

AFFORDABLE HOUSING STATEMENT

Real People in Real Need

LAND SOUTH OF HEMPSTED LANE
GLOUCESTER



MARCH 2020

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EXECUTIVE SUMMARY

- i. This Statement examines the key indicators of affordable housing need within Gloucester City District. It represents real people in real need who are unable to access suitable affordable homes. The shortage of affordable housing is causing serious long-term impacts on both physical and mental health at national and local level.
- ii. There is an acute affordable housing need within the district of Gloucester which is not being addressed. The statistics demonstrate the significant level of unmet affordable need.
- iii. At national level, there were **1.11 million households on local authority waiting lists** on 1 April 2018. The largest group of “People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions”, which covers 233,600 households. This costs the NHS **£1.4bn and £2.5bn annually**.
- iv. The lack of affordable homes in Gloucester is contributing towards the national shortage of suitable homes and associated economic and health impacts.
- v. According to the Gloucestershire Local Housing Needs Assessment 2019, **7,002 households are overcrowded** and live in unsuitable housing in the District.
- vi. **30% of all households in Gloucester are unable to afford market housing.** Lone Parent Families with 1 or more dependent children are the most at risk, where **62% are unable to afford market housing**.
- vii. A total affordable housing need of 3,039 dwellings is identified, **with a net annual need for the provision of 152 affordable dwellings**.
- viii. Since 2011, **Gloucester has delivered 1,026 affordable homes, which equates to an average of 128 dwellings per annum**. This average is lower than the annual need of 152. On this basis, the Council will be unable to deliver the required affordable housing to meet the needs of families in the area.

1 INTRODUCTION

1.1 The Scope of the Report

- 1.1.1 This Affordable Housing Statement has been prepared in support of an outline planning application for the development of up to 245 dwellings to the south of Hempsted Lane, Gloucester. In accordance with the Local Plan, the proposals will provide 20% affordable homes (49 new affordable homes).
- 1.1.2 This responds to the acute affordable housing broadly evident across the Gloucester City area. There are a significant number of families living in unsuitable accommodation that cannot access an affordable home, many of whom are single parent households. These are real people in real need on a waiting list that cannot be met through current adopted policy mechanisms.
- 1.1.3 The social and economic harms of unsuitable housing are demonstrated through this statement. Housing is a key social determinant of health across adults and children. This applies to both physical health and mental wellbeing.
- 1.1.4 The proposals will deliver 49 affordable homes. It provides an opportunity to address the scarcity of affordable homes throughout Gloucester, which has been prevalent since the beginning of the plan period. It is therefore likely that provision will not be made elsewhere, should the proposed development south of Hempsted Lane does not come forward. The delivery of affordable housing should be attributed no less than very significant weight in the planning balance.

2 ECONOMIC AND HEALTH IMPACTS

2.1 National Research in Numbers

- 2.1.1 This section provides an overview of the significant impacts of unsuitable housing at the national level. It demonstrates the impact of long-term waits on the people stuck living in overcrowded and unsustainable living conditions. This is then related to the most up to date statistics surrounding both the need and consistent under delivery of affordable housing.
- 2.1.2 According to DCLG Housing Statistical Release Paper, there are **1.11 million households** on local authority social housing waiting lists (April 2018)¹.
- 2.1.3 The publication also stated that “People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions” covered **233,600 households**. The second largest group was “People who need to move on medical or welfare grounds, including grounds relating to a disability”, which covered **114,900 households**.
- 2.1.4 In the same year (2017-2018) only 47,355 gross affordable homes were built.² At this level of delivery, it will take over 23 years to address the current waiting list. This is before factoring in future housing need. This leads to the conclusion that many people on the waiting list will not live long enough to find a suitable home.
- 2.1.5 On 14th January 2019, Shelter published Building for our future: A vision for social housing³. The report identified that over 25% of households that had been allocated a social home had to wait more than a year and 7% had to wait more than 5 years. This report further reinforced the findings of the DCLG publication that there is simply not a sufficient amount of social housing being delivered to meet the demand.

¹ DCLG Housing Statistical Release 24th January 2019

² DCLG Affordable Housing Supply 22nd November 2018

³ Building for our future: A vision for social housing 14th January 2019

2.1.1 The Shelter report also identifies that there has been a loss of housing stock and a failure to replace it which has resulted in a significant reduction in the number of social homes, with around 1.5 million fewer social homes today than there were in 1980.

2.2 Economic Impacts

2.2.1 In December 2015 the Government published a number of briefing papers on “Understanding the Cost of Poor Housing to Health”.⁴ BRE (Building Research Establishment) produced the ‘Homes and Ageing in England’ briefing paper on behalf of Public Health England (PHE), using English Housing Survey data. This paper provides an overview of the housing conditions of older people (55+).

