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NORTHERN HOUSING CONSORTIUM REPRESENTATION

Introduction

In announcing the Comprehensive Spending Review, the Chancellor promised to honour the Government's commitments to "*rebuild, level up and invest in people and places*"ⁱ.

The Northern Housing Consortium's CSR representation sets out how housing in the North can help the Government deliver on these aims. It focuses on:

- **Rebuild:** securing economic recovery and contributing to levelling-up by readying the North's social housing for net zero
- Level-up: rebuilding capacity in local government in the North, to drive improvements in housing supply and quality
- **Invest in people and places:** making a visible difference by investing in new affordable homes, and infrastructure to support new homes of all tenures.

The economic impact of the Covid-19 pandemic has not yet been fully realised, but we know that it will not be experienced equally across every part of the country. Housing has a track record of delivering effective economic stimulus. Investing in housing growth and quality in the North will contribute to economic recovery, provide visible evidence of levelling-up and prepare the region for net zero.

Our council, housing association and ALMO members across the North stand ready to deliver.

Tracy Harrison Chief Executive

Rebuild: secure economic recovery and contribute to levelling-up by readying the North's social housing for net zero

Policy proposal

Confirmation, and immediate release of the £3.8bn Social Housing Decarbonisation Fund pledged in the 2019 Conservative Manifesto.

Outcome

This proposal will reduce carbon emissions from homes in the North of England, and create good jobs.

One-quarter of the North's carbon emissions come from our existing housing stockⁱⁱ. 85% of these homes will still be standing in 2050, when our country aims to reach net zero.ⁱⁱⁱ Decarbonising the North's existing older and colder homes is a vital step on the route to Net Zero.

Work to upgrade these homes will need to take place over the next ten to fifteen years. Bringing this activity forward would provide an immediate economic stimulus, and skilled jobs with good prospects for some of those left without work as a result of the Covid-19 crisis.

Even at a steady rate of implementation, it is estimated that 20,000 jobs can be created across the North through housing decarbonisation^{iv}.

Housing decarbonisation offers benefits for residents and other public services:

- Ongoing energy bill savings 'cash in the pocket' for those living in the homes upgraded. These savings are estimated at £270 per household per year, or £1.79bn per year across the North if all homes were brought up to EPC C^v.
- Improved health through warmer and more comfortable homes. AgeUK estimate that cold homes cost the NHS in England £1.36bn every year, due to their impact on older people's health^{vi}. Retrofit schemes elsewhere in the UK have been shown to save the NHS 42p for every £1 invested^{vii}.

What this work involves

Decarbonising our existing homes has two elements:

- Fabric First improvements : high standards of insulation, windows, doors and draught proofing. This ensures that homes use as little energy as possible.
- Low carbon heating : replacing gas boilers with low carbon heat sources, such as heat pumps. This work can only take place alongside, or after, fabric first improvements – if measures like heat pumps are installed in leaky homes, financial and carbon savings will not be realised.

Both elements have significant potential for skilled employment. Fabric first improvements involve the application of relatively established skill sets, though the workforce will need to grow significantly to meet the scale of the challenge. Low carbon heating offers significant potential for upskilling in relatively new technologies. The NHC is working with IPPR North to understand the nature and scale of these skills challenges. The NHC also supports the N8 group of universities' *Net Zero North* proposal¹ to establish a 'green skills ladder' in the North of England.

Policy rationale

As noted above, ¼ of the North's carbon emissions come from the existing housing stock. Decarbonising the existing housing stock is therefore a vital component of reaching net zero.

70% of our homes don't meet EPC 'C'^{viii} – the standard which is regarded as the 'first step' towards net zero, and needs to be achieved by the 2030s. This work is going to have to be done – it makes sense to do it now while interest rates are low and labour availability is higher.

