

Space Labelling - four architects' response to the LHDC consultation

Four housing practices, HTA, LBA, PRP, PTEa, come together regularly and offer a joint response to the draft London Housing Design Guide. Ben Derbyshire provides a précis for *Planning in London*.

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The case for minimum space standards in social rented housing is well understood. The bulk of the draft guide constitutes a comprehensive attempt to pull together much of what might be described as contemporary good practice in this field. In some cases the guide goes further than any general guidance has hitherto and anyone familiar with development briefs on EP or HCA exemplar programmes will be used to the high standards proposed.

So long as the present system of affordable housing provision persists, high standards will be applied in the interests of the long term sustainability of this public investment. The balance of costs and benefits is entirely a matter for policy makers. And undoubtedly, the application of the higher standards in this draft guidance to limited budgets will mean fewer homes being built to higher standards.

We note that the consultation is taking place in parallel with an impact study. As practices who have experienced the sharp end of the recent recession, and who have witnessed its' impact on the capacity of the industry, we fervently hope that adequate emphasis on the importance of housing supply is acknowledged when the conclusions of this impact study consider the trade off with higher standards.

So, if the guide will arguably lead to fewer, better homes, does it succeed in its stated objective of streamlining delivery of public sector homes by consolidating and simplifying the plethora of applicable standards? To succeed in this, the Mayor's guidance would need to achieve the status of an overriding statutory substitute for national and

local standards. This outcome seems very unlikely as there appears to be no reliable mechanism by means of which it could ever be achieved.

The draft guide sets out to open the debate on applying the proposed standards consistently for all new housing in London, whether publicly funded or not. The arguments for applying a universal set of standards to all tenures are compelling not least because homes increasingly switch between tenures over their useful lifetime.

However, we believe there will be serious unintended consequences if this draft guidance, designed for the few thousands of publicly funded homes in London, were to be applied to all of many thousands of homes needed each year to meet diverse housing need in the capital. We also have concerns that a highly regulated and rigid set of standards will stifle innovation.

According to the Land Registry, in August 2009 the average London house price was double the average in England and Wales. London salaries are only slightly higher on average, which creates an affordability gap which is unique to London. This is a crucial factor and needs to be addressed, as it creates the need for small flats which the policy seeks to eliminate.

We believe the Mayor should adopt measures that would enhance the operation of the market, increasing the range of choice for consumers and ultimately enhancing value through competition. We propose the development of a system of "Space Labelling" which would require all homes for rent or sale to be clearly advertised with their floor area related graphically to a benchmark standard controlled and

regulated by the LDA. Buyers or renters would then be able to compare and contrast between available properties and use the information to make choices about space on the basis of value for money. This mechanism of regulation could be extended beyond space standards to a more holistic classification of housing according to key metrics including energy efficiency, and other measures of quality, such as Housing Quality Indicators.

Thus purchasers would be permitted the opportunity of trading size for other qualities in their choice of home, enabling people to live affordably in high value locations, well served by local services - an opportunity that would be denied if the blanket application of minimum space standards were applied to all housing. Such an approach would be more effective in delivering desirable outcomes; ensuring increased transparency, permitting diversity, supporting innovation, improving awareness of housing quality, and increasing value. Space Labelling could also be used to plan and control supply much more sensitively in relation to market demand.

The concept of space labelling is not new and has been promoted by the housing ginger group, Design for Homes since 2005 through its' 'Swingacat' website. We hope that Boris Johnson would be sympathetic to the point that whilst the LDA might well have a legitimate role in prescribing the detail of subsidised housing the same is not true in the private sector where purchasers are entitled to freedom of choice in spending their own money. The shadow housing team are looking into this with Design for Homes - perhaps Boris should do so too.

This is a précis of the full text of our response which can be read on the LDA consultation portal.

ACA response to the mayor's housing design guide



The Association of Consultant Architects' response to the consultation follows meetings of their Planning Advisory Group. Here is the introduction.

The Guide is often over specific and inflexible in its standards and requirements, which will stifle innovation while failing to eradicate perceived design flaws. If these are guidelines, there are too many "must" requirements rather than "should" objectives.

The ACA is concerned that it does not make its relevance to (mainly) affordable housing clear, nor does it state that it applies to new-build housing (many of the requirements cannot be applied to conversions or existing houses). It does not allow at all for small "starter" units, studios, bedsitters, etc – most of which can be classified as affordable.

The ACA is also very concerned that the Guide will not achieve its ambition of simplifying regulation, but rather add yet another set of conflicting standards on top of those already existing. It could be acceptable if it were to completely replace the guidelines published by individual London boroughs, which often are often contradicted. This is because the Guide requirements repeatedly duplicate other standards and legislation such as Lifetime Homes, Code for Sustainable Homes and Building Regulations. In the worst cases the requirements adapt, simplify or misquote standards without the detailed notes and explanation of the original standards. This is a recipe for confusion.

Our members find in designing new housing that there are very many different standards and guides with varying interpretations of these, which causes confusion and misunderstanding. In addition, more detailed requirements which are 'interpreted' by planning teams who rarely have design qualifications lead



to standardised solutions based on minimum standards throughout London. Members often find that the planning process even determines the heights of electrical accessories! If a new 'overarching' standard is being created, which the ACA accept in principle, then all the earlier guidance needs to be superseded, otherwise there will be increased complexity and confusion.

In summary, the ACA believes that an attempt to rationalise London's hugely varied housing standards is to be welcomed. However, The ACA is concerned that making fixed space standards significantly more onerous for affordable housing than for private housing will give private housing an unfair advantage for purchasing development sites. There is insufficient flexibility and discretion throughout the document, which appears to be a rigid list of rules rather than an aspirational set of principles for improved standards.

If it were to be adopted in this form, inexperienced junior planning officers across London would have a field day turning down perfectly competent starter homes, smaller flats and innovative design solutions on tricky sites because they do not comply with all the 'guidelines' as set out in this draft.

The ACA asks: "Is this photograph [taken from the Guide] an exemplar or does it show what not to do? There is no level access and an unacceptably stepped approach/entrance with a rather narrow door, no 1500 x 1500 space no entrance canopy and no external lighting. (Comment applies to many of the other photographs included throughout the document: eg - front cover: no canopy over entrance, the pathway appears to be less than 1050 wide and the bin appears to infringe the 1500 x 1500 clear space in front of the door - page 20: the balconies appear to be less than 1.5m deep and the entrances are not illuminated.)"

The ACA is the only association specifically representing architects in private practice, with a remit that concentrates on the practicalities of running a business in the private sector but with considerable experience in the operation of the planning system and development control. More from: www.acarchitects.co.uk