Shelter’s response to the Department for Communities and Local Government Consultation – Transforming places; changing lives: A framework for regeneration

From the Shelter policy library

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www.shelter.org.uk
Shelter is a national campaigning charity that provides practical advice, support and innovative services to over 170,000 homeless or badly housed people every year. This work gives us direct experience of the various problems caused by the shortage of affordable housing across all tenures. Our services include:

- A national network of over 20 advice centres
- Shelter’s free advice helpline which runs from 8am-8pm
- Shelter’s website which provides advice online
- The Government-funded National Homelessness Advice Service, which provides specialist housing advice, training, consultancy, referral and information to other voluntary agencies, such as Citizens Advice Bureaux and members of Advice UK, which are approached by people seeking housing advice
- A number of specialist projects promoting innovative solutions to particular homelessness and housing problems. These include housing support services, which work with formerly homeless families, and the Shelter Inclusion Project, which works with families, couples and single people who are alleged to have been involved in anti-social behavior. The aim of these services is to sustain tenancies and ensure people live successfully in the community.
- A number of children’s services aimed at preventing child and youth homelessness and mitigating the impacts on children and young people experiencing housing problems. These include pilot support projects, peer education services and specialist training and consultancy aimed at children’s service practitioners.
- We also campaign for new laws and policies - as well as more investment - to improve the lives of homeless and badly housed people, now and in the future.
Summary and recommendations

- Shelter supports the direction of the framework in that it aims to focus regeneration programmes on the economic and social development of deprived areas. However, we note that regeneration programmes are often extremely challenging and a sound framework needs to be supported by carefully planned and coordinated implementation.
- We agree that tackling worklessness is important, particularly for those in social housing, but believe that addressing worklessness alone will not significantly improve outcomes for deprived areas.
- Research suggests that worklessness is particularly high in social housing due to the multiple disadvantages faced by tenants, ranging from physical or mental health problems to poor availability of transport. Regeneration projects need to respond to all of these needs.
- While Shelter supports programmes to assist social tenants into work, particularly through third sector agencies and bodies such as housing associations, we would not like to see the Government linking social housing tenancies with work-seeking behaviour if this would mean that punitive sanctions would apply.
- We are concerned that the draft framework does not provide guidance on how communities could, or should, be involved in determining regeneration needs and activities in their area. Successful regeneration depends on involving the community throughout the lifetime of a project.
- We recommend that the proposed measures for assessing performance against the proposed outcomes for the regeneration framework include housing related national indicators.
- While the draft regeneration framework refers to the need to respond to environmental change it does not refer to how the growth and changing make up of households and communities also need to be accounted for in the planning and design of regeneration projects.
- We would like the proposed criterion four, ‘the dynamics of the area’, to use qualitative information, for example survey data or community feedback, as well as quantitative data such as employment rates, in order to establish the social and cultural changes in a community over time.
- Shelter would like to see some of the proposals in the consultation document further developed, for example the proposed regional regeneration priority maps, so that it is clearer how these new tools will fit with existing regional planning processes, and to ensure that adequate time is provided for them to be put into place.
- While Shelter agrees that third sector and housing associations can perform a vital role in the delivery of regeneration projects, we would caution that central government and regional and local authorities need to ensure that they actively help to develop the capacity of these agencies to provide such services.
- Shelter’s Neighbourhood Watch research provides good practice suggestions for community engagement in development projects, and highlights the importance of coordinated delivery of infrastructure, amenities and services to support community integration.
Introduction

Shelter welcomes this opportunity to respond to the Department for Communities and Local Government consultation – Transforming places; changing lives: A framework for regeneration.

Regeneration presents the opportunity to develop localised responses to address deprivation and need. Focusing regeneration in particular areas enables coordinated planning of housing, social infrastructure and promotion of economic growth. Housing is an essential element of, and in many cases will lead, regeneration programmes.

Overall, Shelter supports the aims of the draft framework to develop the long term productive potential of places and people, creating sustainable housing, land, labour and product markets. Successful regeneration projects will focus on both the economic and social development of an area by undertaking activity that incorporates physical regeneration (including rehabilitation of housing and other buildings, and transport links), improving the prospects of people (education, employment, health and community cohesion), and improving the wider economy of an area.

Shelter believes that housing, particularly social rented housing, has a vital role to play in providing a secure environment that enables people to find work, settle and establish roots. The significant levels of housing need in this country demonstrate the importance of regeneration projects that improve existing, and encourage development of new, affordable housing and support the development of sustainable communities.

