

FAMILY
EMERGENCY ACCOMMODATION

GUIDANCE

MORRIS+COMPANY

Research in collaboration with:





**“1 in every 23 children in London
is homeless.”**

London Councils

Preface

This report, funded by Commonwealth Housing, builds upon years of collaborative interdisciplinary research into homelessness and housing to propose a qualitative standard for Emergency Accommodation for families.

Morris+Company became advocates for better standards in Emergency Accommodation in 2017 when the company designed the Newham Homeless Shelter. Led by Miranda MacLaren and Polina Pencheva, the team found a distinct lack of available guidance and a profound disconnect between local government departments.

In 2018, Morris+Company led the winning competition entry for Hidden Homeless, an architectural proposal for specialist accommodation for young people, which received commendation by Transport for London and GLA's then Deputy Mayor. Building on this, Miranda and Polina joined Architects Aware! in 2019, a campaign group founded by Heather Macey that brings together wider government representatives, industry and charity experts to develop responses and raise awareness of spatial injustice.

This led to Morris+Company establishing strong relationships with groups such as DePaul and New Horizon Youth Centre, and instilled a drive to research and

develop qualitative guidance for Emergency Accommodation for young people, made possible by RIBA funding. The research by Miranda, Heather and Polina culminated in publications⁴ and a media campaign "We are not bad kids"⁵, which called for authorities to urgently address this neglected policy area.

This report builds upon these earlier projects with a call to action to raise the bar for Emergency Accommodation for families with dependent children.



'We are not bad kids' campaign ©Morris+Company

Methodology

The purpose of this document is to establish the need for better standards in Emergency Accommodation and provide qualitative spatial guidance for its delivery. All proposals have been viability-assessed to ensure that urgently needed Emergency Accommodation, tailored to families with children and of suitable quality, is deliverable.

The report has been prepared through a thorough review and synthesis of a number of recently published evidence reports, policy mapping and primary research through face-to-face interviews, group workshops and visits to support and accommodation spaces.

The findings enabled Morris+Company's research team to define a set of recommendations which can be used by local authorities to streamline the delivery of higher-quality Emergency Accommodation and relieve the acute shortage we currently face.

This document is written for England's policy, planning and homelessness organisations to inform decision making. It is also aimed at local authority planning, finance, homelessness and environmental health teams who can refer to specific chapters for statistics and recommendations relevant to their needs.



Newham Homeless Shelter ©Morris+Company

¹ <https://morrisandcompany.com/work/newham-homeless-shelter>

² <https://www.architectsjournal.co.uk/news/morris-company-wins-contest-to-house-capitals-hidden-homeless>

³ <https://www.architectsaware.com/>

⁴ <https://www.architecture.com/education-cpd-and-careers/studying-architecture/advice-on-funding-your-architectural-studies/funding-opportunities-for-students-of-architecture/riba-research-trust-awards>

⁵ <https://vimeo.com/466202287>

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Foreword

The need for better standards.

by The Magpie Project: Rights, Experience, Advocacy, Change (REACH) team.



One may be forgiven for thinking that 'housing standards' are - well - a little bit boring.

But, those who would wish to leave the details of these regulations to others have never had to make the heartbreaking decision of whether or not to ignore health advice and share a bed with their baby because there is simply no room for a cot in their accommodation.

Those who don't want to get into the detail, have never had to spend hours each evening in the dark with the TV off so as not to wake their baby sleeping in their only room.

For our families, the devil is most certainly in the detail.

Standards are not simply bureaucracy, we are not talking about measurements, materials, bricks and mortar. What is at stake is - and this is not an overstatement - the development of our most precious babies' brains and bodies.

It is well documented that children's wellbeing, health and life chances are at risk when they have no choice but to grow up in boxes that are damp, lack light, and have no space to play, roll and crawl. But even without academic

authentication, a minute spent with Magpie Mums, or anyone else forced to survive in temporary or emergency accommodation, will tell you that the accommodation in its current state simply makes the basics of family life - eating, sleeping, potty training, playing, studying - impossible.

Our Magpie Project Rights, Experience, Advocacy and Change (REACH) group of mums, were privileged and excited to share their experiences of living in emergency or temporary accommodation with Miranda and Polina from Morris+ Company. We learned about existing policy and regulations, measured our accommodation, and learned how our housing met or didn't meet the basic standards. We also discussed areas where, the existing standards themselves simply don't take account of what it is to raise a family.

We all hope, for the sake of our precious Magpie minis and so many other children, that this piece of work will be seen as a call to action for the creation and enforcement of more humane and healthy standards for all our homes.

1.0 Executive Summary

1.1 What is Emergency Accommodation?

This guidance is concerned with families with dependent children who experience homelessness. Herein, a ‘family’ means, as a minimum, an adult with a dependent child.

In the UK, a family is deemed to have “priority need” for housing. If homelessness is imminent a statutory process applies. Local authorities have homelessness functions and families are either owed a homelessness prevention duty, a relief duty or a main duty, which ultimately should lead to a permanent home being found. It is a complex process with many interim steps of assessment. During this time families in crisis will be placed in ‘temporary accommodation’.

The Department for Levelling Up Housing and Communities (DLUHC) defines temporary accommodation as ‘accommodation secured by a local housing authority under their statutory homelessness functions.’⁶ However, the term temporary is too broad. It encompasses a large range of accommodation types such as B&Bs, hotels, hostels, rooms in shared rented accommodation and self-contained accommodation with lengths of stay varying from 56 days to 10 years.

We propose a clear delineation between emergency and temporary accommodation where emergency accommodation refers to the shorter-term accommodation used when families first become homeless and are in need of support. This is a critical time which could determine whether a family successfully moves onto stable, permanent accommodation without collateral impact on their health and wellbeing or becoming entrenched in the system.

Alongside this, we advocate for more social and **truly** affordable housing to be built so that long-term forms of temporary accommodation can be phased out or aligned to general housing standards.

Figure 1 was developed with the Temporary Accommodation Action Group in Newham and represents the current ‘homelessness route’ highlighting the types of accommodation targeted by this guidance.

Through our research we have identified that the provision of high quality Emergency Accommodation that preserves and respects the dignity of those in need.

This diagram refers to a family as a household deemed to have priority need, with dependent children or pregnant.

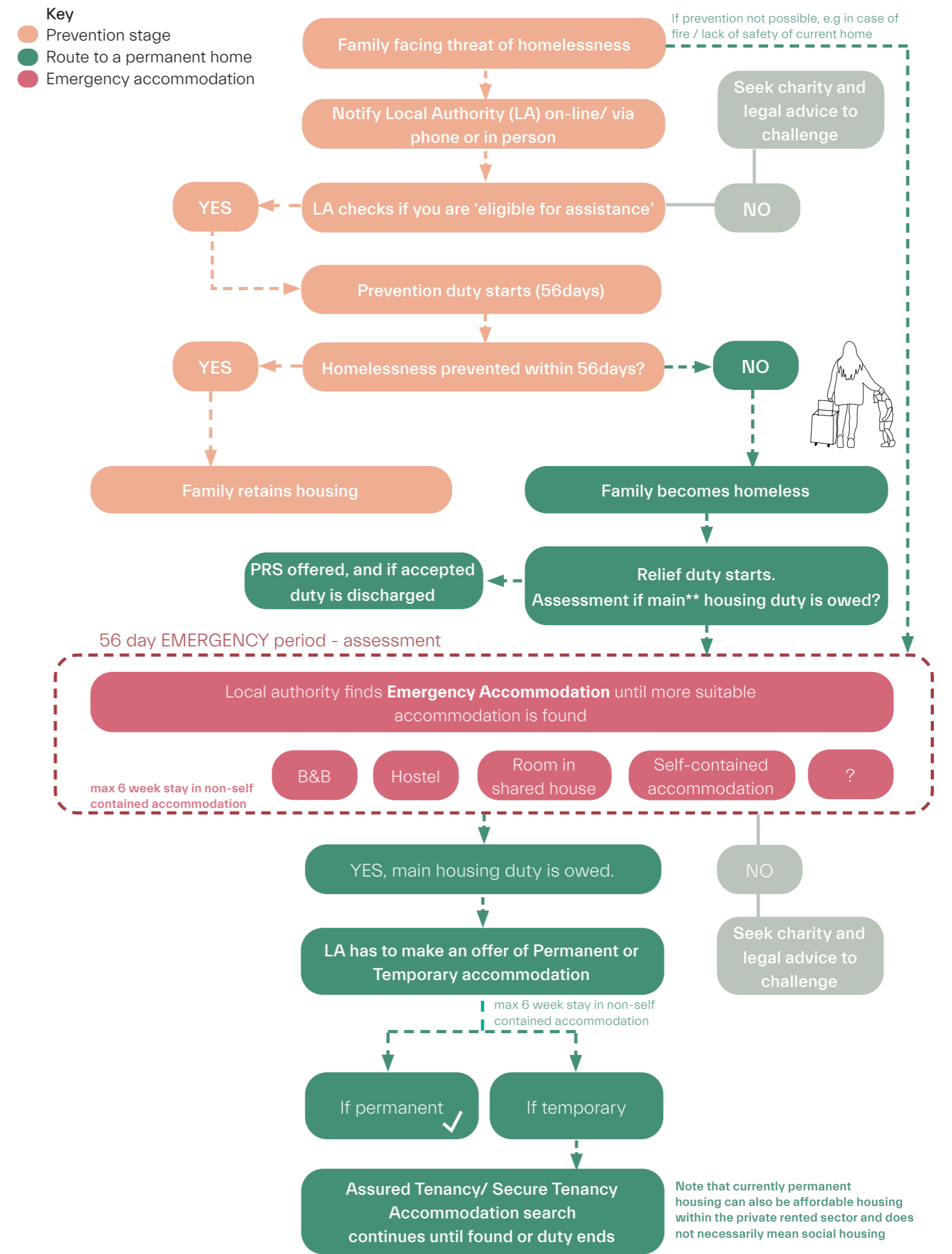


Figure 1. Pathway to Permanent accommodation
Note, every LA decision should be issued in writing with a housing plan provided

⁶ <https://www.gov.uk/government/statistics/statutory-homelessness-in-england-october-to-december-2022/statutory-homelessness-in-england-technical-note#:~:text=Temporary%20accommodation%3A%20Temporary%20accommodation%20is,under%20their%20statutory%20homelessness%20functions.>

1.2 The issue

“The number of households in B&Bs with dependent children more than doubled (131.2%) in March 2023.”⁷

GOV.uk

Family homelessness is a complex problem, that has been exacerbated by the cost-of-living crisis: in the first quarter of 2023 a record number of people were recorded as homeless, with 131,370 dependent children living in emergency and temporary accommodation.⁸

When a family becomes homeless, significant physical and mental health risks arise for both adults and children. It is an emergency moment. If handled appropriately – by providing dignified, secure accommodation that enables and supports families through the complex ‘homelessness solution’ – you provide a healthy foundation for a family to recover and move on to secure long-term accommodation.

The Emergency Accommodation that currently exists is widely below basic living standards. It is not what anyone

would deem to call a home; it is, laid bare, a ‘roof over their heads.’ Emergency Accommodation is often of poor quality or unfit for requirement. This includes nightly-paid accommodation such as B&Bs, which frequently lack even basic facilities; or shared facilities or hostels with long-term homeless adults who can be hostile, exposing children and young adults to harmful life experiences that cannot be undone.

No policy or guidance currently exists in England to address this. Despite the raft of qualitative design guidelines for traditional forms of housing that exist, there is no guidance for Emergency Accommodation beyond basic legislation to prevent fire and ‘significant overcrowding

Charities and local authorities working to secure dignified Emergency

Accommodation for the rising number of families presenting as homeless, therefore face an opaque and complex planning and legislation system. Trying to instigate change through a planning system with no guidance, no benchmarks and no classification, leads to a convoluted, involved and very costly uphill struggle that rarely succeeds.



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⁷ <https://www.gov.uk/government/statistics/statutory-homelessness-in-england-october-to-december-2022/statutory-homelessness-in-england-october-to-december-2022#:~:text=The%20number%20of%20households%20in%20B%26B%20with%20dependent%20children%20more,households%20on%2031st%20December%202022.>
⁸ [https://www.gov.uk/government/statistics/statutory-homelessness-in-england-january-to-march-2023#:~:text=On%2031%20March%202023%2C%20104%2C510,increased%20by%209.6%25%20to%2039%2C570](https://www.gov.uk/government/statistics/statutory-homelessness-in-england-january-to-march-2023/statutory-homelessness-in-england-january-to-march-2023#:~:text=On%2031%20March%202023%2C%20104%2C510,increased%20by%209.6%25%20to%2039%2C570)

1.3 Roadmap

The Demand (refer to Chapter 2)

There is a significant demand and need for emergency accommodation for families, and yet this is not clearly acknowledged in all Local Plans. This can perhaps be due to a lack of communication channels available between the Homelessness Teams and Planning Teams.

Unclear Regulations (refer to Chapter 3)

Policy Local Plans rarely explain the key differences between Emergency, temporary and permanent Housing, and therefore which planning guidance is relevant to these distinct forms of accommodation.

Funding impact (refer to chapter 4)

The amount of private rented sector properties in London has decreased 41% since 2009 whilst in the last year no-fault evictions have risen 41%. Local authorities are under major cost pressures across all services. Spending on temporary accommodation by Local authorities has hit record highs of £1.6 billion with 1/4 of this spent on B&Bs and over 85% going to private landlords. The costs are covered by local authority budgets, housing benefit claims and limited central government grants.

The available options for local authorities appear limited due to funding pressures.

Standards (refer to chapter 5)

There is no specific design guidance or space standards for Emergency Accommodation for families. The existing regulatory framework is inadequate for the needs of families with children, where babies are not counted as requiring any additional space. Only over the age of 10 are you considered a person that requires suitable space.

The lack of a basic set of standards for accommodating families with children has led to huge disparity in the spaces used for emergency accommodation, and the quality of the provision available for families in need.

Recommendation 1.

Highlight Need

Local authorities should be required to:
+ Highlight the need for emergency accommodation within their local plans.
+ Highlight the specific demographic need of the local area- and the specialist accommodation which will respond to that need.
+ Support purpose-built or purpose-retrofit accommodation to meet identified need.

Recommendation 2.

Encourage Supply

New funding models need to be supported to enable local authorities to meet the needs of their community:
+ A range of viable funding model templates to be openly described and proven as viable routes for local authorities, housing associations, charities and the private sector to procure Emergency Accommodation.
+ Template model assessment and development to be tailored to the specific needs of local authorities.

Recommendation 3.

Improve Standards

For this report's spatial and qualitative guidance for Emergency Accommodation to be:
+ Endorsed by local authorities, housing associations, charities and the private sector.
+ Referred to in Local Plans to streamline delivery and improve standards resulting in wider economic benefits.

2.0 An Emergency: The Need

HOW TO USE THIS SECTION?

This section sets out the acute problem of the significant increase in people, and particularly families with children who find themselves homeless. It illustrates that if we do nothing the issues will compound and have a detrimental impact on all public services.

WHO IS THIS SECTION FOR?

This section is to highlight to local and national authorities that recognising the problem and then providing solutions should be of the greatest importance.

2.2 The Numbers

Independent research reports emphasise two main issues:

1. The growing count of families experiencing homelessness

2. The inadequate quality of existing accommodation, which is negatively impacting children’s health and education.

The affordability gap within the private rented sector, coupled with the net-loss of social housing in England, is significantly impacting the pool of properties that can be used for Emergency, Temporary or Permanent accommodation, which in turn is fuelling an increase in the number of families registering as homeless.

“Since 1991, there has been an average annual net loss of 24,000 social homes.”⁹

Considering the data alongside wider socio-economic implications, such as interest rate hikes, inflation and the rising cost of energy and food, the number of families presenting as homeless is likely to increase. **Highlighting the urgent need for quality Emergency Accommodation and more affordable homes to be built today.**

Latest government statistics paint a concerning picture of the upward trajectory, with a record number of children homeless in Q1. Over the last decade, the number of homeless families in emergency accommodation has more than doubled, from 10,130 in 2013 to 23,330 in 2023.

At the same time, changes to the welfare system have been implemented with the roll out of Universal Credit in 2013. However, just three years later in 2016 the government froze housing benefit rates for Local Authorities to 2011 level. In 2023 these historic rates remain, with no adjustment or accountability against current markets and inflation.

“1 in every 23 children in London is homeless.”

