

MAYOR OF LONDON

London Housing Strategy

IMPACT ASSESSMENT

May 2018



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**Greater London Authority
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1. Introduction

- 1.1 This impact assessment reviews the impacts of the London Housing Strategy (LHS), published in May 2018. It should be read with that document. The LHS sets out the Mayor's vision, and the policies and proposals behind it, to address London's housing challenges. This includes £4.82 billion of affordable housing investment through to 2022 and a host of other funding programmes and services provided by the Mayor and his partners. The LHS is also a call to action for all organisations with a role in addressing London's greatest challenge – its housing crisis. The 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.
- 1.2 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 1999).
- 1.3 This impact assessment 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 LHS.
- 1.4 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.

- 1.5 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 other activities where participation by such persons is disproportionately low.
- 1.6 The Act also outlines that fostering good relations involves the need to:
- a. tackle prejudice; and
 - b. promote understanding.
- 1.7 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 partnership¹.
- 1.8 The Act is also clear that carrying out these duties may mean treating some people more favourably than others.

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

- 1.9 Under the GLA Act 1999, 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.
- 1.10 The Mayor has a duty to consider community safety under section 17 of the Crime and Disorder Act 1998.
- 1.11 The Mayor also has legal duties relating to Sustainability Appraisals (including Strategic Environmental Assessments) of his policies. Assessments relating to these duties are dealt with in the Mayor's draft London Plan.
- 1.12 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.
- 1.13 These broadly match the questions applied to all GLA strategies and policies, but were refined to focus on housing-related impacts.
- 1.14 Each policy and proposal was assessed using these questions, supported by quantitative and qualitative data where available. The assessment was carried out as part of the policy development process for the LHS and made available to decision makers. It was produced by GLA officers with some support from the housing consultancy, Altair.
- 1.15 This version of the impact assessment has been updated to reflect revisions to the draft LHS following a public consultation during 2017.

2. Equalities

SUMMARY OF IMPACTS

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

1 Age	
Young people	
1.1	Young people stand to benefit from efforts to increase the supply of homes, 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.
1.2	They are also among the likely beneficiaries of measures to encourage currently under-represented groups into the construction sector, which the LHS identifies as one means of increasing housing supply.
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.
1.4	Young people may also benefit from measures to prevent this group from becoming homeless including funding for supported accommodation for young people and urging Government to review the impact of its welfare reforms on this group.
Children	
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.
1.6	Children 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. This group therefore stands to benefit from policies designed to improve protections for residents.
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.
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.
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.
Older people	
1.10	Older people are less likely to benefit from investment in affordable housing aimed at encouraging home ownership.

1.11	However, older people stand to benefit from investment in specialised and supported housing for older people. They may also benefit from provision for social housing tenants to move, since this has a particular focus on older people and under-occupying households (among whom older social housing tenants are over-represented). These proposals should help this group move to homes that are more affordable, more accessible, and in areas that better meet their needs.
1.12	Older people may be more dependent on services and suffer from limited mobility. Measures to encourage the development of new homes in and around town centres and with social infrastructure may therefore be of particular value to this group.
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.
2	Disability
2.1	Households containing people with disabilities are over-represented in social rented housing. People with disabilities therefore may have been more exposed to potential negative impacts of redevelopment of social housing, and this group consequently stand to benefit from policies designed to improve protections for residents.
2.2	People with disabilities are likely to benefit from investment in specialised and supported housing for this group. People with disabilities 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 move.
2.3	Measures to encourage the development of new homes in and around town centres and alongside social infrastructure may also be of particular value to people with disabilities, who may be more dependent on services and suffer from limited mobility.
2.4	As people 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.
2.5	Disabled people with limited mobility and wheelchair users will benefit from the requirement that new homes should be accessible and 10 per cent should be suitable for wheelchair users.
2.6	The established link between reduced housing affordability and negative mental health impacts suggests that increased numbers of new affordable and specialist housing may bring benefits to those who have mental health issues.
3	Gender reassignment
3.1	The very limited availability of data made it difficult to reliably assess potential impacts of the 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 also from a requirement that all social landlords ensure their services are inclusive of this group.
4	Pregnancy and maternity
4.1	The limited availability of specific data on this group made it hard to identify impacts, beyond those that affect households including children.

4.2	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.
4.3	This group may also derive particular benefits from accessible homes as they may be using prams or pushchairs.
5	Race
5.1	Black, Asian and minority ethnic (BAME) groups are likely to benefit from efforts to increase the supply of homes, including increased supply of affordable homes, because they are more likely to experience poverty and are disproportionately affected by overcrowding. Because of the latter, these groups 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 these groups 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, BAME groups 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 directly benefit from the available funding for supported and specialised accommodation. For example, Gypsies and Travellers stand to benefit from funding for new pitching sites and improvements to existing sites being made available through the Affordable Homes Programme.
5.7	Non-UK nationals living outside the UK are likely to find that their opportunities to buy homes in London priced at £350,000 or less are reduced by measures to ensure that these homes are first marketed to Londoners. However, these measures may also improve the opportunities for Londoners who are non-UK nationals or 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 landlord practices, 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. However, Government immigration and welfare policies mean that this group is likely to have different, and potentially fewer, options open to them than UK nationals found sleeping on the streets.