While Shelter supports the direction of the framework, we note that regeneration programmes are often extremely challenging and a sound framework needs to be supported by carefully planned and coordinated implementation. As the CIH has said ‘choosing which areas to focus on and how growth or regeneration will support the regional, sub-regional or local economies is only an initial step – designing and implementing a programme that supports complimentary change and builds sustainable confidence in an area is more difficult to achieve’.¹

Experience from previous regeneration programmes suggests that the large and ambitious nature of many projects can present new issues for already vulnerable communities, hindering the improvement of outcomes. The draft framework looks to learn from past experiences, and incorporate lessons from a significant pool of research in this area. We, therefore, look forward to seeing how the framework will be practically applied in the future.

The consultation document asked specific questions around each chapter discussion. We have responded, where appropriate, to these questions below. In addition, we have provided comments on other relevant issues related to housing and regeneration.

¹ CIH, Housing and the Economy – Integrating Strategies, August 2008
Chapter One

Questions

- Is this analysis right?
- What further analysis is needed to ensure the needs of different demographic groups are properly reflected in our regeneration priorities?

Worklessness

The proposed framework has a strong emphasis on regeneration being underpinned by economic development and reducing worklessness, especially amongst social housing tenants.

The analysis in chapter one of the consultation document refers to concentrations of deprivation and worklessness, and how areas where these issues are prevalent can result in poorer outcomes for residents. Connections are also made between levels of deprivation, worklessness and concentrations of social housing.

Research by the IPPR\(^2\), with reference to the Sub-National Review’s argument that in addressing the problems of deprived areas an integrated approach must be taken to improving the economy, housing, physical environment and amenities, noted that while tackling worklessness is important addressing worklessness alone will not improve outcomes for deprived areas.

The Hills Review has led to a significant amount of research and debate to identify the causes of worklessness among social housing tenants, and to explore possible means of tackling this beyond existing initiatives to increase employment rates (some of which are presented as case studies in the consultation document). Shelter believes that this discussion will offer opportunities to come up with specific initiatives to tackle worklessness in social housing, but also to address the generic and systemic barriers to employment experienced by the most disadvantaged in society, regardless of their housing tenure.

Research\(^3\) suggests that worklessness in social housing is particularly high due to the multiple disadvantages faced by tenants. These disadvantages can often be hidden from view, such as physical or mental health problems. Other factors that prevent those in social housing from connecting with the labour market are a shortage of accessible and sustainable job opportunities, failing schools, lack of adequate childcare provision, lack of social networks and access to the internet, and poor availability of transport. Social tenants closer to the labour market have reported

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\(^2\) Bennett, J, A Tale of Two Cities: Neighbourhood segregation by income in two urban case studies, IPPR, April 2008

that security of tenure sub-market rents, and more supportive landlords all provided work related benefits.4

The Government’s Working Neighbourhood pilots clearly demonstrate the added value of individual focused assistance with job related costs for work seekers. It is also evident that housing providers can play a key role in providing this support. Shelter believes such projects should be built on so that social tenants not in work have access to intensive and tailored support that meets their needs. The effectiveness of these programmes should be supported by reliable, long-term and simpler funding structures.

National, regional and local government must work with employers to develop attractive job opportunities, particularly in areas of new housing delivery and high worklessness. This work should involve partnering with housing associations and community agencies to ensure that such employment programmes reach the most disadvantaged.

While Shelter supports programmes to help social tenants get into work, we would not like to see the Government linking social housing tenancies with work-seeking behaviour if this would mean that punitive sanctions would apply and that a tenant could lose their home.

Addressing levels of worklessness will provide much needed assistance for some, but there are other groups for whom such a focus is not appropriate and who will continue to require a level of support, including welfare support.

Shelter agrees with the framework commentary that housing is an essential element of regeneration, and that housing and regeneration activities, where appropriate, should be planned, led and delivered jointly. In terms of new housing development generally, and regeneration activity specifically, Shelter considers it vital that housing associations and developers work with the Government to ensure that new housing developments create genuinely mixed communities.

Demographics

There are a wide range of demographic and social factors, beyond just deprivation and worklessness, that need to be understood in order to identify regeneration priorities and activities within particular areas. For example, the consultation paper does not refer to the impact of an ageing population, or the growing number of people with caring responsibilities, and the effect of these factors on people’s housing needs. The draft regeneration framework does acknowledge the need to understand the make up of the local population but given the sizeable discussion on worklessness it does not currently address this point in sufficient detail.