London Councils ¹⁰

63%

Decrease in local authority funding over the last decade ¹¹

130%

Increase in private sector rent over the last decade ¹²

50% to 30%

Rate Reduction in Housing Benefit for local rents (2011–2023) ¹³

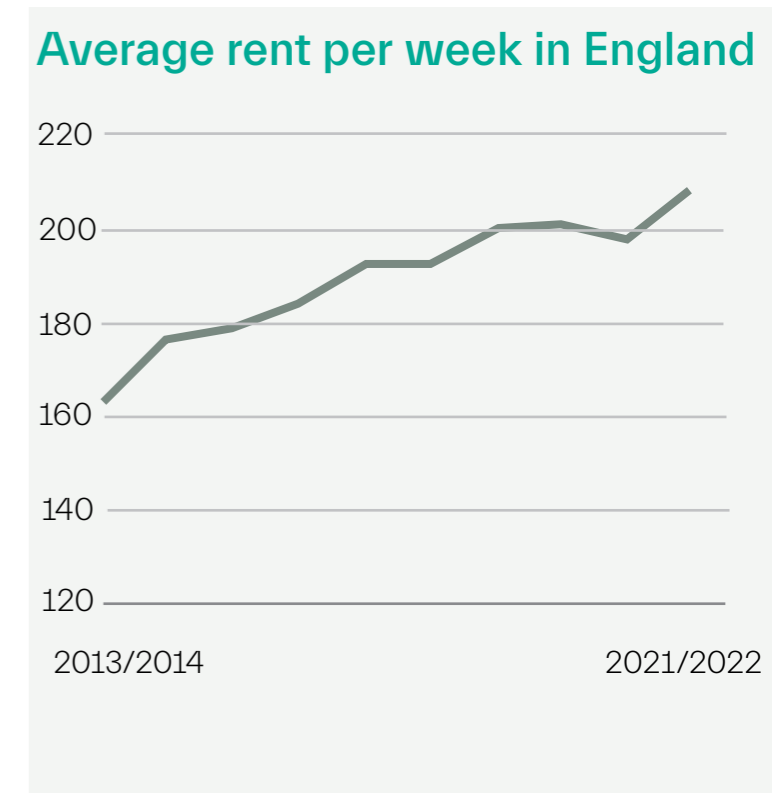
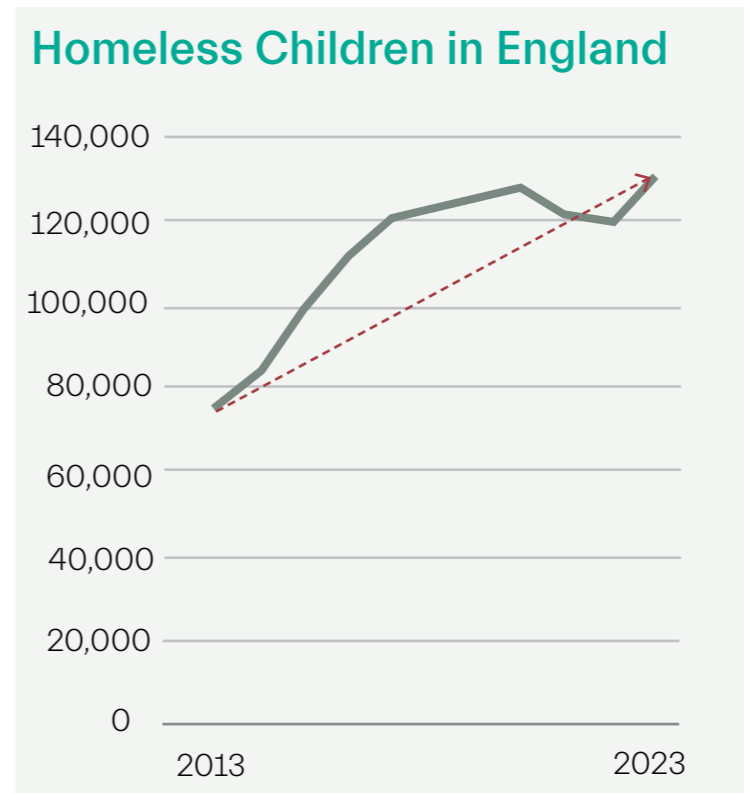


Figure 2. Source: Homelessness Statistics DLUHC

Figure 3. Source: DLUHC

⁹ https://england.shelter.org.uk/support_us/campaigns/social_housing_deficit

¹⁰ <https://beta.londoncouncils.gov.uk/news/2023/boroughs-warn-least-one-child-every-london-classroom-homeless>

¹¹ <https://www.londoncouncils.gov.uk/our-key-themes/local-government-finance/london%E2%80%99s-local-services-investing-future/decade-austerity>

¹² DLUHC

2.3 Conditions

2023 sees highest number of homeless families in B&Bs since records began in 1998.

DLUHC

Pressure to house families quickly and the absence of affordable housing options has left local authorities with little choice but to utilise unsuitable forms of available accommodation that conform to current Emergency Accommodation standards.

The provision of quality accommodation suitable for families is distinctly lacking, many private landlords are exiting the market. Local authorities funding capacity is limited leading to a shortage of suitable accommodation, and in many cases inadequate accommodation such as B&Bs and/or out of area placements, being the only option.

In London, 5.1% of households in Temporary Accommodation are in B&Bs, which equates to 15.3% of total Temporary Accommodation gross expenditure. The problem is not constrained to London alone. For example, in Birmingham the equivalent figures are 15.1% and 38.1% respectively.



Figure 4. Homelessness Statistics DLUHC

Even more acute is the urgent need for accessible accommodation suitable for homeless families with care responsibilities. Research shows that demand for accessible and inclusive properties which can be used in an emergency significantly outstrips supply.

Building on the research carried out by JustLife and the Human Rights Watch, Morris+Company ran a series of workshops with families, with lived experience, to discover the key issues they faced.¹³

The findings broadly covered two principle themes:

- Spatial and functional issues**
 - + Lack of space for safe sleeping and crawling for young children
 - + Basic concerns about security and safety
 - + Lack of basic facilities such as cooking, bathing or outdoor play
- Environmental and management issues**
 - + Mould and water leaks
 - + Thermal comfort (heating)
 - + Air quality (noise or air pollution)
 - + Connectivity including lack of internet connection



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¹³ Refer to Chapter 03 for further information

2.4 Impact

“Between April 2019 and March 2022 there were, at least, 200 individual records of child deaths where homelessness or living in temporary accommodation were present”.¹⁴

NCMD

There is extensive evidence¹⁵ regarding the impact that poor emergency and temporary accommodation has on children and families including:

- Mortality**
- + National Child Mortality Database (NCMD) draw clear parallels between poor quality accommodation and increased child mortality.

- Physical Health:**
- + Difficulty sleeping due to bed sharing or noise
 - + Increased risk of severe ill-health or disability
 - + Malnutrition
 - + Increased risk of meningitis
 - + Significantly increased risk of respiratory conditions such as asthma

- Mental Health:**
- + Social isolation
 - + Severe anxiety (withdrawal in younger children and aggression in older)

- Education**
- + Lower education attainment due to frequent moves
 - + Late/missing from school
 - + Falling asleep in class or appearing physically fatigued and distracted
 - + Academic progress affected by lack of study or homework space or lack of internet connection
 - + Increased risk of exclusion

- Economic Prospects**
- + Long-term health problems and low educational attainment increase the likelihood of unemployment or working on low-paid jobs

What happens if we do nothing?

There is clear evidence that more social and affordable housing is required in the UK to reduce the time families need to spend in temporary accommodation. However, not simultaneously addressing the provision and quality of existing Emergency Accommodation stock will, in the long term, increase the economic burden on public welfare services and ultimately cost lives.

Acknowledging the need for specialist Emergency Accommodation for families, and supporting procurement and funding models for delivery is a significant step in improving positive outcomes.

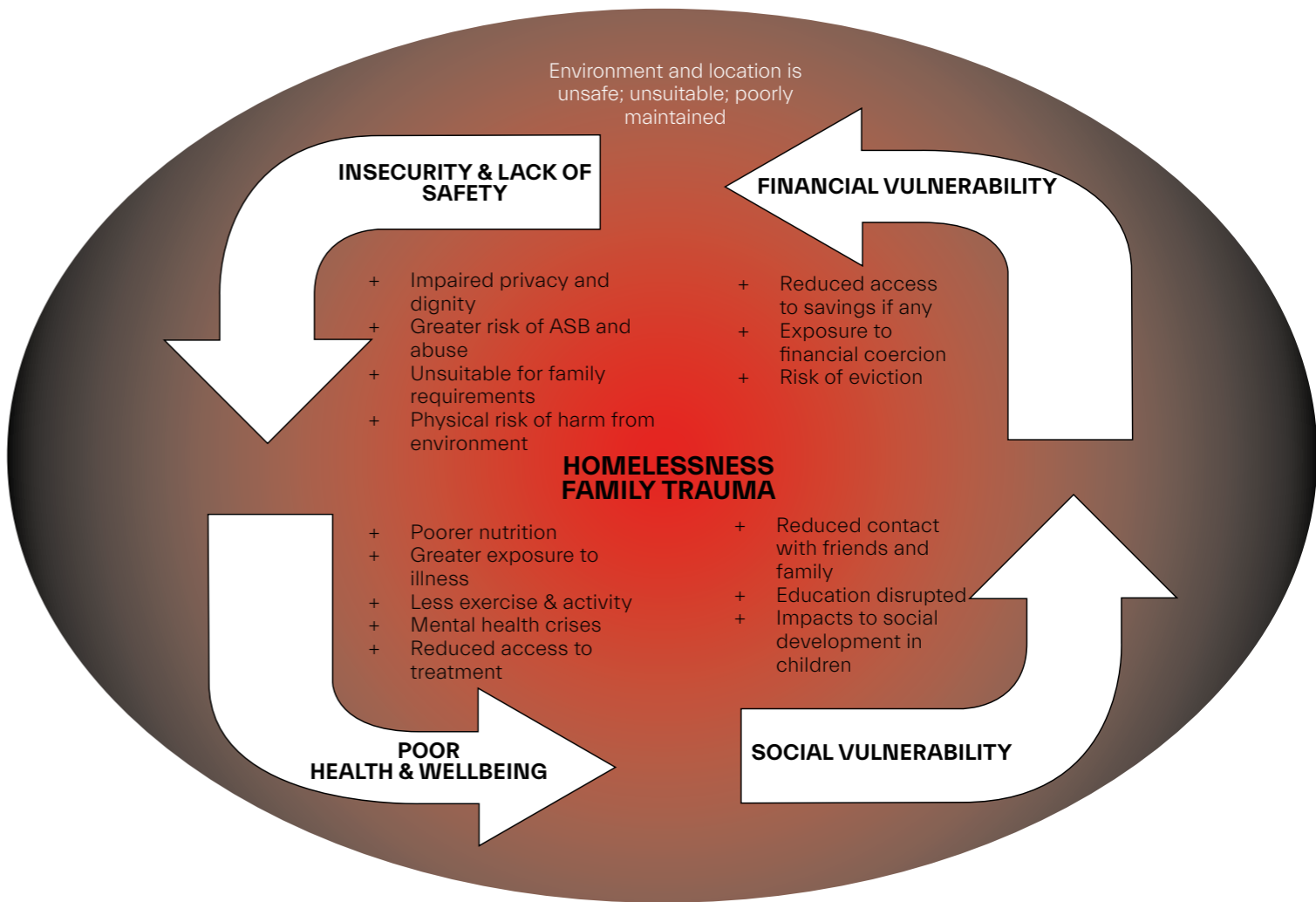


Figure 12. Impacts of a poor environment

¹⁴ <https://www.ncmd.info/?s=Child+Mortality+and+Social+Deprivation+>

¹⁵ Evidence from a range of sources including NCMD (2022) National Child Mortality Database; Department of Health and Social Care (2019) Child death review; NCMD: Child mortality and social deprivation report; Panos, Eleanor & Stuart 1998 "Homelessness and its impact on children"; Hambrick, Rubens, Brawner & Taussig, 2018; Astone, McLanahan 1994; Hagan et al 1996; The impact of homelessness on children and their development" a presentation by Marcus McPhillips, Shelter

3.0 Regulatory Framework

HOW TO USE THIS SECTION?

This chapter presents a rapid review and synthesis of the existing regulatory framework applicable to Emergency and Temporary Accommodation, highlighting the gaps in existing law that allow inadequate accommodation provision for families to exist, and discriminate against children.

WHO IS THIS SECTION FOR?

This section can be used by charities, people experiencing homelessness and professionals to understand what regulations are currently applicable and how. This chapter can also be used by policy makers and civil servants, as a point of reference, highlighting that the current standards available for Families Emergency Accommodation are not fit for purpose.

3.1 Planning Policy Framework Analysis

The National Planning Policy Framework 2023 (NPPF) sets out the government’s planning policies for England and how these are expected to be applied.

Although **no specific guidance is given on emergency, temporary, homeless or other specialist forms of accommodation** in the NPPF, section 5 “Delivering a sufficient supply of homes” loosely refers to *“the provision of specialist accommodation for a group of people with specific needs”*.

At regional and local level, Local Authorities are responsible for responding to the NPPF within individual Local Plans which, in essence, interpret the NPPF and set out more detailed planning guidance.

To review how detailed local planning guidance affects Emergency and temporary Accommodation we have referred to the Greater London Authority’s (GLA) London Plan 2021, where homeless accommodation is referred to under Policy H14 (Supported and specialist

accommodation).¹⁶ This policy supports the delivery of supported and specialised housing which meets an identified need. The form this takes varies, and should be designed to satisfy the requirements of the specific use or group, to include but not exclusive to:

+ ‘Move-on Accommodation’ for people leaving hostels, refugees, and other supported housing provision that enables independent living.

- + Accommodation for rough sleepers.
- + Accommodation for victims of domestic abuse and violence against women and girls.

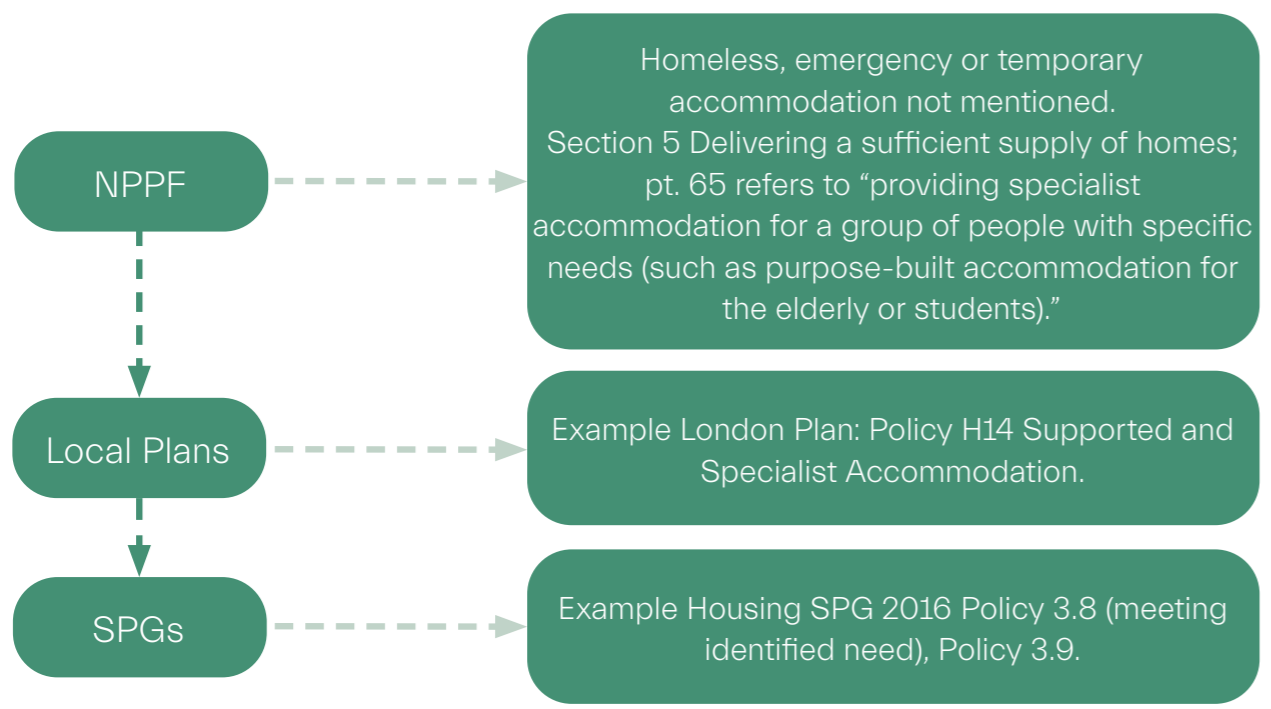


Figure 13. Diagram illustrating the limited relevant policies currently available for Emergency Accommodation.

3.2 Planning Policy Framework Analysis

Alongside Local Plans, local authorities have the ability to publish Supplementary Planning Guidance (SPG) on specific topics.

For example, the Mayor of London Housing SPG (2016) Paragraph 3.5 outlines the policy approach to, and proposals for, non-conventional housing schemes.

Local planning authorities should ensure:

- + Proposals demonstrate how they meet identified housing needs (Policy 3.8Ba).
- + Proposals demonstrate how they contribute to the creation of mixed and balanced communities (Policy 3.9).
- + Schemes contribute the maximum reasonable amount of affordable housing in line with Policy 3.12 and Policy 3.13.

- + Neither the NPPF nor the London Plan limits the requirement of affordable housing contributions to C3 housing. Therefore affordable housing can also be sought on residential schemes that fall into other use classes (including Sui-Generis).
- + Schemes are of good quality and meet all relevant Housing Act and HMO standards and requirements.
- + There are effective management arrangements and support services in place to reflect the needs of the schemes' intended occupiers, ensuring such schemes do not have a negative impact on the surrounding community and that adequate lettings policies are in place to manage the mix of occupants.
- + The development is not used as student accommodation, as a hotel, or as temporary homeless

- accommodation without first securing an appropriate planning permission.
- + Schemes are located only in areas of high public transport accessibility.