5.11	Refugees stand to benefit from policies to reduce homelessness and increase social integration, should the move-on period for all newly recognised refugees be extended by central government as requested by the Mayor. Refugees specifically from Syria will benefit from housing provision for resettling refugees in the capital.
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. 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 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.
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 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. This group therefore stands 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	Female rough sleepers, while comprising a small minority of all rough sleepers, tend to seek more secluded sleeping sites, and therefore 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, such as through projects funded via the Mayor's Rough Sleeping Innovation Fund.
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. There is also limited data on the extent to which this group is subject to particular housing problems. This means that it has only been possible to identify a limited number of impacts.
8.2	There is some evidence that those who identify as LGBT+, 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. This group may also benefit from a focus on the prevention of homelessness, to ensure that those who do become homeless are supported into sustainable accommodation, and measures 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 LHS may adversely impact those who possess this characteristic.

- 2.2 As individual policies within the 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 LHS.

BASELINE

Supply and affordability

- 2.3 The affordability pressures² that result from a long term undersupply of homes of all tenures, and particularly affordable homes, in London (see chapter two of the LHS) are one important respect in which housing impacts a range of those with protected characteristics.
- 2.4 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 Londoners³. Gypsies and Travellers can face particularly acute difficulties securing accommodation that meets their needs⁴.
 - Insofar as those with some religious beliefs – Buddhists, Hindus, Sikhs, and particularly Muslims⁵ – 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 cent⁶.
 - 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 pay⁷. It is also striking that young people are increasingly concerned about high housing costs.

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.

4 Greater London Authority. London Gypsy and Traveller Accommodation Assessment. 2009.

5 Office for National Statistics. 2011 Census.

6 New Policy Institute. London’s Poverty Profile 2015.

7 Ibid.

In a London First survey of London employees, 70 per cent of respondents in the 25-39 age group said they found the cost of housing made it difficult to work in London, and 41 per cent of these said that they would consider leaving London to work elsewhere⁸.

- Although it is difficult to quantify and compare poverty by gender, women are disproportionately likely to be economically inactive⁹, low paid¹⁰, and/or subject to the poverty that affects single parent families¹¹.
- 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 likely that those in this group also disproportionately experience economic inactivity, low pay and/or poverty – especially given the reduction in income that can take place in later pregnancy or after giving birth.

- 2.5 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 reliably identify potential impacts for those with these characteristics. However, there is evidence that those who are LGBT+ may experience discrimination when seeking to rent or buy a home¹². Although not specifically related to the affordability of housing, this does suggest that those who are LGBT+ can be at a disadvantage in a competitive housing market.

Housing tenure

- 2.6 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 consequently the extent to which they experience particular opportunities or problems associated with different tenures.
- 2.7 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

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.

12 Stonewall. LGBT in Britain - Hate Crime and Discrimination. 2017.

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 occupiers¹³.

- 2.8 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 2005/06¹⁴. This implies an increase in the proportion of Londoners who are pregnant or have had a baby in the last 24 weeks in the private rented sector, although specific data is not available.
- 2.9 BAME people are also disproportionately represented in the private rented sector: they are almost twice as likely to rent privately as white British people¹⁵. Those with some beliefs – Buddhists, Hindus, Muslims and those who describe themselves as having no religion¹⁶ – are more heavily represented in the private rented sector too¹⁷.
- 2.10 All of these groups are therefore more likely to experience the above-average levels of poverty found among Londoners living in the private sector¹⁸ and the poorer property conditions that characterise its homes¹⁹. The latter include the lesser energy efficiency of private rented sector homes²⁰.
- 2.11 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 population²¹. Those with some religious beliefs – Muslims and Christians – are also over-represented in this tenure²².

13 Office for National Statistics. Labour Force Survey household datasets, 1990 to 2016. Cited in Greater London Authority. Housing in London 2017.

14 Ibid.

15 Office for National Statistics. 2011 Census.

16 Ibid.

17 Ibid.

18 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.

19 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.

20 English Housing Survey stock data, 2012/13 to 2014/15. Cited in GLA. Housing in London 2017.

21 Office for National Statistics. 2011 Census.

22 Ibid.

- 2.12 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 accommodation²³. This implies an over-representation of Londoners with the pregnancy and maternity protected characteristic, 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 population²⁴. This in turn indicates a greater representation of women, who head the majority of single parent households, in social rented housing.
- 2.13 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 housing²⁵.
- 2.14 The representation of particular groups in social housing reflects not just affordability pressures but the allocation criteria for such housing. These criteria mean that, for example, those who have experienced homelessness and those with disabilities that may create medical grounds for needing to move, are more likely to be allocated social housing.
- 2.15 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).
- 2.16 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.
- 2.17 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.

23 Ibid.

24 Ibid.

25 Ibid.

Particular housing problems

- 2.18 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 overcrowding, homelessness, rough sleeping, and/or living in homes that do not suit their limited mobility.
- 2.19 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.
- 2.20 Overcrowding, which is particularly severe in London, disproportionately affects those on low incomes²⁶, 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 tenures²⁷. Overcrowding is most severe among Pakistani, Bangladeshi and black African households²⁸.
 - Those from some religious groups – Buddhists, Sikhs, Hindus and particularly Muslims – disproportionately experience overcrowding²⁹.
- 2.21 Standard data sources on overcrowding do not cover the representation of those who are preparing for, undergoing or have undergone gender reassignment, those of different sexual orientations, or those who are disabled among those who are affected by overcrowding. This makes it difficult to reliably identify potential impacts on Londoners with those characteristics.