4 Ibid.
Rural communities

There is little reference in the consultation document to the regeneration needs of rural areas. There are significant issues around access to affordable housing and other services in rural communities.\(^5\) Rural concentrations of deprivation are evidenced in the maps on page seven of the consultation document. While regeneration projects are most often undertaken in urban areas the framework needs to also respond to the deprivation experienced by rural communities.

Chapter two

Questions

*Are the outcome measures proposed helpful? Will they ensure that regeneration benefits the poorest people and places in society?*

*Have we proposed the right measures?*

Shelter broadly supports the priority outcomes for regeneration. We believe the outcomes should look to balance the economic and social development needs in an area to support the goal of ‘creating sustainable places where people want to live’.

If regeneration projects are to create places where people want to live then a key area of focus will need to be ensuring that residents are satisfied with their neighbourhood. The proposed measures for assessing performance against the draft outcomes cover key areas of regeneration activity, for example, improved employment earnings outcomes, improvements in attainment as well as monitoring performance in areas such as crime and health.

The Hills Review refers to the 2004 English House Condition Survey which showed that a fifth of social tenants, but only 12 per cent of private tenants and 8 per cent of owners were dissatisfied with their neighbourhood. This rises to more than a quarter of social tenants in flatted estate areas.\(^6\) Improvement against this measure should be a key indicator for areas with a high proportion of social housing.

Given the already stated connection between housing and regeneration we would also like the framework to include housing related national indicators measured at the local level, such as NI 154: Net additional homes provided, NI 155: Number of affordable homes delivered, NI 156: Number of households living in temporary accommodation. Including these measures should provide a more complete picture of the impact of housing related activity undertaken through long


term regeneration projects, particularly how it is contributing to reducing identified housing need in an area.

What can central government do to give communities a stronger voice in shaping regeneration? How can other agencies help?

Improving outcomes overall for deprived communities will require the long term involvement and commitment not only of government and other authorities, but of residents themselves. It is critical that in having a strong economic focus to regeneration the social and community aspects of regeneration are not overshadowed. A key element of this will be recognising that communities already exist in areas targeted for regeneration, and any activity should focus on building on the relationships that these encapsulate.

The Ferrier Estate in Greenwich is an example where the process of regeneration rather than addressing deprivation has diminished a community and made the living conditions of residents even worse. In this case the regeneration activity has resulted in residents being moved from their original homes, and being excluded from the opportunity to be re-housed in the new homes. Tenants have been re-housed throughout the Borough, with vital social and family networks that provided care and support being broken up. Those residents that remained on the estate, many of whom have exercised their right to buy, are now living in even more deprived and rundown conditions. Rather than feeling engaged in the regeneration process, residents feel that the Local Authority has misled them and that their community has been permanently undermined.

The proposed regeneration framework looks to be learning from the successes and mistakes of previous regeneration projects. The example above and other projects highlight the need for long term and effective engagement with communities. Part of this approach is about discussing and arranging sustainable solutions for households that are affected by regeneration projects to ensure that they do reap the intended benefits. This is the responsibility of all parties involved in regeneration activities, but particularly local authorities.

Shelter commissioned research from the London East Research Institute at the University of East London to look at the challenges of building a sustainable community. The research used Thames Gateway developments as case studies. While the research focused on three particular developments, many of the findings apply more generally to new housing developments and regeneration initiatives across the country, especially where there is a significant proportion of affordable housing.

7 ‘Degeneration Game’, Roof, September/October 2008
One of the findings from this research was that most residents did not feel that their views had been actively sought. Some, particularly social tenants, perceived a lack of democracy in decision making procedures, despite the developments all aiming to involve residents. We are concerned that the draft framework does not provide guidance, or good practice examples, on how communities could or should be involved in determining the regeneration need and activity in their area. As an example of good practice the Royal Town Planning Institute has published guidelines\(^9\) on effective community engagement and consultation along with supporting case studies. It is crucial that development plans take account of the views of both existing communities and, in the case of new community developments, the views of prospective residents.

Housing Market Renewal Pathfinders (HMRPs) provide examples of how to deliver housing development in a way that promotes community cohesion. One of the characteristics of the pathfinder areas is community segregation, and there is often an over representation of BME households, for instance in the Oldham/Rochdale and East Lancashire areas. The Audit Commission have highlighted the steps that the pathfinders have taken to improve community cohesion\(^10\), including through an emphasis on seeking to involve all communities in community consultation – for example by holding meetings in culturally sensitive venues and forming links with the national community cohesion pathfinders.

