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1 Introduction

This impact assessment reviews the impacts of the draft London Housing Strategy (LHS), published for consultation in September 2017. It should be read with that document. The draft LHS sets out the Mayor’s vision, and the policies and proposals behind it, to address London’s housing challenges. This includes £3.15 billion of affordable housing investment through to 2021 and a host of other funding programmes and services provided by the Mayor and his partners. The draft LHS is also a call to action for all organisations with a role in addressing London’s greatest challenge – its housing crisis. The draft LHS covers five key priorities:

• building homes for Londoners;
• delivering genuinely affordable homes;
• high quality homes and inclusive neighbourhoods;
• a fairer deal for private renters and leaseholders; and
• tackling homelessness and helping rough sleepers.

The Mayor’s existing legal powers and responsibilities in relation to the LHS are set out in the Greater London Authority Act 1999 (GLA Act).

This impact review has been conducted in line with the Mayor’s legal duties to carry out full assessments of all his strategies and policies. It covers the equalities, health and health inequalities, and crime and disorder impacts of the LHS. Each of these is assessed in relation to the five priorities of the draft LHS.

The Mayor and Greater London Authority (GLA) are subject to the “public sector equality duty” set out in section 149 of the Equality Act 2010. The GLA, like all public bodies, must have “due regard” to the need to:

1. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under [the Equality Act 2010];

2. advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; and

3. foster good relations between persons who share a protected characteristic and persons who do not share it.

The Act explains that advancing equality of opportunity involves the need to:

a. remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
b. take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and

c. encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in participation by such persons is disproportionately low.

The Act also outlines that fostering good relations involves the need to:

a. tackle prejudice; and

b. promote understanding.

The “protected characteristics” to which this duty applies are as follows:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation
- marriage and civil partnership

The Act is also clear that carrying out these duties may mean treating some people more favourably than others.

Under the GLA Act, the GLA has a duty to act to improve the health of people in Greater London. It must also work to reduce health inequalities under the Greater London Authority Act 2007.

The Mayor has a duty to consider community safety under section 17 of the Crime and Disorder Act 1998.

The Mayor also has legal duties relating to Sustainability Appraisals (including Strategic Environmental Assessments) of his policies. Assessments relating to these duties will be dealt with as part of the development of the London Plan.

The impacts identified here have been assessed generally in line with the relevant legislation, but also through using a set of questions developed by the GLA that are listed in Appendix 1. These broadly match the questions applied to all GLA strategies and policies, but were refined to focus on housing-related impacts.

Each policy and proposal was assessed using these questions, supported by quantitative and qualitative data, where this was available. The assessment was carried out as part of the policy development process for the draft LHS and made available to decision makers. It was produced by GLA officers with some support from the housing consultancy, Altair.
This is a draft impact assessment published alongside the draft LHS. It will be amended to reflect changes to the LHS, but also comments on the assessment itself. Comments on its contents are therefore welcome (see below). A final impact assessment will be published alongside the final version of the LHS.

**HOW TO SUBMIT COMMENTS ON THIS DRAFT IMPACT ASSESSMENT**

Please go to: [london.gov.uk/housing-strategy](http://london.gov.uk/housing-strategy) and submit your response,

email comments to: [housingstrategy@london.gov.uk](mailto:housingstrategy@london.gov.uk) (with 'London Housing Strategy Impact Assessment’ as the subject)

or send your written comments to: London Housing Strategy Impact Assessment City Hall The Queen’s Walk London SE1 2AA

All information in responses, including personal information, may be subject to publication or disclosure under Freedom of Information legislation.

This document can be downloaded from london.gov.uk
2 Equalities

SUMMARY OF IMPACTS

The following table seeks to summarise the primary impacts of the strategy by protected characteristic. These are outlined more fully later in this assessment.

<table>
<thead>
<tr>
<th>1</th>
<th>Age</th>
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<tr>
<td>Young people</td>
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<tr>
<td>1.1 Young people stand to benefit from efforts to increase the supply of homes and particularly of genuinely affordable homes, because they are more likely to experience difficulties with housing costs. They are particularly likely to benefit from investment in intermediate housing options.</td>
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<tr>
<td>1.2 They are also among the likely beneficiaries of the diversification of the construction sector workforce that the draft LHS identifies as one means of increasing housing supply.</td>
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<tr>
<td>1.3 Young people are over-represented in the private rented sector and so may derive particular benefit from measures to improve the quality of properties, management standards, affordability and security of the private rented sector.</td>
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<tr>
<td>1.4 Young people may also benefit from measures to prevent this group from becoming homeless, including funding for supported accommodation for them.</td>
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<tr>
<td>Children</td>
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<tr>
<td>1.5 Children will benefit from the downward pressure on housing costs that increased housing supply, including increased supply of affordable housing, will support. Space standards for new homes and measures to enable under-occupying social housing tenants to move will also help to alleviate overcrowding and its impacts.</td>
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<tr>
<td>1.6 Children, who may have been more exposed to potential negative impacts of redevelopment of social housing because households that include children are over-represented in social rented homes, stand to benefit from policies designed to improve protections for residents.</td>
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<tr>
<td>1.7 Households that include children – and particularly younger children – may benefit both from the provision of new homes in and around town centres and alongside social infrastructure, and from accessibility standards for new homes.</td>
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<tr>
<td>1.8 As young children are particularly prone to the effects of excess cold, they will benefit from proposals to ensure that new homes are energy efficient and to improve the energy efficiency of existing homes.</td>
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<tr>
<td>1.9 Households that include children, whose representation in the private rented sector has increased sharply in recent years, may derive particular benefit from measures to improve the security of the sector.</td>
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<tr>
<td><strong>Older people</strong></td>
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<tr>
<td>1.10 Older people are less likely to benefit from investment in affordable housing aimed at supporting first time buyers.</td>
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<tr>
<td>1.11 However, older people stand to benefit from investment in specialised and supported housing for older people and from provision for social housing tenants to move, since the latter has a particular focus on older people and under-occupying households (among whom older social housing tenants are over-represented). This should help this group move to homes that are more affordable, more accessible, and in areas that better meet their needs.</td>
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<tr>
<td>1.12 Measures to encourage the development of new homes in and around town centres and with social infrastructure may also be of particular value to older people, who may be more dependent on services and suffer from limited mobility.</td>
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<tr>
<td>1.13 As older people are particularly prone to the effects of excess cold, they will benefit from proposals to ensure that new homes are energy efficient and to improve the energy efficiency of existing homes.</td>
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<th><strong>Disability</strong></th>
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<tr>
<td>2.1 People with disabilities, who may have been more exposed to potential negative impacts of redevelopment of social housing because they are over-represented in social rented homes, stand to benefit from policies designed to improve protections for residents.</td>
</tr>
<tr>
<td>2.2 Disabled Londoners are likely to benefit from investment in specialised and supported housing for this group and may also benefit from provision for social housing tenants to move, both because those with disabilities are over-represented in social housing and because their disabilities may give them particular cause to need to move.</td>
</tr>
<tr>
<td>2.3 Measures to encourage the development of new homes in and around town centres and with social infrastructure may also be of particular value to people with disabilities, who may be more dependent on services and suffer from limited mobility.</td>
</tr>
<tr>
<td>2.4 As those with disabilities are particularly prone to the effects of excess cold, they will benefit from proposals to ensure that new homes are energy efficient and to improve the energy efficiency of existing homes.</td>
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<tr>
<td>2.5 Disabled people with limited mobility and wheelchair users will benefit from requirement that new homes should be accessible and 10 per cent of them suitable for wheelchair users.</td>
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<tr>
<th><strong>Gender reassignment</strong></th>
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<tr>
<td>3.1 The very limited availability of data made it difficult to reliably assess potential impacts of the draft LHS on those who are proposing to undergo, undergoing or have undergone a process (or part of a process) for the purpose of reassigning their sex. However, insofar as they are a subset of those who are transgender, they may benefit from funding for specialised housing for those who are LGBT+ and from a requirement that all social landlords ensure their services are inclusive.</td>
</tr>
</tbody>
</table>
4 Pregnancy and maternity

4.1 As both pregnant women and babies are among those most prone to the impacts of excess cold, those with this characteristic are likely to benefit from proposals to ensure that new homes are energy efficient and to improve the energy efficiency of existing homes.

4.2 They may also derive particular benefits from accessible homes as they may well be using prams or pushchairs.

4.3 Otherwise, the limited availability of specific data on this group made it hard to identify impacts, beyond those that affect households including children.

