



Mayor of London's Draft Housing Strategy

ADPH London response, December 2017

About this response

This response is from the Association of Directors of Public Health for London, which represents Directors of Public Health (DsPH) in London's 33 local authorities, and supports them to improve and protect the health of their local populations. ADPH London brings together DsPH and their teams to work together to address issues which can either only be successfully tackled on a pan-London basis and/or which enhance the ability of boroughs to meet their responsibilities locally, for example through delivering efficiencies, sharing of best practice, reducing duplication, and improving coordination of related work.

Further information on ADPH London, including current priorities, is available online here: <http://adph.org.uk/networks/london/>

This response represents the professional collective response of Directors of Public Health in London local government. At a local level, individual boroughs will submit their own responses to the consultation.

ADPH London welcomes the opportunity to comment on the Mayor's draft Housing Strategy. Our response does not attempt to provide a comprehensive public health response, but rather pulls together our thoughts on how the strategy can most effectively:

- Improve public health outcomes in London
- Assist councils in developing high value approaches to support their residents' health and wellbeing
- Reduce demand on health and social care services

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Chapter 2: The Mayor's vision

ADPH London welcomes and supports the Mayor's Housing Strategy – a strategy focused on increasing access to affordable housing and more high-quality homes at stable rent, and to take urgent action to prevent and address homelessness.

How long people live, the quality of health and life that people experience and for how long is known to be significantly impacted by whether they have a home, the proportion of their earnings spent on the cost of that housing, and the quality and design of the housing.

Due to the failure of supply to keep up with demand in London, the cost of owning or privately renting a home in London is high. Housing costs are a major factor in creating poverty in London, which in turn impacts on health.

We applaud the ambitions of the Mayor, however it would be more powerful if his Housing Strategy had stronger links to health inequalities and the ambitions in his draft Health Inequalities Strategy.

Chapter 3: Building homes for Londoners

ADPH London agrees with the Mayor's Housing Strategy to significantly increase the availability and accessibility of affordable housing for Londoners. At the same time, it must be recognised that new higher density and therefore smaller housing may come with inherent problems and risks for the health and wellbeing of residents.

The strategy should explicitly have actions to ensure that homes built are designed to:

- Help to promote active travel and physical activity by applying the Healthy Streets approach outlined in the Mayor's Transport Strategy to all areas around new homes. For example secure places for cycles, reduced car parking spaces
- Promote access to healthier food e.g. kitchen facilities allow for meals to be cooked for families, as well the appropriate space needed to store food
- Promote high quality open spaces for sport, recreation and play

The Mayor's ambitious home building programme will provide lessons and insights, particularly around the impact on health and wellbeing. **We ask that the Mayor ensures prospective Health Impact Assessments at pre-application stage are carried out for large building projects, as these will help to mitigate impacts on health.**

The Mayor has made bold and clear ambitions to reduce air pollution in London. **We ask that the Mayor should therefore include in his Housing Strategy measures to prevent air pollution generated from construction activities such as the operation of diesel engines, including non-road mobile machinery, and to mitigate noise pollution,** as this can contribute to mental ill health, stress levels, hypertension, sleep disturbance and others.



Chapter 4: Ensuring that homes are genuinely affordable

We welcome the Affordable Rent Programme and London Living Rent homes as a significant step toward an accessible London housing market. We are broadly supportive of these proposals including: opposition to bedroom tax and pay-to-stay; protecting the affordable housing grants with conditions to prevent misuse; and ensuring replacement of existing affordable housing with like-for-like.

Efforts to ensure that all homes, new and existing, are affordable are welcomed, as this will contribute to reducing overcrowding, which is known to be a risk factor for sleep disturbance, poor mental health, and certain diseases.

We know that affordable housing definitions can vary which places at risk disproportionate numbers of people from BME, older people, disabled and low income groups living in social housing more at risk of homelessness. We also know that genuinely affordable homes are also vital to increasingly the likelihood that family units remain within close proximity, which has inherent benefits such as family members supporting each other with childcare and supporting older family members.

We ask the Mayor develops with partners, appropriate definitions for all housing needs, and is more explicit about the links to the objectives in his Health Inequalities Strategy.

Chapter 5: Well-designed, safe, good quality, environmentally sustainable homes

Good quality housing has a direct impact on health as it helps to prevent accidents in the home, reduces winter-related deaths and protects against ill mental health. We welcome the measures proposed to improve the ability of the housing sector to improve environmental sustainability, as this also impacts positively on health and wellbeing.