Doing this work in the North of England helps the region recover from the impact of Covid-19 (independent estimates suggest the three Northern regions will struggle the most to recover from the impacts of Covid-19 over the longer term^{ix}); and contributes to levelling-up. The North faces additional challenges in reaching Net Zero as our homes are older than the English average: one in four homes in the North were built before 1919^x.

The Government has already announced Green Home Grants, but these are focused on the owner-occupied and private rented sectors. The Social Housing Decarbonisation Fund (SHDF) can play a vital role : utilising the sector's scale to establish supply chains for new technologies and thereby driving down the cost of net zero compliance across all tenures. This vanguard role has been recognised by the Business, Energy and Industrial Strategy Select Committee, who called for Government to set out plans for the social housing sector to 'lead the way in terms of energy efficiency'^{xi}.

Costs and benefits

The total cost of this recommendation is £3.8bn, which is consistent with the Conservative Manifesto plans for the SHDF over ten years. The Manifesto pledged £710m over the 2021/22 - 2023/24 Comprehensive Spending Review (CSR) period^{xii}, so we are proposing that Government brings forward £3.09bn of capital spend (earmarked for 2024-25 and beyond) to the forthcoming CSR period.

£0.05bn has already been allocated to SHDF pilots by BEIS in the 2020-21 financial year, so the total cost over the forthcoming spending round would total £3.75bn of capital investment. This investment will be matched by housing associations and councils with retained stock from their own resources.

The returns to GDP of housing retrofit are estimated at £3.20 per £1 invested by Government^{xiii}, suggesting that a £3.8bn programme could create a £12.16bn return to GDP.

In considering Covid-19 fiscal recovery, the University of Oxford's Smith School have identified building efficiency retrofits as one of five policies with high potential both on economic multiplier and climate impact metrics^{xiv}.

The Cost Benefit Ratio (Value for Money) indicator for a programme of housing retrofit is estimated at 2.27:1 which classifies the programme as "high" Value for Money^{xv}.

Deliverability

The social housing sector in England expects to invest £2.2bn^{xvi} on capitalised repairs and maintenance of existing homes in this financial year. Councils and housing associations are skilled asset managers, and many organisations have inhouse repairs and maintenance functions. Previous research for the NHC^{xvii} has shown that ³/₄ of expenditure by housing organisations in the North is with suppliers based within the North, supporting local jobs and supply chains. This combination of factors makes housing organisations the ideal delivery mechanism for net zero investment.

Coordinated investment in social sector homes by government and housing organisations is a proven model. During the last recession, the Decent Homes programme (a coordinated investment of £37bn over a decade^{xviii}) delivered significant economic stimulus.

Conclusion

Confirmation, and immediate release of the £3.8bn Social Housing Decarbonisation Fund pledged in the 2019 Conservative Manifesto can deliver significant economic benefits, contributing to economic recovery and levelling-up as well as Net Zero.

This is a natural complement to the Green Home Grants already announced, and has potential to reduce the costs of upgrades in all sectors; as well as improving health and quality of life for residents. Delivering the SHDF in this spending review period would lay strong ground for an integrated housing quality investment programme across all tenures in future spending review periods.

Level-up: local government capacity in the North

Policy proposals

- 1. A sustained real-terms increase in local government funding;
- 2. A national centre of specialist housing and planning expertise, located in the North.

Outcome

These proposals will equip local government in the North of England with the capacity to improve the supply and quality of housing in their areas. This will contribute to government priorities around levelling up, economic recovery, net zero and public service reform.

The North of England has experienced larger comparative reductions in housing and planning capacity since 2010 (see policy rationale, below). 80% of local authority capacity in the North is now going into statutory services^{xix}. This chronic lack of capacity is constraining efforts to level-up.

Restarting our housing market will be a key element of economic recovery and is necessary to meet the Government's ambition to deliver 1 million new homes across the country. Equipping local authorities with the resources they need to monitor and drive progress of sites with permission will avoid the stalling of a fragile market.

