

Building sustainability into the West Midlands Regional Housing Strategy: Commentary on Issues Paper

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1 Introduction

- 1.1 Sustainability West Midlands (SWM) offers the Regional Housing Partnership this a commentary on the Sustainability Issues in the January 2005 draft of the Issues Paper for the West Midlands Regional Housing Strategy (RHS). It was prepared for as a desk exercise by Levett-Therivel sustainability consultants, incorporating comments from the SWM membership.
- 1.2 We have used the four key Regional Objectives and their more specific sub-objectives from **Version One of the Regional Sustainable Development Framework (RSDF) *A sustainable future for the West Midlands (Sustainability West Midlands, January 2005)*** as a basis for appraisal and these are listed at Annex 1. It should be noted that these Objectives are subject to review as part of the preparation of Version Two of the RSDF which will take account of the new National Sustainable Development Strategy, due for publication in March 2005.

Caveats

- 1.3 The following limitations and caveats must be emphasised:
 - This is not a full or systematic Sustainability Appraisal, but rather an overview of the key sustainability issues raised.
 - Absence of an issue from the Housing Strategy Issues Paper is not a problem or deficiency if it is covered in another Regional Strategy with adequate influence over the relevant aspects of housing. The Regional Spatial Strategy for example discusses spatial distribution of development and environmental and resource issues extensively, and applies to housing alongside other kinds of development. It is beyond the scope of this focused exercise to assess how far other strategies would ensure Sustainability in Housing. A potentially very valuable role for Version Two of the RSDF would be to check that big cross cutting issues such as Climate Change issues are tackled effectively across Strategies.
 - Supporting information available was limited.
 - We recommend that these findings be tested against, and amplified by, regional and local knowledge, through discussion with relevant stakeholders .
 - The Issues Paper is, rightly, very general, so effects will be very highly dependent on how it is interpreted and implemented.

2 Appraisal against the RSDF objectives

Overall assessment

- 2.1 The overall direction of the new Housing Strategy as set out in the Issues Paper will be good for Sustainability. Even without doing a detailed systematic appraisal it is clear that it would score almost entirely positively for those RSDF Objectives which it would significantly affect (see section 3 below). This overall positive message should be kept in mind in all that follows.
- 2.2 The overall philosophy is very much in line with sustainability thinking. We commend four overall themes in particular:
 - **Concentrating housing growth in urban areas;**
 - **Emphasis on making cities attractive places where people want to live: ‘urban areas where people will choose to live and rural areas where people are not forced to leave’**
 - **Matching housing with jobs and facilities to minimise the need to travel;**

- **Enabling all kinds of people to afford and access suitable housing, including attention to potentially disadvantaged people including black and minority ethnic groups, homeless people, gypsies, travellers and asylum seekers.**

2.3 However the Issues Paper's coverage of quality of life issues is much better developed than its treatment of environmental ones. In seeking to restore the balance, this paper therefore gives strong attention to environmental questions. The following sections consider individual objectives and groups of objectives in more detail.

Housing Objective

2.4 Unsurprisingly, the RSDF Objective for Housing is the one which the Housing Strategy Issues Paper has the most to say about. The main part of this Objective is to: 'provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs . . .' This is a very good summary of the overall aims and the bulk of the detailed content of the Issues Paper. With the caveats made elsewhere, the Issues Paper is highly positive for the RSDF Objective which it is rightly most concerned about, - provided the RHS includes provisions to keep 'affordable' housing available for the people who need it, and prevent it being resold at market prices. The RHS will need to clarify how the Government's proposals to allow tenants of Registered Social Landlords to acquire an equity stake in their homes can avoid eroding affordable housing.

2.5 The remaining part of this Objective is 'in clean, safe and pleasant local environments.' This is hardly mentioned in the Issues Paper. It is discussed in the section below on environmental impacts, where this part of the Housing Objective really belongs anyway.