Paragraph 3.8.5 states local authorities are recommended not to put restrictions on the provision of occupier related accommodation, such as restricting their numbers in specific locations, unless there is clear evidence of significant negative impact on both the neighbourhood and residents.

Local Authorities are advised to ensure that sub-standard accommodation is brought up to standard and if this is not possible, that it is replaced at a satisfactory standard, subject to identified need.

Local Plans vary in their acknowledgment and support for Emergency Accommodation, as the provision can be misunderstood due to unclear policy, in some cases leading to a lack of support from local authorities for this essential requirement.

Local Plans can tackle this problem by highlighting the specific demographic need in the local area for Emergency Accommodation, i.e. tailored for families, young people or single adults and far more.

Law	Why is it relevant?	What has improved?	What gaps remain?
Fire Safety Regulations (England) 2022	Emergency accommodation is a form of sleeping accommodation and is thus considered a high-risk building. This creates scrutiny from a fire safety perspective.	Fire safety only.	Spatial, accessibility, qualitative guidance.
The Homelessness code of guidance for Local Authorities 2018	Provides guidance on how Local Authorities should exercise their homelessness protocol in accordance with the Homelessness Reduction Act 2017. Local Authorities have authority to set minimum standards for interim accommodation. Positive changes to ensure 'suitability of accommodation' provide Local Authorities with discretionary powers to request accommodation with higher space standards than those dictated by the Housing Act.	Gas safety, electrical safety and fire safety. Discretionary powers used differently by different local authorities.	Spatial, accessibility, qualitative guidance.
Licensing of Houses in Multiple Occupation Reforms 2018.	Emergency and Temporary Accommodation can be licensed as an HMO. Each Local Authority has authority to develop and enforce its own HMO Guidance.	Inconsistent. Differs between authorities.	Spatial, accessibility, qualitative guidance.
Homelessness Reduction Act 2017	Places early intervention duties on the Local Authority to assist the prevention of homelessness in their areas. It also requires Housing Authorities to provide inclusive homelessness services, not just those who have 'priority need.' A new duty for those who are already homeless ensures that Housing Authorities support households for 56 days to assist relieve their homelessness and aid their route to secure accommodation.	Support and care is required.	Spatial, accessibility, qualitative guidance.
Setting the Standard	A pan-London programme to ensure Bed & Breakfasts and Studio flats used by Local Authorities for nightly paid temporary accommodation meet set levels of quality and management standards. The programme also provides funding for Environmental Health inspections.	Funding for audits of properties is provided.	Not applicable nationally. Spatial, accessibility, qualitative guidance.
Fire Safety Order 2005	Ensures that a 'responsible person' (owner/manager) for a property meets the required fire safety order relating to fire-risk assessment and the identification of possible health and safety issues; risk mitigation and protocols.	Fire safety only.	Spatial, accessibility, qualitative guidance.
Housing Act 2004	Lays on requirements for housing conditions and licensing of houses in multiple occupation (HMO).	Licensing requirement.	Spatial, accessibility, qualitative guidance.
Housing Act 1985	Key legislation that sets the minimum space standards used for emergency accommodation. The Housing Act 1985 sets minimum space standards for persons (adults and children over the age of 10) and half persons (children between the age of 1 and 10) as well as prescribes the number of rooms based on the number of persons.	This is the baseline standard.	Children and babies are not adequately accounted for, safety, privacy and environmental quality of accommodation not accounted for.

3.3 Standards

“These standards are based on the Boer war to prevent the transmission of disease, every piece of legislation has rehashed it in some way.”

Paul Fitzgerald, MCIEH

Although current policy states that sub-standard accommodation be brought up to standard, it does not provide tailored qualitative design guidance to support local authority housing departments and planning Teams.

Due to the lack of specific standards for this accommodation type, extremely poor accommodation is considered fit for purpose, despite it falling far below what a family requires to carry out daily life.

Also, current policy does not include specific user group guidance pertaining to Emergency Accommodation. Presently, Emergency Accommodation is a one size fits all approach, and is not tailored to specific needs of groups that have differing, and sometimes, contradictory priority needs.

This lack of guidance for Emergency Accommodation contrasts greatly to the significant and continuous evolution of housing guidance for traditional forms of housing.

The HMO standards commonly referred to, take a generalist approach. The guidance can be used for any group of residents sharing facilities within a residence. The guidelines do not reference any specific enhancements for families with infants and children.



Figure 14. Existing Legislation Control: Requirements for housing homeless

3.4 Standards

The definition of a House of Multiple Occupation (HMO) is found in sections 254-260 of the Housing Act 2004. In broad terms, an HMO can be described as a building or part of building (flat) which is occupied by more than one household (defined as occupiers of the same family and includes spouses, co-habitees, same sex couples and any blood relative) where:

- + At least one of the households shares or lacks access to basic amenities such as a WC, personal washing facilities and cooking facilities.
- + The building is fully converted into self-contained flats or studios and the conversion work does not fully comply with the building standard of the 1991 Building Regulations and less than two thirds of the flats are occupied by long leaseholders.

HMOs are used for a variety of forms of multiple tenancies and as such are split into different categories, these are:

- + HMOs comprising bedsits/studio rooms.
- + HMOs comprising self contained flats.
- + Flats in multiple occupation (FMOs).
- + Hostel/Staff accommodation.

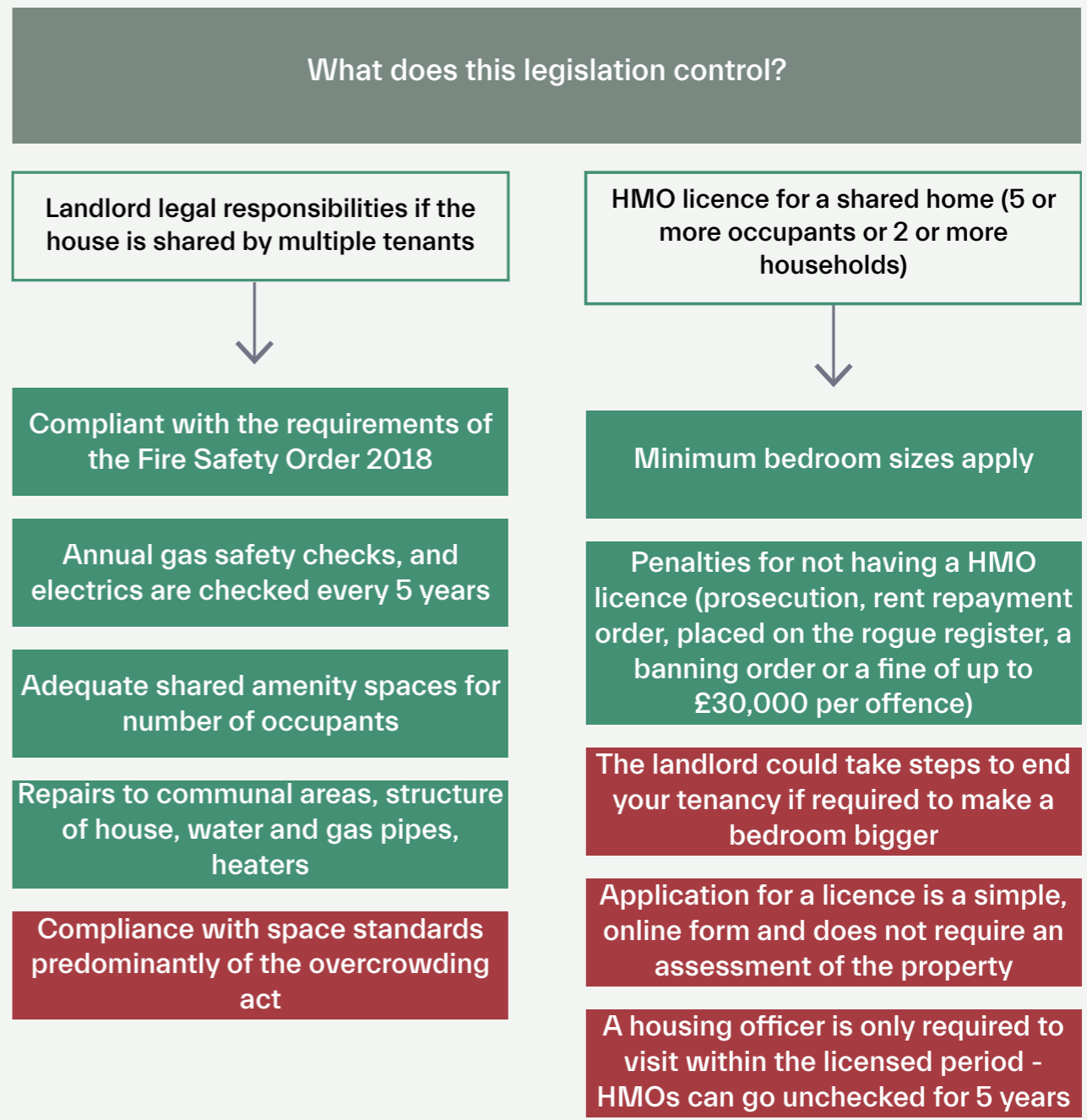
Emergency Accommodation can fall into most HMO categories, and in some cases any such property could require a mix of guidelines.

HMO guidelines focus on a minimal guidance for harm prevention, with no qualitative precedents.

The owner of a property of multiple tenants must obtain a license confirming compliance with HMO regulations. This is a simple online form, and through a series of questions will typically be accepted.

As standard, an HMO should be visited by a local authority housing officer within the period of the license. Due to overstretched resources, in the worst case, a property may go unchecked for 5 years whilst housing residents. The result can be non-compliant bedsits, hostels, B&B or other accommodation that may offer lower, short term rates for a family but could be lacking basic amenities.

2018 HMO Guidance Houses of multiple occupation



Guidance for Family Accommodation



Figure 15. 2018 HMO Guidance: House of Multiple Occupation

3.5 Standards

Housing Act 1985 Part X discriminating against children

Table 1

Number of rooms	Number of persons	+ No provision for 1/2 persons.
1	2	
2	3	
3	5	
4	7 1/2	
5 or more	2 for each room	

Table II

Floor area of room	Number of persons	+ 90sqft is a single bedroom under Building Regulations for C3 housing. + 70sqft room may not fit a cot
110sqft (10sqm) or more	2	
90sqft (8sqm) or more but less than 110sqft (10sqm)	1 1/2	
70sqft (6.5sqm) or more but less than 90sqft (8sqm)	1	
50sqft (4.6sqm) or more but less than 70sqft (6.5sqm)	1/2	

(2) For this purpose-
 a) No account shall be taken of a child under the age of one and a child aged one or over but under ten shall be reckoned as one-half of a unit, and
 b) a room is available as sleeping accommodation if it is a type normally used in the locality either as a living room or as a bedroom

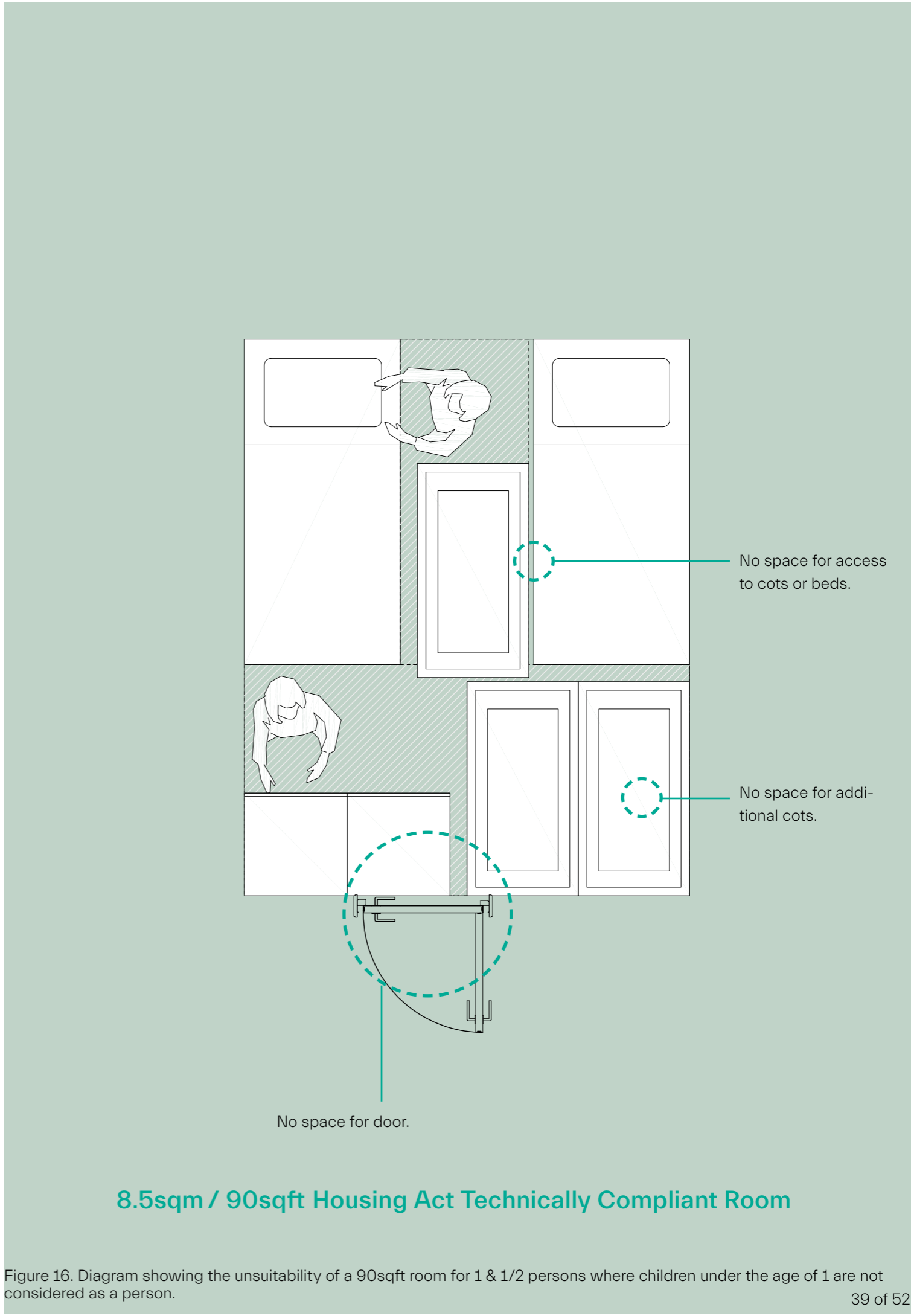
Source: <https://www.legislation.gov.uk/ukpga/1985/68/part/X>

Analysis of current legislation highlights a serious gap in standards that impact the safety and wellbeing of families and children in Emergency and Temporary Accommodation. Whilst some Local Authorities provide additional HMO guidance beyond the bottom line of the Housing Act, it is inconsistent and rarely takes into account infants and children.

The Housing Act sets out a standard requirement of 90sqft for one and a half persons, which is equivalent to the space standard mandated by the Building Regulations Approved Document Part M

for a single bedroom (single person occupancy). In addition infants under the age of one are unaccounted for, which means that a mother with multiple children under the age of one, may be lawfully placed in a 90sqft room.

Figure 16 shows a lawful spatial configuration within the requirements of the 1985 Act. It cannot accommodate furniture for safe sleeping and any type of adequate storage, window and door access, not to mention space for a pram. If a baby and mother sleep together there is a significant health risk.



8.5sqm / 90sqft Housing Act Technically Compliant Room

Figure 16. Diagram showing the unsuitability of a 90sqft room for 1 & 1/2 persons where children under the age of 1 are not considered as a person. 39 of 52

3.6 Vanessa

Vanessa* lives in an HMO compliant home in Waltham Forest.

Vanessa used to be a championship swimmer, she has a university degree and has worked in the area of public health, she is an expert in intricate Henna designs, and is always immaculately dressed.

Her 2-year-old son David*, is bright, noisy and he adores trucks and trains. They invited us into their home in August 2023 to share their experience of living in a (mostly) compliant three-storey HMO property.

Vanessa became homeless on fleeing domestic abuse in 2020. Since then she has not had a secure place to live. She has only been in this property for three months and faces moving again as she has now regularised her status.

Her room is her only private space, she shares a kitchen, a bathroom, a hallway, a living room and a stairwell with multiple families. With no additional storage available, Vanessa's room is packed with all her worldly belongings.

Although there is a garden it is not maintained and has been left to the foxes so families don't use it because they feel it is unsafe.

A trip to the kitchen means taking her son down two flights of stairs. The stairs

have high treads so she needs to hold her sons hand as he carefully navigates each step. When the family moved in there was water dripping from the landing light fixture outside Vanessa's room. When she called to ask for it to be fixed she was told 'it's normal, it does that when it rains' and that 'it is not in your room, it is not a problem'. She had to get external advocates involved to get the repair done.