26 Shelter. People living in bad housing – numbers and health impacts. 2013.

27 Greater London Authority. London Plan Integrated Impact Assessment Scoping Report. 5.3.20 and 5.3.25. 2017.

28 Shelter. People living in bad housing – numbers and health impacts. 2013.

29 Office for National Statistics. 2011 Census.

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

- Londoners from BAME backgrounds, and so potentially those with some religious beliefs (see above): 40 per cent of Londoners identify themselves as coming from BAME groups³⁰, whereas 68 per cent of homeless households whom London authorities assisted during 2016/17 did so³¹.
- 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 2016/17³², compared to eight per cent of all London's households³³.
 - Five per cent of the homeless households London authorities assisted during 2016/17 became homeless as the result of violence from a partner³⁴, something more likely to be experienced by women.
 - those who identify as LGBT+: There is some evidence, mainly concerning young people³⁵, that this group may be at greater risk of homelessness. There is also evidence that this group experiences discrimination when seeking to rent or buy homes³⁶. This may compound the risk of them being unable to access accommodation.

2.23 There is no data on the representation of those who are preparing for, undergoing or have undergone gender reassignment, those who are married or in a civil partnership, or those who are disabled, among those who experience homelessness.

2.24 Rough sleeping (a particular form of homelessness) is disproportionately likely to affect men, who accounted for 85 per cent of those seen on London's streets in 2016/17³⁷. However, it is worth noting that those who work with rough sleepers believe that female rough sleepers are less likely to be seen, because they are more inclined to seek more secluded places to sleep. Those of non-UK nationalities are also over-represented among those seen sleeping on

30 Greater London Authority. London Plan Integrated Impact Assessment Scoping Report. 5.3.3. 2017.

31 Department for Communities and Local Government. P1E data on statutory homelessness.

32 Ibid.

33 Office for National Statistics. Labour Force Survey. Q2 2016.

34 Department for Communities and Local Government. P1E data on statutory homelessness.

35 See, for example, Crisis. Sexuality and Homelessness. 2005.

36 Stonewall. LGBT in Britain - Hate Crime and Discrimination. 2017.

37 Greater London Authority. CHAIN Annual Report. Greater London 2016/17.

London's streets, accounting for 53 per cent of that cohort in 2016/17³⁸. It is also possible that those with conditions that might be identified as disabilities are over-represented, given that 47 per cent of those rough sleepers whose support needs were assessed identified as having a support need related to their mental health³⁹.

BUILDING HOMES FOR LONDONERS

- 2.25 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.
- 2.26 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 chapters four and five of the LHS.
- 2.27 Increased supply may have potential negative impacts for those with some protected characteristics in the short term. (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 is likely 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. Specific groups, such as the Gypsy and Traveller community, may also be particularly impacted by intensification policies if they affect existing Gypsy and Traveller sites.

38 Ibid.

39 Ibid.

- 2.28 However, the 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, including implementing ballots where required, will give residents a clear say on proposals and should offer full rights of return for displaced tenants. Fifth, 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. Finally, **Proposal 5.2A** outlines new planning guidance in the draft London Plan, such as for local authorities to actively plan to protect existing Gypsy and Traveller accommodation capacity when considering new, residential developments. More broadly, if the housing crisis is not tackled, then displacement of those with protected characteristics is likely to happen anyway, as people are driven out by rising prices and rents.
- 2.29 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.
- 2.30 **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 be in low paid work or to experience unemployment to secure, sustain and progress in employment.

- 2.31 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 the private rented sector, who are 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 supporting Build to Rent schemes with more genuinely affordable homes, including some let at London Living Rent levels.
- 2.32 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 chain⁴⁰. 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 jobs⁴¹. **Policy 3.4** seeks to ensure that these benefits are felt by those with some protected characteristics. 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 backgrounds⁴². As well as benefitting these groups, it is also likely to foster good relationships between them and other Londoners.

DELIVERING GENUINELY AFFORDABLE HOMES

- 2.33 **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 LHS. By improving the affordability of housing, these policies may also leave those on lower incomes with more disposable income, enabling them to participate more fully in the city's life and thereby helping to foster good relations between and beyond groups.

40 Department for Communities and Local Government. Laying the foundations: a housing strategy for England. 2011.

41 GLA Economics. Working Paper 71: More residents more jobs? 2015.

42 Greater London Authority analysis of Labour Force Survey data. Q2 individual data for 2014 to 2016.

- 2.34 **Policies 4.1 and 4.2** 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 these groups can more readily secure, sustain and progress in employment. It will also help promote good relations between those with some protected characteristics and others.
- 2.35 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.
- 2.36 A substantial commitment has been made to provide affordable homes based on social rent levels that are affordable to the poorest Londoners. The Mayor has underlined this ambition by securing an additional £1.67bn of affordable housing funding from central government in spring 2018. The Mayor's agreements with Government to date 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 on 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 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.
- 2.37 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 affordable homes, within the context of national policy and available funding.
- 2.38 The LHS also sets out a commitment to continue making the case to Government for additional funding to support more homes based on social rent levels. Initial GLA analysis suggests that to build the amount of new affordable homes London needs would require four times the funding the capital currently receives. Analysis by Savills suggests London requires £3.4bn of affordable housing funding a year⁴³.