2.2.2 The report concluded that unsuitable housing costs the NHS between **£1.4bn and £2.5bn annually**. This is considered to be an underestimate of the total cost, as it does not factor in minor hazards or consider health and care issues which linger long after the immediate NHS treatments costs.⁵ The actual figure for the money the NHS spends due to unsuitable housing is therefore likely much higher. To put this into context, it is costing the NHS a similar amount that smoking does annually (£2.3-3.3bn).

2.2.3 The BRE report also states that outside of the NHS, unsuitable housing costs wider society **£18.6bn per year**.

2.2.4 The Government published Guidance on “Improving Health through the Home” in which it is stated:⁶

“The right home environment is essential to delivering NHS England’s Five Year Forward View, and local authority plans for social care... It is also essential to ambitions for the economy”.

⁴ <https://www.gov.uk/government/publications/homes-and-ageing-in-england-understanding-the-cost-of-poor-housing-to-health>

⁵ BRE Briefing Paper, The Cost of Poor Housing to the NHS, P.9

⁶ <https://www.gov.uk/government/publications/improving-health-through-the-home/improving-health-through-the-home>

2.2.5 The economic implications of unsuitable housing are evident. Every new affordable home built will help reduce the significant sums spent due to unsuitable living on both the NHS, and wider society.

Housing Benefits

2.2.6 Housing benefits cost the economy several billion pounds per year. The shortage of affordable housing plays a role in these costs, as the under provision of suitable affordable options drives many people into costly private rented accommodation.

2.2.7 The Office for Budget Responsibility was created in 2010 to provide independent and authoritative analysis of the UK's public finances and predict future trends in government spending. In their latest report regarding welfare spending titled: "Welfare Spending: Housing Benefit", the amount spent on housing benefit was predicted to increase by £1.5 billion in the 12-month timeframe following the 2017/18 fiscal period:

"In our latest forecast, overall outturn spending on housing benefit was estimated to be £21.9 billion in 2017-18... We expect overall housing benefit spending in 2018-19 to total £23.4 billion, with 4.6 million recipients paid an average of £5,035 each. That would represent 2.9 per cent of total public spending and 1.1 per cent of national income".⁷

2.2.8 This cost analysis demonstrates the striking annual increase and overall percentage of government spending due to the need for housing benefits by many people across the UK. With the overreliance on private rented accommodation, driven by the lack of affordable housing provision, this is a figure that could be reduced significantly by providing the identified affordable homes needed to lift families out of unsuitable and expensive private rented accommodation.

⁷ <http://obr.uk/forecasts-in-depth/tax-by-tax-spend-by-spend/welfare-spending-housing-benefit/>

2.3 Health Impacts

Physical Impacts

2.3.1 The Association of Directors of Public Health (ADPH) is the representative body for Directors of Public Health (DsPH) and advise on national public health policies.

2.3.2 ADPH produced a Policy Position Paper on Housing and Health in November 2017 predicated on a series of research papers. It concluded that housing is a key social determinant of lifelong general health and emphasised that housing affordability has worsened in all local authority districts in the last two decades. The following statements were made:

- i. Unsafe housing is associated with increased falls and estimates suggest that **10% of excess winter deaths** are due to fuel poverty, with **21.5% of excess winter deaths** attributable to the coldest 25% of homes.⁸
- ii. Fuel poverty can lead to cold, damp homes, which may lead to poor health outcomes and **increased morbidity and mortality including cardiovascular disease, respiratory diseases and mental health problems.**⁹
- iii. Poor housing can result in up to **25% higher risk of serious ill-health or disability** during childhood and early adulthood, increased risk of **meningitis, asthma, slow growth, mental health problems, lower educational attainment** and greater likelihood of unemployment and poverty.¹⁰
- iv. local authorities accepted **14,600 households as being statutorily homeless**, and the total number of households in temporary accommodation on 31st March 2017 was 77,240, up eight percent on a year

⁸ ADPH, Housing and Health, P.3

⁹ ADPH, Housing and Health, P.3

¹⁰ ADPH, Housing and Health, P.1

earlier. **The average age of death of a single homeless person is 30 years lower** than the general population.

2.3.3 The Policy Position Paper also addressed the impacts of overcrowding on physical health. The paper defines overcrowding as: *where two or more people aged 10 or above and of opposite sexes, not living together as husband and wife, must sleep in the same room*. Living in overcrowded accommodation can lead to a host of **negative health impacts in children such as respiratory conditions, tuberculosis, viral or bacterial infections, and slow growth**. The Paper also concluded that there was a notable association between overcrowding and **poor psychological health in children**.¹¹

Mental Health Impacts

2.3.4 In April 2017, Shelter in partnership with the research agency, ComRes, explored the relationship between housing and mental health through a two-stage research project.