Shelter’s research also found that the local provision of good infrastructure and services is very important to residents. However, there was often a time lag between people moving into schemes and service provision. In two of the developments lack of transport networks was a significant problem for residents.

Community development clearly has a role to play in helping people to feel less isolated. Residents felt there was a lack of social and community infrastructure to meet their needs. It was either not factored into plans or, where it was provided, was generally completed several years after the first residents moved in.

The establishment of local shops and cafes in the developments suffered from a time lag due to reliance on a market model in which a critical mass of residents is necessary for business. On some developments, this critical mass appeared elusive, despite a clear need, and more has to be done to facilitate social enterprise as an important source of goods and services, particularly in the early phase of developments.

Shelter recommends that a more systematic approach to gathering existing and future residents’ views needs to be undertaken as an important resource for planning. Also, a community development plan should be drawn up to coincide with residents moving into a new housing development. This would set out a strategy and implementation plan for community development.

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\(^9\) These guidelines can be found at [http://www.rtpi.org.uk/item/593/23/5/3](http://www.rtpi.org.uk/item/593/23/5/3).

that would identify ways of creating effective and representative systems of housing governance, including a role for private renters.

Social and community enterprise also has a role to play, specifically in relation to the development of local facilities and services. We agree that the third sector, and particularly social enterprises, can play a key role in working with communities to improve the support and development opportunities in a particular area, whether it be providing amenities such as a cafe, or offering employment and training opportunities.

*What else can we do to ensure regeneration is responsive to environmental change?*

Shelter believes that it is essential that any form of development, including regeneration, is planned in a way that is responsive to environmental change. Sustainable home and community design plays a role in managing not only the impact of housing and people on the environment, but also household costs such as fuel bills.

When planning regeneration projects consideration must be given to ensuring that any redevelopment minimises carbon emissions, takes account of flood risk damage and provides accessible transport and services.

Regeneration, through good planning and design, should respond not only to climate change but also address the demands and pressures resulting from the growth and changing make up of households and communities over time. For example, CABE’s recent consultation on the Thames Gateway Design Pact proposed to ensure all new housing in the development meet the Lifetime Homes and Building for Life standards, as well as ensuring that the unique estuary environment and eco-region designation of the Thames Gateway is incorporated into the design of the development. We would like to see this kind of broader perspective on design incorporated into the regeneration framework.

*How can we further strengthen sub-regional partnerships to deliver regeneration outcomes?*

HMRPs are one of the few instances where sub-regional working arrangements are in place and working well. As such, they provide an exemplar for the Treasury’s proposals – set out in its review of economic regeneration and development - for greater co-operation by local authorities at sub-regional level, supported by multi-area agreements or through statutory sub-regional arrangements. The HMRP experience should be drawn on when planning other regeneration projects, and specifically housing-led regeneration.
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Chapter three
Is the criteria based approach a helpful way of ensuring greater consistency in prioritising regeneration investment?

We agree with the proposed criteria around understanding the level of deprivation, strength of the sub-regional economy, and economic and social characteristics of the area to be able to identify where and how to prioritise regeneration.

We also support proposed criterion four, which focuses on the need to understand the dynamics of an area. However, for this criterion, as well as analysing quantitative information (such as the examples provided in the consultation document of trend analysis around employment rates and population changes) we consider that qualitative information should also be incorporated into this assessment (for example, surveys or community involvement). Collecting both qualitative and quantitative information will provide a fuller picture of the dynamics of an area and support more informed decision making.

Regeneration programmes should work alongside mainstream programmes to address deprivation and improve outcomes for communities. The analysis resulting from the application of the proposed prioritisation criteria could result in any number of scenarios, many of which may identify varying types and levels of deprivation, and assessments of the appropriateness of regeneration activity. The application of the criteria should not just be about whether an area will be targeted for regeneration but also be used as a tool to identify how mainstream and regeneration funding can best be coordinated to address community need.

Shelter would not want to see a situation where significant community need was identified through this analysis, but that need was not responded to because the area was not seen as a priority for regeneration.

Given the long term nature of regeneration projects, and the fact that development is often completed in phases, it is important the framework provides the ability to review and reassess priorities and activity throughout the project’s lifetime.

Should we ask regions to develop regional regeneration maps? What are the disadvantages of that approach?

We support the concept of regional regeneration maps as a tool for helping to align central government and regional investment in local and regional regeneration priorities. The long term and often capital intense nature of the regeneration projects means that it is critical that there is a clear process by which central government and regional and local partners can agree priorities and
funding commitments. However, this process should not prevent local authorities looking for opportunities to undertake regeneration projects when central government funding is not available.