Even more of a concern than the physical hardships of living in this type of accommodation, is the constant anxiety caused by not feeling safe in your own home.

"I don't know who will come in the house, when, or what kind of person they are really" Vanessa says.

She describes incidents involving aggressive behaviour from another resident's child and ongoing trouble with a visiting boyfriend making threats to David and other residents children.

"It is difficult to keep out of other people's way when you have an energetic two-year-old boy who needs to be with you in communal areas while you cook or do laundry."



Vanessa's current home ©Morris+Company

*Names have been changed for anonymity

3.6 Vanessa

Vanessa explained she craves her own front door that she can close, to know she is safe. She says that she used to live in a self contained flat where she did not have to share basic amenities such as bathroom, kitchen, laundry - and she would love to be able to do so again.

Although Vanessa has only just moved in, she will be moved again soon as she has just received her universal credit. Vanessa is finding the uncertainty of where her next move will be very difficult. But she is mainly worried for her two-year-old son. Each new move takes a toll on him.

When they moved three months ago, Vanessa tells us:

“David was not eating. He stopped eating for two months. Just imagine. No, he was only drinking milk. He ate once a day. And he was getting thinner. I was so worried. His hair started falling out, at this age, very badly.”

Vanessa does not want her son to have to go through further upheaval, but her social worker tells her that she will have to move, and that staying in London is unlikely unless she can secure a job. Vanessa is actively seeking work - she is highly qualified - but being the sole carer for her two-year-old, and high childcare costs mean it is not, currently, financially viable for her.

“I am scared about where they will move me to, I want to get a job so I can go back to Newham and be near the Magpie Project and David’s nursery. I asked the social worker where I will be moved to and she said ‘most probably out of London’.”

Vanessa’s has heard that the most likely choices for moving on seem to be a relocation outside of London or the possibility of a hotel room (with no cooking facilities available at all) if she wants to stay in the capital.

As her son has already had issues eating, she is worried that a hotel would disrupt his routine, dietary preferences, and pose serious financial challenges as she attempts to find a meal outside the hotel.

Her social worker warned her that she would not be able to take all her belongings and household items to a hotel. So she is now thinking about which of her household belongings to get rid of or sell. This is difficult because when she is moved in to temporary accommodation or finds a private rental it will be unfurnished - and she will have to start from scratch buying fridges, beds, pots and pans.

The constant uncertainty, lack of safety, and lack of control over her circumstances have been making Vanessa unwell. She has been to the GP to report symptoms of anxiety and vitamin D deficiency. Vanessa tells us

that, without a safe and secure place to live she is not able to address this anxiety, let alone start to heal from the original traumatic events that necessitated she seek housing assistance in the first place.

Vanessa tells us that she once had a cheerful and mentally strong demeanour but it has been worn down over the past three years as these circumstances weigh heavily on her.

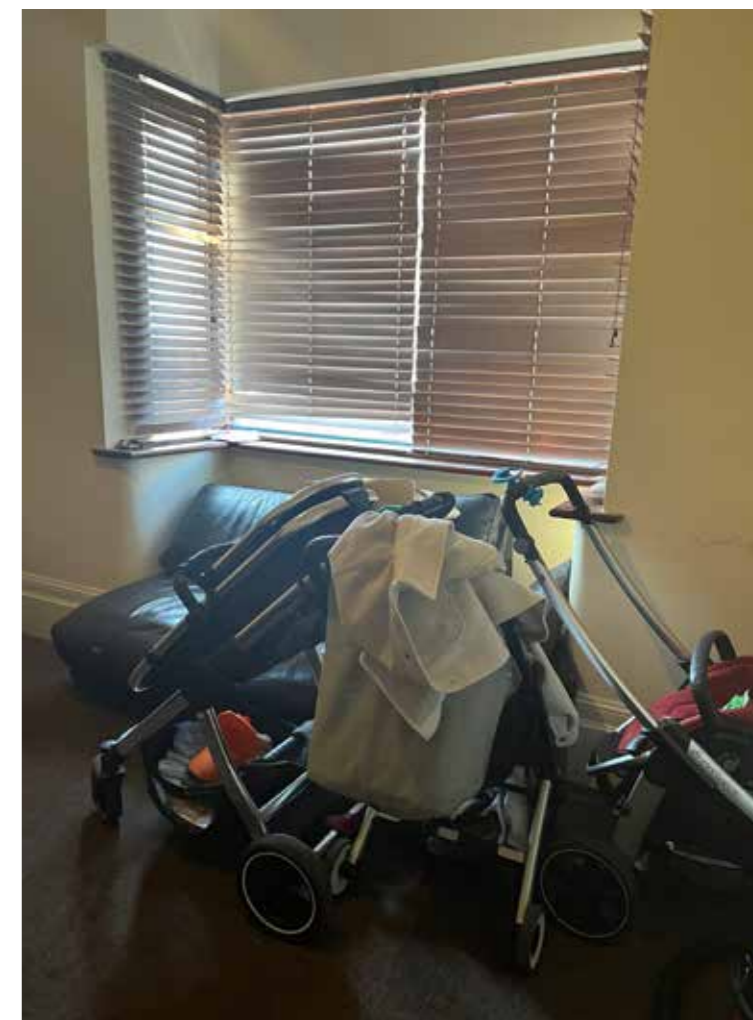
She is also concerned for her son’s health and wellbeing, she is desperate to be able to provide him with his own space, particularly a private bathroom.

Despite attending meetings and gaining a better understanding of the housing system, the terminology and distinctions between Section 17, Emergency, Temporary, and Permanent housing remain confusing. The extended stay in Section 17 accommodation has left her desperate, and she is really concerned about moving into shared housing with private landlords, based on previous negative experiences.

Vanessa tells us that, at present, many aspects of her life are tied to council support, including speech and language therapy for her son. And, while she had learned to navigate some systems independently, she needs guidance from others.

Moving out of London would mean that she not only has to go back to square one in terms of putting support systems in place for her son’s speech and language, education and care as well as her own medical needs - but that she will have to do that without the social and community support that she has built up in the east London area over the past three years.

We are grateful to Vanessa for inviting us in to her home to share her experiences and to give us a real understanding of what it is like to live in this accommodation.



Vanessa’s current home ©Morris+Company

3.6 Vanessa

Vanessa's room meets current space standards

Vanessa's room is 11.7 sqm in total

Table 1

Number of rooms	Number of persons
1	2
2	3
3	5
4	7 1/2
5 or more	2 for each room

+ Vanessa and her son are counted as 2 persons

Table II

Floor area of room	Number of persons
110sqft (10sqm) or more	2
90sqft (8sqm) or more but less than 110sqft (10sqm)	1 1/2
70sqft (6.5sqm) or more but less than 90sqft (8sqm)	1
50sqft (4.6sqm) or more but less than 70sqft (6.5sqm)	1/2

+ No mention if space under 1.5m in height should be counted in the floor area

(2) For this purpose-
 a) No account shall be taken of a child under the age of one and a child aged one or over but under ten shall be reckoned as one-half of a unit, and
 b) a room is available as sleeping accommodation if it is a type normally used in the locality either as a living room or as a bedroom

Source: <https://www.legislation.gov.uk/ukpga/1985/68/part/X>

Vanessa's bedroom exceeds the Housing Act (1985) space standards, despite there being very little space for both her and her son to use the room.

However, Waltham Forest have set additional rules for HMO rooms that are within a shared house. Two people irrespective of age must be within a 13sqm space. Therefore, Vanessa and her son should have a room that is 1.3sqm bigger. The eaves area is under 1.5m and should be discounted as unusable space other than storage.

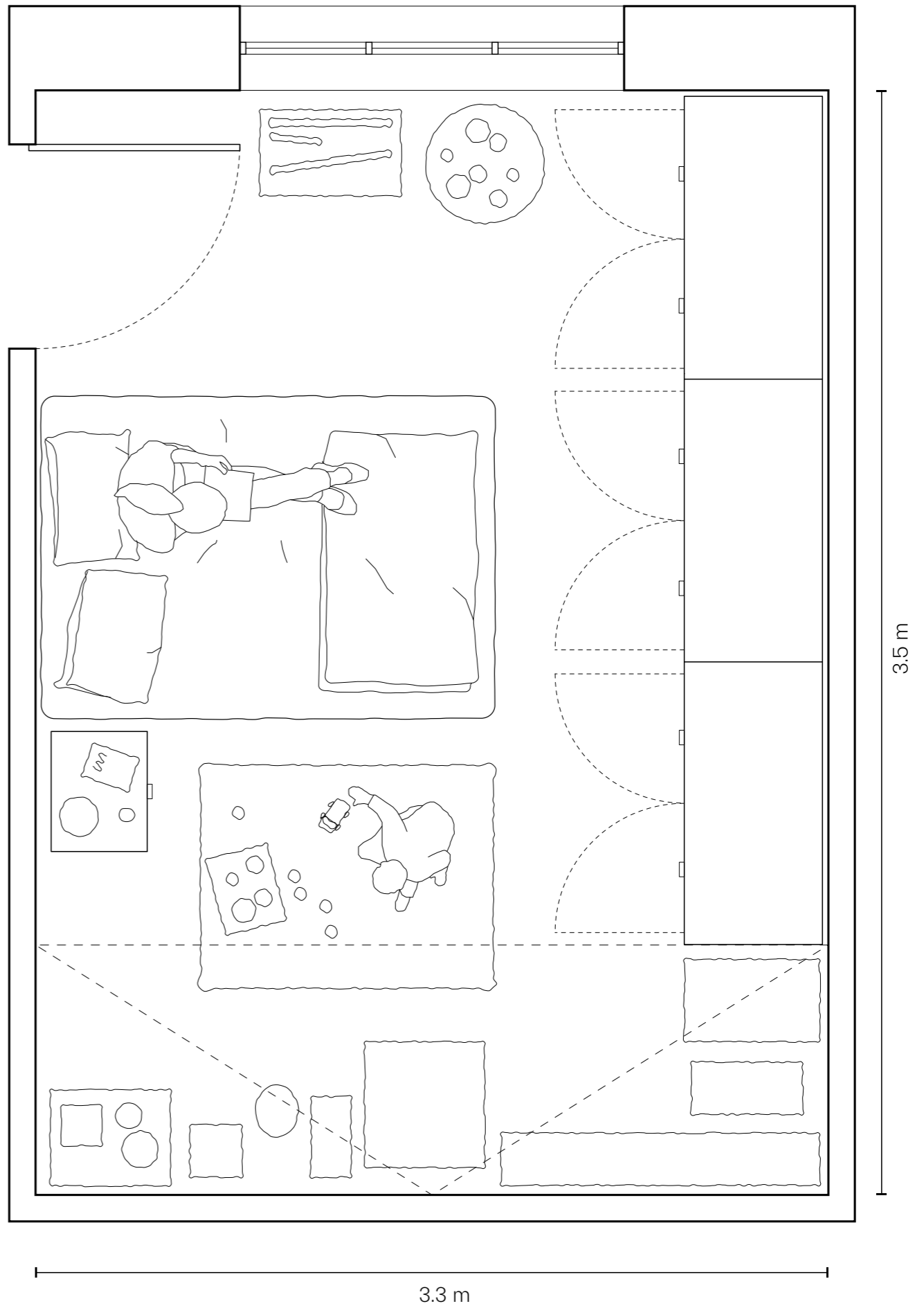


Figure 17. Vanessa's room dimensions

3.7 Sarah

Sarah* lives in a hotel room with her 2 children

Sarah is a young mum of two preschool children, Jenny, and James who are two and three years old respectively. Although Sarah has been through a lot, she is optimistic and generous with her two children, and always expresses gratitude for any help and support she receives. Jenny and James are highly active children who love drawing, and recently enjoyed visiting the local city farm.

Sarah became homeless on fleeing domestic abuse early in 2023. Since then, she has moved four times from hotel room to hotel room. On every move she has had to dispose of more and more of her belongings, as it is impossible for her to carry suitcases, a pram and children's toys alongside her two children, and with no support.

Sarah was given notice to leave the last hotel she was relocated to, as she took two croissants and two yoghurts into her room, to feed her children because they were not hungry at breakfast.

Sarah now lives in another hotel room, situated on a main road, with her two young children living in the uncertainty of when they will be moved again. The hotel room has an ensuite bathroom,

three beds next to each other, a desk, a TV, and a small storage cupboard. She has no kitchen, and no access to a fridge or laundry facilities; she washes all the family's clothes in the bath and dries them by hanging them up in her room.

Sarah and her family are provided with a small breakfast box each morning which her children do not enjoy. With no shared or private kitchen facilities and no fridge, Sarah and her children must eat out every day, for every meal. Sarah's children need milk when they wake and before bed, but as there is no fridge, she throws away any remaining milk each day as she has nowhere to keep it refrigerated and to ensure the room doesn't smell of turned milk.

Living in four hotel rooms has been exceptionally difficult for her family, and Sarah explains the uncertainty and constant change has impacted her and her children's physical and mental health, "they keep crying **"I want to go home, I want to go home"**".

Both children have been ill with chest infections, and with every move to a new hotel and new location, Sarah is required to join a new GP's surgery and explain their family circumstances all over again.



Sarah's current hotel room ©Morris+Company

*Names have been changed for anonymity

3.8 Sarah

Her children are craving consistency she explains, with every move taking a further toll on their collective well-being as a family.

Hotel rooms are not fit for a family; the children have no room to play so they are confined to drawing on the bed, reading on the bed or watching tv on the bed. There is nowhere to play outside the hotel, so we take a bus to get to a nearby park. **“Kids need space to play, there isn’t even space for them to walk in this room”.**

Sarah also explains she doesn’t feel safe in her room and that her children get scared at night-time.

“Sometimes there are different types of people that stay in the hotel, they’re drinking. They’re screaming. They like banging doors, the children can’t sleep”.

Sarah also recounts instances where hotel staff have shouted at her and threatened her. **“My children were so scared”** she says. **“They keep asking me if the person was going to come into our room and hurt them”.**

Sarah is concerned about how long she will be forced to stay in this hotel or move to yet another hotel room. The local authority has told her that they are looking for more suitable accommodation, they have suggested she could move to private rental accommodation. However, with her allowance of £900 per month and no other source of income, while supporting two children single handedly, private rent

is impossible for her to achieve in the borough.

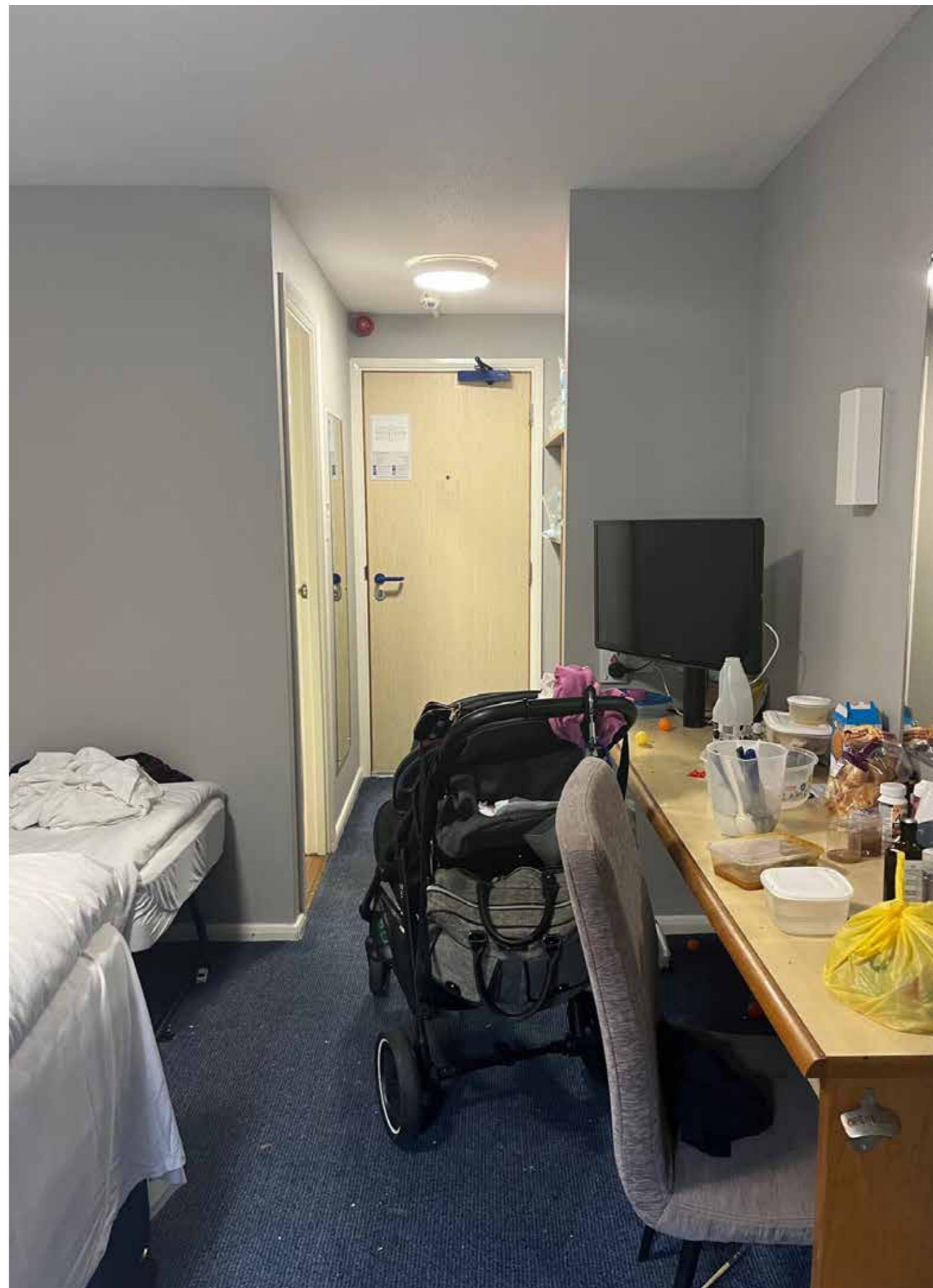
Sarah is most concerned with the fact she is unable to cook for her children and the health impacts of poor nutrition **“It costs money, and the food I can afford to buy isn’t the best food for them”.**

Sarah is desperate for a private studio with her own kitchen where she can cook healthy food for her children, with washing facilities so she can clean and dry their clothes. She explains that the option of a spare room for her children to sleep in would be beneficial to both her and her children’s health and wellbeing.

