

# North West of England Draft Plan

## Examination in Public – Matter 4 statement from Shelter

**25<sup>th</sup> September 2006**

**[www.shelter.org.uk](http://www.shelter.org.uk)**

## 1 About Shelter

- 1.1 We are the fourth richest country in the world, and yet millions of people in Britain wake up every day in housing that is run-down, overcrowded or dangerous. Many others have lost their home altogether. Bad housing robs too many of us of security, health, and a fair chance in life. Shelter believes everyone should have a home.
- 1.2 Shelter is the UK's largest provider of independent housing advice, helping over 100 000 homeless or badly housed people each year.
- 1.3 In the North West of England, Shelter Housing Aid Centres provide advice, advocacy and solicitor services to people with housing problems, and to other agencies, in Cumbria, Cheshire, Lancashire, Manchester and Merseyside. Our work gives us direct experience of causes and effects of bad housing and homelessness both in urban and rural areas, including the impact of the growing shortage of affordable housing and the housing needs of different sections of the community. We use the evidence gained from our services to develop solutions and campaign for change in the region.

## 2 Question i

- 2.1 In addition to household growth estimates produced by Nathaniel Lichfield & Partners, Shelter believes that the latest household projections from DCLG must inform the amount of housing planned for the region. *Shelter proposes that more research on housing need and affordability is carried out in the North West, as has been done in other regions. This, as well as the DCLG work on household projections, would provide a robust evidence base for the regional target for affordable housing, and in particular for social housing for rent, that Shelter proposes the Plan provides.*
- 2.2 The Housing Market Renewal (HMR) programme of work covers a similar timeframe as the North West Plan. The programme relies on there being sufficient affordable housing available to owner-occupiers and tenants needing to relocate due to clearance. There has been growing concern about the lack of affordable

housing options available to individuals in this situation, expressed both by local authority partners in HMR pathfinders and members of the community. Shelter supports HMR and the much-needed long-term investment this provides to improve the region's housing stock. We welcome an early evaluation of the environmental, economic, social and cultural impact of the proposed clearance and after-uses, and how this will affect the surrounding area and the local community and the proposal that this evaluation be incorporated into an action plan for implementing strategies of housing renewal and after-uses.

- 2.3 *Shelter proposes that the Plan provide more guidance to pathfinders on the timing and scale of clearance, the tenure mix, affordability and quantity of replacement stock, and use of empty properties, in light of the growing affordability issue, and the high levels of homelessness and the backlog of housing need this is linked to.*

### 3 Question ii

- 3.1 Shelter believes that the Plan needs to provide a regional percentage target for affordable housing, and for the proportion of social rented housing within this. *Shelter recommends that the Plan provide this, whilst also building in mechanisms to review and alter plans to take account of changes in demand, and in particular the likely increases in the need for more affordable housing*
- 3.2 Shelter supports the re-use of previously developed land and buildings as a first priority. There are 128,730 empty dwellings in the North West, 85% of which are privately owned<sup>1</sup>. Shelter supports the Plan to make better use of existing housing stock by encouraging local authorities to take a positive, co-ordinated approach towards dealing with under used housing stock.

### 4 Question iv

- 4.1 Shelter understands that phasing will be dependent on a number of factors including the number of homes already being developed, levels of investment in infrastructure and the capacity of the building industry to deliver. It is vital that local planning authorities take into account affordable housing investment when phasing sites.

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<sup>1</sup> Source Housing Strategy Statistical Appendix (HSSA) 2004/5

- 4.2 In addition to the high levels of homelessness experienced in this region, in 2004/05, there were 200,600 households on local authority housing registers in the North West<sup>2</sup>.
- 4.3 Shelter agrees with the premise of the Barker Report, that two thirds of newly arising social housing need is acute need, and therefore should be prioritised. There is growing evidence that without intervention the bias is against provision of affordable housing, and in particular against social rented housing. Research carried out by the Centre for Housing and Planning Research at Cambridge University (CCHPR) found that only 16,000 affordable homes were built nationally last year as a result of 'planning gain' contributions secured from developers under S106 agreements. The vast majority of these were low-cost home ownership rather than social housing for rent<sup>3</sup>. ***Shelter therefore proposes that the development of new social rented housing is prioritised within the early phasing of the Plan, to meet the backlog of urgent housing need.***

## 5 Question v

- 5.1 Emerging guidance Planning Policy Statement 3 (PPS3) recommends regional spatial strategies should set out, where appropriate, an affordable housing target for the region and for each sub-regional housing market area. Other regions have set targets on affordable and social rented housing. In its Regional Spatial Strategy, the London planning body has determined that 50 per cent of all new housing developments must be affordable, and 70 per cent of this must be social housing for rent. Shelter believes that the Plan should adopt a similar approach in order to reflect emerging national guidance and address housing need in the region.
- 5.2 The lack of affordable housing is a growing problem in the region. Since 1994, it has become 44 per cent more difficult for first-time buyers in the North West region to access the housing market<sup>4</sup>. Meanwhile, Right to Buy (RTB) has eroded the number of social rented houses available. In 2004/05 a total of 8,460 houses were sold under the RTB in the region and since the RTB was introduced a total of

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<sup>2</sup> ODPM statistics 2005

<sup>3</sup> Building to meet housing need and demand, CCHPR, forthcoming research

<sup>4</sup> Professor Steve Wilcox's Affordability Index, ROOF magazine, Vol 31 no. 2, March/April 2006

200,000 council houses have been sold, representing 28 per cent of the total stock<sup>5</sup>.