Other Sustainable Community Objectives

2.6 The Issues Paper is also good on the RSDF Poverty and Access Objectives, which in a housing context are closely related to the Housing Objective already discussed.

2.7 It says little about the other Sustainable Community Objectives. This is not a problem for those on which housing policy has limited impacts. However we suggest the following could benefit from more coverage:

- **Crime:** the role of design in 'designing out' crime; advantages of passive security through more people about in attractive public spaces
- **Participation:** more on resident / tenant involvement in decisions (including the contentious point of ability for tenants to choose to stay with a local authority landlord without financial penalty)
- **Health:** the Issues Paper is already good on the importance of decent housing and affordable warmth for health. But housing can also play a major role in enabling and supporting healthy lifestyles, through settlements where it is not only practicable, but also safe, easy and attractive, to make a lot of daily routine journeys on foot or by bicycle. This has implications not only for settlement location layout, but also for location and quality of amenities and services.
- On a related issue, the need for '**supported housing**' can be reduced if settlements are easy and safe for frail, disabled and vulnerable people to live independent lives- for example so that day to day requirements such as food shops, chemists and surgeries are close enough, in pleasant and safe enough places, for elderly people to walk to without fear of mugging, need to go up and down stairs or dangerous roads to cross, and so that even a very slow walk to the shops with frequent pauses for rest can feel like a pleasant way to pass time, rather than a gruelling expedition through hostile territory.

Economic Objectives

- 2.8 The Issues Paper is designed to fit and support the approach of the Regional Economic Strategy which in turn is largely consistent with the Economic Objectives of the RSDF. The revision of the RSDF incorporating the new National Sustainable Development Strategy will allow these to be re-framed in terms of the benefits the economy should provide for human wellbeing. We welcome the emphasis, especially in the Housing and Economy section of the Issues Paper, on the need for the RHS to understand and respond to the linkages between economy and housing as well as possible.

Urban development, planning and transport

- 2.9 The Issues Paper's emphasis on concentrating housing in existing settlements is good by implication for the RSDF Urban Development sub-objective under 'enhance and protect the environment' and the Planning and Transport sub-objectives under 'prudent and efficient use of natural resources'. (The first two of these again largely overlap.) However the benefits are largely implicit and understated. **It would be better to be stronger and more explicit about the need for high design quality, 'placemaking' and an attractive public realm, perhaps in an expansion of the current short section 4l which is commented on later in this section**. The aim must be to make the 'offer' of living within settlements – including the housing, its surroundings, the services and amenities available nearby, the overall 'feel' and image of living in town – desirable enough to tempt people out of not only their cars but also their country homes.

Environmental quality and environmental resources

- 2.10 Section 4l of the Issues Paper, '**Quality, design and sustainable construction**' is very short and apparently incomplete. We assume it is intended to expand this to cover environmental protection and natural resources issues, since they are hardly mentioned in the rest of the Issues Paper: for example the words 'water' and 'flood' do not appear anywhere in the document, and 'energy' and 'climate' only within section 4l.
- 2.11 Section 4l does however acknowledge the importance of housing for energy use and conservation, and raise two very important and valuable suggestions: that '**this region's approach to creating "decent homes" in both the public and private sectors should factor in climate change e.g. insulation standards in excess of current regulation standards**', and that '**investment priorities set in the RHS could help stimulate a market for the types of [sustainable construction] technologies that the RES is trying to promote ...**'. These both warrant fuller treatment in the RHS and a proposal for this is made in 2.21,
- 2.12 The RSDF's Environmental Natural Resources Objectives provide a good checklist for issues missing in the Issues Paper that should be covered in the RHS. Some specific points RHS should highlight are set out in the following paragraphs.
- 2.13 **Climate change mitigation**: the latest scientific findings provide alarming confirmation of the seriousness of the likely results of climate change and the need for deep and rapid cuts in greenhouse gas emissions. A sense of urgency and serious commitment to achieve these is the single most important point the RHS must include if it is to be regarded as sustainable.
- As already mentioned, the RHS should sanction, support and so far as possible require energy efficiency standards and requirements beyond the Building Regulations;
 - The RHS should exploit opportunities particularly in larger housing developments for 'step change' in the use of environmentally damaging forms of energy, especially fossil fuels. Depending on context and circumstances, relevant approaches can

