



Homes
England

The Housing and Regeneration Agency

Clive Betts MP
Chair of the Levelling Up, Housing and Communities Select Committee
House of Commons
London
SW1A 0AA

Via email

21 March 2024

Dear Clive,

Thank you for your invitation to provide information to the Levelling Up, Housing and Communities Select Committee's ongoing inquiry into children, young people and the built environment, with specific questions aligned to Homes England's Strategic Plan and related activities. As ever, we are willing to use our delivery insight and expertise to support the committee's work wherever appropriate for us to do so.

Ensuring that children and young people have a safe and permanent place to call home is a driving force for me as Chief Executive of Homes England. One of the reasons that I joined the Agency was a focus on getting more children out of temporary accommodation. As a young child, over a number of years, I personally experienced living in a precarious and volatile situation with regard to accommodation. That experience means that the impact on children is always at the front of my mind when talking to colleagues or partners about everything the Agency does.

Consider the recent announcement in Blackpool for £90 million of funding that commences the effective regeneration of the whole town or the £125 million of loans to Berkeley Homes (in Southwark and Newham) and Barking Riverside that unlocks 8,000 homes 40 per cent of which will be affordable supporting children into a permanent home in areas of acute need.

My personal commitment is also underpinned by our Strategic Plan and the overarching mission which frames the Agency's objectives. I believe it is important to emphasise it here:

"We drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home."

As you know, the Strategic Plan sets out how we will use our land, funding, powers and expertise to do this, as well as our commitment to engage proactively with local communities as we look to address the geographic inequalities in the built environment and deliver better homes and places for the people who need them – our support of greater social justice most certainly includes achieving that for our children and young people.

I hope the information accompanying this letter is helpful to the Committee.

With best wishes,

Peter Denton

**Chief Executive
Homes England**



LUHC Select Committee's Inquiry on children, young people and the built environment

How does Homes England account for children and young people as residents and future residents of the homes and places that it is seeking to deliver? For example, where do they feature in its strategy, policy objectives and guidance?

Children and young people in the Agency's affordable housing programmes

Whilst the strategic policy objectives for the [Affordable Homes Programme](#) agreed with the Department for Levelling Up, Housing and Communities do not explicitly refer to children and young people, a number of the objectives are implicitly relevant in ensuring that the homes supported by the AHP meet their needs. In particular, partners are expected to deliver well designed places and to indicate how their schemes deliver against the [10 characteristics set out in the National Design Guide](#), including the environmental and sustainability impact. In addition, partners are also encouraged to use the [Building for a Healthy Life \(BHL\)](#) criteria in their scheme design (although this is not mandatory) – further detail on why we encourage BHL and what it can deliver is provided in greater detail in this note.

More broadly, partners are expected to demonstrate how their schemes meet local affordable housing need and the engagement they have had with strategic housing authorities. The Agency also proactively seeks feedback from the relevant strategic housing authority to ensure schemes align with their local affordable housing strategy and accurately meet local affordable housing need. Homes England expects engagement between affordable housing providers and local authorities to factor in the needs of children and young people as part of any consideration of meeting local housing need.

Children and young people are expected to be amongst the key beneficiaries of affordable housing supported by the AHP. As the AHP business case notes, one of the non-monetised benefits of – and key reason for – increasing the supply of affordable housing is the impact taking people out of temporary accommodation and providing them with security of tenure, financial stability and community support has on improving educational outcomes.

Young people are amongst the client groups the Agency supports via specialist housing delivered through both the AHP and [Single Homelessness Accommodation Programme \(SHAP\)](#). Whilst the client groups in the AHP are not limited, they include single homeless people with support needs; young single parents (often under 20 years of age) and vulnerable young women; young people (16-25 years of age) who are homeless or in insecure accommodation; and, young people leaving care. SHAP supports single homeless people and young people (18-25 years of age) experiencing or at risk of homelessness or rough sleeping.

