uk/Topics/type/Demonstrating-the-Health-and-Social-Cost-Benefits-of-Lifestyle-Housing-for-Older-People/>

- It is suggested that there are strong synergies here, and that as a consequence, Local Planning Authorities and health and social care commissioning leads (based in councils and in Clinical Commissioning Groups, or CCGs) should be strongly encouraged to collaborate in the process of identifying the specific housing needs of older and disabled people in their localities. This could be achieved through the alignment of local housing needs assessments, social care Market Position Statements, and Joint Strategic Needs Assessments (which underpin local Health and Wellbeing Strategies). On a larger geographical footprint, partners should consider alignment with the plans being developed and delivered by Sustainability and Transformation Partnerships (STPs) for all regional health economies across England.

## **2. Broader comments about the draft Strategy**

- Under 'Building Homes for Londoners' section of Strategy there is reference to increasing the density of developments to enable provision of more housing. While the Housing LIN supports this as a general approach it is important to note that in specialist housing for older people, the provision of communal space will mean reduced density.
- The proposals to improve skills and capacity in the housebuilding industry is welcomed. However, our sector learning and improvement experience highlights that there are currently a limited number of developer with expertise in building specialist housing for older people. There is an argument for supporting mechanisms that will widen expertise in this particular type of workforce training and development.
- The Housing LIN notes that older people's housing is treated separately the draft Housing Strategy from other sections (e.g. it is not specifically mentioned in relation to Build to Rent or general needs housing). While the emphasis on older people's / retirement housing (of which there is a real undersupply in London - as identified in our SHOP@<sup>6</sup> analysis) is welcome, it is also important to recognise that most older people live in mainstream housing, will never want or need specialist housing, and many prefer to remain in mixed-age communities.
- Similarly, the Housing LIN recognises the general concerns about the leasehold housing market which are well explored in the draft Strategy, but would also point out that there are also serious questions about the leasehold/shared ownership retirement housing market, which will need to be resolved if this market is to achieve its potential. Issues in some cases include loss of re-sale value, no option for equity release, and service charges and exit fees.

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<sup>6</sup> <https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareStrategy/SHOP/SHOPAT/>

The recent work of the Law Commission<sup>7</sup> is therefore welcome and offers greater transparency for older movers into leasehold retirement living.

- Again, looking at tenure, it is important to recognise that older people's housing options need to include a range of tenures, with increasing demand (especially in London) for older people's private rented housing options, alongside concerns about the risks to which older private renters are exposed. Age UK London has conducted some important research in this area: <https://www.ageuk.org.uk/london/projects/older-private-sector-tenants-programme/>
- The draft Strategy makes some useful references to Build to Rent (BTR) as a sector. The Housing LIN would note that most Build to Rent is currently aimed at young professionals, particularly those being developed by housing associations. However, the Housing LIN would suggest that BTR is a viable option for some older people in the middle-income brackets who will never be eligible for social/ "affordable" housing, but who are unable to afford the higher end market sale retirement products. For these groups, BTR may be preferable to Assured Shorthold Tenancies with buy to let landlords, which may be the only alternative. BTR could be attractive as a short-term option for 'downsizers (bridging the time gap between sale and purchase) as well as longer-term for some older people (because most BTR providers now offer 3-year tenancies).
- Indeed, it is suggested that BTR could have a positive influence on the wider private rental market in terms of encouraging longer tenancies / rent increase limits (see the Age UK London work referenced above).

### **About the Housing LIN**

The Housing LIN is recognised by industry as the sector leading 'knowledge hub' on specialist housing. It is a signatory of the pioneering Health and Housing Memorandum of Understanding. Furthermore, the Housing LIN's online and regional networked activities:

- Connect people, ideas and resources to inform and improve the range of housing choices that enable older and disabled people to live independently
- Share thought-leadership, learning and intelligence on latest funding, research, policy and innovate developments to spread practice faster
- Engage with industry to raise the profile of specialist housing with developers, commissioners and providers to plan, design and deliver aspirational housing for an ageing population, and for people with physical and learning disabilities

For more information on the work of the Housing LIN, visit: [www.housinglin.org.uk](http://www.housinglin.org.uk).

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<https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareProvision/SupportServices/EventFees/>