- 2.39 **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.
- 2.40 This proposal may help tenants move to accommodation where rents are more affordable, perhaps because the homes are smaller, and therefore also cheaper to maintain – for example, because they are less expensive to heat. This proposal may also enable people to move closer to their work and/social support networks, and in some cases, may mean that tenants cease to be subject to Social Sector Size Criteria. 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, have necessary adaptations, are in areas closer to facilities they need, have better transport provision, or are 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.
- 2.41 **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

- 2.42 **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 poverty⁴⁴. 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 disabilities⁴⁵.
- 2.43 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 quality⁴⁶.
- 2.44 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 priced into land values and the general cost of housing development.
- 2.45 **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 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.
- 2.46 **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.

44 Department of Energy and Climate Change. Annual fuel poverty statistics report. 2016.

45 National Institute for Health and Care Excellence. Quality Standard 117: Preventing excess winter deaths and illness associated with cold homes.

46 Aether. Updated Analysis of Air Pollution Exposure in London: Report to the Greater London Authority. 2017.

- 2.47 **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.
- 2.48 **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 men⁴⁷.
- 2.49 Data suggests that some BAME groups are over-represented among those with mental health problems. So, they may also particularly benefit from an increase in supported housing for those with mental health problems⁴⁸. This funding for types of housing that meet specific housing needs is therefore likely to improve the availability of accommodation that meets the needs of all of these groups, and help them to lead more active lives.
- 2.50 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.
- 2.51 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 group.
- 2.52 **Proposal 5.3A** supports community-led housing. This will provide access to homes for groups who might otherwise have limited ability to access homes.

47 Office for National Statistics. 2011 Census.

48 Department of Health. No health without mental health. 2011.

Forms of community-led housing, such as community land trusts or cooperative housing schemes, are usually established to provide housing for those who are unable to access market housing. This may include some Londoners with protected characteristics, such as older people.

- 2.53 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.
- 2.54 **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.
- 2.55 **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.
- 2.56 **Proposal 5.3D** seeks to ensure that all new homes priced at £350,000 or less are marketed exclusively to Londoners (including those planning to move to London) for a minimum of three months. This proposal is intended to reduce the scope for overseas buyers to purchase homes of this value in the capital. As such, it may be construed as discriminating against those of particular nationalities, and therefore races or ethnicities, whose capacity to buy homes within this price bracket 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 rather 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 and those of non-UK nationalities, who are resident in the city – and these groups are currently among those who find it most difficult to afford to buy homes in the city.

- 2.57 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.
- 2.58 Where estate regeneration projects engage residents of social housing, in line with **Proposal 5.3E** (including through ballots where required) as well as also meeting the requirements relating to the replacement of affordable homes outlined in **Proposal 4.3D**, this should help protect the needs of those in social housing, among whom those with certain protected characteristics are over-represented. It should also preserve the diversity of neighbourhoods.

A FAIRER DEAL FOR PRIVATE RENTERS AND LEASEHOLDERS

- 2.59 **Proposals 6.1B, 6.2A, 6.3A and 6.3B** of the 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. A recent survey did indicate, however, that those who identify as LGBT+ experience discrimination when seeking to rent or buy homes⁴⁹. BAME groups may also face prejudice and discrimination when seeking to access accommodation.
- 2.60 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.
- 2.61 **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.

49 Stonewall. LGBT in Britain - Hate Crime and Discrimination. 2017.

- 2.62 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, thereby increasing the financial pressures on tenants. It seems unlikely that this impact will be widespread, insofar as poor standards and management practices are limited to pockets of the sector. **Proposals 6.2B and 6.2C** also mitigate these potential adverse impacts by seeking to improve the affordability of private rented accommodation, and **Proposal 6.2C** focuses on the lowest income tenants who require welfare benefits to cover their housing costs.
- 2.63 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 sector⁵⁰. 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. It is outside the scope of the LHS to address any deficiencies in the decision-making process through which migration policy is implemented.
- 2.64 The Government's Right to Rent policy has also been shown to be potentially discriminatory against non-UK nationals⁵¹. They therefore stand to benefit from **Proposal 6.1A's** call for a review of this policy.
- 2.65 The ending of a private rented sector tenancy is now the most common reason for homelessness in London⁵². In tackling affordability and security of tenure, **Proposals 6.2A, 6.2B and 6.2C** should benefit the those with certain protected characteristics who are more likely to become homeless, as established in the baseline for this assessment.
- 2.66 **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

50 Anecdotal evidence gathered by local authority enforcement teams.

51 Joint Council for the Welfare of Immigrants. Passport please. 2017.

52 Department for Communities and Local Government. P1E data on statutory homelessness.

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 security.

- 2.67 It is possible that **Proposal 6.2A** could have unintended negative impacts for those with protected characteristics who are over-represented in the private 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 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.
- 2.68 **Proposal 6.2A** also recommends that measures which discriminate against welfare claimants, such as 'No DSS' property adverts, be banned⁵³. Since welfare claimants are more likely than the wider population to have protected characteristics⁵⁴, those with protected characteristics stand to benefit from this proposal.
- 2.69 **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 sector⁵⁵, 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 capital⁵⁶. 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.

53 Citizens' Advice. Citizens Impact Assessment: Lowering the Benefit Cap. 2015.

54 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.