Community engagement

Homes England has an internal Community Engagement Framework document which establishes the Agency's broad approach to community engagement and linked social value. It is aligned with the Homes England's Strategic Plan 2023-28 in creating consistent, impactful approaches that ensure all projects reflect community priorities, contribute to local levelling up and facilitate the delivery of successful places.

The approach to community engagement is as inclusive as possible, as reflected in the definition which is provided to all consultants the Agency employs to do that direct engagement on its behalf. The definition of 'community engagement' which is used is: "*Actively listening and engaging with people living, working, visiting and investing in an area so as to inform and shape our ideas, support long term transformation and empower communities.*"

What research/evidence has Homes England gathered about children and young people's needs?

Homes England has [supported research by the University of Birmingham \(Peter Kraftl and Sophie Hadfield Hill\) by providing links to projects within the Garden Communities programme](#). A toolkit they developed for engagement with children and young people was tested with projects within the government's Garden Communities programme, including Dunton Hills Garden Village, and then made available to the wider Garden Communities network where it has been used by local partners to shape their engagement programme on these large new settlement projects to ensure that young people have a voice. Homes England continues to act as project partner to various other

University research bids on a variety of issues which affect the wellbeing of families and children including those on housing size, layout, access to natural greenspace amongst others.

How does Homes England measure the ‘improved lives’ of children and young people in homes and places it is seeking to deliver? For example, how does Homes England ensure “quality homes in well-designed places” have met the needs of children and young people and that children and young people are “proud” to live in these places?

Homes England combines commercial expertise with social purpose to deliver social value, maximising the net impact on the wellbeing of the communities it serves through its interventions, partners and employees. Social value is accordingly considered at every stage of the Agency’s end-to-end process of housing and regeneration.

The first measurement of the net impact of interventions is made at the point of investment decision, where net impact /social value is ex-ante appraised at the household level. In this way, the ‘improved lives’ of children and young people are considered, albeit not separately.

The Agency has invested in an ongoing programme of research aimed at enabling the full social value delivered through housing and regeneration activities to be measured and assessed with the first publication in September 2023 [Homes England: Measuring Social Value - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/homes-england-measuring-social-value). Amongst these, ‘Brownfield Development Values’ includes values for the amenity benefit of children’s play areas and sports pitches, amongst other recreational features, on well-designed places government seeks to deliver, to existing local households.

In line with the duties of the Public Sector Equality Duty and the Families Test, Homes England has research (which is yet to be published) on the wellbeing impact of specialist housing for older persons’ housing. Follow-on research is to be considered for the wellbeing impacts of housing children and young people out of temporary accommodation.

For the past two years, the Agency has established a process of going back to review completed schemes on our land, measured against Building for a Healthy Life. This does not include post occupancy surveys with residents, but it does mean that schemes are reviewed for what can be learnt to enable the Agency to further refine processes and approach to ensure continued better outcomes.

KPI 12 as set out in the Strategic Plan (defined as ‘*share of supported schemes that meet or exceed the agreed standards for design quality in line with Building for a Healthy Life*’) is the Agency’s performance indicator which will measure strategic objective to promote the creation of high-quality homes in well-designed places. Whilst underpinning the Agency’s broader work, the promotion of health, safety and access to open spaces and natural environments will benefit children and young people. Through the involvement of Homes England, the intention is to deliver:

- More integrated neighbourhoods with access to nature and amenities facilitated by walking, cycling and public transport;
- Distinctive places that reflect local character; and
- Streets, public space and blue and green infrastructure¹ that are designed for people to use, easy to navigate and have a well-considered relationship between public and private spaces.

How does Homes England “champion the creation of sustainable homes, communities and places that are brilliantly designed for the people that live there now, and in the future” for children and young people? What conditions does Homes England put on developers to build “brilliantly designed” places for children and young people?