include terraced / tenemental built forms, orientation for solar gain, high thermal mass / high insulation to make best use of solar heat (while avoiding summer overheating), natural lighting and ventilation (and avoidance of air conditioning), careful planting to manage microclimate (eg trees to provide shelter in winter, reduce solar gain in summer), 'embedded generation' / heat distribution grid / CHP, maximum use of reused, recycled, local and recyclable building materials, multi-utility service ducts to allow cheap and easy addition of further common services as and when needed, on-site renewables where appropriate;

- Climate change mitigation is another reason for minimising the need to travel and discouraging car use;
- Water efficiency measures, rain water and grey water use, and sustainable drainage should be standard practice.

2.14 The RHS should not micro-manage: it should be left to development control authorities and developers to decide the optimum mix of technologies site by site, with intelligent regard to how people's behaviour may affect well-meaning measures (eg conservatories increase rather than reduce carbon emissions if people heat them for use as extra rooms in winter; net curtains and shady planting can reduce benefits of passive solar design). The RHS however should require all housing developers to consider the issues thoroughly and adopt the best practicable option

2.15 The RHS should recognise and underline the importance of resource efficiency in both new build and retrofit, both for its direct environmental impacts but also for minimising local infrastructure loads and therefore enabling housing to fit in capacity. It should encourage experiments with innovative technologies and approaches, perhaps by including text that be could be used to support them in planning conditions and/or inquiries.

2.16 **Climate change adaptation:**

- New housing and refurbishment needs to be designed to be comfortable and secure in extremes of heat, cold, wind, rainfall, and humidity, all of which are likely to increase;
- Housing should not be built in areas prone to flood;
- Much more attention should be given to resilience in the sense of ability to live comfortably even if there are energy supply shortages, cuts and price rises, and disruptions to trade and transport. This implies planning for lower travel dependence, and greater local economic diversity / resilience.
- NB Climate Change Adaptation is the focus of the current SWM Climate Change Programme

2.17 **Environmental resource and infrastructure capacity** as a constraint on housing in different parts of the region should be assessed as a constraint on development.

2.18 **Biodiversity:** maintaining and enhancing it in urban as well as rural areas, with particular attention to avoiding further fragmentation of habitat, and to creating and re-creating corridors and connections.

2.19 **Demolition vs renewal.** Life cycle energy and carbon implications need to be considered. Options between the status quo and wholesale demolition and redevelopment should be considered as alternatives to both total demolition and renewal of housing. These will depend on the local specifics of the housing stock and market conditions, but might for example include such interventions as knocking down one row in 3, lateral flat conversions, combining small dwellings to form larger ones. Again, the

RHS should not seek to 'micro manage' which approaches should be implemented, but rather to ensure that the options and possibilities are properly considered. .