55 Shelter. Letting agents: the price you pay. 2013.

56 Department for Work and Pensions. Stat Xplore. Cited in Greater London Authority. Housing in London 2017.

- 2.70 **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, as they may struggle with high service charges in the leasehold sector.
- 2.71 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 accessibility needs – in particular, older people and those with disabilities - to live as independently as possible.

TACKLING HOMELESSNESS AND HELPING ROUGH SLEEPERS

- 2.72 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.
- 2.73 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.
- 2.74 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.
- 2.75 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.

- 2.76 **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.
- 2.77 **Proposal 7.1B** also includes the provision of funding for accommodation for victims of domestic abuse, both to develop and refurbish refuges and to support the provision of accommodation for those ready to move on from them. Furthermore, it contains proposals to establish London-wide support for refuge provision, which will mean London's refuges better meet different needs. Provision of refuges and move-on accommodation assists in reducing poverty and social exclusion for those who experience domestic abuse⁵⁷.
- 2.78 **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.
- 2.79 There is a risk that female rough sleepers, who constitute a minority of all those seen in London's streets⁵⁸, 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 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.

57 NEF Consulting. Refuge: A social return on investment evaluation. 2016.

58 Women constituted 15 per cent of those seen on London's streets in 2016/17. Greater London Authority. CHAIN Annual Bulletin Greater London 2016/17.

- 2.80 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 they may 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 allows for the removal of nationals of other EU states who have been in the UK for more than three months and are not exercising treaty rights. These constraints necessitate differentiation in support for rough sleepers dependent on their nationality. In this context, 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.
- 2.81 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.
- 2.82 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 LHS. These homes would therefore have a positive impact in providing suitable accommodation for homeless households, including victims of domestic abuse, also 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

- 3.1 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.
- 3.2 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 LHS.
- 3.3 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.
- 3.4 Longer term, increases in the supply of housing, particularly affordable housing, are likely to reduce stress and anxiety related to the affordability of housing. Increased supply will also help to relieve poverty, 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

- 3.5 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 Inequalities⁵⁹. A number of housing-related factors are now included in the Public Health Outcomes Framework for England 2016 to 2019.

59 Institute of Health Equity. Fair society, healthy lives (the Marmot review). 2010.

Poor conditions

- 3.6 The impacts of poor quality housing on health are well documented⁶⁰. These are particularly acute for children⁶¹, as well as pregnant women, older people and those with disabilities⁶². Conditions such as damp, indoor pollutants, and excess cold have all been shown to be associated with physical illnesses, including eczema, hypothermia and heart disease⁶³. The Building Research Establishment has estimated that poor quality housing costs the NHS £1.4 billion a year nationally⁶⁴, with £500m of that cost directly related to older people⁶⁵.
- 3.7 Such problems are particularly likely to affect those living in the private rented sector, because the proportion of homes that do not meet the Decent Homes standard is disproportionately high in the sector⁶⁶. 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 year⁶⁷, and each London borough spends around £27,000 per day treating problems associated with cold homes⁶⁸.

Affordability and security

- 3.8 Housing problems and particularly issues around the affordability and security of housing can contribute to mental ill health⁶⁹, something that evidence suggests is a particular problem in London⁷⁰. More than half of Londoners

60 Ibid. Shelter. People living in bad housing – numbers and health impacts. 2013.

61 Shelter. Chance of a lifetime: the impact of bad housing on children's lives. 2006. Shelter. Against the odds. 2006.

62 National Institute for Health and Care Excellence. Quality Standard 117: Preventing excess winter deaths and illness associated with cold homes.

63 Chartered Institute of Environmental Health. Physical health – key issues.

64 BRE. The cost of poor housing to the NHS. 2015.

65 BRE. Homes and ageing in England. 2015.

66 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.

67 BRE. The Health Costs of Cold Dwellings. 2011.

68 National Energy Action. Connecting policy to people seminar. 2016.

69 Shelter. The impact of housing problems on mental health. 2017. Samaritans. Dying from inequality. 2017. A report by the Mayor of London identified a wide range of factors beyond health that may contribute to an individual's vulnerability to mental ill-health. These included access to good housing. Mayor of London. London mental health: The invisible costs of mental ill health. 2014.

70 London has the lowest reported life satisfaction and the highest anxiety rating of any UK region. London's average anxiety rating was 3.15, compared to England's average of 2.93 on an eleven-point scale. Office for National Statistics. Statistical bulletin: Personal wellbeing in the UK, 2013/14. 2014.

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)⁷¹.

- 3.9 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 due to the insecurity of the sector. They are thought to bear particularly heavily on households for whom insecurity may have more acute negative impacts, such as those with young children or older people⁷².

Overcrowding, homelessness and rough sleeping

- 3.10 Some specific housing problems that reflect broader affordability pressures are closely associated with poor physical and mental health.
- 3.11 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. There is also some evidence that it is associated with physical ill health⁷³.
- 3.12 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. Research on the experience of households in temporary accommodation describes health hazards from mould, faulty electrics, animal infestations, and cramped conditions. 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 children⁷⁴. These findings are supported by earlier research

71 London Councils and Ipsos MORI. 2015 Survey of Londoners.

72 Shelter. Unsettled and insecure: The toll insecure private renting is taking on English families. 2017. Shelter. The impact of housing problems on mental health. 2017. Age UK. Ageing in squalor and distress: older people in the private rented sector. 2016.