Homes England has been focused on improving the design quality of its own schemes for some time and more detail is set out below about how design quality assessment is embedded through development processes. In addition, Homes England’s Strategic Plan committed to design quality on all of its interventions, not just those where the Agency holds the land. The Agency will use Building for a Healthy Life to assess that, in addition to KPI 12, to measure

¹ Blue infrastructure examples – rivers, canals, ponds, wetlands, floodplains, and water treatment facilities; Green infrastructure examples – trees, forests, fields and parks.

progress against BHL. BHL is nested alongside some sustainability requirements which together are labelled “Sustainability and Design Outcomes”. These are not yet published externally but will be shortly.

Homes England does not construct any homes outright. Rather, its role is to work with partners and bring in others to undertake the work on land in its ownership. As the government’s housing and regeneration agency, Homes England exists to work with partners to support them to tackle the housing and regeneration challenges faced by communities around the country (such as shortages of deliverable and developable land in the places where demand is concentrated and insufficient infrastructure to accommodate new housing and mixed-use development at the scale required) and enable the delivery of new homes and housing-led, mixed-use regeneration.

As an example, through the Agency’s work with local partners in the [Garden Communities](#) programme, it actively signposts and encourages implementation of good practice in engaging with young people as part of shaping plans for a new place.

Homes England will also seek partnerships with a broad range of organisations who share the ambition to deliver high-quality, sustainable homes and mixed-use regeneration that meet the needs of local people and communities, including children and young people. We bring our land, funding, powers and expertise to these partnerships. In return, partners are asked to:

- be creative and ambitious in identifying opportunities for housing and regeneration that meet the needs of local communities with whom they work, and to be assertive in championing these opportunities;
- support and accelerate the delivery of housing-led, mixed-use regeneration projects with a brownfield first approach, focused on areas of greatest need;
- set high aspirations for beauty, quality and sustainability, exceeding existing standards and regulations where possible; and
- engage proactively with local communities from the outset of any housing development or regeneration project, offering meaningful opportunities for a range of stakeholders to contribute to the design and planning process.

With explicit reference to young people, the Agency works with partners on the range of infrastructure needed to support new places including educational facilities, green infrastructure and sustainable and active transport – aspects that benefit young people.

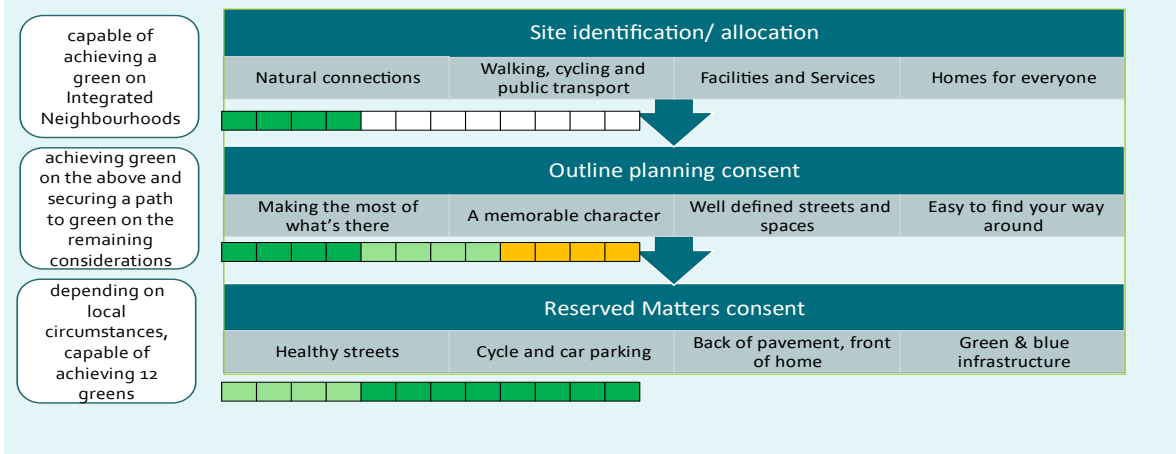
In regard to Homes England land holdings, in 2019 the Agency adopted “[Building for a Healthy Life](#)” (BHL) as its design quality assessment tool. This tool is used throughout the planning and land disposal process to ensure better placemaking for all. Building for a Healthy Life was developed with NHS Improvement to better reflect the NHS’s “Putting Health into Place” principles, and in particular the principles about maximising active travel and enabling healthy play and leisure. BHL was adopted because it is:

- Referred to in the National Planning Policy Framework and is industry-accepted. It’s already widely used and understood by Local Authorities;
- A practical way for the Agency to assess design quality;
- Free to use for all;
- Straight forward to use, prompting the right questions at the right stages of the design process. It’s written for those assessing or commissioning designs who are most likely not designers themselves; and
- It can set out what bad design looks like, which can be particularly instructive.

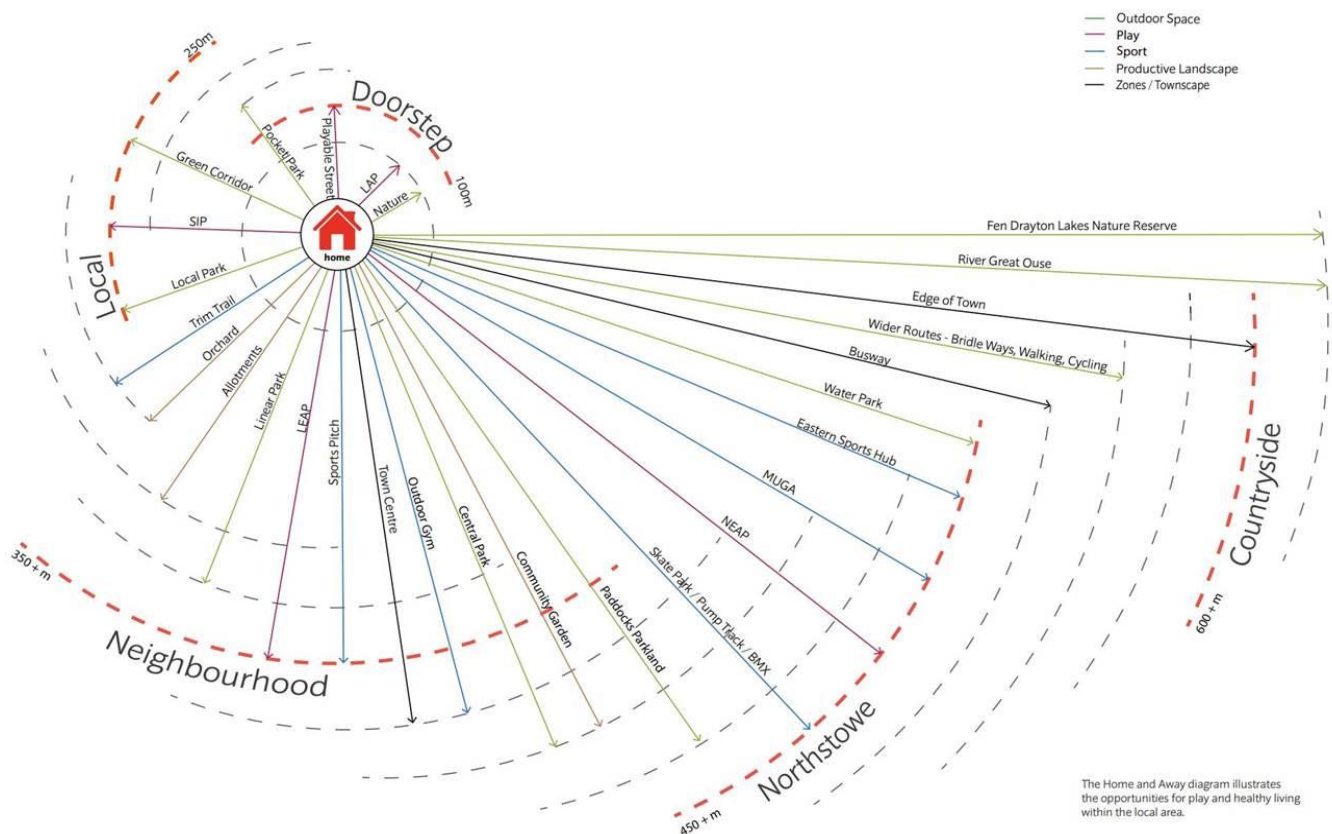
With regard to place making for children and young people in particular, BHL has multiple references to people friendly streets to enable walking and cycling and encourages social interaction in streets and public spaces for informal or formal play. Photos of children and young people actively using the public spaces are threaded through the document to show ‘what good looks like’.