2.3.5 The key findings are as follows:¹²

- i. **1 in 5 English adults** (21%) said a housing issue had negatively impacted upon their mental health in the last 5 years.
- ii. **Housing affordability was the most frequently referenced issue** by those who saw housing pressures having had a negative impact upon their mental health.
- iii. **3 in 10** of those who have had a housing problem or worry in the last five years, not only said that it had had a negative mental impact, but that they had no issue with their mental health previously.

¹¹ ADPH, Housing and Health, P.4

¹² SHELTER, the Impact of Housing Problems on Mental Health, P.4

2.3.6 The Government published Guidance on “Improving Health through the Home” and stated that:¹³

“The right home environment is essential to health and wellbeing, throughout life. It is a wider determinant of health... The right home environment protects and improves health and wellbeing and prevents physical and mental ill health.”

2.3.7 This leaves no room for doubt that National Government considers housing and mental health to be directly linked. The Guidance provides more information that the right home and environment enables people to:

- i. manage their own health and care needs, including long term conditions.
- ii. live independently, safely and well in their own home for as long as they choose.
- iii. complete treatment and recover from substance misuse, tuberculosis or other ill-health.
- iv. move on successfully from homelessness or other traumatic life event.
- v. access and sustain education, training and employment
- vi. participate and contribute to society.

2.3.8 The wealth of evidence from both government and independent organisations, demonstrates that the negative effects of affordable housing are unequivocally persistent and pervasive. More action is required to overcome these issues than simply acknowledgement and broad commitments to the provision of better and more easily accessible affordable accommodation options. Authorities across the nation must make the commitment to consistent and adequate delivery figures of affordable housing. Without doing so, it is the reality that many people across the

¹³ <https://www.gov.uk/government/publications/improving-health-through-the-home/improving-health-through-the-home>

UK may never meet the essential necessities of a basic and decent standard of living.

3 NATIONAL PLANNING POLICY

3.1 The National Planning Policy Framework

3.1.1 The National Planning Policy Framework identifies health and longevity of communities, achieved through sufficient provisions of the appropriate homes in the appropriate places, as one of the key requirements in ensuring that existing and new developments are sustainable. The Framework (8a) states the following:

“A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being..”

3.1.2 This is one of the key objectives to achieving sustainable development. For plan-making this means **as a minimum**, providing for the objectively assessed needs for housing¹⁴.

3.1.3 At the Local Level, the Framework states that strategic policies should also set out a housing requirement for designated neighbourhood areas. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority¹⁵.

3.1.4 Health and housing are without doubt essential to the provision of sustainable communities and the long-term sustainability envisioned by the National Planning Policy Framework. Affordable housing allows for both of these objectives to be met simultaneously, as they provide means for people stuck in unhealthy living

¹⁴ NPPF 11b

¹⁵ NPPF 66

situations to find better accommodations, whilst also contributing to the greater need for housing nationally.

4 THE RELEVANCE TO GLOUCESTER CITY

4.1 The Joint Core Strategy

- 4.1.1 The Joint Core Strategy, adopted in December 2017, between Gloucester City, Cheltenham Borough and Tewkesbury Borough sets out how development will be co-ordinated across the area of these authorities.
- 4.1.2 The Core Strategy sets out the ambitions and objectives of Gloucester and the other joint authorities in Part 2 of the document, titled: *Visions and Objectives*. Ambition 3 – *A healthy, safe and inclusive community*, contains Strategic Objective 8 – *Delivering a wide choice of quality homes*, and Strategic Objective 9 – *Promoting Healthy Communities*.
- 4.1.3 These objectives clearly state the commitment of Gloucester and the other joint authorities to “meeting the housing needs of all age groups and vulnerable groups” through “delivering, at least, a sufficient number of market and affordable homes” with the aim of “creating stronger communities by reducing inequality and social exclusion.”¹⁶
- 4.1.4 Core Strategy Policy SD12 – *Affordable Housing* provides further detail on the authorities’ planned delivery of the ambitions and objectives set out in part 2 of the Core Strategy. Policy SD12 demonstrates that the joint authorities appreciate the need for sufficient affordable housing delivery, and the explanation below this policy specifically identifies “higher levels of need in Gloucester City than in other districts.”¹⁷
- 4.1.5 The delivery of sufficient affordable housing, of the appropriate types in the appropriate places, is an evident ambition of Gloucester and the other authorities for the fulfilment of their Core Strategy. Health and affordable housing are prioritised within the Core Strategy, and the need within Gloucester City is especially noteworthy.

¹⁶ Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Ambition 3, Page 15.

¹⁷ Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Policy SD12, Section 4.12.16 Page 67-70

4.2 Affordable Housing Need in Gloucester City

Gloucestershire Local Housing Needs Assessment

4.2.1 As part of the review of the Joint Core Strategy currently underway, a Local Housing Needs Assessment has been prepared and published in October 2019. The assessment details most up to date figures for affordable housing need and affordable housing supply for all six authorities contained within Gloucestershire, with each authority having an individual breakdown of their current need and affordable supply.