Declarations of climate emergencies reflect councils' commitment to net zero targets. They have an important role to play in the trajectory towards all housing to reach Band C by 2035 either through enforcement activity, administering grant funding or retrofitting their own stock. This will require fresh capacity and skills.

The Planning White Paper proposes ambitious changes to our planning system. The forthcoming Devolution and Local Growth White Paper is likely to lead to further local government reform. It is clear from NHC research on local government housing and planning capacity in the North that services are now *'operating on a skeleton model'*^{xx}. To make a success of the Government's reforms, to deliver the 'rapid progress' Government wishes to see, and to maintain delivery throughout, additional resource will be required.

Policy rationale

The 2019 Spending Round provided the first real-terms increase in the local government funding package for a decade, which was welcomed by the NHC and our members. However, settlements over one or two years make longer term resource planning very difficult for local authorities. Such an increase needs to be sustained over time to give local government the opportunity and confidence to rebuild the capacity which has been lost in recent years, losses which research for the Northern Housing Consortium^{xxi} shows have disproportionately impacted the North of England over the last decade.

The change in average net spend per local authority in the North between 2010/11 and 2018/19 stood at **-54%** for housing services; and **-65%** for planning and development services. Comparatively, across the rest of England, this difference stood at -34% for housing services and -50% for planning and development services.

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This means that:

- Councils in the North now spend 1.9p of every £1 on housing, compared to 3.7p in the rest of England
- For planning and development, the figures are 1.4p in every £1 in the North, compared to 1.6p in the rest of England.

These high relative reductions in expenditure, and lagging patterns of expenditure need to be set in a context of the need to level-up housing supply <u>and</u> quality in the North:

- 1 million owner-occupied homes in the North fail to meet the decent homes standard, in addition to 354,000 privately rented homes, with more private homes falling into disrepair^{xxii}
- Independent assessments show that at least 100,000 of the new homes built in this Parliament should be affordable ones here in the North; another 150,000 should be homes for market rent or sale in the North^{xxiii}. Both of these figures represent an increase on recent rates of supply and could be higher if economic growth ambitions are realised.

Researchers concluded that the reductions in spending since 2010 have *"Fundamentally reshaped the capacity of local authorities to deliver services in housing, planning and development^{xxiv}". This loss of capacity not only impacts on councils' ability to secure local housing and planning ambitions, but as noted above, also undermines the potential of achieving Government's own housing ambitions.*

The NHC recommends that the CSR sets out a package that provides a **sustained realterms increase in local government funding.** Councils may choose to invest additional funding in services like social care, but additional funding for these statutory services may enable local government to stem or slow the rate of reduction in other services like housing and planning.

In addition to the need to fund core services, it is clear that reductions in capacity have particularly impacted on northern councils' access to specialist skills. As capacity has focused on core functions, expertise on large-scale regeneration or housing growth; or specialist skills like ecology, have been lost. We recognise that it may be unrealistic to expect every council to have access to all the skills they require in-house, which is why we propose **a national centre of specialist planning skills and expertise**, located in the North. Such a centre, focused on boosting housing growth and quality, would enable councils to call on expert help for priority projects. Locating it in the North would emphasise that it is open to all areas.

We warmly welcome the pledge in the Planning White Paper to develop a resources and skills strategy for planning. We hope this will incorporate the proposals above. We note the Government's proposal that a small proportion of developer contributions could be used to fund local authorities' overall planning costs. The spatial implications of this proposal need careful thought. It is a fact that planning obligations deliver less in the North than elsewhere at present: the North East and North West taken together account for only 5% of the total value of planning obligations in England^{xxv}, and many sites in the North are likely to sit beneath the viability threshold the Government proposes, below which the infrastructure levy would not be charged. It is important that the resourcing strategy reflects the needs of places, rather than following land values.