5 Race

5.1 Black, Asian and minority ethnic (BAME) groups are likely to benefit from efforts to increase the supply of homes and particularly of genuinely affordable homes, because they are more likely to experience poverty and are disproportionately affected by overcrowding. Because of the latter, they will also benefit from space standards for new homes and measures to enable under-occupying social housing tenants to move.

5.2 BAME groups, who may have been more exposed to potential negative impacts of redevelopment of social housing because they are over-represented in social rented homes, stand to benefit from policies designed to improve protections for residents.

5.3 Because of their over-representation in social rented homes, Londoners from BAME backgrounds may derive particular benefit from provision for social housing tenants to move.

5.4 BAME groups may benefit from measures to encourage currently under-represented groups into the construction sector.

5.5 Those from BAME backgrounds stand to benefit from more energy efficient homes insofar as they are more likely to experience poverty.

5.6 Some BAME groups may benefit from funding for supported and specialised accommodation for these groups.

5.7 People not defined as Londoners are likely to find that their opportunities to buy homes in London are reduced by steps to make more new homes available to Londoners before anyone else. However, these measures may also improve the opportunities for Londoners who are from BAME backgrounds to buy such homes.

5.8 Because those from BAME backgrounds are over-represented in the private rented sector and non-UK nationals are at particular risk from poor landlords, they may derive particular benefit from measures to improve the quality of properties, management standards, affordability and security of the private rented sector.

5.9 As those from BAME backgrounds experience homelessness at a disproportionate rate, they will benefit from the downward pressure that increased housing supply, including increased supply of affordable housing, will exert on rates of homelessness. They will also benefit from a focus on the prevention of homelessness and measures to ensure that those who do become homeless are supported into sustainable accommodation.
5.10 Non-UK nationals, over-represented among the rough sleeping population, may benefit from measures to support people off the streets, although Government immigration and welfare policies mean that they will be treated differently from UK nationals found sleeping on the streets.

6 Religion or belief

6.1 The limited availability of data on the extent to which those who hold a particular religion or belief, including no religion or belief, are subject to particular housing problems, made it difficult to reliably identify potential impacts across the board. However, to the extent that households with some religious beliefs belong disproportionately to BAME groups, they are likely to experience impacts identified for those from BAME backgrounds against the race characteristic above.

6.2 Those with some religious beliefs, who may have been more exposed to potential negative impacts of redevelopment of social housing because they are over-represented in social rented homes, stand to benefit from policies designed to improve protections for residents.

6.3 In that those with some religious beliefs are disproportionately affected by overcrowding, they will benefit from the downward pressure on housing costs that increased housing supply, including increased supply of affordable housing, will support. Space standards for new homes and measures to enable under-occupying social housing tenants to move will also help to alleviate overcrowding and its impacts.

6.4 Because those with some religious beliefs and those with no religion are over-represented in the private rented sector, they may derive particular benefit from measures to improve the quality of properties, management standards, affordability and security of the private rented sector.

7 Sex

7.1 Women stand to benefit from efforts to increase the supply of homes and particularly of genuinely affordable homes, because there are a number of indications that they are more likely to experience poverty.

7.2 Women, who may have been more exposed to potential negative impacts of redevelopment of social housing because single parent families, where parents are predominantly female, are over-represented in social rented housing, stand to benefit from policies designed to improve protections for residents.

7.3 Women who are single parents or victims of domestic abuse experience homelessness at a disproportionate rate, so they will benefit from the downward pressure that increased housing supply, including increased supply of affordable housing, will exert on rates of homelessness. They will also benefit from a focus on the prevention of homelessness and measures to ensure that those who do become homeless are supported into sustainable accommodation. Victims of domestic abuse will benefit from measures to support this group, including funding to develop or redevelop refuges and for move on accommodation for those ready to leave them.

7.4 Women may benefit from measures to encourage currently under-represented groups into the construction sector.
| 7.5 | Women are likely to benefit from more energy efficient homes and the resulting improvements in air quality insofar as they are more likely to experience poverty and because single parent households, in which parents are predominantly female, disproportionately experience fuel poverty. |
| 7.6 | As a small minority of rough sleepers who tend to seek more secluded sleeping sites, female rough sleepers may be less likely to be seen and assisted by services to help rough sleepers off the streets. However, specific provision is made to ensure that they do receive assistance. |
| 8 | Sexual orientation |
| 8.1 | There is an absence of data on the extent to which those who identify as LGBT+ experience difficulties covering housing costs or occupy particular types of housing and limited data on the extent to which they are subject to particular housing problems. This means that it has only been possible to identify a limited number of impacts here. |
| 8.2 | There is some evidence that those who identify as LGBT+, and particularly younger people, are more likely to experience homelessness. To this extent, they may benefit from the downward pressure that increased housing supply, including increased supply of affordable housing, will exert on rates of homelessness. They may also benefit from a focus on the prevention of homelessness and from measures to ensure that those who do become homeless are supported into sustainable accommodation and to prevent young people becoming homeless, including funding for supported accommodation for them. |
| 8.3 | LGBT+ Londoners may also benefit from funding for specialised housing for that group and from a requirement that all social landlords ensure their services are inclusive. |
| 9 | Marriage and civil partnership |
| 9.1 | This assessment does not identify any ways in which there is a risk that policies or proposals contained in the draft LHS may adversely impact those who possess this characteristic. |

As individual policies within the draft LHS are adopted and implemented, GLA decision-making processes require that their potential impacts on those with protected characteristics are considered. This will ensure more detailed consideration of the impacts of particular policies and proposals than is possible within the scope of an assessment of the draft LHS.

**BASELINE**

**Supply and affordability**

The affordability pressures\(^2\) that result from a long term undersupply of homes of all tenures, and particularly affordable homes, in London (see chapter two of the draft LHS) are one important respect in which housing impacts a range of those with protected characteristics.
Those with some protected characteristics are more likely to experience poverty, which is both a cause and a symptom of them struggling with the cost of housing. Specifically:

• Londoners from BAME backgrounds are more likely to live in poverty than white British people: 32 per cent of BAME Londoners live in poverty, compared to 17 per cent of white British Londoners. Gypsies and Travellers can face particularly acute difficulties securing accommodation that meets their needs.

• Insofar as those with some religious beliefs – Buddhists, Hindus, Sikhs, and particularly Muslims – are more heavily represented among London’s BAME population, they too may be more likely to live in poverty.

• Disabled residents are also more likely to be living in poverty: 33 per cent of London households where someone is disabled are living in poverty, compared to a London average of 25 per cent.

• Young people are more likely to be unemployed: the unemployment rate for London young adults is 2.5 times higher than for adults aged 25-64. Even when in work, young adults may well be on low pay. It is also striking that young people are increasingly concerned about high housing costs. In a London First survey of London employees, 70 per cent of respondents in the 25-39 age group said that they found the cost of living and working in London difficult and 41 per cent of these said that they would consider leaving London to work elsewhere.

• Although it is difficult to quantify and compare poverty by gender, women are disproportionately likely to be economically inactive, low paid, and/or subject to the poverty that affects single parent families.

• Although specific data is not available for those who are pregnant or have given birth within the last 24 weeks (the pregnancy and maternity characteristic), it is therefore likely that those in this group are also disproportionately likely to experience these conditions – especially given the reduction in income that can take place in later pregnancy or after giving birth.

Data on relative levels of poverty by sexual orientation, or for those who are preparing for, undergoing or have undergone gender reassignment is not readily available. This makes it more difficult to identify potential impacts for those with these characteristics reliably.
Housing tenure

The disproportionate extent to which those with some protected characteristics struggle to afford housing is one factor in their uneven distribution across housing tenures – and therefore the extent to which they experience particular opportunities or problems associated with different tenures.

For example, the fall in home ownership among Londoners in recent decades has been most acute among younger Londoners. In 1990, 25 per cent of owner occupied households in London were headed by someone aged 16-24, and 57 per cent by someone aged 25-34 who owned their home. But by 2014, these figures had fallen to six per cent and 26 per cent respectively. Conversely, older Londoners are over-represented among owner occupiers.

Young Londoners are over-represented in the rapidly growing private rented sector and the proportion of households in the sector with children has also increased: 36 per cent now have dependent children, up from 30 per cent in 2005/06. This implies an increase in the proportion of Londoners who are pregnant or have had a baby in the last 24 weeks in the sector, although specific data is not available. BAME people are also disproportionately represented in the private rented sector: they are almost twice as likely to rent privately as white British people. Those with some beliefs – Buddhists, Hindus, Muslims and those who describe themselves as having no religion – are more heavily represented in the private rented sector too. Thus, all of these groups are more likely to experience the above-average levels of poverty found among Londoners living in the private sector and the poorer property conditions that characterise its homes.