73 Shelter. Full house? How Overcrowded Housing Affects Families. 2005. Office of the Deputy Prime Minister. The impact of overcrowding on health and education. 2004.

74 Shelter. Green Book 50 Years On: the reality of homelessness for families today. 2016.

that established that temporary accommodation worsens health⁷⁵ and wider wellbeing. Education, job opportunities and child development were all found to be affected⁷⁶.

- 3.13 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 issues such as loss of support from extended family and disruption to education contributed to poor mental and emotional health⁷⁷.
- 3.14 Those who sleep rough (8,108 individuals in 2016/17⁷⁸) 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. 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 abuse⁷⁹. Both physical and mental health problems can be made worse by alcohol and drug abuse.
- 3.15 Rough sleepers are also more likely to catch some infectious diseases, including TB⁸⁰. 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 others⁸¹. 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 women⁸². The average age of death of a male rough sleeper is 47 and, for female rough sleepers, 43⁸³.

75 Shelter. Sick and tired: the impact of temporary accommodation on the health of homeless families. 2004.

76 Shelter. Living in Limbo: Survey of homeless households living in temporary accommodation. 2004.

77 Shelter. Home and away: The rise in homeless families moved away from their local area. 2016.

78 Greater London Authority. CHAIN Annual Bulletin Greater London 2016/17.

79 Ibid.

80 Crisis. Homelessness: A silent killer. 2011.

81 Department of Health. Inclusion health: improving primary care for socially excluded people. 2010.

82 Greater London Authority. London Plan Integrated Impact Assessment Scoping Report. 5.4.2. 2017.

83 Crisis. Homelessness: A silent killer. 2011.

Age and disability

- 3.16 Disability and/or ageing can have implications for the type of housing that people need. People who are older and/or disabled may need accessible or adapted housing, or require supported accommodation to continue living independently. They may also need accommodation to facilitate prompt and appropriate discharge from secondary care settings such as hospitals. 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 2011⁸⁴.

BUILDING HOMES FOR LONDONERS

- 3.17 The policies presented in chapter three focus on increasing the supply of homes in London. This is likely to have a broadly positive impact on Londoners' health and help to reduce health inequalities between groups. This is because an increase in the supply of homes should reduce the costs of housing, thereby easing affordability pressures. These pressures can, as established in the baseline, contribute to mental ill health and also fuel particular housing problems, such as overcrowding and homelessness, that are associated with poorer physical and mental health. This is particularly true of overcrowding in private housing, for which high house prices and rents are key drivers.
- 3.18 The potential benefits of increased housing supply 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.
- 3.19 **Proposal 3.1A** addresses the location of new homes. It includes commitments to promote development in and around town centres and to protect the Green Belt and other open public spaces. Providing homes in well-connected locations can help reduce car use and reduce time spent commuting. 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

driving⁸⁵. 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 quality⁸⁶. So, improvements in air quality stand to help reduce health inequalities.

- 3.20 The preservation of open spaces may also encourage Londoners to lead active lives, as they can be used for physical and social activity.
- 3.21 The construction of new homes in already populated areas may adversely affect 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 manufacturing construction methods - something supported by **Proposal 3.4C**. Moreover, these are temporary negative effects and should be considered against the health benefits of increased housing supply.
- 3.22 **Proposal 3.2B** sets out how homes will be delivered according to the Mayor's Healthy Streets Approach. This focuses on creating attractive places that encourage people to walk, cycle and use public transport – behaviours that will deliver direct and indirect health benefits, as outlined above.
- 3.23 **Policy 3.4** seeks to increase uptake of careers in construction, including by groups currently under-represented in the sector. The policy also supports the Good Work Standard, encouraging employers to implement the very best employment standards in London. Insofar as employment and income are beneficial to health, it may help to increase the number and the range of Londoners who experience these benefits.

DELIVERING GENUINELY AFFORDABLE HOMES

- 3.24 **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 thereby helping to reduce the poorer health that is associated with poverty. It could also help to narrow inequalities in life expectancy between low and higher income groups.

85 Transport for London. Travel in London: Report 8. 2015.

86 Aether. Updated Analysis of Air Pollution Exposure in London: Report to the Greater London Authority. 2017.

- 3.25 An increased supply of genuinely affordable homes may reduce reliance on the private rented sector for those on lower incomes. This group has limited options in the sector and are most likely to live in homes with poor conditions. This group 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 negative health effects associated with the private rented sector.
- 3.26 In part by reducing reliance on the private sector, from where the largest proportion of cases of homelessness arise⁸⁷, 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.
- 3.27 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 are currently concealed within other households⁸⁸. **Policy 4.1** and **Proposal 4.2B** should therefore help to improve health and reduce health inequalities by improving the health of those disproportionately likely to be living in overcrowded housing, as established in the baseline for this assessment.
- 3.28 More broadly, a large proportion of the homes funded through the Affordable Homes Programme outlined in **Policy 4.1** and **Policy 4.2B** will be intermediate homes for middle income Londoners and younger people. This may constrain the benefits delivered to the lowest income Londoners, as the need for affordable homes identified in the 2017 Strategic Housing Market Assessment cannot fully be met by the funding agreed to date. However, evidence suggests that middle income Londoners and younger people 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 LHS includes a commitment to continue making the case to Government for additional funding to support even more homes based on social rent levels. This is reflected in the recent agreement to spend an additional £1.67bn in London, with priority for new homes based on social rent levels.