It is appropriate that existing planning mechanisms such as Local Area Agreements, the proposed Economic Assessment Duty and Local Development Frameworks are also used to identify where regeneration might be targeted, and how projects are to be progressed. We are concerned about the draft framework’s current lack of information on how the development of the regional regeneration maps would be worked into the processes for developing other regional planning documents, and consider that these connections need to be further developed before the framework is finalised.

The proposal to introduce this new planning tool would have RDAs, Regional Assemblies and other partners provide indicative regional regeneration priorities maps as part of their regional funding advice by early 2009. Shelter is concerned that the proposed timeframe for this advice is ambitious and additional time may be required in some cases for these organisations to undertake the level of analysis proposed and consult appropriately with relevant local authorities and the community.

Should we go further? What else can be done to align national Government investment behind local and regional priorities?

Is there a case for central government still identifying some specific neighbourhoods and targeting particular assistance at them in future in order to learn lessons, as we have done with NDCs?

Yes. Central government, alongside regional and local authorities, have a leadership role in regeneration, which may mean taking on particular types of regeneration projects in order to develop new approaches, or address specific areas of need. This is particularly the case where regeneration projects need to be supported by major infrastructure investment.

The role taken by central government in these projects would depend on the nature of the project, for example it may be as a primary funder only. Arguably the draft regeneration framework, by including the proposed prioritisation tools, should support a process where central government and regional and local authorities would be able to collaboratively identify projects that would require a significant role for central government.

HMRPs provide examples of how targeted regeneration programmes may require substantial support from central government. While the HMRPs were primarily focused on addressing housing market failure, this was undertaken in the context of also addressing long term economic and social decline. The HMRP programme was undertaken with the understanding that it would be a long term commitment, and require significant funding over this time, but the pathfinder areas
would have a level of autonomy to determine the most appropriate approach to regeneration in each case.

The progress of this programme provides valuable lessons about the benefits and challenges of regeneration projects. For example, increasing house prices in the pathfinder areas has brought benefits to the different areas, such as growing private sector investment and higher values for public sector land and other assets. But the flipside of this growth is that home ownership in pathfinder areas has become increasingly unaffordable, which has created additional housing pressure. It remains to be seen how the current state of the housing market will impact on affordability in HMRPs over the long term.

When the HMRP programme was established it was acknowledged that the projects would run over a 10 – 15 year period. However, this acknowledgement has not been backed up with security of funding over this period. Funding for HMRPs is currently only committed to the end of the 2008-2011 Comprehensive Spending Review period. Sizeable regeneration programmes such as this need to have greater certainty about the government funding available to them throughout the lifetime of the project.

The experience of some of the pathfinder areas supports the principle proposed in the draft framework that targeted regeneration projects must address both improvements in the physical environment, opportunities for people and improvements in the wider economy.

**Chapter Four**

*Taken together, do these new and enhanced roles for different agencies equip them to deliver the expectations in the framework?*

*What would be the costs and benefits of this approach?*

Shelter has a particular interest in the proposed roles for housing associations and third sector agencies in activities to tackle social and economic outcomes. Many third sector agencies and housing associations already provide integrated services that are focused on addressing both economic and social needs within the context of housing. Shelter delivers a number of services of this nature, such as our Homeless to Home programme, drawing on Supporting People funding.

While Shelter agrees that third sector and housing associations can perform a vital role in the delivery of regeneration projects, we would caution that central government and regional and local authorities need to ensure that they actively help to develop the capacity of these agencies to provide such services. This support could, for example, take the form of simpler and longer term funding arrangements, and/ or partnership approaches to the design and delivery of services.
Conclusion

Shelter supports the direction of the draft regeneration framework under consultation. The draft framework builds on the lessons learned from previous regeneration projects and the significant amount of discussion and research in this area, particularly housing market renewal.

The draft framework provides a solid starting point for ensuring a sustainable and community focused and involved approach to regeneration. We support the draft framework’s recognition of the role of housing, particularly social housing, in regeneration and the need to undertake housing regeneration alongside work to improve the economic, social and wider physical environment.

We particularly look forward to see how some of the concepts outlined in this consultation, especially around supporting social housing residents into work, are further developed in the forthcoming housing green paper.

Regeneration programmes undertake substantial tasks that require concerted, integrated and long-term investment from authorities at all levels and the communities they are looking to support. We look forward to seeing how this framework is put into practice to ensure that it meets the outcomes it is looking to achieve, including delivery of decent affordable homes in areas where people want to live.

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