- 2.20 **'Decency'**. Elements of the ODPM 'decency' standard are highly questionable in sustainability terms:
- It requires replacement of individual room heaters including gas ones (which for many lifestyles are more affordable and controllable, and more energy efficient in terms of greenhouse gas emissions to achieve comfort levels) and replacement with central heating (unless they are electric storage heaters, which for most lifestyles other than the housebound are extremely inefficient);
 - The insulation standard of 50mm is grossly inadequate;
 - Disrepair of even major building elements does not make a house 'non decent' if the elements are not also older than their design life. This seems to create a peculiar inconsistency where defects in design and construction in newer buildings are not recognised;
 - Kitchens over 20 years and bathrooms over 30 are automatically assumed inadequate with no reference to whether they meet residents' needs. This creates a bias in favour of needless replacement. This is particularly perverse given that the latest fashions (Belfast sinks, free-standing storage units, cast iron rolltop baths) are a return to 1930 - 1950s norms from what replaced them in the 70s and 80s.
- 2.21 **Quality, design and sustainable construction.** The Issues Paper is incomplete in this area and poses two questions relating to sustainable construction. **SWM proposes that the RHS should include a statement that a Sustainable Housing Action Programme will be implemented during the Strategy period by the Regional Housing Partnership and SWM Members and Partners to provide examples of best practice in sustainable construction in parallel with the SWM Sustainable Construction Project, the SWM Climate Change Programme and the Regional Energy Strategy.**
- 2.22 **This Programme would be prepared by consultation between SWM and the Partnership, in accordance with the agreed procedure for SWM's engagement with the Regional Policy Partnerships and would be coordinated with the preparation of Version Two of the RSDF, Version One of which was launched jointly by the Assembly and SWM on the 27th January 2005.**
- 2.23 **The Programme would include other initiatives by the Policy Partnerships and SWM which meet the objectives of the Housing Strategy themes such as Community Cohesion and Diversity which is being considered by the Social Inclusion Partnership and SWM.**

3 Issues raised

Alternatives?

- 3.1 The paper contains hardly any discussion of options or alternatives, or explanations or justifications for the approaches it proposes. The prompts / questions in the text are mostly of the form ‘how can X best be done?’ and almost none are of the form ‘which out of X, Y and Z should be our approach?’, or even ‘do you agree that X should be preferred to Y?’
- 3.2 This enables even this early stage of appraisal to be more definite than might otherwise be the case, since the Paper gives a clear sense of what the RHS intends. And it would be pointless to invent and solemnly evaluate obviously silly ‘alternatives’ to the themes commended at 2.2 above, such as encouraging sprawl, allowing urban areas to remain places that people try to escape from, or complacently accepting that some people will never be able to afford decent housing. However there are a range of *prima facie* reasonable options or dimensions of choice, including the following.
- 3.3 **Which existing settlements should get the most housing?** The principle of building new housing in existing settlements does not necessarily entail a strong concentration on the Major Urban Areas. It would be consistent with a range of distributions of housing between these, the 12 ‘other urban areas’ identified as needing regeneration (page 4, footnote 3) and indeed other smaller cities, towns and villages which might be more ‘liveable’, have more environmental headroom and have more prospects for generating jobs and housing together.
- 3.4 **Public service quality as well as location.** How important is the *quality* of public services (as distinct from mere *availability*) in making urban areas more attractive for people to live? If (as many anecdotes suggest), the wish to avoid schools, hospitals etc. which are perceived as poor is one of the main ‘trigger points’ for middle class flight from cities, and rural life is perceived as offering better public services (at least for those who can afford to live in favoured locations or drive extensively) it could be that the top priority for stopping or reversing the exodus will be to ensure that *every* school, hospital etc. in urban areas is at least as good as people expect to find outside urban areas.
- 3.5 **Potential conflicts with ‘choice’ and rural proofing agendas.** The previous point implies a more stringent and specific requirement than the general commitment to investment and improvement (referred to in section 2 para 4). It is not obviously consistent with either an approach to public services based on ‘choice’ (which is only meaningful if there are big differences in quality) or the ‘rural proofing’ philosophy of making sure rural dwellers are not disadvantaged compared to urban ones in terms of access to services and amenities. If you can get all the benefits of urban life in the countryside *and* space, tranquillity and nice views, who in their right mind would stay in the city?
- 3.6 **Economic development patterns and commuting.** Simply building homes near workplaces will have limited effect encouraging people to work near home (or live near work) while ‘predict and provide’ policies make car travel easy and cheap, and demographic factors (two-career households, lack of confidence in security of jobs, worries about getting children into ‘good’ new schools) encourage people to commute to new jobs rather than relocate. It is not clear that the conventional economic development priorities referred to in section 2 will help: it seems intuitively plausible that an alternative approach emphasising long term employment stability and security, making use of skills residents already have, and developing businesses meeting local needs, might be better for the professed aims of regeneration and helping people ‘remain

in their own communities' than one based on notoriously footloose and unpredictable sectors.