BAME groups are also more likely to live in social housing in London. The 2011 census shows that 26.9 per cent of London’s BAME population lived in social housing in 2011, compared to 21.3 per cent of the white British population. Those with some religious beliefs – Muslims and Christians – are also over-represented in this tenure. Children are more likely to live in the social rented sector: under 16s account for 20 per cent of all Londoners, but 27 per cent of those living in social rented accommodation. This implies an over-representation of Londoners with the pregnancy and maternity protected characteristics, although no specific data is available. The proportion of single parent households in social rented
housing in London is about double that of the whole population. This in turn indicates a greater representation of women, who head the majority of single parent households, in the sector.

Londoners who report that their day to day activities are limited by a long term health condition or disability are disproportionately likely to live in social rented housing: they account for 13.8 per cent of all Londoners, but 23.1 per cent of those living in social rented housing.

The representation of particular groups in social housing reflects not just affordability pressures but the allocation criteria for such housing. These mean that, for example, those with disabilities that may create medical grounds for needing to move and those who have experienced homelessness (see below), are more likely to be allocated social housing.

There is scope for some of these patterns of representation across different housing tenures – and the property wealth inequality that they reflect - to be compounded by further falls in home ownership, and further increases in property values compared with other assets (e.g., pensions or savings).

Data on the distribution of Londoners across different tenures by sexual orientation, or for those who are preparing for, undergoing or have undergone gender reassignment is not readily available. This makes it more difficult to identify potential impacts for those with these characteristics reliably.

It is also difficult to reliably or precisely identify the potential impact of policies and proposals relating to the leasehold tenure on leaseholders with different protected characteristics, because there is a dearth of data on the profile of leaseholders within London.

**Particular housing problems**

In addition to experiencing the pressures of housing supply and affordability and occupying particular tenures differently, those with some protected characteristics are more likely to experience particular problems with housing, including living in homes that do not suit their limited mobility, overcrowding, homelessness or rough sleeping.

Older and disabled people are particularly likely to have limited mobility and may therefore struggle in accommodation that is neither
accessible nor adapted – a particular issue with the older homes that account for the bulk of London’s housing stock. Those with small children, including those with the maternity protected characteristic, may also find the physical characteristics of some homes challenging.

Overcrowding, which is particularly severe in London, disproportionately affects those on low incomes, and – specifically – those with certain protected characteristics:

- By its nature, overcrowding is most likely to affect households that include children. As well as this impact on the youngest Londoners, it also seems likely that those with the maternity protected characteristic are more likely to experience overcrowding.
- BAME households are more likely to live in overcrowded accommodation than children in white households across all housing tenures. Overcrowding is most severe among Pakistani, Bangladeshi and black African households.
- Those from some religious groups – Buddhists, Sikhs, Hindus and particularly Muslims – experience overcrowding at above-average rates.

Standard data sources on overcrowding do not cover the representation of those who are disabled, those who preparing for, undergoing or have undergone gender reassignment, or those of different sexual orientations among those who are affected by overcrowding. This makes it difficult to reliably identify potential impacts on Londoners with those characteristics.

Those with some protected characteristics are also more likely to experience homelessness, including the following:

- Londoners with BAME backgrounds, and so potentially those with some religious beliefs (see above): 40 per cent of Londoners identify themselves as coming from BAME groups, whereas 68 per cent of homeless households whom London authorities assisted during 2016/17 did so.
- women:
  - Lone parent households in which the parent was female accounted for 37 per cent of homeless households accommodated in temporary accommodation by London boroughs at the end of 2016/17, compared to eight per cent of all London’s households.
with conditions that might be identified as disabilities are over-represented, given that 47 per cent of those whose support needs were assessed identified as having a support need related to their mental health.

BUILDING HOMES FOR LONDONERS

The policies presented in chapter three of the draft strategy focus on increasing the supply of homes in London. This is likely to have a broadly positive impact on those with some protected characteristics. This is because an increase in supply should reduce the costs of housing, thereby improving affordability – something that, as established in the baseline, particularly affects those with a range of protected characteristics. It should also help to ease the problems of overcrowding and homelessness, problems that result in part from the inadequate supply of homes and disproportionately affect those with some protected characteristics.

These potential benefits to those with some protected characteristics are enhanced through policies and proposals on the affordability, quality and type of housing to be delivered that are set out in in chapters four and five of the draft LHS.
Increased supply may have potential short-term negative impacts for those with some protected characteristics. Re(development) may require some of them to relocate, which is likely to be disruptive. In particular, Policies 3.1 and 3.2 encourage land use intensification in existing residential areas, which may include existing social housing estates. This has the potential to displace some social housing tenants who, as established in the baseline for this assessment, are disproportionately likely to have certain protected characteristics. Proposal 3.1D also allows for the use of Compulsory Purchase Orders for this purpose. Displacement may have a negative impact on households, especially if they are not able to return.

However, the draft LHS contains measures to mitigate these problems. First, increasing the proportion of affordable housing in new developments – in line with Policy 4.2 – will benefit those with some protected characteristics who find it difficult to cover the costs of market housing. Second, Proposal 4.3D protects the number of affordable homes on estates that undergo regeneration. Third, redevelopment is also likely to provide higher quality housing. Fourth, by requiring a clear public interest case for use of Compulsory Purchase Orders (Proposal 3.1D), working in partnership with the local community (Proposal 5.3A) and in line with the Mayor’s good practice guide for estate regeneration (Proposal 5.3E), regeneration schemes should offer full rights of return for displaced tenants. Fifth, it is worth noting that regeneration of social housing estates is only likely to account for a small proportion of the overall supply of new homes and to affect a small proportion of Londoners who live on social housing estates.

More broadly, if the housing crisis is not tackled, then displacement of those with protected characteristics from many areas may happen anyway, as people are driven out by rising prices and rents.

In seeking to develop new homes close to existing communities, employment and transport links, Policy 3.1 will help to preserve and promote local diversity, reducing the risk that those who struggle to afford housing – which includes those with some protected characteristics – become concentrated in particular areas with lower housing costs. This is likely to prove beneficial to equality of opportunity and relations between those who do and do not have protected characteristics.
Policy 3.2 seeks to unlock housing delivery by investing in infrastructure improvements, including transport. This approach will help households with accessibility and mobility needs, such as older and/or disabled people and households with young children. It also reduces reliance on cars. Given their associated costs, this may benefit those with protected characteristics who are disproportionately likely to experience poverty. The provision or improvement of infrastructure will benefit those with some protected characteristics who may be more likely to rely on local services – for example, those with disabilities, older people, households that include children and those who are pregnant or have recently had a baby. It may also maximise opportunities for those with some protected characteristics who are more likely to experience unemployment or be in low paid work to secure, sustain and progress in employment.

Support for the Build to Rent sector, outlined in Proposal 3.3A, will add high quality, well-managed homes to the private rented sector. This has the potential to assist some of those with some protected characteristics who are concentrated in that sector and therefore disproportionately subject to the poorer condition of homes in the sector and the poor standards of management that occur in parts of it. Build to Rent homes have typically been let at the upper end of the private rented sector and so they will arguably deliver little benefit for lower income groups. However, the proposal seeks to mitigate against that risk by encouragement that some of the Built to Rent homes the Mayor intends to support should be let at London Living Rent levels.

The policies set out in chapter three are likely to create new jobs and deliver other economic benefits that result from new house building. (Each new home is estimated to create two new jobs in construction and related parts of the supply chain. Local population growth through housebuilding can also boost local employment: the GLA estimates that every extra 1,000 residents have the potential to create a further 171 local jobs.) Policy 3.4 seeks to ensure that these benefits are felt by those with some protected characteristics who may not otherwise do so. It seeks to fill the construction skills gap by encouraging under-represented groups into the construction sector, in particular, young people, women and those from BAME backgrounds. As well as benefitting these groups, it is also likely to foster good relationships between them and other Londoners.
Tackling the affordability of housing should also help to address some of the specific housing problems, notably overcrowding and housing, that disproportionately affect those with certain protected characteristics.

While a substantial commitment has been made to providing affordable homes at low cost rents that are affordable to the poorest Londoners, the Mayor’s agreement with Government means the majority of new affordable homes funded in line with Policy 4.1 and Proposal 4.2B will be for the ‘intermediate’ market – i.e., for middle income Londoners. This may mean there is less of a positive impact for some lower income households, among whom those with protected characteristics are over-represented, for whom low cost rent homes would be more appropriate. The forms of intermediate housing funded by the Mayor may also be more suitable for younger people, because of their emphasis on home ownership – something that may be more viable for those able to take out a mortgage over an extended period.