Since she fled her home due to domestic abuse, Sarah has been by her children’s side 24 hours a day. When her children go to sleep, she lies next to them in the dark before they wake up: **“It is so difficult to manage just one room with two kids with all our stuff it is very hard. - Very hard. I can’t even tell you how much”.**

We ask Sarah what would she and her children need to feel healthier, safer and at home? **“Every person has their own dreams - I would like to have my own flat with a kitchen, near a nursery, near a park, near a train station, near a doctor, near buses, but, let’s see what they are going to do with us next”.**

We are so grateful to Sarah for sharing her story, and hope that she and her family get settled soon.



Sarah's current hotel room ©Morris+Company

3.8 Sarah

Sarah's room is Housing Act compliant on the basis that her children are counted as half persons

Table 1

Number of rooms	Number of persons	+ Sarahs children only count as half persons
1	2	
2	3	
3	5	
4	7 1/2	
5 or more	2 for each room	

Table II

Floor area of room	Number of persons
110sqft (10sqm) or more	2
90sqft (8sqm) or more but less than 110sqft (10sqm)	1 1/2
70sqft (6.5sqm) or more but less than 90sqft (8sqm)	1
50sqft (4.6sqm) or more but less than 70sqft (6.5sqm)	1/2

(2) For this purpose-
 a) No account shall be taken of a child under the age of one and a child aged one or over but under ten shall be reckoned as one-half of a unit, and
 b) a room is available as sleeping accommodation if it is a type normally used in the locality either as a living room or as a bedroom

Source: <https://www.legislation.gov.uk/ukpga/1985/68/part/X>

Sarah's room, although there is very little space for both her and her two children, exceeds the Housing Act (1985) space standards. This is partly due to Sarah's children being only counted as half a person each, as they are both under 10years old.

East London's HMO guidance for minimum standards follow the Housing Act. The bedroom in Sarah's room is 13.7sqm when the bathroom and storage space is subtracted. This still, is over the minimum requirements for East

London HMO guidance and the Housing Act.

HMO guidance, however, highlights the requirement to access a shared kitchen. This is partly why hotels are only legally able to house families for a maximum of 6 weeks. However, in reality this time period is commonly exceeded, due to severe lack of supply of suitable Emergency Accommodation. Sarah has been living in hotel rooms for approximately seven months with no sign from her borough of this changing.

Sarah's Room is 21.45 sqm in total

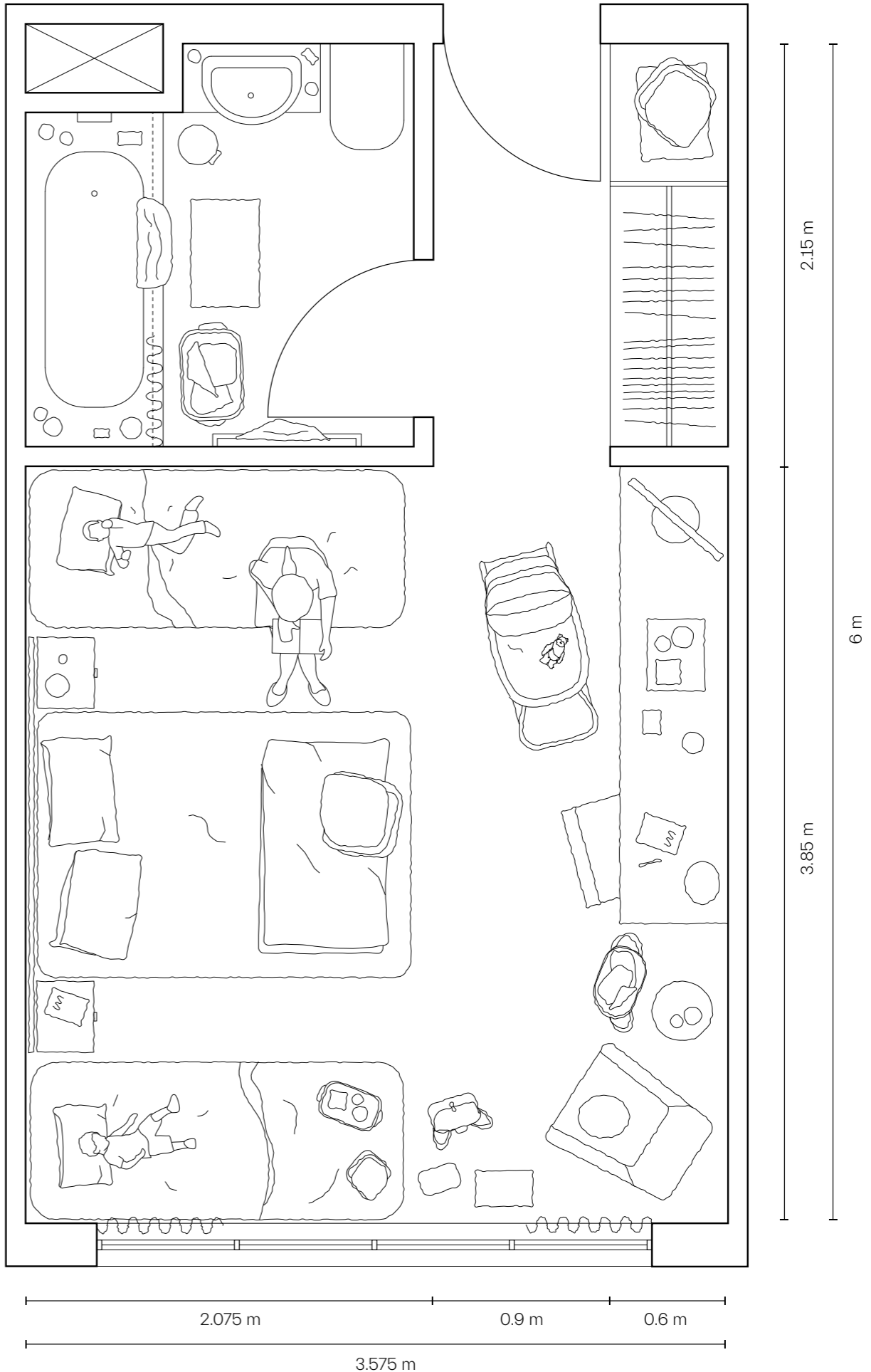


Figure 18. Sarah's room dimensions

4.0 Spatial Guidance

HOW TO USE THIS SECTION?

This section sets the minimum requirements for individual elements within Emergency Accommodation.

WHO IS THIS SECTION FOR?

Chapter 4 is aimed at planners, architects, designers, local authority and other professional teams including service providers, private landlords and property management teams

4.2 A Healthy Community

This universal guidance has been developed so it can be used for both refurbishment and new build Emergency Accommodation for families.

It prioritises the health of occupants and has been developed through consultation with families.

Wider considerations such as location, accessibility and health are detailed below, whereas spatial provision for key furniture, functional capacity and habitation activities (architectural quality) are detailed in sections 4.3-4.5.

Families require a nurturing support network to thrive.

Parents and their children must be located in safe accessible, walk-able 15min neighbourhoods with access to a nursery, school, GP surgery, a playground and park, and their local support network whether that be faith or charity organisations.

The importance for children to have access to holistic nurturing care is highlighted in The Nurturing Care Framework by WHO, see figure 19, which reinforces the key components required for children to thrive.



Figure 19. The Nurturing Care Framework, key components for nurturing care

Location and Setting

It is critical to consider the location and setting of specialist accommodation first. The neighbourhood social infrastructure should be analysed and proximity to parks, nurseries, churches, faith organisations, GPs and local support networks highlighted.

Census data (indicators of multiple deprivation and crime) could also be considered to assess if a potential site is suitable for use as Emergency Accommodation. This is to ensure that every neighbourhood has a mixed and balanced community.

Accessibility

Accessible units should be provided based on the Local Authority Housing Needs data, and as a minimum 5% of all units should be fitted as accessible. Accessibility should also be considered in all communal areas and in the approach to the building.

Single parents with children using prams may not be able to use buildings which have stepped access and no lift provisions.

Health: Environment

Air quality within the Emergency Accommodation should be controlled, and MVHR systems installed to ensure humidity levels are kept low, complying with current building regulations.

Acoustics between walls and floors and window glazing U-values should comply with current building regulations, with heating meeting statutory recommendations. Overheating to rooms must be mitigated by passive measures.

A comprehensive management plan should be signed off by the Local Authority, and management teams monitored to ensure maintenance issues are dealt with in a timely fashion.

Wellbeing: Infants and children

The health and well being of infants and children should be the priority for all family accommodation. Inclusive, welcoming, colourful, safe and well maintained spaces that create supportive non-institutional spaces for children should be required of all licensed family emergency housing.

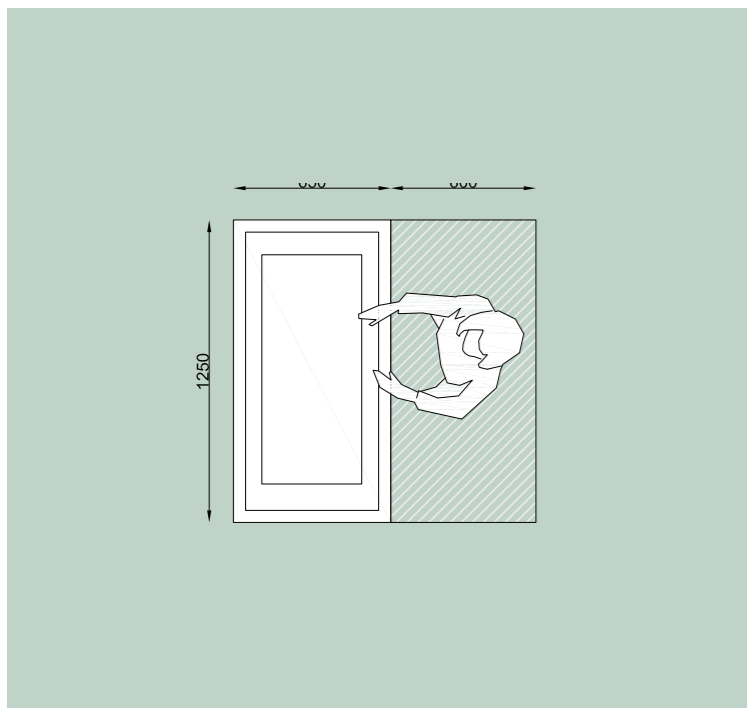
The safety of children in all emergency accommodation should be prioritised. For example, opening window sill heights of 1.1m, sockets to be lifted, and finger guards to be added to doors to prevent injury.

4.3 Private Space

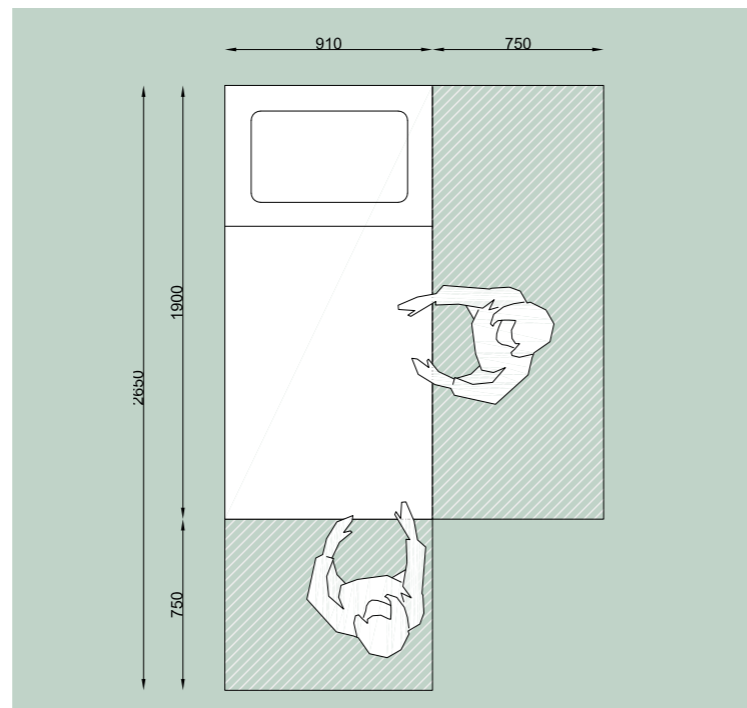
Sleeping

Private space is the most critical space for a family in an emergency to ensure safeguarding of children, adequate privacy and security.

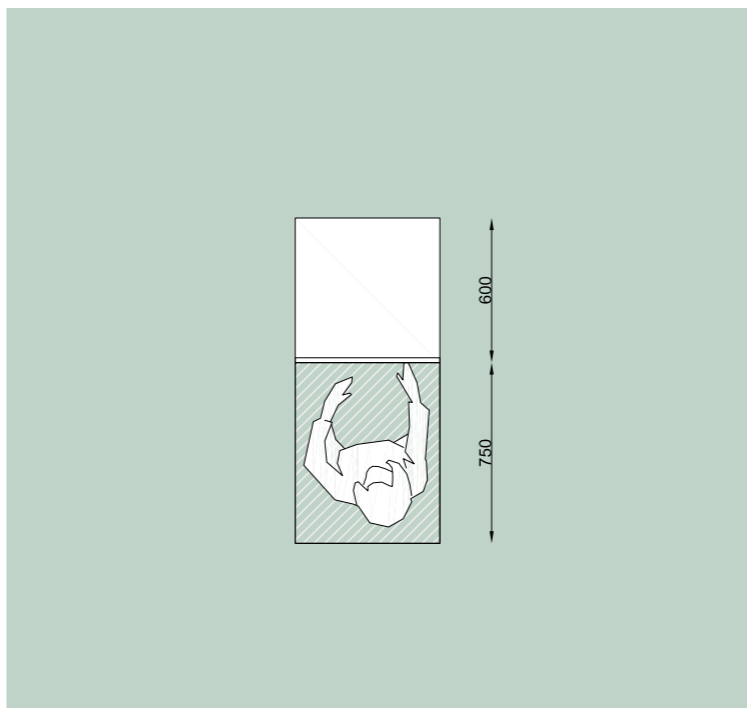
Bedrooms should be separate from living areas to improve acoustics and allow for families, with children of different ages, to stagger bedtimes.



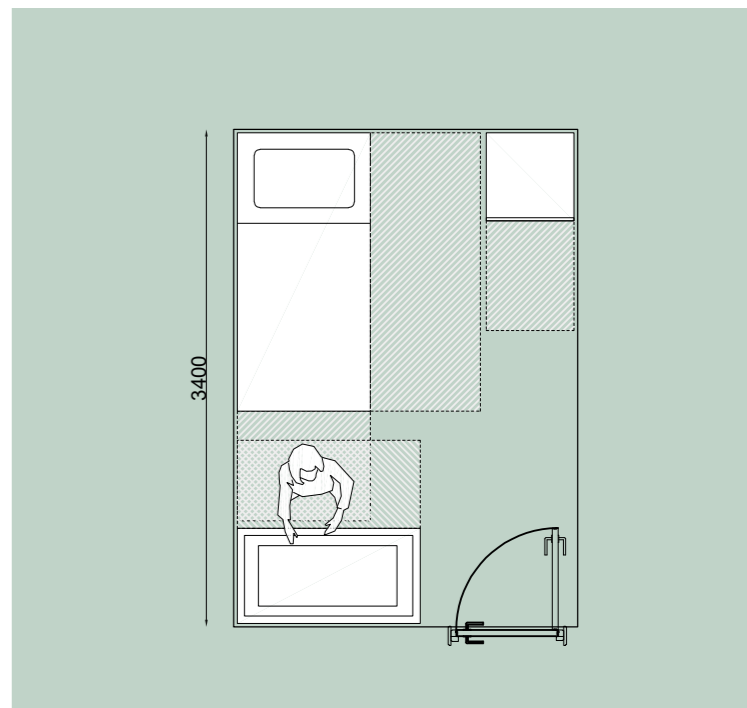
- Cot**
- + A cot should be provided for every baby aged 0-2yrs.
 - + As a minimum 600mm space, clear of any other furniture, should be allowed for at the front of the long side of the cot to allow access to the infant.