87 Department for Communities and Local Government. P1E data on statutory homelessness.

88 Labour Force Survey household datasets, 1996 to 2016. Cited in Greater London Authority. Housing in London 2017.

- 3.29 **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 quality of life, and it can also enable social housing tenants to live a more active and fulfilling life.
- 3.30 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.

HIGH QUALITY HOMES AND INCLUSIVE NEIGHBOURHOODS

- 3.31 **Policy 5.1** includes provisions to make London's new and existing homes more environmentally sustainable. Homes and workplaces account for around 78 per cent of CO₂ emissions in London. Eighty per cent of the existing building stock is expected still to be in place in 2050⁸⁹. Improving the energy performance of both new and existing homes will reduce carbon emissions and waste.
- 3.32 **Policy 5.1** is also likely to benefit Londoners by improving air quality. Although improvements in air quality will benefit the health of all Londoners, there is evidence that lower income households, who tend to have poorer health, are most affected by poor air quality⁹⁰. Improvements in air quality therefore stand to help reduce health inequalities.
- 3.33 As well as improving energy efficiency, **Proposal 5.1A** also includes measures to ensure the quality of London's new homes, and **Proposal 5.1B** includes measures to improve the fire safety of existing homes. The delivery of high quality housing and improvements to London's existing homes will promote improved health and wellbeing.

89 Mayor of London. Energy in buildings.

90 Aether. Updated Analysis of Air Pollution Exposure in London: Report to the Greater London Authority. 2017.

- 3.34 **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 it⁹¹.
- 3.35 London's homes also need to meet the specific health needs of the capital's diverse population. **Proposal 5.2A** includes a commitment, set out in the 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.
- 3.36 **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. The Mayor's encouragement of joint commissioning of supported housing by health services, boroughs, and other housing providers is also likely to have positive health impacts.
- 3.37 **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). This is 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

- 3.38 **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 sector⁹². One reason

91 Royal Institute of British Architects. The Case for Space. 2011.

92 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 Greater London Authority. Housing in London 2017.

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. **Proposal 6.1A** will help to ensure that such hazards are addressed by supporting local authorities to use their existing powers to the fullest extent to enforce standards in the private rented sector.

- 3.39 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.
- 3.40 Instability can have a negative impact on mental health⁹³. **Proposal 6.2A** includes exploring options that offer 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. **Proposal 6.2A** could also help to reduce the number of cases of homelessness that result from the termination of a private rented sector tenancy - a number that has increased substantially in recent years⁹⁴. This would help reduce the adverse impacts on health and wellbeing that those who experience homelessness can suffer.
- 3.41 **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 can compound poverty.

TACKLING HOMELESSNESS AND HELPING ROUGH SLEEPERS

- 3.42 **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.
- 3.43 **Proposal 7.1B** also seeks to ensure that Londoners who become homeless are supported into sustainable accommodation. Improving accommodation options for households who do become homeless may particularly 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

93 Shelter. Unsettled and insecure: The toll insecure private renting is taking on English families. 2017. Shelter. The impact of housing problems on mental health. 2017.

94 MHCLG, P1E data, September 2017.

wellbeing between Londoners who face or experience homelessness, and those who do not.

- 3.44 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. This will potentially improve their health and wellbeing.
- 3.45 **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, and/or sources of care and specialist medical treatment.
- 3.46 **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. Furthermore, these proposals seek to establish a London-wide support to refuge provision that will mean London's refuges better meet different needs. 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 exclusion⁹⁵. These proposals are therefore likely to benefit the health and wellbeing of that group.
- 3.47 **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 suffer disproportionately⁹⁶. It should also help to narrow the stark inequalities in life expectancy between rough sleepers and other Londoners.
- 3.48 As well as helping people who sleep rough off the streets, the services outlined in **Proposal 7.2B** make provision for support around wider determinants of

95 NEF Consulting. Refuge: A social return on investment evaluation. 2016.

96 Crisis. "It's no life at all": Rough sleepers' experience of violence and abuse on the streets of England and Wales. 2016.

wellbeing, such as training and employment. They 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).

- 3.49 **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 optimum utilisation of the hostel and move on accommodation spaces that are available, through a Hostels Clearing House. The latter should help to 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 also improve the availability of hostels to those newly sleeping rough.

4. Crime and disorder

SUMMARY OF IMPACTS

- 4.1 Overall, the policies contained within the LHS are likely to have a positive impact on levels of crime, anti-social behaviour, and sense of fear and security.
- 4.2 Crime is likely to be directly impacted by measures to tackle landlords and agents who behave unlawfully. Funding accommodation for victims of domestic abuse, and plans for a pan-London approach to refuge accommodation that will mean it better meets need will increase opportunities for them to be away from the perpetrators. This will reduce scope for further abuse and violence.
- 4.3 Supporting rough sleepers into suitable accommodation is also 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 may 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.
- 4.4 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

- 4.5 Housing's relationship with crime and disorder, community safety, and fear of crime is complex. Housing policy and planning policy can influence them, but data is limited.

Area and tenure

- 4.6 There is evidence to suggest that mixed communities experience lower rates of crime than deprived areas⁹⁷. Moreover, evidence that indicates younger households and single parent households are more likely to be victims of

97 Department for Communities and Local Government. Mixed Communities: Evidence Review. 2010.

burglary⁹⁸ 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).