However, it is clear that middle income Londoners and especially younger people experience difficulties accessing secure housing. It should also be noted that the balance of affordable housing tenures represents a balance between meeting different forms of need and maximising the overall delivery of

**DELIVERING GENUINELY AFFORDABLE HOMES**

**Policies 4.1 and 4.2** seek to increase London’s supply of affordable housing and ensure that new affordable homes are genuinely affordable. For those with range of protected characteristics, whom the baseline established face particular pressures around the affordability of housing, an increased supply of genuinely affordable homes is likely to be one of the most significant impacts of the draft LHS. By improving the affordability of housing, these policies may also leave those on lower incomes with more disposable income, so enabling them to participate more fully in the city’s life and thereby helping to foster good relations between and beyond groups.

It will also protect London’s diverse neighbourhoods from being undermined by growing unaffordability, by allowing some of those from lower income groups (among whom some of those with protected characteristics are disproportionately represented) to remain in those areas, where they might otherwise have moved to a cheaper area of the city or out of London. This may, in turn, mean they can more readily secure, sustain and progress in employment. It will also help promote good relations between those with some protected characteristics and others.
affordable homes, within the context of national policy and available funding. Moreover, the draft LHS sets out a commitment to making the case to Government for additional funding to support more homes for low cost rent.

Proposal 4.3A aims to open up opportunities to move for those in social rented housing. This will benefit those with some protected characteristics who are more likely to live in that sector (as outlined in the baseline) and those who may have particular reasons to want to move, some of them related to protected characteristics.

This proposal may help tenants move to accommodation where rents are more affordable, perhaps because the homes are smaller (which may, in some cases, mean that tenants cease to be subject to Social Sector Size Criteria), and therefore also cheaper to maintain – for example, because they are less expensive to heat. It may enable people to move closer to their work and/social support networks. The proposal may benefit specific groups who may be more likely to need or want to move. For example:

• The Mayor’s mobility schemes will give priority to those – predominantly women – who have suffered domestic abuse and sexual violence.
• Older people, who may wish to move to be nearer family or friends and/or into accommodation that is smaller and/or better suited to their needs, also stand to benefit.
• Voluntary moves may help tenants with limited mobility, including older people and/or those with disabilities, to move to a home and/or location that better suits their needs. This may include properties that are more accessible, or have necessary adaptations, or are in areas closer to facilities they need, with better transport provision, or nearer family or friends who can provide assistance.
• Overcrowded households, among whom those with particular protected characteristics are over-represented, will benefit indirectly from this policy. By providing opportunities for under-occupiers to move to smaller homes, it will help to free up larger homes in the social rented sector.
Policies 4.3C and 4.3D aim to preserve affordable housing in high-value areas, and will thus make a particular contribution to maintaining mixed communities across London. The benefits of this for those with certain protected characteristics are outlined above. Proposal 4.3D has a key part to play, in combination with Proposal 5.3E, in mitigating the potential displacement of those in social housing, among whom those with protected characteristics are over-represented, that can result from estate regeneration schemes.

HIGH QUALITY HOMES AND INCLUSIVE NEIGHBOURHOODS

Proposal 5.1A seeks to ensure that new homes are more energy efficient and Proposal 5.1B that the energy efficiency of existing homes is improved, through a programme of investment. Energy efficient homes are more cost effective to run. This will particularly help those on lower incomes, who disproportionately include those with certain protected characteristics. It will particularly benefit single parents, who are more likely to be women, as they disproportionately experience fuel poverty41. The savings to these groups should increase their disposable income, potentially helping them participate in city life. Energy efficient homes will benefit those in groups most prone to the adverse effects of excess cold, including young children, pregnant women, older people and those with disabilities42.

More energy efficient homes will also contribute to improvements in air quality. Although such improvements will benefit all Londoners, there is evidence that lower income households, among which those with a number of protected characteristics are disproportionately represented, are most affected by poor air quality43.

There is a risk that the energy efficiency standards required through Proposal 5.1A may add to the cost of constructing new homes. This may in turn push up house prices, to the detriment of those with particular protected characteristics who find it most difficult to afford housing in London. However, over time, these increased costs could be absorbed into land values and the general cost of housing development.

Proposal 5.1B includes improvements to the energy efficiency of private rented sector housing. In combination with policies on improving private renting contained in chapter six of the draft LHS, this will be of particular benefit to those with particular protected characteristics who are over-represented in the private rented sector, as established in the baseline for this assessment.
Policy 5.1A also calls for tenure-blind developments with well-designed public realm. These can help promote equality of opportunity and create opportunities for Londoners from different backgrounds, including those with and without particular protected characteristics, to mix.

Proposal 5.2A, which seeks to ensure that new homes are accessible, will directly help those with mobility needs. This includes those with disabilities, older people, and families with young children (including some of those with the pregnancy and maternity protected characteristic). Accessible homes will enable those with particular mobility needs to more actively participate in city life. A specific requirement for 10 per cent of all new homes in London to be suitable for wheelchair users will increase the supply of housing suitable for disabled people who use wheelchairs.

Proposal 5.2B includes the provision of funding for types of housing that meet specific housing needs, particularly those of Londoners with a range of protected characteristics. This includes funding accommodation for older and disabled people and some young people, particularly those leaving care; new sites, and improvements to existing sites, for Gypsies and Travellers; and housing for specific BAME communities and LGBT+ Londoners. (Women may also indirectly benefit from funding for older people, insofar as they account for a higher proportion of older Londoners than men\(^44\).) This is likely to improve the availability of accommodation that meets the needs of these groups and help them to lead more active lives. Data suggests that some BAME groups are over-represented among those with mental health problems. So, they may particularly benefit from an increase in supported housing for those with mental health problems\(^45\).

Enabling vulnerable Londoners to live independently in appropriate supported housing gives them the opportunity to be part of, and participate fully in, their community. In addition, Londoners living in supported housing may often receive advice and assistance to help them secure work or training. This can improve their economic circumstances and thus promote social inclusion.

Londoners who identify as LGBT+ should also benefit from the Mayor’s expectation that all social landlords ensure that their services are inclusive of this cohort.

Proposal 5.3A supports community-led housing. This will provide access to homes for groups who might otherwise have limited ability to access homes. (Forms of community-led housing, such as community land trusts or cooperative
Proposal 5.3C’s commitment to making the delivery of housing more transparent and open will help Londoners participate in decision-making. This should lead to planning proposals better meeting the diverse needs of those living in neighbourhoods where development takes place, including the needs of residents with protected characteristics.

Proposal 5.3D’s commitment to consider steps to make more new homes available to Londoners before anyone else may be construed as discriminating against those of particular nationalities, and therefore races or ethnicities, whose capacity to buy homes in London will be reduced. However, the proposal is not intended to reduce their capacity to buy these homes because of their nationality and therefore race and ethnicity, but because they are not resident in London or planning to move to the capital. Moreover, this proposal aims to benefit Londoners with particular protected characteristics, including those from BAME groups, who are resident in the city – and they are currently among those who find it most difficult to afford to buy homes in the city.

Community-led housing will support Londoners’ ability to be involved in the location, design and specification of their homes. This will bring together people from a range of backgrounds with a shared purpose. Thus, community-led housing will encourage active participation and decision-making, potentially fostering equality of opportunity and good relations between those who have a particular protected characteristic and those who do not.

Proposal 5.3B ensures the provision of social infrastructure with new housing development. This will mean that facilities such as school places, healthcare and open spaces will be there for residents to use. This will support their fuller participation in community life. It will especially help those most reliant on social infrastructure, which may include those with a number of protected characteristics, such as families with or expecting children, those with disabilities, and older people. Building housing with social infrastructure can also help promote social inclusion.
Those with protected characteristics who are over-represented in social housing also stand to benefit from Proposal 5.3E, which calls on Government to introduce reforms that enhance the rights and regulation from which social housing tenants benefit.

Where estate regeneration projects engage residents of social housing, in line with Proposal 5.3E, as well as also meeting the requirements relating to the replacement of affordable homes outlined in Proposal 4.3D, this should help ensure that the needs of those in social housing, among whom those with certain protected characteristics are over-represented, are protected, as well as preserving the diversity of neighbourhoods.

A FAIRER DEAL FOR PRIVATE RENTERS AND LEASEHOLDERS

Proposals 6.1B, 6.2A, 6.3A and 6.3B of the draft LHS aim to strengthen renters’ and leaseholders’ rights and the opportunities that they have to uphold them. Although those with a number of protected characteristics are more likely to be living in the private rented sector and therefore stand to benefit from these proposals, there is, as yet, limited evidence around whether those with particular protected characteristics are more adversely affected by poor management in the private rented and leasehold sectors than other groups. Moreover, it is also difficult to know whether those with particular protected characteristics are disproportionately subject to the problems faced by leaseholders due to a dearth of information about the profile of that group. However, these proposals should have a beneficial effect in helping those who may be more broadly discriminated against to report discriminatory behaviour in both the private rental and leaseholder markets.