- Bed**
- + All beds should be single, and as minimum 910mm wide by 1900mm long.
 - + As a minimum 750mm space, clear of any other furniture, should be allowed for to the long side of the bed enabling for access and bed making.



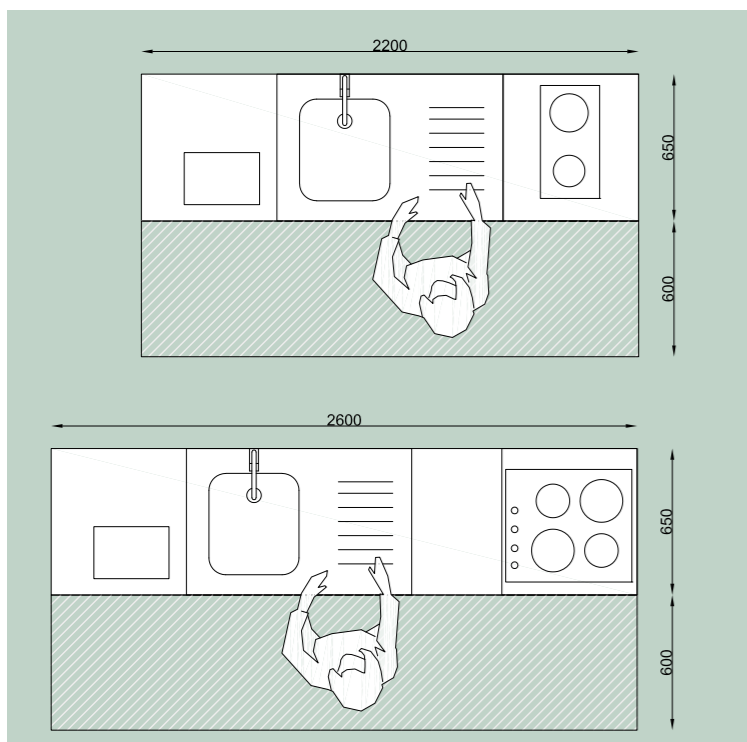
- Storage**
- + As a minimum a standard single wardrobe 600mm wide by 600mm deep should be allowed for each occupant including children of all ages.
 - + As a minimum 750mm space, clear of any other furniture, should be allowed for in front of the wardrobe for access.



- Bedroom**
- + At least one twin or single bedroom should comfortably allow for a cot to be placed inside the room without blocking access to beds, storage or the door itself.
 - + Internal width of the bedroom should be no less than 2300mm.

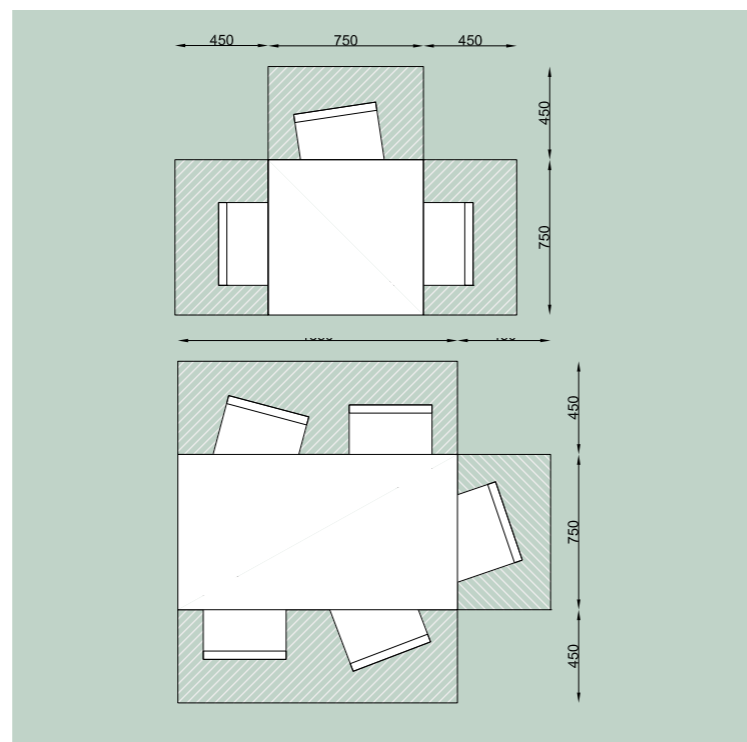
4.4 Private Space Necessities

Kitchen and dining spaces should be self-contained. This enables families to carry out daily activities safely and with dignity.



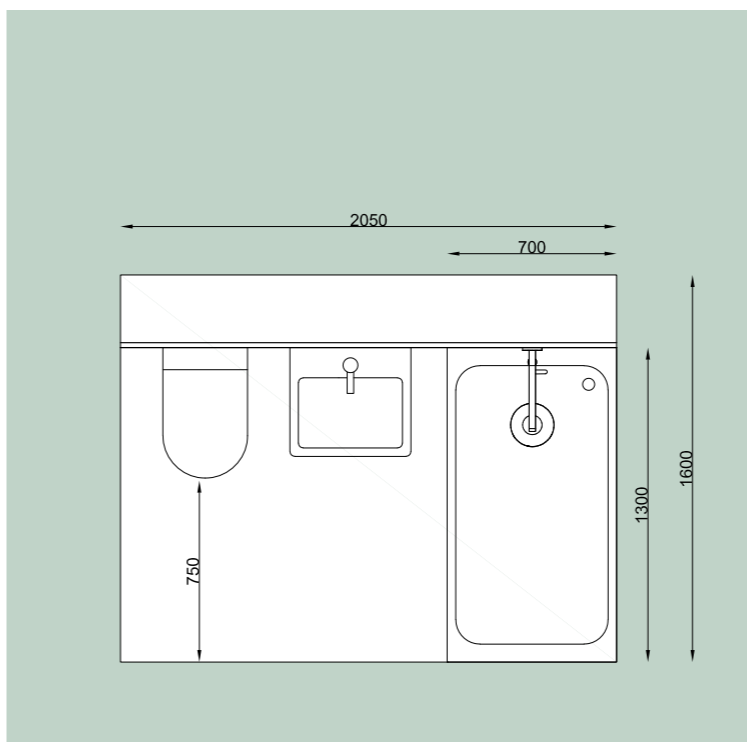
Cooking

- Basic cooking facilities should include: hob, kettle, sink, tap, counter-top food preparation space, room temperature and refrigerated food storage.
- For occupancies of up to three persons a 2-ring hob should be provided. Occupancies of 3+ persons minimum a 4-ring hob should be provided.



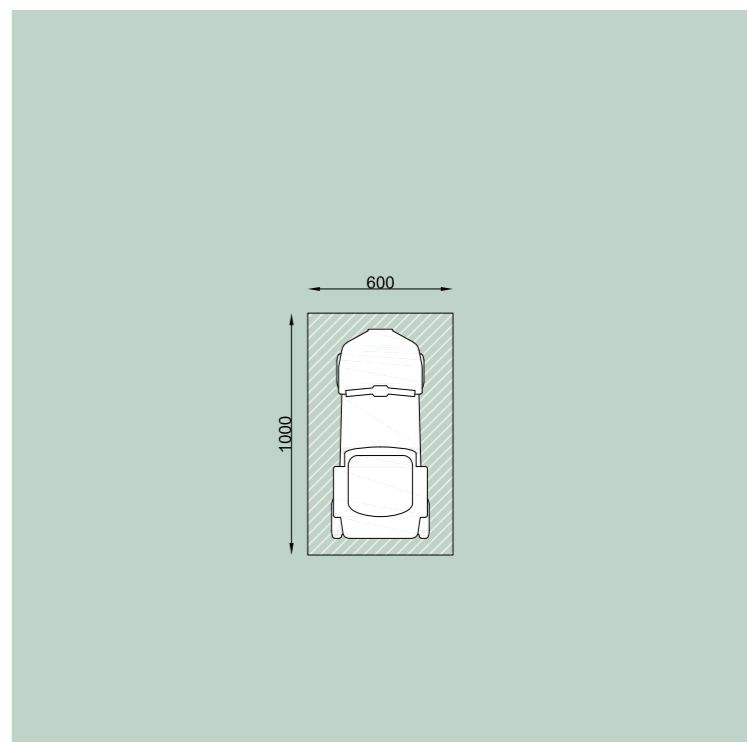
Eating

- Dining space should be provided to seat the maximum number of occupants.
- A minimum of 450mm should be allowed for around the table for the chairs.



Bathing

- Bathrooms should allow for a child and adult to move inside.



Storage

- Each unit should have space for a pram to be parked inside without blocking access or obstructing circulation.

4.5 Private Space

Example Layouts

The example layouts adjacent illustrate the minimum sizes required for families: from a single person with a baby to two adults with three children.

The example layouts show the importance of daylight and views to the key living spaces, with storage and bathrooms concentrated in the darker areas in the centre of the plan. Ideally, cross ventilation and daylight could be provided to both the front and the rear of the accommodation if access to the front door is provided by external deck access.

The dimensions for the overall accommodation illustrate how purpose-built or retrofit projects can follow a repeated structural grid, allowing for future flexibility and adaptability.

Through the simple adjustment of joining accommodation together these spaces would meet permanent housing standards.

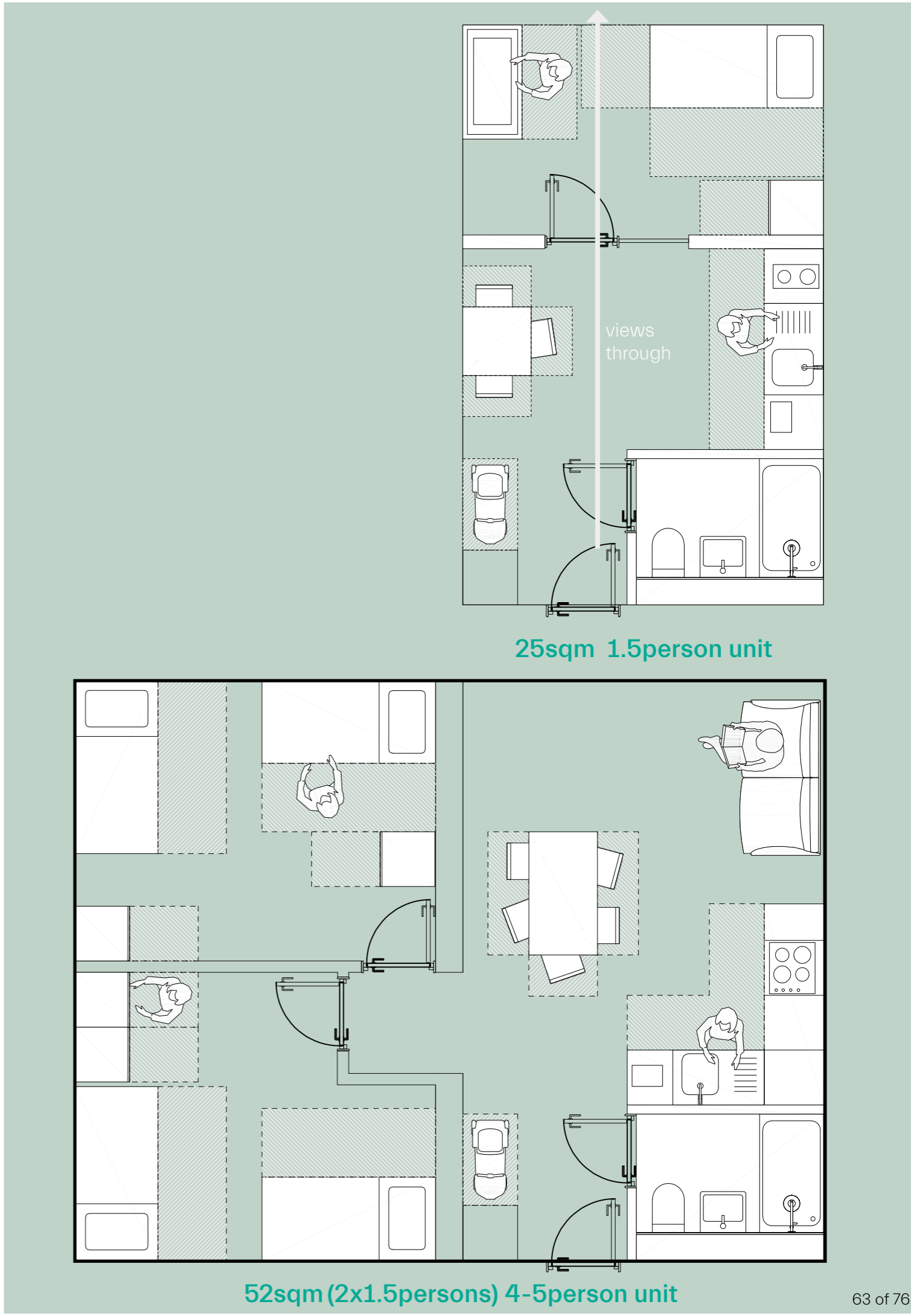


Figure 20. Layout diagrams illustrating how the spatial recommendations for each space can be provided.

4.6 Entrance

The entrance and the route to the front door is essential to ensure that families feel welcome, safe and are treated with dignity as soon as they arrive in their new temporary home.

The entrance must be inclusive and fully accessible, with views to safe external spaces, ensuring a supportive environment where children can play while parents and guardians settle in.

Support space requirements will vary depending on the scale of the proposed accommodation. As a minimum the following support spaces should be incorporated:

- + Access to the front entrance allowing for pick-up, drop-off and deliveries.
- + Main entrance should be visible, subtle in design, safe and secure.
- + The entrance approach should be physically and visually accessible to all from the street.
- + Lobby space passively overlooked by security/staff.
- + Access beyond the lobby space should be controlled.
- + A manned reception or security office (minimum) is required connected to the entrance and with visibility to the main outdoor entrance.



Model entrance ©Morris+Company

4.7 Support Spaces

All shared spaces both for the residents and staff need to be carefully located to encourage positive relationships, ensuring that both staff and residents have spaces where they feel safe to carry out their daily activities. As well as a place to ask for assistance and share knowledge with their community.

- + Space should be provided for 1:1 interviews and meetings.
- + Staff spaces should be considered such as staff lockers, shower, storage.
- + Communal waste and bulky waste should be carefully considered.
- + Bicycle lockers should be provided for children and adults on a X ratio
- + Pram storage is to be located in the bedroom or close by at each floor level.
- + Flexible space to be used as homework club.
- + Washing and Drying must be provided with a minimum of one washer dryer per 10 people¹⁷
- + Where possible every home should its own washer/dryer within a private kitchen area- subject to a detailed management plan.
- + Communal laundries need to be located close to staff presence.



4.8 Shared Spaces

An external, safe, play area for children is a priority for family accommodation, and should be designed and maintained to provide an inclusive and uplifting space for children to play safely together.

The play area should be located near the staff entrance, and provide opportunities for passive surveillance for other residents and staff as a safety precaution.

External playspace

On average it is expected that external playspace should be provided at a 2.5sqm per child.

(This is an average that accommodates a range of age groups).

Space should be suitable for play including the reduction of hard surfaces, with some play equipment provided - natural play opportunities such as tree trunks etc. should also be accepted.



Model External Space ©Morris+Company

5.0 Delivery Models

HOW TO USE THIS SECTION?

This section explores the viable delivery models for Emergency Accommodation.

WHO IS THIS SECTION FOR?

Chapter 5 is aimed at finance and delivery teams and demonstrates how the guidance might be implemented and delivered.

5.1 Funding

Local authorities spent £1.1b on homelessness in the financial year 21/22 - almost half of local authority housing services' net expenditure. Of that, £421.9m (39%) was spent in London. Breaking out gross expenditure and making estimates for missing data, more than three quarters of this 1.1b was spent on temporary accommodation

Unaffordable Private Sector vs Local Housing Allowance (LHA) rates:

Benefits payable based on LHA rates do not cover the market cost of private rented accommodation in London, due to freezes in LHA rate increases against general rental inflation. Joint research conducted by Savills and LSE found that only 2.3% of London listings on Rightmove between January and March of this year were affordable to those using benefit to pay their rent.

Housing Benefit Claims

Where residents placed in Temporary Accommodation are eligible for Housing Benefit, local authorities can claim housing benefit subsidy from central government to recover the benefits paid. However, the income-related benefits (subsidy to authorities) order restricts amounts local authorities are able to recover to 90% of LHA rates as they were

at 2011 where the property being used for temporary accommodation is leased from a private provider on a lease shorter than 10 years. This has a profound impact on local authority budgets.

Generally, there are two broad models of Emergency Accommodation provision operating in the UK:

- 1. Privately owned and managed accommodation** - rented or leased from private landlords by Local Authorities on nightly rates or through longer-term lease agreements. The allocation of management responsibilities for this type of accommodation varies.
- 2. Local Authority or RSL owned and managed accommodation** - whilst local authorities can own and manage up-to 199 units of residential accommodation outside of a Housing Revenue Account (HRA).