- 3.7 **Dimensions of affordability.** The text already recognises that affordability is a complex issue. Government's emphasis on cutting the cost of construction, including new construction methods, will doubtless be reflected in the RHS. It will be important to ensure that paring down construction costs does not prevent the higher energy standards advocated in this document, and that brownfield land remediation does not divert funding from quality construction.
- 3.8 Two aspects of affordability seem under recognised:
- (1) the role of high incomes in bidding up the price of 'desirable' housing. Increasing income inequality is likely to add to the housing problems of people on lower incomes. This again calls into question the wisdom and benefits of an economic development approach likely to increase income disparities;
 - (2) the potential role of good free or subsidised public services (for example public transport) and community based services (eg childcare) for reducing the cash cost of living for people on low incomes and increasing their ability to pay for housing.
- 3.9 These alternatives will not necessarily prove better than the options already implicitly adopted in the current version. But this cannot be known unless they are actually considered. Moreover, SEA requires consideration of 'reasonable alternatives to the plan'. We do not believe the current draft would be judged to meet this requirement (although this can only be an opinion since there is as yet no 'case law' or precedent on what the courts will decide will be required for SEA compliance.).
- 3.10 For the same reason, the RHS should also consider relative consequences of lower and higher rates of housebuilding, and more or less demolition, to provide some evidence that the levels proposed are right.

Relations with other plans and strategies

- 3.11 The Issues Paper already rightly emphasises the interdependency of the RHS with other Regional Strategies. The previous section further underlines this point: much of it is about how then interpretation and implementation of other Regional Strategies, notably spatial, transport and economic, will affect achievement of housing goals.
- 3.12 Coherence and mutual support will need the most robust possible linkages between Strategies. We suggest the RHS should include explicit list of what it expects / requires other Strategies to deliver as prerequisites for success.
- 3.13 The RSDF can make an important contribution to promoting policy coherence and convergence by setting overall outcome objectives for all Strategies, and SWM can play a valuable role in testing the effects of Regional Strategies on these both individually and in combination.

Terminology

- 3.14 The Issues Paper is generally admirably clearly written. But we think it will be important to clarify the use of a handful of important terms to avoid confusion and cross purposes.
- 3.15 **‘Sustainable’** This is often used in the sense of ‘able to be kept going or afforded in the long run’. This is potentially confusing when ‘sustainability’ will also be used in a different sense by the RSDF. We recommend that the ‘s-word’ is replaced by more specific terms wherever possible, and that where it is still used, the sense intended is made clear.
- 3.16 **‘Pathways of housing choice’** This phrase is used extensively. Perhaps it has a defined and rigorous meaning within housing policy circles, but to a non housing expert it seems dangerously vague. (The fact that it is sometimes ‘pathways TO housing choice’ instead adds to the vagueness.) At some points it appears to mean a variety of housing tenures and ownership models; at others, affordability of housing to people on low incomes; at others just a generally good correlation between the types of housing people want and what is available. These are all worthwhile policy goals, but they each has a different combinations of costs and benefits in sustainability terms. It would be clearer what the strategy meant if more concrete and specific terms were used. It might be helpful to identify three dimensions of alternatives: rented / shared ownership / owner –occupied; rural / suburban / urban, and rented / social landlord / local authority.
- 3.17 **‘Balance’ and ‘mix’** It will be important to be clear about the scale at which these are desirable. Improving the ‘balance’ of housing within a town or suburb may call for new housing to be mostly of types currently scarce: requiring every new development to be ‘balanced’ would obstruct. Mixing households with very different needs, lifestyles and expectations within single streets or blocks needs to be carefully managed to foster social cohesion.