Policy 6.1 aims to improve property standards and management practices in the private rented sector. The proposals target the worst parts of the sector, where low income households, among which those with several protected characteristics are over-represented, are most likely to live. They are therefore likely to have a positive impact on people with those protected characteristics.

There is a risk that improvements to property standards and management practices in the private rented sector yield unintended adverse consequences for those with some protected characteristics. This could occur if the improvements resulted in landlords and agents raising rents, increasing the financial pressures on tenants.
The Government’s Right to Rent policy has also been shown to be potentially discriminatory against non-UK nationals. They therefore stand to benefit from Proposal 6.1A’s call for a review of this policy.

The ending of a private rented sector tenancy is now the most common reason for homelessness in London. In tackling affordability and security of tenure, Proposals 6.2A to C should benefit those with certain protected characteristics who are more likely to become homeless, as established in the baseline for this assessment.

Proposal 6.2A, which aims to improve security of tenure, will have a particular positive impact on the large and growing number of children living in the private rented sector. Their social and educational development may be harmed through having to change schools regularly. Greater security may also benefit older and/or disabled people living in the sector, in that they may particularly value this.

It is possible that Proposal 6.2A could have unintended negative impacts for those with protected characteristics who are over-represented in the private renting sector. This group may already face unfair treatment and may be more vulnerable to exploitation, harassment, and unsafely housed by criminal landlords. Proposal 6.2A could mitigate these potential adverse impacts by seeking to improve the affordability and security of tenure for those at risk of homelessness.

Non-UK nationals (and therefore those of particular races and ethnicities) are more likely to be exploited, harassed, and unsafely housed by criminal landlords. This group is therefore likely to benefit from Proposals 6.1A and 6.1B, which seek to tackle criminality among landlords and agents in the sector. However, enforcement action against poor standards in the private rented sector may identify some non-UK nationals who are in the UK illegally and result in them being removed from the country. While this may be experienced as a negative outcome by those removed, their removal would need to be in line with the UK’s migration policy and it is outside the scope of the draft LHS to address any deficiencies in the decision-making process through which migration policy is implemented.
rented sector. Improving security in the sector may mean that landlords and agents become less willing to let to tenants whom they perceive may be more likely to accrue rent arrears and/or behave in an anti-social manner. This might further limit housing options for, for example, benefit claimants, among whom those with certain protected characteristics are over-represented. However, the draft LHS makes clear that the Mayor will work with groups that represent both landlords and tenants in the course of developing a London Model for the private rented sector. This exercise should allow for risks such as this to be identified and addressed.

**Proposal 6.2A** also recommends that measures which discriminate against welfare claimants, such as ‘No DSS’ property adverts, be banned\(^49\). Since welfare claimants are more likely than the wider population to have protected characteristics\(^50\), those with protected characteristics stand to benefit from the proposal.

**Proposals 6.2C** calls on the Government to review welfare provision for private renters and improve affordability in London’s private rental market. This will have a beneficial effect for the low income households in the sector\(^51\), among whom those with a number of protected characteristics are over-represented. Their housing options are significantly reduced because of the limited amount of housing affordable to them and they cannot simply change accommodation if they have problems in private rented accommodation. There is some evidence that suggests households dependent on benefits to cover private sector rents may have relocated to cheaper areas of the capital\(^52\). A review of support available to private sector tenants might help to slow or reverse any such displacement, with its attendant negative impacts on those with protected characteristics.

**Proposals 6.3A and 6.3B** support reform to leasehold and better advice and support for existing leaseholders. This should have positive benefits for those on lower incomes, among whom those with certain protected characteristics are over-represented, who may struggle with high service charges in the leasehold sector.

Improved provision of information and guidance for leaseholders, as outlined in **Proposal 6.3B**, should ensure that leaseholders and freeholders have a better understanding of their rights and obligations when adapting their properties. This should enable leaseholders with additional access needs - in particular, older people and those with disabilities - to live as independently as possible.
TACKLING HOMELESSNESS AND HELPING ROUGH SLEEPERS

By seeking to make the prevention of homelessness in all its forms a key priority and ensure that Londoners who do become homeless are helped into sustainable accommodation, **Policy 7.1** is likely to have a positive effect on those with certain protected characteristics who are disproportionately likely to experience homelessness.

Both preventing homelessness and working with local authorities to improve accommodation options for homeless households may help reduce, or at least limit the increase in, the number of homeless households being accommodated away from their communities, support networks and sources of employment. As well as having direct benefits for those households, this should also enable more Londoners who experience homelessness to remain in the capital. This may help to preserve London’s diversity.

The policy also makes particular commitments around preventing young people from becoming homeless, including by funding accommodation through the Platform for Life programme. Young people who enter this accommodation are likely to benefit from better life chances – for example, as a result of support to sustain and progress in education, employment or training.

For homeless households who are placed in unfamiliar areas, **Proposal 7.1B** may have a positive impact. It encourages boroughs to ensure that they receive the support they need. This may encourage and equip them to participate in communities and civic life in their new location.

**Proposal 7.1B** endorses recommendations that local authorities be transparent about their allocation of accommodation for homeless households. This particular proposal may help to promote a culture of equality and fairness, as well as ensuring that the households most in need of local accommodation – a group likely to include some of those with protected characteristics, such as those with disabilities who rely on local support or services – are appropriately prioritised.

**Proposal 7.1B** also includes the provision of funding for accommodation for victims of domestic abuse, both refuges and accommodation for those ready to move on from them. Such provision assists in reducing poverty and social exclusion for this group. This proposal is therefore likely to benefit the disproportionate number of women who experience domestic abuse.
Policy 7.2 commits to supporting rough sleepers off the streets and helping them to avoid returning there. This means rough sleepers will be removed from the acute risk and social isolation that sleeping rough creates. This will benefit those with certain protected characteristics whom the baseline for this assessment identifies as disproportionately likely to be seen sleeping on London’s streets.

There is a risk that female rough sleepers, who constitute a minority of all those seen in London’s streets\textsuperscript{54}, will derive less benefit from the support this policy seeks to put in place for rough sleepers. This is because, as explained in the baseline for this assessment, they are thought to be more likely to sleep in secluded locations and therefore less likely to be identified by services that provide assistance to rough sleepers. There is some mitigation of this risk within the draft LHS, in that the Rough Sleeping Innovation Fund included in Proposal 7.2B makes women a priority group – in recognition and support of the distinctive approach that may be needed for this relatively small but highly vulnerable group. Female rough sleepers may also derive particular benefit from the Hostel Clearing House outlined in Proposal 7.2C, insofar as this may help rough sleeping services better utilise the limited number of hostel spaces available for women.

Plans outlined within Proposal 7.2B, to seek funding for additional assistance for non-UK nationals seen sleeping rough, may be construed as discriminatory insofar as they propose treating non-UK nationals who sleep rough in London differently from UK nationals who do so. However, the scope for the Mayor and other partners involved in tackling rough sleeping to treat rough sleepers of all nationalities in the same way is constrained by two factors. First, unless they are working or have a documented history of significant employment in the UK and have become unable to work, EU nationals are unlikely to be entitled to the welfare benefits that they probably need to cover the costs of accommodation. The same is true for nationals of non-EU states whose immigration status is unclear. Second, Government policy is to treat EU nationals sleeping rough as abusing EU free movement rights. These constraints necessitate differentiation in support for rough sleepers dependent on their nationality. In the context of Government policy, EU nationals returning to their home country, with appropriate support for those who are vulnerable, is likely to leave them at less risk than would be the case if they continued to sleep rough in the UK.
The services and improved accommodation provision outlined in Proposals 7.2B and 7.2C will ensure that rough sleepers receive assistance with a range of issues, such as health, welfare benefits, training and employment, and – for those assisted through the Clearing House and Tenancy Support Teams – settling into local communities. These things will deliver long term benefits to those with protected characteristics who are more likely to sleep rough, above and beyond the immediate provision of shelter.

Moreover, any new accommodation delivered through Proposals 7.1B and 7.2C will meet the accessibility and space standards detailed in chapter five of the draft LHS. These homes would therefore have a positive impact in providing suitable accommodation for homeless households, including victims of domestic abuse, and rough sleepers with disabilities or other constraints on their mobility, such as older people or parents with small children.
3 Health and health inequalities

SUMMARY OF IMPACTS

The overall impact of the draft strategy on the health and wellbeing of London’s population is likely to be neutral or positive in the short term, and positive over the medium and long term.