Smoke-free Housing

We ask the Mayor to commit to explore with Councils and developers the development of housing policies that promote smoking cessation.

Smoke-free home policies should include whole building or site restrictions on smoking to prevent vulnerable groups, children and those that wish to be living in entirely smoke-free accommodation from being subjected to second-hand smoke, decreasing the likelihood of related illness and deaths from fires.

There are also benefits for landlords as it is likely it costs more to clean a home of a former resident who was a smoker. There may also be financial benefits linked to insurance costs.



Housing design, health and wellbeing

We agree with the Mayor's ambitions to ensure that there are homes suitable for families and innovative design. However, **the Mayor's Housing Strategy should be more explicit and ambitious on the design of homes to ensure physical, mental and social wellbeing is not compromised.**

Space standards have been well documented to be beneficial for health and wellbeing. It is vital that we require London space standards for developers, even when facing an undeniable crisis in shortage of homes. In London there are a number of space challenges especially for storage space for families, cycle storage for commuters, comfortable stairwells for active communities, space for home working, and kitchen design.

Whilst size standards are important and should be adhered to, we support the link to the delivery of the Mayor's Environment Strategy as this will set out the design of areas outside homes which can provide areas that meet some of the needs of specific populations.

Chapter 5: Meeting London's diverse housing needs

We are very supportive of the Mayor's ambitions to ensure housing is appropriate for older people and people with disabilities, and other vulnerable groups, however **the strategy should go beyond this and ensure that there is housing suitable for all ages and is inclusive of other vulnerable groups.**

It is important that the Mayor recognises in his strategy that owner-occupiers considering down-sizing will more likely be older people. **The Mayor's strategy should be explicit about ensuring an impact assessment takes place for these groups of people** to identify any risks associated with moving such as isolation from family and friends which we know links to poor physical and mental health outcomes.

We know that a higher proportion of people living in poor quality housing experience mental ill health and are unlikely to have secure tenure. We also know that the number of families with children living in the private rental sector in poor decency standards has increased. Consequences of poor housing on children can include severe ill-health and disability, meningitis, asthma, slow growth, mental health and behavioural problems, as well as lower educational attainment, greater likelihood of unemployment, and poverty. **The Mayor should expand on his commitments to improve the planned for tenants' rights with specific reference to vulnerable groups, such as those who experience mental ill health and children.**

Supported Housing

We agree with the Mayor that people with care and support needs have the same right to opportunity, inclusion and security in housing as all other Londoners. Supported housing



helps to prevent homelessness and enables independence post recovery for those residents receiving support to address substance misuse.

We are supportive of the Mayor contributing funding for supported housing for older people and those with disabilities, however **the strategy should be expanded to include other vulnerable groups, including young people, those who experience mental ill health and those with substance misuse issues.** These vulnerable groups should have equal access to flexible and personalised housing support afforded of others.

Chapter 7: Preventing homelessness, helping homeless Londoners into accommodation and helping rough sleepers off the streets

We are strongly supportive of the Mayor's ambitions to set up a fund for accommodation of homeless households, to commission and develop pan-London services to target groups of rough sleepers, and to develop his 'No Nights Sleeping rough' taskforce.

In some areas of London, the health service is already undertaking work in this area. We believe that the health service does have a key role to play and believe that the **Mayor should use his leadership platform to convene the health service to develop a more consistent and robust role in meeting the health and wellbeing needs of people and families experiencing homelessness, and tackling health inequalities experienced by Londoners who are homeless or insecurely housed.**

Conclusion

We are supportive of the Mayor's efforts to address overcrowding, insecure and unaffordable housing. To ensure that the strategy becomes a reality and that meaningful impacts for improving health outcomes are achieved, we strongly recommend that the Mayor:

1. Ensures that prospective Health Impact Assessments are carried out at pre-application stage for large building projects
2. Includes measures to prevent air and noise pollution generated from construction activities
3. Develops with partners, appropriate definitions for all housing needs, and is more explicit about the links to the objectives in his Health Inequalities Strategy
4. Commits to explore with Councils and developers the development of housing policies that promote smoke-free housing
5. Be more explicit and ambitious on the design of homes to ensure physical, mental and social wellbeing is not compromised
6. Ensure that the strategy includes housing suitable for all ages and all vulnerable groups.



7. Use his leadership platform to convene the health service to develop a more consistent and robust role across London in meeting the health and wellbeing needs of people and families experiencing homelessness, and tackling health inequalities experienced by Londoners who are homeless or insecurely housed