Government Spending Quote

Central London Broad Rental Market Area (BRMA)

Shared Accommodation Rate:	£154.19 per week
One Bedroom Rate:	£295.49 per week
Two Bedrooms Rate:	£365.92 per week
Three Bedrooms Rate:	£441.86 per week
Four Bedrooms Rate:	£593.75 per week

Source: BRMA

Unaffordable Private Rental Sector (PRS) vs Local Housing Authority (LHA) rates:

LHA does not cover the market cost of PRS in London. For a single bedroom housing 1 mother, child under 10 years and a baby, a cap of £42 per night exists, based on LHA.

In comparison, a private rental such as a studio or shared room is £438 per week and a 1 bedroom property is £495 per week, nearly double the LHA allowance.

5.2 Delivery Models

“There are substantial savings to be realised by councils who are able to take steps to provide purpose designed emergency accommodation.”

Jim Andrews, Common Projects

The economic characteristics of these models vary substantially depending on the terms, but broadly speaking there will be a marked difference in the economics of short and long term leases entered into between Local Authorities and private landlords and of Local Authority owned accommodation:

1: Short Term Lease

This offers maximum flexibility for Local Authorities, but reduces security of supply and is likely to be the least cost effective option in the face of sustained demand for accommodation.

2. Longer Term Lease

The Local Authority takes a 40/50 year lease from a landlord with an option to acquire the property for £1 at the end of the lease term. The advantage of this is that in principle Local Authorities are able to command substantial discounts to rents due to the de-risked nature of the

resulting rental income stream from an investor’s perspective. It provides security of supply for Local Authorities but conversely councils will need to be content that the need for emergency accommodation in their area will be consistent throughout the lease term and/or they would have an alternative use (eg. key-worker accommodation) should that not be the case.

In some cases where these long term positions are secured by private landlord investors, the benefit is passed to the landlord investor upon onward sale of the properties with a long lease in place to a pension fund investor. In finance speak they benefit from the ‘yield arbitrage’ between their yield on cost, and what a pension fund will buy a 50 year lease for. The key to ensuring that rent reductions savings are realised by councils (rather than capital value increases by the landlord investor), is for the council to be

pro-actively involved from the start of the development process. Properties should be delivered to council’s specific requirements, and with full visibility over the yield provided by the pension fund investor.

3. Self Build

This is similar economically to the long terms lease scenario in that it results in security of supply in return for a long term stream of payment obligations. However, instead of a fixed lease agreement, the local authority can borrow from the Public Works Loan Board to fund the costs of building the accommodation themselves. They would then effectively be paying interest on government bonds which decreases over the years as the loans amortise, meaning that savings could be more substantial.

The disadvantage is that the near term savings are unlikely to be as significant as

in the long term lease scenario due to the index-linked nature of the latter reducing the opening rental costs.

There are substantial savings to be realised by councils who are able to take steps to provide purpose designed emergency housing. These savings are not only the costs of providing the accommodation vs their ‘business as usual’ position, but should also include the costs of longer term health and wellbeing impacts on families who experience poor emergency accommodation. It’s difficult to quantify as it has the potential to touch so many parts of a council’s budget, but one could quickly see a scenario where the non-property savings could be as significant if not more so than the already significant property savings. Getting this right therefore could have a much wider beneficial impact on already stretched budgets.

6.0 Feasibility Study

HOW TO USE THIS SECTION?

This sections is used to benchmark the design guidance for a purpose retrofit building.

WHO IS THIS SECTION FOR?

Chapter 6 is aimed at Local Authorities, private sector professionals, and Housing Associations.

6.1 Zodiac Court

The Zodiac Court feasibility study has been undertaken on a live development site to illustrate how the proposed standards, in this case applied to an existing redundant office building in Croydon, can provide tailored high quality emergency homes for families.

Whilst the design work has been carried out with the fundamental aim of satisfying the requirements of households presenting as homeless, the review and subsequent design recommendations also assess deliverability. The resulting conclusions were that the design, as proposed, would likely allow a substantial discount to be applied to household rents whilst maintaining an equivalent yield on cost that could be achieved with a more traditional residential scheme.

In the absence of clear guidance, it is evident that such a scheme would be difficult to deliver through planning (due to lack of planning policy and design guidance) and therefore impossible to fund. However, with guidance in place for local authority planning departments to apply, it is anticipated that future projects could be delivered rapidly and at scale.

We have already touched on some of the possible lease and funding structures available to local authorities – aside from being able to design the housing well and to an agreed quality that is considered to be ‘good’. Quantifying the savings available will be dependent on the delivery route chosen as well as the type and cost of temporary accommodation currently being used by the local authority.

Discussions with local authorities who manage family accommodation with up to 150 emergency homes reveal that larger developments for families can be successful when carefully balanced with high quality self-contained homes with wrap around support spaces.

The prototype proposal for Zodiac Court provides 85 family homes, a safe and secure play space, a homework club, and staff support spaces. An improved public space and retail is also provided due to the opportunities that the site provides.

The site has constraints and opportunities and makes the building typical of stranded workplace assets in London. The scheme illustrates how the guidance can be used to ensure a high quality, shared residence for families in need.

Existing Building;

- + Empty stranded asset
- + Location: Croydon, London.
- + Previous use: mixed-use building
- + Workplace/Residential

Robust building:

The simplicity of the regular concrete structural frame with floor-to-floor heights that support contemporary conversion to achieve building regulation compliance. A simple modular facade allows for flexibility and adaptability to each floor plate and window upgrades provide correct thermal comfort and safe window sill heights.



Zodiac Court

6.2 Guidance Testing

Zodiac Court Guidance Testing

We have chosen to test the guidance on Zodiac Court as we have access to information regarding the costs of the existing site and detailed information of the existing building.

This information has enabled viability testing of a refurbishment approach for Local Authorities when or if existing buildings become available for purchase or lease.

Neighbourhood Profile

Zodiac Court is located in the London Borough of Croydon, Broad Green Ward. The local neighbourhood is urban and densely populated, with a rich and diverse culture including a large Asian community.

Proximity to Amenities

London Road is a commercial High Street offering access to shops and cafés. Traffic on London Road is fairly low and air quality is good. Within a 15 minute walking distance there are good local education facilities from nurseries to academies. GP's, medical and health centres are located within a five minutes walk.

Currently there is a lack of green space and children's play space in open public parks in the immediate vicinity.

Access & Approach

The pedestrian ground plane shows level differences which would require adjustment to ensure level access to and from the building.

Neighbourhood Constraints

- + Lack of green space.
- + Lack of children's play space.

Neighbourhood Opportunities

- + Well connected to public transport.
- + Network of local amenities including affordable shopping facilities.
- + GPs and Schools within walking distance.



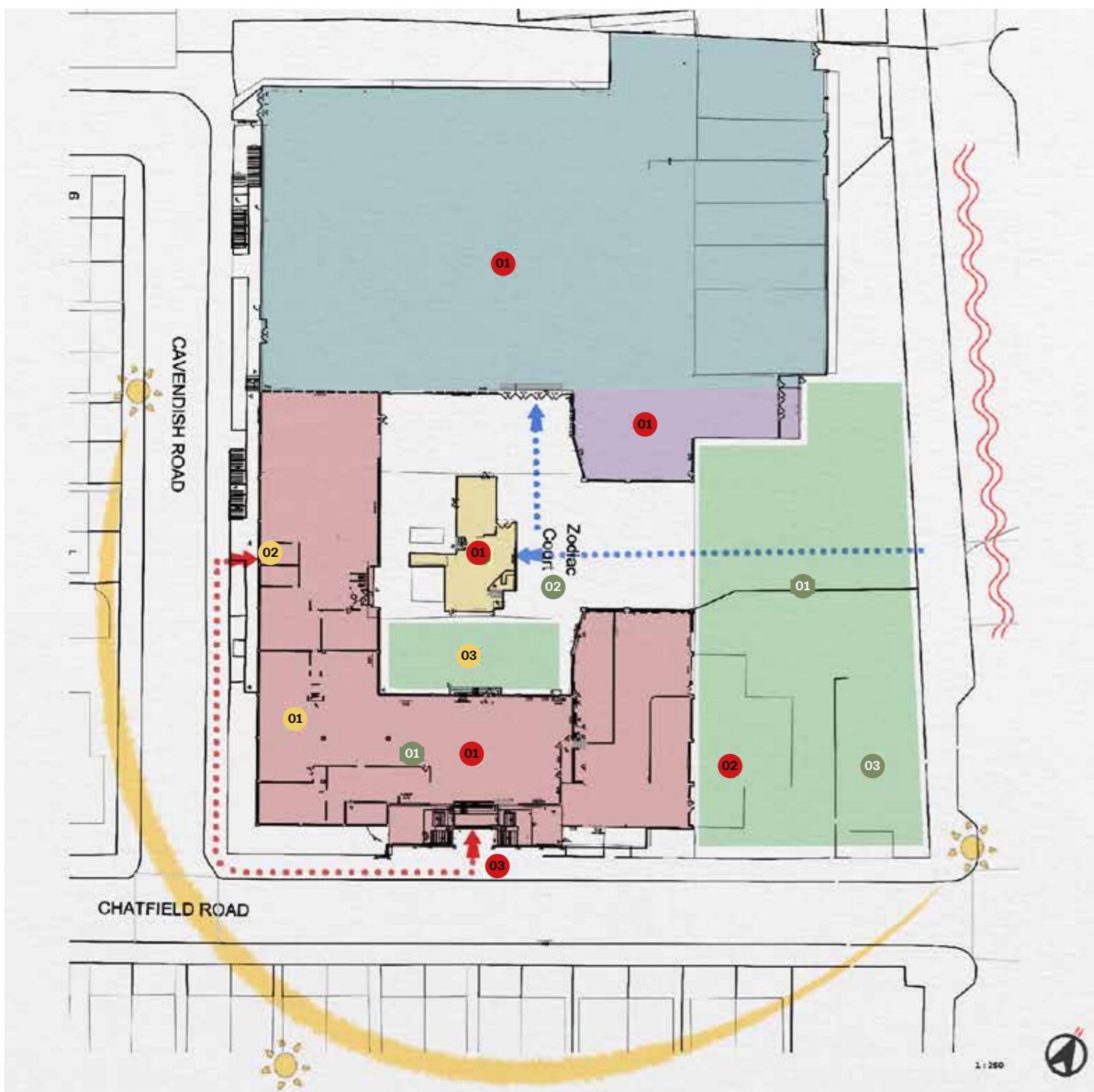
Zodiac Court



Zodiac Court site map with key amenities

Existing Building Constraints

- Key**
- Constraints**
 - 01 Mix of Tenures (Entrances) C3 housing, temporary housing, retail
 - 02 Public realm not secure and in close proximity to busy road
 - 03 Slope of site and accessibility (basement level)
 - Opportunities**
 - 01 The site as a holistic mixed-use offer
 - 02 Designing for future flexibility - split of existing buildings
 - 03 Providing more green space, improving UGF
 - General building constraints:**
 - 01 Size of existing building and overconcentration of use
 - 02 Existing building widths (avoiding long double sided corridors)
 - 03 Safe play space will be key challenge



Zodiac Court Constraints and opportunities

6.0 Feasibility Study

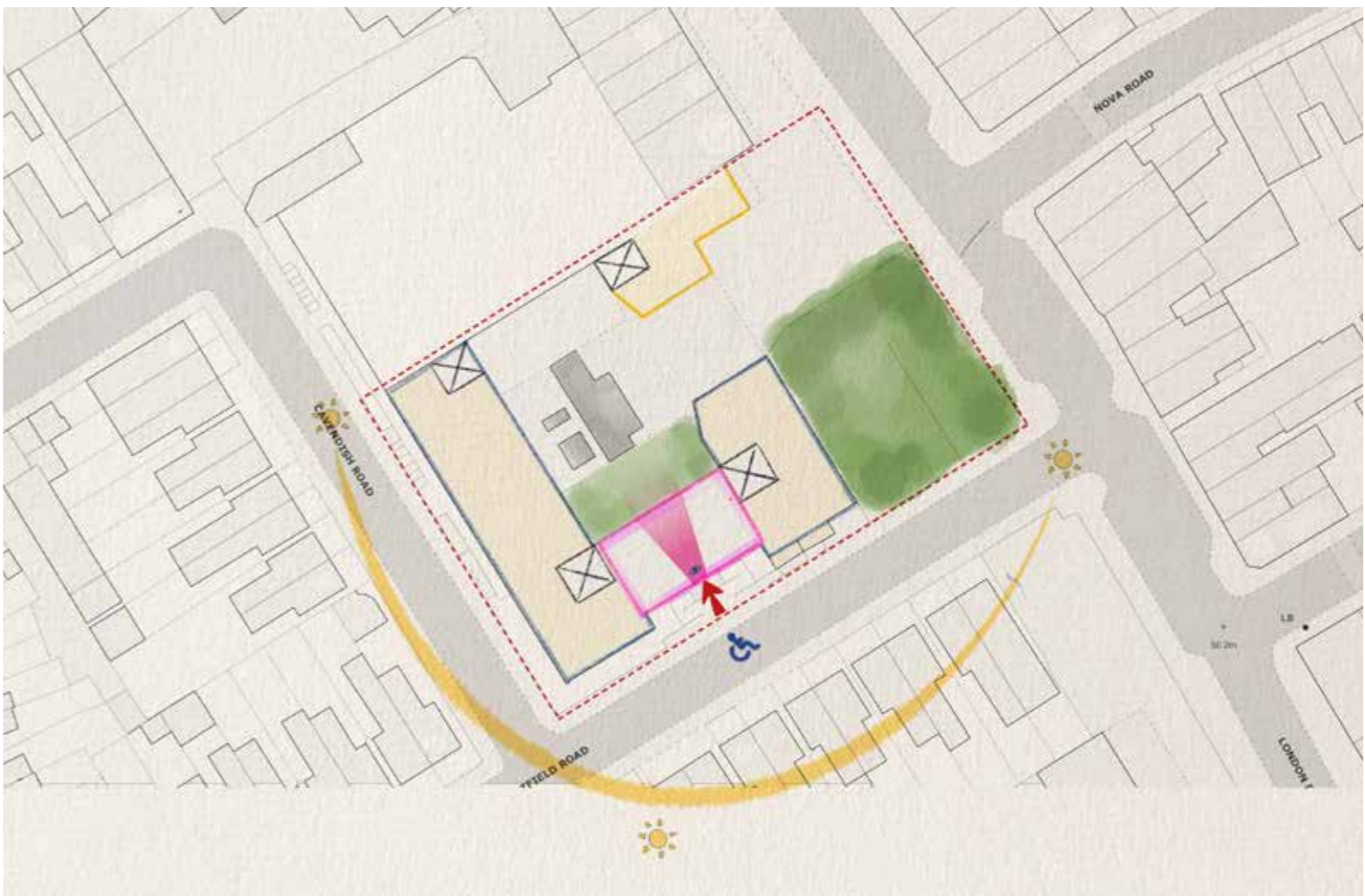
6.3 Brief

Brief:
85 residences (based on proposed space standards)

Breakdown of accommodation type:
(People refers to adults, children and infants)

- + 48 Studios (2 persons)
- + 24 Medium Size Studios (3 persons)
- + 22 Large Studios (5 persons)
- + 10% of the above studios are accessible

Maximum total number of people that could be housed in this stranded asset is 230.



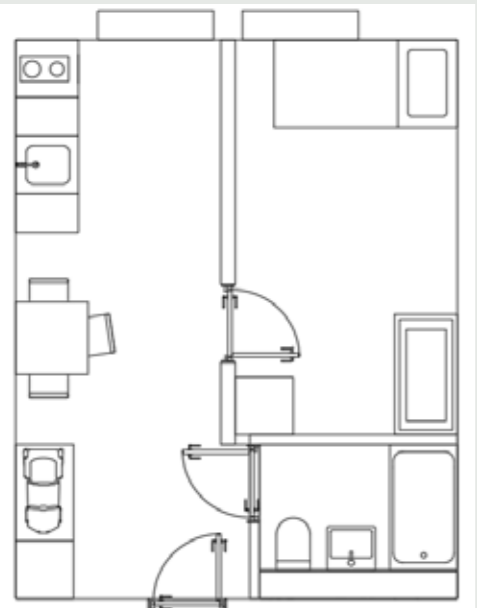
Zodiac Court Initial brief response

6.4 Ground Floor

At ground floor: the proposal shows the main entrance, off Chatfield Rd, a quieter street than London Road. The approach includes a new public square and retail space activating the corner and creating a safe and welcoming approach.

The large entrance area provides an accessible and generous route into the building. As the family enter they are greeted by staff and views to a secure play area to the rear, which is only used by residents. Rooms are provided at ground level, but landscaped defensible zones are incorporated to provide privacy.

**Example Studio (1.5-2 persons)
25sqm**



+ Sink, hob, table for 3 person, space for pram and storage, bathroom with shower, WC and sink unit; bedroom with bed storage and cot or child's bed.

Ground Floor Viability Testing

Lower Ground:

- + Potential for 5 units.