In the short term, there are likely to be some negative impacts from increased construction on existing residential sites. However, these negative impacts could be reduced by the use of precision manufacturing - something supported by the strategy.

There are a number of measures that will have positive health impacts in the short to medium term. These include more secure and better quality private rented accommodation, preventing homelessness and ensuring that those who do become homeless are supported into sustainable accommodation, and ensuring that there is a route off the street for every rough sleeper.

Longer term, increases in the supply of housing, particularly affordable housing, are likely to reduce stress and anxiety related to the affordability of housing, as well as relieving poverty and thereby easing its adverse impacts on health. The focus on the quality of housing in both the private rented sector and in new housing supply in general, including on its energy efficiency, is also likely to improve the physical health of Londoners.

BASELINE

Introduction

The relationship between housing and health is complex and linked to other socio-economic determinants of health, such as income. However, there is extensive evidence to show that housing has an important effect on health - for example, the Marmot Strategic Review of Health Inequalities. A number of housing-related factors are now included in the Public Health Outcomes Framework for England 2016 to 2019.

Poor conditions

The impacts of poor quality housing on health are well documented. These are particularly acute for children, as well as pregnant women, older people and those with disabilities. Conditions such as damp, indoor pollutants and excess cold have all been shown to be associated with physical illnesses, including eczema, hypothermia and heart disease. The Building Research Establishment has estimated that poor quality housing costs the NHS £1.4 billion a year nationally, with £500m of that cost directly related to older people.
Such problems are particularly likely to affect those living in the private rented sector, because the prevalence of homes that fall short of the Decent Homes standard is disproportionately high there\textsuperscript{62}. For example, in 2011, it was estimated that 82,000 privately rented properties in London were associated with excess cold. The resulting cost to the NHS is £18.9m per year\textsuperscript{63} and each London borough spends around £27,000 per day treating problems associated with cold homes\textsuperscript{64}.

**Affordability and security**

Housing problems and particularly issues around the affordability and security of housing can contribute to mental ill health\textsuperscript{65} - something that evidence suggests is a particular problem in London\textsuperscript{66}. More than half of Londoners report that housing costs cause them a great deal or a fair amount of stress. There are clear differences by tenure. Thirty-nine per cent of homeowners say they are stressed by housing costs, compared to 63 per cent of social renters and 75 per cent of private tenants. Those aged 65 or more are less likely (38 per cent) to report stress than 18-34 year olds (62 per cent)\textsuperscript{67}.

As well as reporting a high rate of stress about housing costs, there is evidence that those living in the private rented sector experience negative impacts on mental health from the insecurity of the sector. They are thought to bear particularly heavily on households with pre-existing vulnerabilities, such as those with young children or older people\textsuperscript{68}.

**Overcrowding, homelessness and rough sleeping**

Some specific housing problems that reflect broader affordability pressures are closely associated with poor physical and mental health.

For example, overcrowding can contribute to stress and anxiety, disrupt sleep, inhibit children’s development because they lack space to play, and increase the risk of accidents, and there is some evidence that it is associated with physical ill health\textsuperscript{69}.

Homelessness is intrinsically stressful, but there is also evidence that homeless households who spend time in temporary accommodation may experience negative impacts on
their health and wider wellbeing. Recently published research describes health hazards from mould, faulty electrics, animal infestations, and cramped conditions in temporary accommodation. Some people in temporary accommodation also reported that it was difficult to store and prepare fresh food. People described deterioration in their own or their partner’s mental health and, in most cases, that of their children. These findings are supported by earlier research that established that temporary accommodation worsens health and wider wellbeing. Education, job opportunities and child development were all found to be affected.

Homeless households accommodated away from their local areas may face particular pressures. Research published in 2016 on the increase in homeless households placed out of borough highlighted how factors such as disruption to education and loss of support from extended family contributed to poor mental and emotional health.

Those who sleep rough (8,108 individuals were seen sleeping rough in 2016/17) suffer disproportionately from physical and mental health problems. Health problems can contribute to them ending up on the street, and deteriorate while they sleep rough. Forty-seven per cent of those seen sleeping rough in London in 2016/17 were assessed as having mental health problems. (Both physical and mental health problems can be made worse by alcohol and drug abuse.) And in 2016/17, 44 per cent of rough sleepers were assessed as having alcohol related support needs, while 35 per cent had support needs associated with drug abuse. Rough sleepers are also more likely to catch some infectious diseases, including TB. The difficulties that rough sleepers can have in accessing primary care also mean that health conditions can deteriorate unnecessarily. As a result, rough sleepers make much more frequent use of A&E than others.

Rough sleepers’ life expectancy is dramatically lower than average. London’s average life expectancy at birth is now 80.3 years for men and 84.2 years for women. The average age of death of a male rough sleeper is 47 and, for female rough sleepers, 43.

Age and disability

Disability and/or ageing can have implications for the type of housing that people need. They may need accessible or adapted housing, or require supported accommodation in order to continue living independently. Such impacts will be felt more widely, as the number of over 65s in London increases: their number is expected to increase by 600,000 between 2015 and 2041, an increase of 65 per cent from 2011.
This may have direct health benefits, if Londoners make more journeys on foot or by bike and/or spend more time exercising. It may also yield indirect benefits insofar as reduced car use will improve air quality. The scope for such impacts is demonstrated by analysis by TfL that shows that, between 2001 and 2011, neighbourhoods with the greatest increases in density (in terms of population per hectare) also saw the biggest increases in cycling and the biggest falls in driving. Although improvements in air quality will improve the health of all Londoners, there is evidence that lower income households, who tend to have poorer health, are most affected by poor air quality. So, improvements in air quality stand to help reduce health inequalities.

The preservation of open spaces may also encourage Londoners to lead active lives, because they can be used for physical and social activity.

The construction of new homes in already populated areas may have short-term impacts on the health of existing residents. There may be stress from noise pollution, congestion and traffic issues caused by construction vehicles, and air quality problems from dust and increased site traffic. These negative impacts could be mitigated by the use of offsite and precision...
An increased supply of genuinely affordable homes may reduce reliance on the private rented sector for those on lower incomes, who have limited options in the sector and are most likely to live in homes with poor conditions – and who are therefore most subject to the negative effects that poor conditions have on mental and physical health of tenants. Alternative housing options may help to reduce the ill health associated with the private rented sector.

In part by reducing reliance on the private sector, from where the largest proportion of cases of homelessness occur\(^8\), an increased supply of genuinely affordable homes may help to reduce homelessness and thus the adverse health impacts that those who experience homelessness can experience.

Greater availability of genuinely affordable homes may also help to ease overcrowding, reducing the adverse impacts it has on the health of Londoners. While the investment outlined in Policy 4.1 and Proposal 4.2B is likely to deliver some larger homes, smaller new affordable homes can also play a valuable part in relieving overcrowding in the social rented sector. Smaller homes may be attractive both to would-be downsizers currently occupying larger homes, and to the growing number of families who

**DELIVERING GENUINELY AFFORDABLE HOMES**

Policies 4.1 and 4.2 are concerned with increasing the supply of genuinely affordable homes for those who struggle to cover the cost of market housing. This could help reduce poverty and thereby help to reduce the poorer health that is associated with poverty, as well as narrowing inequalities in life expectancy between low and higher income groups.
Policy 4.3A provides and encourages opportunities for social housing tenants to move, which may help improve health. People may have opportunities that they would not otherwise have had to move to a home and/or area more conducive to their health and wellbeing. This might include moving to live near to family members or friends, or moving to a more manageable or accessible home – particularly for older and/or disabled people whose mobility is limited. Moving for these reasons can significantly improve the quality of life and enable social housing tenants to live a more active and fulfilling life.

More broadly, there is a risk that the Affordable Homes Programme outlined in Policy 4.1 and Proposal 4.2B is constrained in the benefits it delivers to the lowest income Londoners because a large proportion of the homes funded by the Mayor will be intermediate homes for middle income Londoners. However, evidence suggests that this group also experience adverse health impacts as a result of the unaffordability of housing. Moreover, the Mayor’s funding programme reflects Government’s policy and funding priorities and the strategy includes a commitment to making the case to Government for additional funding to support more homes for low cost rent.

By encouraging the local re-provision of affordable homes that are sold or demolished as part of estate regeneration schemes, Proposals 4.3C and 4.3D are likely to have a positive impact on health and help reduce inequalities. These policies will help enable lower income Londoners, who experience poorer health, to remain closer to social networks and/or sources of employment. This will, in turn, have positive impacts for their health and wellbeing. The displacement that might otherwise occur would not only compound inequalities, but may result in Londoners spending large sums of money commuting, struggling to sustain employment, and experiencing social isolation.
Proposal 5.1A also includes a commitment to seek to maintain London’s existing space standards for new homes. This will help reduce some of the adverse health impacts of overcrowding for households who experience it87.