4 Monitoring

- 4.1 It is essential to monitor *outcomes* despite the difficulties rightly identified in the Issues Paper. If only *outputs* are measured, this assumes that the RHS’s policies and actions are achieving the intended results which are precisely what monitoring should be testing.
- 4.2 A lot of social and quality of life outcome measures are already implicit in the Issues Paper, so this section will concentrate on the environmental ones.
- 4.3 Key issues should include:
- Actual ‘environmental footprint’ of lifestyles achieved by new / refurbished housing: eg how much greenhouse gas emissions from not only occupancy of homes (heat, light, appliances) and share of construction / demolition energy, but also how much incurred in travel to work, school shops etc. Overall figure reflecting renewables content of energy supplied, how far people need to travel to what they regard as a decent shop, school etc, availability / attractiveness of public transport, walking, cycling etc for these journeys
 - Loss / gain of environmental capital (use Quality of Life Assessment or similar methodology?)
 - Traffic generation.

Annex 1: the four key Regional Objectives and their more specific sub-objectives

From Version One of *A sustainable future for the West Midlands* (Sustainability West Midlands, January 2005):

Develop thriving sustainable communities		Enhance and protect the environment	
Participation	Provide opportunities for communities to participate in and contribute to the decisions that affect their neighbourhoods and quality of life	Environmental assets	Value, enhance and protect the region's environmental assets, including the natural and built environment and environmental heritage
Crime	Reduce crime, fear of crime and antisocial behaviour	Biodiversity	Value, enhance and protect biodiversity
Health	Improve health and reducing health inequalities by encouraging and enabling healthy lifestyles as well as protecting health and providing health services	Land use	Encourage development that optimises the use of previously developed land and buildings and creates high quality built environments incorporating high quality green space and encouraging biodiversity
Poverty	Tackle poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage	Urban development	Encourage urban development that improves the quality of the urban environment as a whole in order to stem the unsustainable decentralisation of people, jobs and other activities away from the region's major urban areas
Access	Promote and improve access to services and opportunity, including education and lifelong learning, leisure, employment, health; and ensure that access is equitable, regardless of location, income, lifestyle or background	Stewardship	Encourage local stewardship of local environments
Culture & recreation	Improve opportunities to participate in the diverse cultural and recreational activities the West Midlands can offer	Pollution	Minimise air, water and soil pollution levels
Housing	Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs, in clean, safe and pleasant local environments	Climate change	Minimise the Region's contribution to the causes of climate change while implementing a managed response to its unavoidable impacts

Ensure prudent and efficient use of natural resources		Develop a flourishing, diverse and stable regional economy	
Energy	Reduce overall energy use through increasing energy efficiency, and increase the proportion of energy generated from renewable sources	Growth	Achieve sustainable economic growth and prosperity for the benefit of all the Region's inhabitants
Conservation	Conserve use of natural resources such as water and minerals	Employment	Create high quality employment opportunities suited to the changing needs of the local workforce, whilst recognising the value and contribution of unpaid work
Standards	Promote and ensure high standards of sustainable resource-efficient design, construction and maintenance of buildings	Investment	Promote investment in future prosperity
Planning	Ensure the location of development makes efficient use of existing physical infrastructure and helps reduce need to travel, especially by private car	Skills	Encourage ongoing investment and engagement in learning and skills development
Transport	Increase use of public transport, cycling and walking and reducing road traffic and congestion	Innovation	Encourage a culture of enterprise and innovation
Waste	Encourage and enable waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream	Technology	Promote and support the development of new technologies, especially those with high value and low impact
Local sourcing	Encourage local sourcing of goods and materials	Responsibility	Encourage corporate social and environmental responsibility, with regional organisations and agencies leading by example