



The future of the Code for Sustainable Homes: Making a rating mandatory

Comments Submitted to Communities and Local Government
By Care & Repair England

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1. About Care & Repair England

- 1.1. Care & Repair England is a national charity established in 1986 to improve the housing and living conditions of older and disabled people.
- 1.2. Its aim is to innovate, develop, promote and support housing policies and initiatives, which enable older and disabled people to live independently in their homes for as long as they wish.
- 1.3. The main focus of Care & Repair England is housing for older people in private sector housing. Our comments are primarily about the implications of this consultation paper for the housing of this growing sector of the population.

2. Basis of our Response

- 2.1. For a number of years we have been working with local older people's groups in order to consider housing needs and aspirations during retirement and to identify shortcomings in the current provision of housing for an ageing population.
- 2.2. We have worked with local authorities and older people with the objective of shaping local housing strategies in ways that are rooted in the everyday experience of older people.
- 2.3. Everywhere we have heard the message – *'We want all housing to be well designed with growing older in mind; housing which better meets the needs of all age groups – we want adaptable 'homes for life'.*
- 2.4. The Director of Care & Repair England is the independent Chair of the Government's Advisory Committee on Housing and Older People and in that capacity has been involved in the consultations and meetings that have informed the emerging *'Housing Strategy for an Ageing Society'*
- 2.5. Thus our comments relate to Question 8a about Lifetime Homes Standards

3. Lifetime Homes – Response to Q8

Q8a: Do you agree that Lifetime Homes standards should be made mandatory in the Code?

Q8b: Do you agree that Lifestimes Homes standards should be made mandatory at progressively lower levels of the Code, starting with level 8 in 2008, level 4 in 2010 and level 3 in 2013?

- 3.1. We believe that given the ageing of the population it is essential to make 'Lifetime Homes Standards mandatory in all new build, across all tenures and that making LTH standards mandatory in the Code is the least that can be done.
- 3.2. What we believe needs to happen is for LTH standards to be incorporated into Building Regulations at the earliest opportunity.

3.3. Unless Government sets minimum standards for the building industry, standards with regard to adaptability will not rise. The concept of Lifetime Homes Standards (LTH) as a standard that homes should be built to has been around for over a decade. It was only following the introduction of Part M of the Building Regulations that even small steps were made towards making homes more accessible.

3.4. It will only be through regulation that remaining LTH standards will be introduced into the design of new homes. Without a level playing field, there is no incentive for builders to incorporate these design features, and a 'bottom line' will prevail – it is the role of Government to set that bottom line for all.

3.5. We do *not* support the staged introduction over the next 6 years as this would result in a missed opportunity that the planned increase in home building/growth areas in the near future presents.

3.6. With the government's plans for a major programme of home building over the next few years, and the rapid ageing of the population, it is absolutely critical that this opportunity is seized to build these new homes to higher design standards, including LTHs.

The rationale for our response is set out in Appendix A below

Appendix A

Rationale for the call for the wider application of Lifetime Homes

1. In general, new home building is not addressing, and shows no signs of addressing in the near future, the housing needs and aspirations of an ageing population. Uniquely in the developed world, there has been a fall in space and design standards over the past 20 years that has left even more of the housing stock unadaptable to a person's needs should they become less mobile.

2. *“Older people will make up 48% of all new growth in households to 2024”* (Source: Housing Green Paper, CLG, 2007). In fact, when the figures are examined in more detail, if the exceptional situation of London is removed, this growth level is closer to 60%.

2.1 However, this major social change is not being addressed in mainstream housing design, remaining either an afterthought or not considered at all.

2.2 Already:

- 30% of households include a person of 60 or over and this is set to increase significantly.
- 90% of older people live in the general housing stock.
- 70% of all households are owner occupied. This is even higher amongst the younger retired, amongst which group there is 84% owner occupation in rural areas.

2.3 Thus only applying LTH standards in social rented stock is almost an irrelevance to the majority of older and disabled people, doing nothing to improve the availability of suitable homes for purchase by this majority group.

2.4 It is therefore crucial that Lifetime Homes Standards become mandatory across tenures.

2.5 Only through Lifetime Homes Standards becoming mandatory will there be even a small amount of progress towards delivering a more sustainable housing supply and inclusive housing for the wider community.

2.6 Through the creation of ‘future-proofed’ homes a small step will be taken towards meeting the aspiration of older people to stay as active, included members in their communities.

2.7 Failure to legislate for such inclusive homes will also have a significant impact on future demand for health and social care services.