Costs and benefits

Additional capacity in northern councils will enable the delivery of additional homes, and improvements to the quality of existing homes. Evidence assembled by Sheffield Hallam University^{xxvi} on benefit-cost ratios is clear that these actions lead to positive economic outcomes:

Activity type	Valuation basis	Central valuation	Cautious valuation
New build housing	Consumption (property betterment) and production benefits (GVA)	2.6	1.7
Housing improvement	Consumption benefits - property betterment and social benefits	2.0	1.3
Acquisition, demolition and new build	Consumption benefits - property betterment and visual amenity enhancement	5.5	3.7

According to the costs and benefits associated with various regeneration activities, £1bn invested could generate £3.47bn in benefits^{xxvii}.

Deliverability

Over March and April 2020, the Government supported local councils with £3.2 billion of emergency grant funding and over £5 billion of cashflow support to support public services through Covid-19. The heroic response from local authorities demonstrates what local organisations can achieve when supported to deliver the services needed. We believe that a lack of capacity in public services will be a major issue in local recovery in the regions of the UK. Investment will be needed to grow capacity and develop skills.

The local government finance system offers a ready framework through which a sustained real-terms increase in local government can be delivered.

We suggest that Homes England would be an appropriate agency to oversee our proposed national centre of specialist planning skills and expertise. It is consistent with the Agency's existing objective to 'offer expert support to priority locations'xxviii.

Conclusion

Levelling up housing and planning capacity within local authorities in the North is a vital underpinning for future growth and renewal. It would contribute directly to Government priorities:

- To level-up the UK's cities and regions
- Building at least a million more homes, including hundreds of thousands of affordable homes

- Reaching Net Zero by 2050, reducing carbon emissions and pollution
- Regeneration of our cities and towns.

Invest in people and places: infrastructure and affordable homes

Policy proposals

- Support the delivery of homes on brownfield land, and build on the success of the Brownfield Land Fund, with at least one further round of funding to Northern Combined Authorities, at a cost of £450m;
- 2. Bring forward the Single Housing Infrastructure Fund announced at Budget 2020, unrestricted by geographic targeting;
- 3. Expand the Affordable Homes Programme, working towards the sector consensus on the funding needed to build affordable and social rent housing at the scale England requires, and ensuring that grant funding is open to every part of the country and offer flexibility of tenure.

<u>Outcomes</u>

Developing an expanded, national, approach to affordable housing and infrastructure investment represents investment in people and places, delivering on the Government's priorities for a post-Covid economic recovery, to level up the regions and to reach a target of net zero by 2050.

Our proposal on the Brownfield Land Fund will result in more homes being built on brownfield land in the North of England. By bringing forward sites which may not have been built-out without additional support, it contributes to economic recovery and levelling-up. It provides visible evidence of regeneration and investment in communities across the North.

The removal of the 80:20 rule for the forthcoming Single Housing Infrastructure Fund would allow the northern regions to integrate housing investment into wider policies centring on economic growth, in keeping with the Northern Powerhouse and levelling up agendas. To date, there has been a historic regional imbalance in infrastructure investment. Rather than being seen as a means of unlocking economic potential, it has been targeted at helping already high productivity areas grow faster^{xxix}.

1 in 3 Homes England affordable home completions occur in the North. However, the delivery of affordable homes in the North still falls short of the independently assessed need for 19,168 affordable homes per year, with only 5,050 affordable homes completed in 2018/19^{xxx}. The North's access to this grant funding is vital to housing supply in the North and so it must be adapted in ways that will fully meet housing need in the region.

Policy rationale: Brownfield Land Fund

Brownfield sites are typically ex-industrial sites that require additional intervention in order to ready them for new homes. This may involve clearance of derelict buildings, landworks or remediating land to remove the legacy of previous uses (e.g. pollution or contamination). Because development in some parts of the North is more marginal, commercial developers are often unable to absorb these additional costs, hence the need for state support.

In 2020, the Government introduced the Brownfield Land Fund, which is intended to support pro-development councils and ambitious mayoral authorities to boost housing delivery on brownfield sites. Over £270m of the first fund was allocated directly to Combined Authorities

in the North. We propose to build on this success with at least one further round of the Fund at a cost of £450m.

