



## **Consultation Paper on Proposals for introducing a Code for Sustainable Homes**

Comments Submitted to the ODPM  
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 paper for the housing of this growing sector of the population.

## 2. Basis of our Response

2.1. One element of our work has been to develop and enable local older people's groups to more effectively express their housing needs and aspirations at a local level 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 to shape local housing strategies and older people's strategies which are rooted in the everyday experience of older people.

2.3. We undertook specific project entitled '*Should I Stay or Should I Go*' which aimed to enable older people to make an informed choice about moving to more suitable housing in older age.

2.4. Through this programme and the 8 pilot services operating in very different parts of England we identified a significant lack of suitable housing for an ageing population and a real lack of local housing options, particularly for the growing numbers of disabled older people.

2.5. Building new housing to Lifetime Home Standards has been identified by older people's groups and organisations as a small but essential step to both increase the availability of a suitable housing supply and also to promote an inclusive community, whereby disabled people are still able to visit and stay with more of their relatives and friends ie. more people live in accessible homes.

2.6. We were therefore very pleased at the commitment made in the governments overarching strategy for an ageing population, '*Opportunity Age*' to legislating by 2007 to incorporate the Lifetime Home Standards (p35).

2.7. We also note the comment in the Social Exclusion Unit's recent report (*A Sure Start to Later Life: ending inequalities for older people*. ODPM), that the Office of the Deputy Prime Minister will build the lifetime homes standard into the Code for Sustainable Homes.

2.8. ***However, we believe that this latter comment and the proposals in the consultation paper fall far short of the commitment in Opportunity Age and are not adequate steps to ensure the creation of a greater supply of Lifetime Home Standards properties.***

### 3. Comment on the Consultation Paper

3.1. We are extremely concerned by the demotion of Lifetime Home Standards to the category of items which homes may be applied (page 8)

3.2. We are also concerned about the very limited, and erroneous, description of Lifetime Homes (P8) as only being about ‘*the internal adaptability so that a home can be adapted for use of an elderly or disabled person.*’

3.3. Design to Lifetime Home standards means including sixteen design features that ensure a new property will better meet the needs of most households throughout their lifespan, whatever their age or composition and whether or not such needs are influenced by either physical or mental health issues. ***The Code should be amended to incorporate this key point about Lifetime Homes.***

3.4. Given our knowledge of demographic trends, the ageing of the population and growth in disability we believe that ***the very minimum change that needs to be applied is to include Lifetime Home standards as an essential element.***

Already, 30% of all households are headed by a person of 60 or over and this is set to increase

- 90% of older people live in general housing stock.
- 71% of households are now owner occupied – 84% amongst the newly retired in rural areas.

3.6. Our key point is that that so little of the existing stock is suitable or adaptable for people with disabilities, and rates of new build are so low that any decision about the design of that new stock must be made within the context of the current and future demographic trends

3.7. Without this acknowledgement of a major force in housing markets and new area of housing demand the policy will not be effective in delivering a sustainable housing supply or an inclusive environment for the wider community.

3.8. It is essential to create ‘future-proofed’ housing and wider environment which will meet the needs of future generations.

3.9. Any equality impact assessment has to also ensure that development proposals are ‘age proofed’, and fully address the ageing profile of the population.

3.10. Our final and key point is that the Code does not have the force of law but only ‘encourages’ housebuilders to apply such standards. Therefore even if adopted, we are concerned that such a voluntary code will not have a significant impact on the standards of new build..

3.11. Whilst appreciating that social housing will have to incorporate the essential elements, this will not be the case for private sector housing – and thus as the majority of housing is being built in this sector will not incorporate such standards. *To create a level playing field, the Code should be strengthened to apply to all new build housing.*