Ground Floor:

- + Public realm.
- + Entrance, reception and lobby.
- + Staff spaces incl. 1:1 meeting room, staff office, w.c and lockers.
- + After school club/communal space.
- + Ancillary spaces including laundry.

Total No. units

- + 13 Studios (max occ. 2 persons).
- + 6 large units (max occ. 5 persons).
- + Potential for WCA unit.

Key

- Entrance
- Studio
- Medium unit
- Large unit
- External space
- Retail

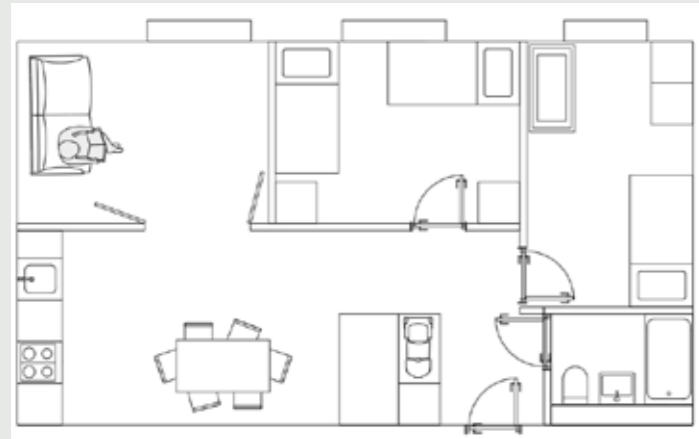


Zodiac Court ground floor plan

6.5 Typical Floor

A typical floor includes homes that look inwards into the shared courtyard with distances between homes of 21 metres from window to window. The east and west wings look across to the neighbouring streets, and larger units are provided here to allow for a mix of families with single and multiple children. Accessible homes are provided near the lift and stair cores for ease of access. The corridors of 1.5 metres wide are lit by natural light provided via south facing windows.

**Example Large Unit (4.5-5persons)
52 sqm**



+ Larger kitchen and dining area.

Typical Floor Viability Testing

First Floor:

- + 16 Studios (2 persons).
- + 8 Large units (5 persons).
- + 4 Medium units (3 persons).

Second Floor:

- + 16 Studios (2 persons).
- + 8 Large units (5 persons).
- + 4 Medium units (3 persons).

Total No. units Ground to Second

- + 45 Studios.
- + 22 Large Studios.
- + 8 Medium Studios.

Total % of accessible units

- + 10%

Key

- Studio
- Medium unit
- Large unit
- Ancillary (cores, storage)



Zodiac Court typical floor plan

7.0 Conclusion

HOW TO USE THIS SECTION?

This section provides recommendations and a suggested insertion to your local plan to instigate purpose built or purpose retrofitted Emergency Accommodation supported by tailored Space Standards.

WHO IS THIS SECTION FOR?

Local Authorities to support improvements to Local Plans to ensure Emergency Accommodation is clearly understood across planning and housing departments.

7.1 Concluding Recommendations

This document has been developed to set out recommendations, guidance and standards associated with Family Emergency Accommodation, to help inform local authorities' emerging planning policy and decision-making.

Recommendation 1. Highlight Need

As illustrated in the planning policy chapter three, at national level councils/ local authorities are not required to consider the need for Emergency Accommodation.

The national guidance on the evidence for local plan housing need focuses, initially, on overall need in terms of the standard method or areas defined under a regional plan, such as London, regional housing targets. Therefore national guidance focuses on national numbers, meaning the plan-making process can be consumed with the debate over 'how high' should that number be, and not what makes up that number.

The level below this considers the component form of housing need, such as specialist accommodation for groups like the elderly and then also the price point of homes such as market and affordable housing. **However, the use of umbrella terms such as temporary housing means that something as pressing as the need for purpose built Emergency Accommodation (PBEA) is overlooked.**

As a first step consideration of this need at a regional or a local authority for PBEA should be included in national guidance (LA's undertake this assessment for the Gypsy, Roma and Traveller (GRT) communities and even those using houseboats). Once need is understood policies or even site allocations could be included in a local plan to support such developments coming forward.

Recommendation 2. Encourage Supply

Additional guidance could be provided at a national or regional level (and further refined at a local level) as to what should be the key design principles of such developments. Cross cutting consideration is also required such as if the need for such accommodation is set out in a local plan, could there also be a mechanism to collect developer contributions towards its delivery or delivery through the use of CIL.

Parallel to the local plan, it should be reflected upon that a local housing strategy would be a strong delivery mechanism for PBEA. These are no longer statutorily required, and would traditionally have been the policy document for such need.

Local Authorities could use the evidence base of a local plan, or commission a separate evidence base for local authority housing strategy, to set out how they will deliver PBEA.

Schemes could be developed in house, included in the local housing strategies delivery plan, and cross referenced within both the local and infrastructure delivery plans to maximise delivery opportunities through a capital plan.

As part of meeting the needs and challenges across all tenures and typologies, new and emerging local plans can strengthen the role of plan-making to ensure that all new Family Emergency Accommodation meets the standards set out within this document, as a minimum.

Recommendation 3. Improve Standards

This should be delivered as part of a Local Authorities meeting their local and strategic needs for all types of households and that appropriate forms of accommodation are provided in the right locations, where this need has been clearly demonstrated as part of an evidence-based approach. Through the provision of defined, quality standards and guidance for Family Emergency Accommodation, families are housed in suitable accommodation, adequate for their needs, in accessible locations and close to relevant support networks.

Separate to plan-making, we would encourage boroughs and district councils to adopt the following guidance when assessing relevant planning applications for Family Emergency Accommodation in addition to HMO guidance that is specific

to the needs of the user groups. **This will set a new standard for schemes which seek to deliver an important and necessary form of accommodation.**

Recommendation 1.

**Highlight
Need**

Recommendation 2.

**Encourage
Supply**

Recommendation 3.

**Improve
Standards**

7.2 Call to Action

Update your local plan



Recommendation 1.

**Highlight
Need**

Recommendation 2.

**Encourage
Supply**

Recommendation 3.

**Improve
Standards**

**UPDATE YOUR LOCAL
PLAN**

Example text to be included in your local plan

An overall managed delivery of housing mix is required to ensure appropriate forms of accommodation are provided where need has been clearly demonstrated, and that the local and strategic needs of all types of households are considered.

The council acknowledge the need to deliver emergency accommodation tailored to the needs of our local area. Emergency accommodation facilities must ensure that young people, families and single people are housed in accommodation suitable for their needs, oriented towards town centres, and close to relevant supporting facilities.

All planning applications for emergency accommodation must refer to emergency accommodation guidance in addition to HMO guidance specific to the needs of the relevant user groups. Refer to family emergency guidance.

8.0 Appendix

8.1 Case Studies

Examples of exemplary current and proposed Emergency Accommodation for families

There are examples of purpose-designed, tailored Family Emergency Accommodation projects that are either recently completed, or that have received planning, and are due to start on site. The examples shown here are either developed, managed or owned by the council or a private developer.

They illustrate that although there are plentiful examples of substandard accommodation, there are also councils, organisations and individuals trying to raise the standard, with examples which mirror many of the standards set by this research piece.

They all share an ambition to provide safe and uplifting play space for children, alongside dedicated self-contained private flats.

These private spaces all focus on enabling families to carry out their daily life with dignity, while feeling safe and at home.

Shared spaces encourage neighbourliness and chance encounters between children safely and securely, and are available to residents when needed or desired.

The internal layouts of each case study, illustrate thoughtful, considered, and tailored designs, paired with the building's high quality external appearance. Each proposal fits into its neighbourhood and creates a home where families feel safe and secure.



Newham family shelter ©Morris+Company

8.2 LB Newham

Newham Family Shelter Morris+Company

Ownership/operation model:

Management Model:

Status:

Size:

Mix:

Privately owned and procured
Privately managed + LB Newham Care
Planning Approved
28 units / 2–4 storeys
+ 8 units: incl. 1 accessible: 19sqm max.
indicative occupancy: 1adult+1child (2p)
+ 9 units: 32sqm max.
indicative occupancy: 1adult+2 children (3p)
+ 5 units: incl. 1 accessible; 41sqm max.
indicative occupancy: 1adult+3children (4p)
+ 3 units: 48sqm max.
indicative occupancy: 1adult+3children (4p)
+ 3 units: 53sqm max.
indicative occupancy: 1adult+4children (5p)

Length of stay:

6 weeks

Quality:

- + Carefully considered arrival sequence.
- + Safe and secure entrance (lobby).
- + Support spaces: reception, staff room, staff shower/wc, 1:1 interview.
- + Communal space: internal communal room and kitchen; pram store.
- + External safe and secure outdoor play space.
- + Overall accessibility.
- + Self-contained (private kitchen and shower for each family).



Newham family shelter, shared Space ©Morris+Company



Newham family shelter, ground floor plan, ©Morris+Company

8.3 LB Camden

Camden Road RcKA

Ownership/operation model:

LB Camden+private consultancy procurement

Management Model:

LB Camden management+Care

Status:

In Construction

Size:

39 units / 5 storeys

Mix:

+ 36 studio: 27sqm max.

indicative occupancy: 1adult+1child+1baby (3p)

+ 2 apartment: 41sqm max.

indicative occupancy: 1adult+1teen+2children (4p)

+ 1 accessible apartment: 57sqm max.

indicative occupancy as above (4p)

Length of stay:

Up to 2 years

Quality:

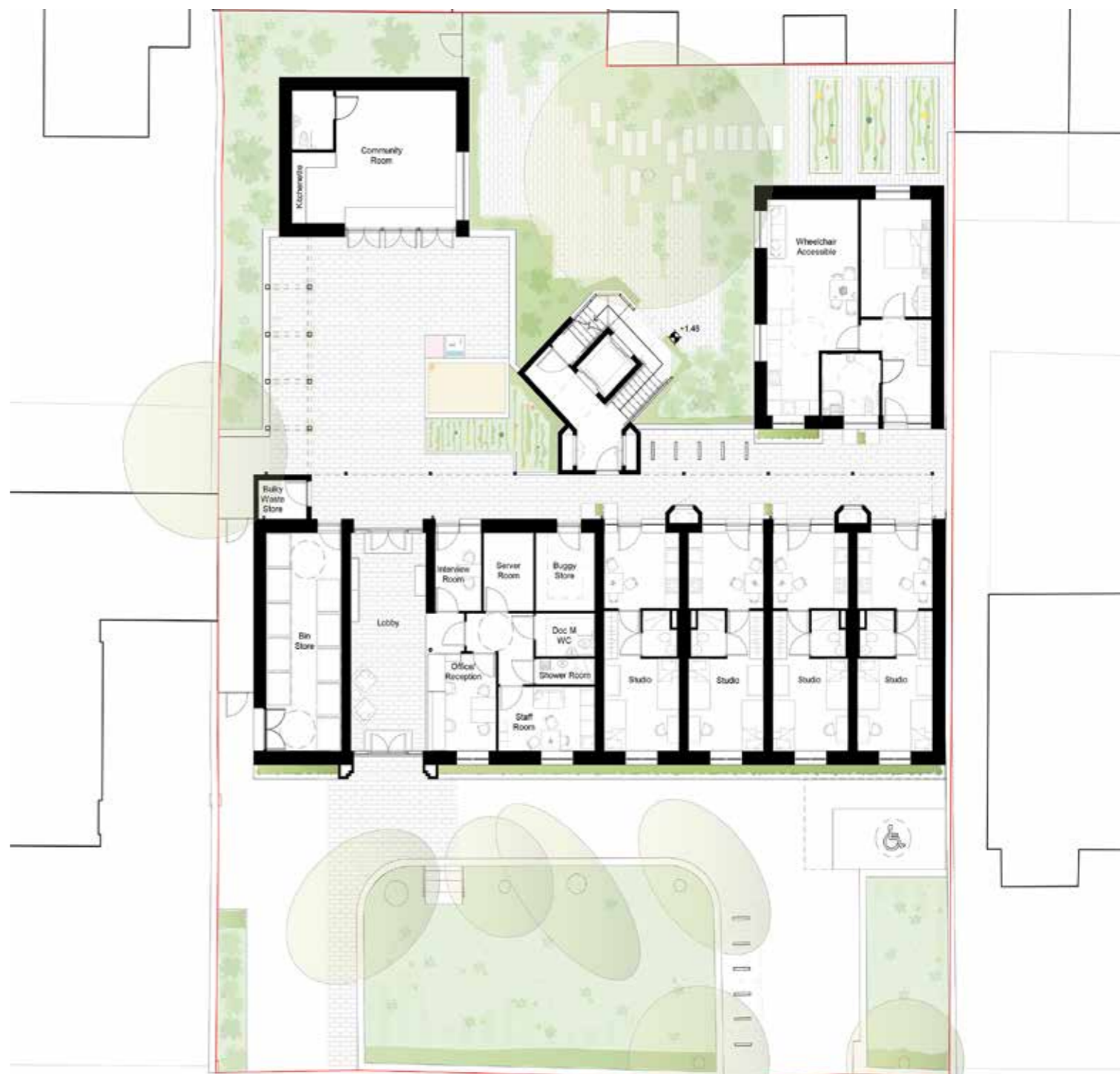
- + Carefully considered arrival sequence.
- + Safe and secure entrance (lobby).
- + Support spaces: reception, staff room, staff shower/wc, server room,
- + Communal space: internal communal room and kitchen; bulky waste and storage and buggy store.
- + External safe and secure outdoor play space.
- + Overall accessibility.
- + Adequate space for cot and pram.
- + Self-contained.
- + Separated kitchenette/dining from living space.



Camden Road, street view ©RcKA Architects



Camden Road, rear view ©RcKA Architects



Camden Road, ground floor plan ©RcKA Architects

8.4 LB Camden

Chester House Bell Phillips Architects

Ownership/operation model:

LB Camden+private consultancy procurement

Management Model:

LB Camden management+care

Status:

In construction

Size:

50 units / 5 storeys

Mix:

+ 30 studio: 26sqm max.
indicative occupancy: 1adult+1child+1baby (3p)
+ 17 apartments: incl. 1no accessible. 37sqm max.
indicative occupancy: 1 adult+3children (4p)
+ 2 apartments: indicative occupancy: 1 adult+4children (5p)

Length of stay:

Not specified

Quality:

- + Carefully considered arrival sequence.
- + Safe and secure entrance (lobby).
- + Support spaces: reception, staff room and changing, furniture store.
- + Communal space: common room.
- + External safe and secure outdoor play space.
- + Overall accessibility.
- + Self-contained.
- + Separated kitchenette/dining from living space.



Chester Road, street view ©BPA



Chester Road, courtyard view ©BPA



Chester Road, ground floor plan ©BPA

8.5 LB Hackney

Seven Sisters Road Crawford Partnerships

Ownership/operation model: Private Ownership
Management Model: LB Hackney management+care
Status: Completed
Size: 148 units / 5 storeys
Mix: + Studio: 18sqm max.
 indicative occupancy: 1adult+1child (2p)
 + Double: incl. accessible. 25sqm max.
 indicative occupancy: 1adult+3children (4p)

Length of stay: 1-12weeks

- Quality:**
- + Close proximity to park, play and neighbourhood amenities.
 - + Well considered street frontage.
 - + Safe and secure entrance (lobby) with 24/7 staff presence.
 - + Support spaces: reception, staff room and security office.
 - + Communal space: common room (homework club); laundry.
 - + Self-contained units with kitchenette and bathroom.



Seven Sisters Road, in use ©Crawford Partnerships



Seven Sisters Road, bike and pram storage ©Crawford Partnerships



Seven Sisters Road, ground floor plan ©Crawford Partnerships

Acknowledgements

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Importantly we’d like to thank our Local Authority Partners - Hackney Council who offered access to their existing facilities and plans for new projects and spent time with the team discussing spatial, management and operational needs. Camden for speaking to us about their experiences of delivery of Emergency Accommodation and Tower Hamlets for peer review and advice on the local plan statement.

ArchitectsAware!



Common Projects



Commonweal Housing



Crisis



DP9



JustLife



LB Camden



LB Hackney



LB Tower Hamlets



Magpie Project



TAAG Newham



MORRIS+COMPANY

As architects who specialise in housing, our first experience of designing for homeless people was back in 2019, when we began a new project for purpose built emergency family accommodation in Newham.

From this moment on we realised that there was a huge disparity between how traditional housing (permanent) and transitional forms of housing (emergency and temporary) were valued. This was illustrated to us by the lack of design guidance, as there is inadequate clarity of the specifics of the end user needs, and as a result there is a lack of many built examples to refer to.

Since then we have been researching and campaigning for tailored guidance for Emergency Accommodation specific to peoples needs.

Our research through conversations, meetings, site visits, historical analysis, debate and personal experience has been abbreviated into this document.

Our aim is to reach people at boroughs and district councils, to highlight the continuous need for Emergency Accommodation, ensuring we have adequate, qualitative guidance that is specific for the needs of the people and children that find themselves homeless.

Young people, families, single people, older people who find themselves homeless all have specific needs at this

point in their life and the design of emergency housing can reflect that.

This guidance focuses on the specific needs of family accommodation. Children and their parents deserve a safe, welcoming, playful and dignified place to call their home which supports them while the search for a permanent home can be found.

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