BHL is structured in three segments which align with both time and the design process. This starts with looking at the site in its wider context, then at how the layout within the site can be set out, and finally at the more detailed design. This in turn aligns with the planning process of securing outline consent before more detailed design takes place. Homes England’s processes align with this as set out in the below diagram.

BHL stages of consideration



In practical terms, this means that the Agency expects BHL considerations to flow through all planning decisions and documents, from site acquisition and due diligence to masterplans and design codes. As an example, the design code for the new town at Northstowe in Cambridgeshire has a 'Home and Away' rule about proximity to different types of greenspaces which developer partners must meet as they work up the detailed layout of their schemes. Homes England will have set the locations of strategic greenspaces and play spaces to respond to this diagram.



At another site, Brookleigh in Sussex, the Agency has developed a detailed Highways Street Manual, agreed with the Local Authority, that allows for lower speed, people friendly streets. On sites where Homes England is acting as the master developer, it will typically deliver much of the strategic landscape plus the play and social spaces within it.

You have published Building for a Healthy Life to replace the Building for Life guidance. It states that Procurement Panel Partners whose designs ignore Building Healthy Life considerations are marked down in the bidding process. How rigidly will this be enforced?

Homes England did not publish the guidance. It was written by Design for Homes and Homes England was part of the partnership that helped to write it.

In terms of how BHL is used to dispose of Homes England land to the market, a number of design quality assessment steps are undertaken:

- A site specific qualitative pre-disposal assessment of outline application/ consent, to establish a BHL capability score is undertaken – “the art of the possible” to give an indicative steer to promote quality. This is done independently of Homes England by the accredited assessors within the [Design Network](#) (made up of regional design review bodies). Previously, a minimum score was set but this enabled developers to seek to achieve the pass rate (i.e. the minimum acceptable level possible). As a result, an indication is established of what is possible, but all bidders are encouraged to get as high a score as possible, with the highest score getting the highest marks.
- Production of a **parcel code** (if needed), based on the pre-assessment report helps to codify and pull together all the requirements for the bidders to understand for that specific parcel. Often that code is enshrined in the building lease.
- The pre-assessment and parcel code are included as part of tender documentation to provide clarity and guidance for bidders.
- All bids then undergo independent design assessment by the accredited BHL assessors at the Design Network against BHL.
- Depending on the submission, the Agency can require that the preferred bidder’s scheme undergo a further design review as they are developed up to Reserved Matters (RM) stage.
- Developers must, under the terms of the Building Lease, ensure that their schemes are approved prior to RM submission.
- Homes England undertakes a further independent design review of RM proposals of preferred bidder prior to submission to ensure there has been no diminution in the quality.

The Agency is confident therefore that there is a robust process, but also that bidders are helped to improve their schemes.

As part of all community engagement on Homes England projects, the Agency seeks to engage with relevant local schools and colleges. Their views and feedback help to inform and shape visions, masterplans and planning applications.

Part of the engagement process looks to identify local needs and opportunities for levelling up, whilst also seeking to understand the needs of young people and factor those into projects via working with relevant local partners. A recent example is at Northstowe where Homes England and local partners have worked with the local [Northstowe Arts CIC](#) to create and deliver much improved hoardings for the phase two works, through workshops with young people at the Connections Bus Project/Northstowe Youth Hive @ Northstowe Secondary College, and with people of all ages at the Northstowe Warm Hub. [All About Creativity - Hoardings panels are up \(northstowearts.co.uk\)](#)