London’s homes also need to meet the specific health needs of the capital’s diverse population. Proposal 5.2A includes a commitment, to be set out the Mayor’s draft London Plan, to require 10 per cent of all new build housing in London to be wheelchair accessible or adaptable, and the remaining 90 per cent to be accessible and adaptable. This will enable Londoners with accessibility needs to live a more active and fulfilling life, both benefitting their health and reducing health inequalities between them and other Londoners.

Proposal 5.2B’s commitment to invest £75m in new supported housing for older and disabled Londoners will have a direct positive health impact for those able to live in those properties. Many of those who will access supported or specialist housing are likely to be experiencing or be more susceptible to poor health. Receiving support can help them to manage their health more effectively and live more independent lives.
Proposal 5.3B sets out a commitment to work with developers, councils, TfL and other public-sector service providers to ensure that new housing development is matched with new infrastructure. This is likely to include health facilities and other institutions that may have a positive impact on health (e.g., community centres, recreation/sports facilities). These are likely to have a positive impact on health and wellbeing by making it easier for people to access to the services they need and to join in activities that will contribute to them living active and healthy lives.

A FAIRER DEAL FOR PRIVATE RENTERS AND LEASEHOLDERS

Policy 6.1 aims to improve standards in the private rented sector. The impacts of poor housing on physical and mental health are well documented (see baseline above). The prevalence of homes falling short of the Decent Homes standard is disproportionately high in the private rented sector. One reason homes fall short of the Decent Homes standard is that they present risks to health and safety that are classified as Category 1 hazards under the Housing, Health and Safety Rating System. Local authorities are empowered to take action against landlords whose properties contain such hazards. Proposal 6.1A will help to ensure that such hazards are addressed by supporting local authorities in using their existing powers to enforce standards in the private rented sector to the fullest extent.

This is likely to help reduce health inequalities in that private renters are disproportionately likely to be younger people and/or from BAME backgrounds. It will also benefit the growing number of children who live in the sector.

Instability can have a negative impact on mental health. Proposal 6.2A includes exploring options that offer tenants private rented sector tenants greater stability. This could help tackle some of the negative impacts that the relative insecurity of private rented housing can have on the mental health of those living there, as well as the disruptive impacts it can have for other determinants of health, such as education and employment.

Proposals 6.2B and 6.2C seek to improve the affordability of the private rented sector. This would deliver health benefits, insofar as the affordability of housing can be a significant source of stress for Londoners and compound poverty.
TACKLING HOMELESSNESS AND HELPING ROUGH SLEEPERS

Policy 7.1 may help to remove or reduce some of these detrimental impacts on the health and wellbeing of Londoners who experience homelessness, in that Proposal 7.1A seeks to make the prevention of homelessness in all its forms a key priority and Proposal 7.1B to ensure that Londoners who become homeless are supported into sustainable accommodation. In particular, improving accommodation options for households who do become homeless may help counter some of the detrimental impacts on health and wellbeing experienced by those placed in temporary accommodation. The policy will also reduce inequalities in health and wellbeing between Londoners who face or experience homelessness and those who do not.

Where new accommodation is developed as a result of the Mayoral investment that is part of Proposal 7.1B, it will need to meet accessibility standards highlighted by Proposal 5.2A and will thus add to options available for homeless Londoners with limited mobility, potentially improving their health and wellbeing.

Proposal 7.1B includes an expectation that local authorities will have clear policies on providing accommodation for homeless households.

These policies should prioritise the most vulnerable households for the most local accommodation. They also ensure that households placed in other areas are provided with information and support that will help them to settle there. This provision should reduce the detrimental impacts on health and wellbeing of moving away from support networks.

Proposals 7.1B and 7.2C also include measures to support victims of domestic violence. These include providing funding to develop new, and refurbish existing, refuges, and up to £50 million of capital funding for accommodation for people leaving hostels or refuges. There is strong evidence that the provision of appropriate accommodation for victims of domestic abuse can significantly improve health and wellbeing, as well as reducing poverty and social exclusion. Thus, these proposals are likely to benefit the health and wellbeing of that group.

Policy 7.2 seeks to assist rough sleepers off the streets and is therefore likely to reduce both the health inequalities between rough sleepers and Londoners overall and the risk of injury from the violence from which those sleeping on the streets are at disproportionate risk, as well as narrowing the stark inequalities in life expectancy between rough sleepers and other Londoners.
As well as helping them off the streets, the services outlined in Proposal 7.2B make provision for support around wider determinants of wellbeing, such as training and employment, and are therefore likely to help support longer term improvements in the health and wellbeing of those who have slept rough. Proposal 7.2B makes particular provision for entrenched rough sleepers, who experience the poorest health (see above).

Proposal 7.2C specifically aims to support increased and improved provision of both hostel and move on accommodation for those who have slept rough and, through a Hostels Clearing House, optimum utilisation of the hostel spaces that are available. The latter should help maximise the number of sleepers who benefit from accommodation and support, while the provision of additional move on accommodation should help reduce the risk of rough sleepers returning to the streets and improve the availability of hostels to those newly sleeping rough by enabling greater throughput.
4 Crime and disorder

SUMMARY OF IMPACTS

Overall, the draft LHS is likely to have a positive impact on levels of crime, anti-social behaviour and sense of fear and security.

Crime is likely to be directly impacted by measures to tackle landlords and agents who behave unlawfully. Funding accommodation for victims of domestic abuse will increase opportunities for them to be away from the perpetrators, reducing scope for further abuse and violence. Finally, supporting rough sleepers into suitable accommodation is likely to have a direct impact on crime and disorder. Almost a third of rough sleepers report having spent time in prison and helping them off the streets will reduce the risk of reoffending, as well as reducing the risk of them being victims of crime. To the extent that rough sleeping is sometimes associated with begging and other street activity, helping rough sleepers off the street may also reduce instances of such behaviour.

Other proposals are likely to have a less direct, more long term positive impact on levels of crime, anti-social behaviour and security. Such proposals include support for planning and design standards that can help ‘design out’ crime; developing vacant plots; and reducing the number of empty homes. These last two measures may reduce the number of locations that attract crime and anti-social behaviour.

BASELINE

Housing’s relationship with crime and disorder, community safety, and fear of crime is complex. Housing policy and planning policy have been shown to influence them, but data is limited.

Area and tenure

There is evidence to suggest that mixed communities experience lower rates of crime than deprived areas. Moreover, evidence that indicates younger households and single parent households are more likely to be victims of burglary suggests that this form of crime may be more common in rented housing, where households with these characteristics are disproportionately represented (see baseline for equality assessment).

It is clear that a sizeable minority of Londoners are fearful of crime: in 2015, 36 per cent of Londoners were ‘worried’ or ‘very worried’ about crime in their local area. However, data on
the relationship between fear of crime and housing tenure does not seem to be sufficiently current to account for recent changes in housing tenure in London, particularly the growth of the private rented sector. Neither is there robust data on fear of crime and the range of housing in an area.

Research does show that (un)familiarity with an urban area is the single largest predictor of people’s sense of safety in that area\textsuperscript{94}. To that extent, displacement of households – for example, as the result of growing unaffordability or homelessness that results from it – may fuel fear of crime.

**Design and planning**

The design and management of neighbourhoods and homes is also significant in the relationship between housing and crime and disorder. Approaches to planning and design can help to reduce opportunities for some forms of crime. This is achieved through passive (or ‘natural’) surveillance\textsuperscript{95}. Relevant design features include clear lines of sight, lighting, and homes that overlook communal areas. Evidence suggests that homes built to ‘Secured by Design’ principles reduce burglary and crime rates by up to 75 per cent\textsuperscript{96}.

**Rough sleeping**

A high proportion of those seen sleeping rough in London - 33 per cent in 2016/17\textsuperscript{97} - report that they have spent time in prison at some point in their lives. There is also evidence that having stable accommodation can reduce the risk of someone reoffending after release from prison\textsuperscript{98}. Thus, sleeping rough may increase the risk of someone with a history of offending re-offending.

Rough sleepers are also at disproportionate risk of being victims of crime. A 2016 report by Crisis, based on a survey of rough sleepers, found that almost eight out of ten had suffered some sort of violence, abuse or anti-social behaviour in the past year\textsuperscript{99}. 