- 5.3 In 2005/2006, 23,500 households were found to be homeless in the North West by local authorities<sup>6</sup>. At the end of June 2006, 2,508 homeless households, the majority of which included children, were accommodated in temporary accommodation by local authority housing departments. The North West Regional Housing Strategy suggests that in high demand areas there should be high targets for the provision of affordable housing to help meet the local needs with a minimum of public funding, so long as they did not undermine the viability of developing the site. It suggests that in some locations a minimum requirement should be 50 per cent.
- 5.4 There is also growing recognition of the problem of homelessness in rural areas. Homeless households in rural areas often do not ask for help because there are no services in their area, or they move to urban areas in search of more support and therefore do not appear to be part of the rural picture. Statutory homeless numbers are rising in rural areas, as they are in urban areas. In Cumbria, for example, the number of households found to be homeless has doubled between 2001/2002 and 2005<sup>7</sup>.
- 5.5 In the North West there are 60,000 households living in overcrowded conditions (lacking one room or more, using the 'bedroom standard') which is more than any other area outside London<sup>8</sup>. Shelter's research into the extent and impact of overcrowding in the social rented sector<sup>9</sup> support Cambridge Centre for Housing and Planning Research recommendation that a proportion of social rented dwellings need to be larger than 3 bedrooms.
- 5.6 Progress in tackling homelessness and bad housing in the North West is predicated on an adequate supply of social and other affordable housing. The link between the growing problem of affordability and homelessness was recognised in the Regional Housing Strategy 2005 and should be reflected in the Plan
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<sup>5</sup> [www.communities.gov.uk](http://www.communities.gov.uk) Live Tables: Table 643

<sup>6</sup> ODPM, Housing Statistics 2006

<sup>7</sup> ODPM quarterly Homelessness Statistics

<sup>8</sup> Census 2002 and ODPM 'Overcrowding in England 2000 – 2003

<sup>9</sup> Shelter Full House, 2005

- 5.7 The research carried out by the Centre for Housing and Planning Research at Cambridge University to update the analysis contained in the Barker Report concluded that between 2008-11, a minimum of 1,330 social rented homes are required each year in addition to existing house-building commitments of 2,000 social rented units in the North West<sup>10</sup>. These homes are needed in the region to meet both acute newly arising need, and the backlog of housing need. Meeting this backlog is vital if we are to achieve the Government's target to halve the numbers of homeless households in temporary accommodation. ***Shelter proposes that the Plan ensures that increased supply of social rented homes to meet acute housing need identified by Cambridge (above) is delivered.***
- 5.8 Policy L5 needs to be explicit about the need for all types of affordable housing to be developed, including social housing for rent and set the tenure split within the provision of affordable housing, giving priority to social housing for rent. Shelter proposes that the Plan should provide that up to 2011, 20 per cent of all housing development will be social rented housing, a percentage which should be reviewed for the years following this.
- 5.9 Shelter calls on the Plan to provide clear minimum percentage quotas on the proportion of all new developments that must be affordable housing, and the proportion of this that is social housing for rent.

## 6 Matter 4B: Sustainable Communities Question i

- 6.1 Shelter recognise the importance of having mixed tenure and mixed income communities in order for them to be sustainable. One of the key factors in achieving this is to ensure there is sufficient affordable housing. In order for a community to be sustainable it needs housing that meets the needs of all members of the community.
- 6.2 Black and minority ethnic households in the North West are four times more likely to be statutorily homeless<sup>11</sup> and are more likely to live in overcrowded conditions than non-BME households of the same size<sup>12</sup>
- 6.3 The lack of official sites in this region has contributed towards the creation of housing need and social exclusion for Gypsies and Travellers. ***Shelter***

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<sup>10</sup> Shelter, Building Hope, 2005

<sup>11</sup> ODPM: households accepted as homeless in the year ending March 2004

<sup>12</sup> Shelter Report 2005 'Full House? How overcrowd housing affects families'

***recommends that the Plan provides guidance on best practice on carrying out quantitative and qualitative needs assessments that take into account needs such as health, education and other aspects of social inclusion, alongside housing and provide guidance and recommendations for sub regional and local site provision.***

- 6.4 There is an increasing need for property that is wheelchair accessible/adaptable. The London Plan recommends that as well as all new housing being built to Lifetime Home Standards, 10 per cent of this should be built or easily adapted to the higher wheelchair standard. ***To meet the needs of disabled people in the North West, Shelter recommends that the Plan adopt the same commitment in relation to the higher wheelchair standard.***
- 6.5 ***Shelter recommends the Plan give a strong statement that Local Housing Assessments must include a thorough investigation of housing need which takes account of the diverse housing requirements of different needs groups, including BME communities, larger families, refugees and migrant workers, young people, rough sleepers and those who require hostel accommodation, gypsies and travellers, disabled people requiring adapted or accessible properties and people requiring supported housing.***

## 7 Question ii

- 7.1 Shelter's latest report Chance of a Lifetime, identified that children living in bad housing had up to 25 per cent higher risk of severe ill-health and disability during childhood and early adulthood. Homeless children are up to four times more likely to have mental health problems than other children and bad housing affects children's ability to learn at school and study at home<sup>13</sup>. Addressing the shortage in affordable housing, and increasing the supply of social rented homes in the region is crucial to tackling the problems with child welfare, health and education that living in bad housing brings. ***Shelter recommends that the link between health and education and meeting the region's urgent housing need is made explicit in the Plan.***

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<sup>13</sup> Shelter Report, September 2006 Chance of a Lifetime The impact of bad housing on children's lives