4.7 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 area⁹⁹. However, data on the relationship between fear of crime and housing tenure does not seem to be sufficiently up to date 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.

4.8 Research does show that (un)familiarity with an urban area is the single largest predictor of people's sense of safety in that area¹⁰⁰. 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

4.9 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') surveillance¹⁰¹. 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 cent¹⁰².

Rough sleeping

4.10 A high proportion of those seen sleeping rough in London - 33 per cent in 2016/17¹⁰³ - 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

98 Office for National Statistics. Overview of burglary and other household theft: England and Wales. 2017.

99 Greater London Authority. London Plan Integrated Impact Assessment Scoping Report. 5.5.4. 2017.

100 Martin Traunmueller, Paul Marshall and Licia Capra. "...when you're a Stranger": Evaluating Safety Perceptions of (un)familiar Urban Places', the 2nd EAI International Conference on IoT in Urban Space. 2016.

101 Greater London Authority. London Plan Integrated Impact Assessment Scoping Report. 5.4.2. 2017.

102 Secured by Design. Reducing crime by good design. 2014.

103 Greater London Authority. CHAIN Annual Bulletin Greater London 2016/17.

risk of someone reoffending after release from prison¹⁰⁴. Thus, sleeping rough may increase the risk of someone with a history of offending re-offending.

- 4.11 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 year¹⁰⁵.
- 4.12 Correspondence to the Mayor, from both Londoners and visitors to the capital, suggests that rough sleeping can prove intimidating to members of the public. This is particularly so where people sleep rough in larger groups or at higher concentrations, or where there is also begging and/or street drinking.

BUILDING HOMES FOR LONDONERS

- 4.13 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 can 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 help to foster mixed communities, which evidence indicates experience lower levels of crime.

DELIVERING GENUINELY AFFORDABLE HOMES

- 4.14 **Policies 4.1 and 4.2** seek to increase the supply of new genuinely affordable homes in London, and **Proposal 4.3D** seeks 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 crime¹⁰⁶.
- 4.15 **Proposal 4.3A** could also reduce fear of crime. Evidence shows that those who want to move are more likely to be fearful of crime¹⁰⁷. Enabling social housing tenants to move could therefore help alleviate those individuals' fear of crime.

104 HM Inspectorate of Prisons. Resettlement provision for adult offenders. 2014

105 Crisis. "It's no life at all" Rough sleepers' experiences of violence and abuse on the streets of England and Wales. 2016.

106 Department for Communities and Local Government. Mixed Communities: Evidence Review. 2010.

107 Centre for Regional Economic and Social Research, Sheffield Hallam University. Fear of Crime in NDC areas: How do perceptions relate to reality? 2005.

HIGH QUALITY HOMES AND INCLUSIVE NEIGHBOURHOODS

- 4.16 **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.
- 4.17 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 adopted¹⁰⁸.
- 4.18 **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.
- 4.19 **Proposal 5.3D** seeks to tackle the issue of empty 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 behaviour¹⁰⁹, so by reducing their number, the proposal may help to discourage such behaviour.

A FAIRER DEAL FOR PRIVATE RENTERS AND LEASEHOLDERS

- 4.20 **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.
- 4.21 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.

108 Secured by Design. Reducing crime by good design. 2014.

109 Empty Homes Agency. Empty homes: why do some areas have high levels? 2016

- 4.22 **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.
- 4.23 **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 scheme¹¹⁰. This suggests that, by encouraging the use of licensing schemes, this proposal may help to reduce anti-social behaviour.

TACKLING HOMELESSNESS AND HELPING ROUGH SLEEPERS

- 4.24 **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 areas that are not familiar to them. Given that (un)familiarity with an urban area is the single largest predictor of people's sense of safety in that area¹¹¹, this policy may help to reduce the fear of crime for those households who might otherwise be moved into unfamiliar areas.
- 4.25 There is also some evidence that remaining in a community can have a protective effect against criminal behaviour for young people¹¹². By enabling more households to remain in their local area, **Policy 7.1** may therefore help to avoid crime and anti-social behaviour that might have happened had more homeless families been displaced.
- 4.26 **Proposals 7.1B and 7.2C** commit to provide funding to develop new refuges, and to refurbish existing ones, and also up to £50 million of capital funding for accommodation for people leaving hostels or refuges. **Policy 7.1B** also includes a proposal for a London-wide approach to refuge provision that would enable it to better meet need. Providing sustainable accommodation to victims of

110 Figures supplied by London Borough of Newham.

111 Martin Traumueller, Paul Marshall and Licia Capra. "...when you're a Stranger" Evaluating Safety Perceptions of (un)familiar Urban Places.' The 2nd EAI International Conference on IoT in Urban Space. 2016.

112 Department for Education and Skills. Offenders of the Future? Assessing the Risk of Children and Young People Becoming Involved in Criminal or Antisocial Behaviour. 2004.

domestic abuse is likely to reduce the incidence of crime against them. They will be accommodated in a safe place, away from perpetrators.

- 4.27 **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 reoffending rates among those who are helped off the streets.
- 4.28 By supporting people who might otherwise have continued to sleep rough off the streets, **Policy 7.2** will also reduce the opportunities for the violence to which those who sleep rough are disproportionately subject.
- 4.29 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.

Appendix 1: Impact assessment questions

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?

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?

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