This proposal replicates the approach adopted in 2020 to the allocation of the first round of the Brownfield Land Fund, and aligns with the direction of travel set out in the Government's Planning White Paper, which seeks to ensure that *"the development potential of brownfield land is maximised"* in growth and renewal areas. The White Paper also proposes a threshold for low viability sites, below which the new Infrastructure Levy would not be applied. The infrastructure requirements of such sites could therefore be supported from the Brownfield Land Fund.

We are proposing that the geographic coverage of the fund is extended to the whole of the North of England, with funds allocated to Combined Authorities where these exist at present. We note that the forthcoming Devolution and Local Recovery White Paper is expected to set out the direction of travel for those parts of the North not currently covered by Mayoral/Combined Authority arrangements. In the absence of such arrangements, funds could be allocated directly to local housing/planning authorities.

Policy rationale: Single Housing Infrastructure Fund

Expanding affordable housing and infrastructure investment in the North offers Government a visible opportunity to show their commitment to levelling-up the regions. Using analysis by Homes for the North that identifies the need for 500,000 new homes in the North over a tenyear period^{xxxi}, there is potential for the region to contribute 1/6 of the Government's target to deliver 300,000 homes per year by the mid-2020s.

Housing and infrastructure investment should play an important role in the strategic growth planning for the North. Research commissioned to identify the potential role of housing identified key considerations such funding would be critical to supporting, especially in the context of planned increases in transport capacity:

- To meet the North's growth ambitions outlined above, the rate of housing construction needs to increase to 50,000 units per year to 2027, and to 70,000 per year thereafter;
- There needs to be a clear strategic focus on the type and quality of the homes that are built in the North in order to meet the needs of the workers its future prosperity will depend on;
- Housing will be an important factor in determining the North's future competitiveness and should be thought of as part of its 'infrastructure offer'^{xxxii}.

The North is currently significantly locked out of the five key housing funds, of which the current Housing Infrastructure Fund is one,^{xxxiii} due to the geographical targeting of 'high affordability pressure' areas, predominantly located in the South East. Subsequently, there are only 4 local authorities in the North, home to just 3.9% of the North's population, that qualify for access to the lion's share of these funds. This geographic targeting (referred to as '80/20' criteria) must not be replicated in the SHIF as it is antithetical to levelling-up.

We welcome the proposal from our colleagues at Homes for the North for a 'Levelling-Up Housing Infrastructure Fund', and believe this proposal merits further investigation as a policy mechanism which could ensure the North's housing infrastructure needs are met through the new Single Housing Infrastructure Fund.

Policy rationale: Affordable Homes Programme

An Affordable Homes Programme that is open to the whole country and includes flexibilities on tenure will contribute to the Government's priorities for economic growth, levelling up, and reaching net zero, which are integral to the third phase of the Chancellor's recovery plan. The Chancellor's announcement of a new £12.2bn Affordable Homes Programme at the Budget in March was welcome, but this does not match the ambition of housing organisations in the North. The Programme should be expanded, working towards the sector consensus on a £12.8bn per year programme : the funding needed to build affordable and social rent housing at the scale England requires. Critically, this grant funding should be open to every part of the country and offer flexibility of tenure^{xxxiv}.

To maximise this economic potential, it is critical that housing providers have full flexibility of tenure when delivering under the scheme to ensure that a wide range of housing aspirations in the region are met. This would also contribute to the regeneration of our cities and towns to assist in the recovery of local economies.

Homes England's data on the Affordable Homes Programme shows that only 4% of homes funded under the scheme so far have been for social rent, compared to 52% for affordable rent and 44% for affordable ownership homes^{xxxv}. Bids for investment in homes for social rent are only accepted for those who are delivering homes in 'high affordability pressure' areas, which has directed funding out of the North. Despite a need for an increase of homes of a mixture of tenures in the region, this arbitrary formula locks out the majority of the North from accessing support for socially rented homes, and the prospectus for the Affordable Homes Programme suggests this will continue.