**BUILDING HOMES FOR LONDONERS**

The policies in chapter three seek to increase the supply of homes in London. **Policy 3.1** contains measures to bring forward smaller sites and those in town centres. Such land often has relatively little oversight or surveillance, and could attract crime or anti-social behaviour. The redevelopment of this land for housing will reduce these opportunities. In addition, developing new homes in such locations could contribute to mixed communities, which evidence indicates experience lower levels of crime.

**DELIVERING GENUINELY AFFORDABLE HOMES**

**Policies 4.1 and 4.2** seek to increase the supply of new genuinely affordable homes in London and **Proposal 4.3D** to preserve existing affordable housing, including ensuring that homes lost through the Right to Buy policy or estate regeneration are replaced locally. This could help to counter deprivation and maintain mixed communities, something that evidence suggests is likely to result in lower rates of crime.

**Proposal 4.3A** could also reduce fear of crime. Evidence shows that those who want to move are more likely to be fearful of crime. Enabling social housing tenants to move could therefore help alleviate those individuals’ fear of crime.

**HIGH QUALITY HOMES AND INCLUSIVE NEIGHBOURHOODS**

**Proposal 5.1A** includes measures to help ensure that London’s new and existing homes and neighbourhoods are well-designed. As established in the baseline for this assessment, the design of the built environment can help to minimise both the risk of criminal behaviour and the fear of crime. This proposal is therefore likely to have a positive impact on levels of crime and the fear of crime.

There is arguably a risk that the development of well-designed homes and neighbourhoods simply displaces criminal and anti-social behaviour. However, research found no indication that this has been the case where Secured by Design principles have been adopted.

**Proposal 5.2B**, which supports the delivery of additional supported housing in the capital, is likely to have a positive impact on the fear of crime because the provision of appropriate housing for older and disabled people is likely to reduce social isolation and, in turn, the fear of crime.

**Proposal 5.3D** seeks to tackle the issue of empty homes by encouraging councils to levy a Council Tax premium and lobbying Government to enable them to charge higher rates. There is
some evidence that empty homes attract anti-social behaviour\textsuperscript{103}, so by reducing their number, the proposal may help to discourage such behaviour.

\textbf{A FAIRER DEAL FOR PRIVATE RENTERS AND LEASEHOLDERS}

\textbf{Policy 6.1}, which seeks to help boroughs use their enforcement power against landlords, should lead to a greater number of criminal landlords and letting agents being detected and prosecuted, and so to a reduction in this particular form of criminal activity.

Crimes committed by criminal landlords may extend beyond those specific to their landlord activities. Many children are also sharing accommodation with adults not known to them, particularly in Houses of Multiple Occupation. This could place their safety at risk.

\textbf{Proposal 6.1B} proposes a database ‘naming and shaming’ criminal landlords and letting agents who have been prosecuted by councils. This will send a clear message that criminality in the sector is unacceptable and will be exposed. In turn, this may reduce the incidence of criminal behaviour on the part of landlords.

\textbf{Proposal 6.1B} also supports landlord licensing to improve standards. Some local authorities have introduced property licensing schemes to deal with anti-social behaviour, with some success. For example, the London Borough of Newham has recorded a 67 per cent reduction in the number of anti-social behaviour notices it issues, as a result of its licensing scheme\textsuperscript{104}. This suggests that, by encouraging the use of licensing schemes, the proposal may help to reduce anti-social behaviour.

\textbf{TACKLING HOMELESSNESS AND HELPING ROUGH SLEEPERS}

\textbf{Policy 7.1}’s focus on preventing homelessness and improving the options available to households who become homeless may help reduce the proportion of homeless households accommodated in unfamiliar areas. Given that (un)familiarity with an urban area is the single largest predictor of people’s sense of safety in that area\textsuperscript{105}, this policy may help to reduce the fear of crime for those households who might otherwise be moved into unfamiliar areas.

There is also some evidence that remaining in a community can have a protective effect against criminal behaviour for young people\textsuperscript{106}. So, by enabling more households to remain in their local area, \textbf{Policy 7.1} may also help to avoid crime and anti-social behaviour that might have happened had more homeless families been displaced.
By taking people who might otherwise have continued to sleep rough off the streets, the policy will also reduce the opportunities for the violence to which those who sleep rough are disproportionately subject.

There may be particular positive impacts on levels of crime and disorder from elements of **Policy 7.2** that seek to assist the most entrenched sleepers, both insofar as these individuals are a more persistent presence on London’s streets and in that they are more likely than those who sleep on the streets for shorter periods of time to have complex needs, including substance misuse.

**Proposals 7.1B and 7.2C** commit to provide funding to develop new, and refurbish existing, refuges and up to £50 million of capital funding for accommodation for people leaving hostels or refuges. Providing sustainable accommodation to victims of domestic abuse is likely to reduce the incidence of crime against them. They will be accommodated in a safe place, away from perpetrators.

**Policy 7.2** focuses on ensuring a sustainable route off the streets for all rough sleepers. Given evidence, outlined in the baseline for this assessment, around rough sleepers having spent time in prison and the reduction in the risk of reoffending that results from having stable accommodation, this policy is likely to reduce the chances of those who are helped off the streets reoffending.
Appendix 1: Impact assessment questions

**Health and health inequalities**

1. What impact is this policy likely to have in terms of reducing differentials in life expectancy across London?
2. What impact is this policy likely to have in terms of reducing inequalities in physical and mental health and wellbeing?
3. What impact will this policy have in terms of providing opportunities for people to choose an active fulfilling life?

**Crime and disorder**

1. What impact is this policy likely to have on levels of crime, including reducing the opportunity for crime and anti-social behaviour?
2. What impact is this policy likely to have on safety and fear of crime, so that barriers to activities the help reduce social isolation are removed?

**Equalities**

1. What impact is this policy likely to have on poverty and social exclusion?
2. What impact is this policy likely to have in terms of promoting a culture of equality, fairness and respect?
3. What impact is this policy likely to have in terms of ensuring an inclusive, barrier-free environment for all, especially disabled people?
4. What impact is this policy likely to have in terms of providing opportunities for Londoners to actively participate in the city’s life, decision-making and communities?
5. What impact is this policy likely to have in terms of providing opportunities for Londoners of every background to connect?
References

1 For this characteristic, there is only a duty to eliminate unlawful discrimination.

2 After accounting for housing costs, 2.2 million Londoners live in relative poverty (with a household income below 60 per cent of the national median). This is equivalent to 27 per cent of the population, compared with 20 per cent in the rest of England. A third of Inner London residents live in poverty. Housing is a significant cause of these high rates of poverty in London: poverty rates almost double after housing costs are considered. Greater London Authority. London Plan Integrated Impact Assessment Scoping Report. 5.3.20. 2017. Property wealth in London is extremely unequally distributed, with around half of households owning nothing. Meanwhile, the wealthiest 10 per cent each own property worth an average value of around £1 million. Office for National Statistics. Wealth and Assets Survey 2010-2012.

3 New Policy Institute. London’s Poverty Profile 2015


7 Ibid.

8 London First. Moving Out: how London’s housing shortage is threatening the capital’s competitiveness. 2014.

9 Although they form a minority (46 per cent) of Londoners who are unemployed, worklessness rates for women in London are 11 percentage points higher than for men. New Policy Institute. London’s Poverty Profile 2015.

10 58 per cent of low paid jobs in London are carried out by women. Moreover, the biggest group among the low paid in London is female part-time employees, who account for 31 per cent of all low paid Londoners. Ibid.

11 53 per cent of all London’s single parent families live in poverty, and 97 per cent of those parents are female. Ibid.


13 Ibid.


15 Ibid.

16 Ibid.

17 38% of people in London’s private rented sector are in poverty after housing costs, compared to 27% of all Londoners (but lower than the 50% figure for social tenants), New Policy Institute. London’s Poverty Profile 2015.

18 Over a quarter (24 per cent) of private rented homes failed to meet the Decent Homes standard in 2014. The comparative figure for social rented homes was 15 per cent. Department for Communities and Local Government. English Housing Survey stock data 2008 to 2014. Cited in GLA. Housing in London 2017.


21 Ibid.
22 Ibid.
23 Ibid.
24 Ibid.
30 Department for Communities and Local Government. P1E data on statutory homelessness.
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33 Department for Communities and Local Government. P1E data on statutory homelessness.
34 See, for example, Crisis. Sexuality and Homelessness. April 2005.
36 Ibid.
37 Ibid.
42 National Institute for Health and Care Excellence. Quality Standard 117: Preventing excess winter deaths and illness associated with cold homes.
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46 Anecdotal evidence gathered by local authority enforcement teams.
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50. GLA analysis of 2015/16 English Housing Survey data shows that Londoners in receipt of Housing Benefit are more likely to be above State Pension age, female, disabled or from a BAME background.


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