4.2.2 This assessment reaches the following conclusions for Gloucester City:

- i. **7,002 Households** were identified as being overcrowded¹⁸.
- ii. A total affordable housing need of 3,039 dwellings is identified, **with a net annual need for the provision of 152 affordable dwellings**¹⁹.
- iii. **30% of all households in Gloucester are unable to afford market housing.** Lone Parent Families with 1 or more dependent children are the most at risk, where **62% are unable to afford market housing**²⁰.

4.2.3 It is notable that the findings of this assessment are considerably higher than the affordable housing requirement set out within the Joint Core Strategy. The Core Strategy sets Gloucester City's affordable housing requirement at 50 per annum, however this most recent evidence suggests more than triple that number would be needed on a yearly basis to meet the need in full. It emphasises that appropriate provisions must be made quickly, as the affordable situation in Gloucester City requires significantly more completions than previously assumed.

4.2.4 Without improving the delivery of affordable housing, through the consideration of further development in the area, the council will continue on its current affordable trajectory. Over the current plan period, beginning in 2011, Gloucester

¹⁸ Gloucestershire Local Housing Needs Assessment, Figure 40, Pages 59-60

¹⁹ Gloucestershire Local Housing Needs Assessment, Section 8.40

²⁰ Gloucestershire Local Housing Needs Assessment, Figure 36, Page 56.

City has provided 1,026 affordable homes, at an average rate of 128 per annum. The continuation of affordable provision at this rate will lead to a deficit in affordable homes. Means to deliver sufficient homes, which will lead to the need for further development across Gloucester City must be considered.

The National Context

4.2.5 The acute affordable housing need in Gloucester City directly contributes to the following:

- i. The 1.1 million households on the waiting list in England
- ii. The 14,600 households statutorily homeless in England
- iii. A £1.4 – 2.5 billion annual cost to the NHS due to unsuitable housing

4.2.6 The health and economic harms identified in Section 3 are directly applicable to Gloucester City. On the Council's figures alone, the provision of affordable homes is set to become an even greater issue within the area, as the deficit between those in need and those able to obtain an affordable home continues to grow.

5 THE RELEVANCE TO HEMPSTED

5.1 Context

5.1.1 As a suburban village and part of the City of Gloucester, Hempsted is considered alongside Gloucester City as a "Tier 1 Settlement". The Core Strategy describes that "these settlements are the main focus for new homes, jobs, retail, leisure, education and cultural development. They make best use of existing principal infrastructures and they represent the most sustainable locations for development."

5.1.2 Policy SP2 of the Joint Core Strategy sets out that Gloucester City, as an authority, will make provision for at least 14,359 new homes, 13,287 of which will be delivered within the Gloucester City administrative boundary.

5.1.3 Hempsted is therefore well placed, in an acknowledged sustainable location, to assist in the delivery of the extensive requirement placed on the city of Gloucester to uphold the core strategy policy housing requirement.

6 CONCLUSION

6.1 Real Families in Real Need

6.1.1 This Government has stated that “The right home environment is essential to health and wellbeing, throughout life. It is a wider determinant of health”. The physical and mental harms of unsuitable homes is widely accepted.

6.1.2 There is also a significant economic harm of unsuitable housing. It costs the NHS over £2.4 billion annually. There is also a current welfare annual welfare bill which is fast approaching £24 billion annually.

6.1.3 The acute affordable housing need in Gloucester City is directly contributing towards a growing affordable housing issue prevalent throughout the area. Currently:

- **152 affordable homes per annum** are needed to overcome the affordable housing deficit;
- **7,002 households in Gloucester City** are identified as overcrowded;
- **30% of all households in Gloucester are unable to afford market housing.** Lone Parent Families with 1 or more dependent children are the most at risk, **where 62% are unable to afford market housing**

6.1.4 In order to meet this need Gloucester City must provide affordable homes at a greater rate than it has been doing annually. The wealth of evidence from both government and independent organisations, demonstrates that the negative effects of affordable housing are unequivocally persistent and pervasive.

6.1.5 Gloucester must make greater commitments to ensure that affordable housing provision can keep pace with the most recent figures that demonstrate the local housing need. This naturally means the consideration of further development throughout Gloucester City authority, and primarily the City of Gloucester, that is sustainable, deliverable and achievable in enough time to matter to the people who already cannot find a suitable home to live in.

6.1.6 The proposed development will provide 49 affordable in Hempsted, within the City of Gloucester, where there is a significant affordable housing need. These are real people in real need susceptible to the health conditions referred to in this statement. No less than very significant weight should be given to providing homes for 49 families currently living in unsuitable accommodation.

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