The Affordable Housing Commission's latest report found that the North has seen the largest percentage decrease in social housing between the period 1980-2016/17^{xxxvi}. To build more homes for social rent in the region, the Affordable Homes Programme must open up support for social rent across the country to address the regional imbalance caused by current funding arrangements and meet housing need in the North, in an effort to truly level up the regions of the UK.

There is appetite amongst our membership to increase the use of Modern Methods of Construction (MMC) in the delivery of new homes. Homes built utilising MMC are able to reach exceptional standards of energy efficiency with the potential for homes to use 20-30% less energy to heat than homes built entirely onsite^{xxxvii}. Adopting this approach will lower carbon emissions from the domestic built environment, introduce new green jobs to the region to stimulate the economy, and invest in innovation in the North as part of the levelling up agenda.

The NHC is working with our members to aggregate demand for MMC to generate supply chain confidence, reduce costs and reduce carbon emissions linked to traditional building methods. The expansion of the Affordable Homes Programme would contribute significantly to the realisation of ambition across the North for new sustainable homes of all tenures.

Costs and benefits

The cost of a further round of the Brownfield Land Fund, extended on an equal basis to all parts of the North, is estimated at £450m, based on the per-capita allocations from the first round of the Fund.

The Conservative election manifesto pledged a £10bn Single Housing Infrastructure Fund (SHIF)^{xxxviii}. The commitment to a long-term SHIF was restated at Budget 2020. We are not proposing funding in excess of that already pledged, rather we are seeking to influence the allocation of the Fund and to move away from arbitrary geographical targeting restrictions applied to predecessor funds.

The sector consensus is for an Affordable Homes Programme of £12.8bn per year, with an estimated delivery of 145,000 new homes (including 90,000 for social rent). The National Housing Federation have calculated that this would deliver a benefit worth between £78.5bn and £120bn per year^{xxxix}. This is based on the Centre for Regional Economic and Social Research (CRESR) estimate of a Benefit to Cost ratio of new build housing at 2.6 (with a cautious assumption of 1.7)^{xl}, as shown in the table below:

Activity Type	Valuation Basis	Central Valuation	Cautious Valuation
New build housing	Consumption (property betterment) and production benefits (GVA)	2.6	1.7
Housing improvement	Consumption benefits - property betterment and social benefits	2.0	1.3
Acquisition, demolition and new build	Consumption benefits - property betterment and visual amenity enhancement	5.5	3.7

Deliverability

Our proposals on Brownfield Land Fund extend the delivery model used for the first round of the Fund to new geographies. They therefore build on a proven model.

Housing Infrastructure Funds are currently managed by Homes England. This arrangement should continue for the Single Housing Infrastructure Fund, though in the longer-term we believe local and Combined Authorities in the North should have greater influence over allocation and management of funds.

NHC members have a track record of delivering outstanding homes for tenants through the Affordable Homes Programme, and they are ambitious to deliver even more. For example, in Salford, NHC member *Salix Homes* used £780,000 of Affordable Homes Programme investment to transform an empty sheltered housing scheme that was devastated by floods into 26 high-quality apartments^{xli}. These fully furnished homes were made available to NHS staff employed at Salford Royal hospital for affordable rent. Grant funding enabled *Salix Homes* to convert a redundant building into affordable housing to meet local need and support the NHS in attracting and retaining key workers. Further examples of use of the AHP in the North can be accessed at https://www.northern-

consortium.org.uk/influencing/ournorth/affordable-housing-programme/

Conclusion

The proposals set out above to invest in people and places will make a visible difference to communities across the North. By investing in new affordable homes, and infrastructure to support new homes of all tenures, Government can support economic recovery and contribute to levelling-up and net zero.

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