Improving the design of new housing What role for standards?

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The state of play in 2010

The good news is that the housing industry can and does produce good quality housing, and there has been real progress in recent years: more developers recognise the value of better design quality, and are taking measures to achieve it. Many local councils are also better equipped to help create better quality homes and new neighbourhoods for local residents.

We know that good design matters to people, and that it can add to the social and economic value of housing. There are objective and measurable criteria for good design, based on evidence and centuries of learning. Design quality itself is fundamental to how places work: road layouts that prioritise pedestrians; public spaces that are safe and attractive; and buildings at an appropriate scale and density to support local services.

Well-designed housing also has many benefits:

- It can improve social well being, quality of life and a community's sense of pride in the neighbourhood, as well as people's willingness to accept new development at all.¹
- It can bring public health benefits. Research shows the costs to society of poor housing may be greater than £1.5 billion per year.²
- It increases property values. Case studies show that exemplar schemes can achieve higher residual values than conventional schemes³, whereas poor design can reduce future sales values.⁴
- It reduces crime. Research shows that residential developments designed to Secured by Design (SBD) standards showed lower reported crime rates and less fear of crime than those without. Conversely the average cost of building in SBD measures was just £440 per new dwelling, compared with average losses of £1,670 per dwelling from burglary.

CABE's national housing audits⁵, which assessed new housing developments in terms of layout, urban design and placemaking, found some examples of very good design – great places that residents are clearly proud to call home. This demonstrates just what can be achieved when we get it right.

But the bad news is that housing quality is not getting better quickly enough. CABE's housing audits revealed that almost one in three homes (29 per cent) were so poor that they should not have been given planning permission. It uncovered family housing with no play areas, windows looking out on blank walls, and broad expanses of tarmac. Only one in five schemes were rated as 'good' or 'very good', revealing a disappointing picture of housing quality, and demonstrating that many consumers still get a raw deal when it comes to new homes and neighbourhoods.

Design quality itself is fundamental to how places work

This picture is reinforced by recent evidence from assessments carried out by local authorities, which give a useful indication of the quality of 123 schemes from across England over the past 12 months. The results show that the quality of housing has not greatly improved: the proportion of 'good' schemes is roughly that same as in the housing audits, but there are even more schemes in the lowest category.

At the same time, we know that the smallest homes in Europe are now being built in the UK. We are unique in not setting a legal floor space minimum for new private sector housing. Various minimums do apply to different sorts of housing funded or delivered by the public sector here. But in the rest of Europe, basic rules govern factors such as the quantity of living space that must be provided, minimum acceptable ceiling heights, ventilation, and light requirements⁶. These minimum standards are set for all tenures.

So, despite progress, the quality of housing delivered in England remains a cause of concern and we cannot afford to slow down the momentum that has been generated. In particular, CABE believes that a new, simpler framework for housing design standards could play an important role in supporting communities to ensure new housing makes a real and positive contribution to the quality of life of people who live in and around the new homes, and help developers generate greater value from their products.

Better is affordable

Not only can well-designed housing increase value – economic as well as social – but it also needn't cost the earth. Case studies of schemes that fail in terms of quality show that with the application of some urban design principles developments can be redesigned – without changing the design of individual homes or reducing the number of units or car parking spaces delivered – yet having a dramatic impact on the quality of the place that will result. This can be achieved at no extra cost except for the cost of a day of a good designer's time, by creating a better layout of the homes across a site, creating a clear street pattern and frontage, good definition of public and private space and appropriate allocation of space for parking.

Better quality development is as likely to increase viability as it is to cost, and an improvement in the consistency and predictability of the requirements placed on developers also has the potential to lower costs by reducing any 'risk premium'.

A new, simpler framework for housing design standards would play an important role in supporting communities

Standards today - complex and ineffective

This is a pivotal year for housing standards. We have proposals from the Mayor of London in relation to the London Plan, which go before an examination in public and are backed by the related *London Housing Design Guide*⁷; and the Homes and Communities Agency (HCA) is consulting on its *Proposed Core Housing Design and Sustainability Standards*.⁸

Design itself is not just a creative process. It is also a technical one. The vast majority of decisions about design in the built environment are taken within the planning system. This is, at root, a political activity, within which local people should take the driving seat. When they make planning decisions, communities and their representatives need and deserve the best available technical advice to inform their choices. CABE believes that housing standards should play an important part in providing a framework for this advice.

Any standards framework needs to be flexible enough to allow local decision makers to choose what is best for their locality. It should also place no unnecessary burdens on developers, thereby undermining viability and supply. But above all, a new standards framework needs to be effective, creating consistency and eliminating the worst examples of bad design.

The current regime required by building regulations, planning policy and by funders fails to deliver on any of these objectives. It has built up over the last decade and created a confused, overlapping and sometimes contradictory range of measures. For example:

- There is a good deal of overlap and cross-referencing between one set of quantitative standards and another (eg Lifetime Homes and Secured by Design are separate but are also referenced within the Code for Sustainable Homes as non-mandatory).
- Standards are applied differently depending on if they are funded by the public sector and their location.
- Some standards have in part been over taken by events (eg a proportion of Lifetime Homes is now incorporated in building regulations).

- Different standards are owned and/or administered by different parties and have different assessment and certification process.
- As many standards have been developed to address specific areas there is limited understanding of how each impacts on another in terms of their design implications and development viability.
- Finally, the standards as set out above do not cover everything. There are other regulatory frameworks (such as highways issues and matters relating to utilities) which impact on housing design, as well as important matters that existing standards do not cover (eg minimum public space requirements).

The diagram on page 4 illustrates the complexity of the standards framework as it currently stands, and highlights the Byzantine inter-relationships between housing standards, building regulations, existing planning policy and other regulations. The left-hand column identifies standards and guidance that apply universally to all projects (national planning policy, national guidance, housing standards, building regulations and other regulations), the second column identifies additional standards and guidance that vary (depending on the development type, location, or certification procedure), the third column shows the assessment procedure and the last column shows how different aspects are certified in order to prove compliance.

While each element of the framework was introduced for good reasons, the cumulative effect has been to create a set of standards that are generally viewed as layers of burdensome regulation – undermining the viability of schemes and tying local decision makers and communities to rigid templates.

The current proposals being considered by the HCA and the GLA/LDA – again laudable in their own terms – do not address the complexity of existing standards and are unlikely to result in a core set of measures which address the design criteria at the heart of creating high-quality homes and communities and create certainty in the planning system.

A map of current housing standards: confused and overlapping

National standards & guidance

(applicable to all housing)

Additional standards & guidance

Assessment

(applicable depending on location, type of project and assessment procedure)

National planning policy eg: Regional/local planning policy eg: Planning committee/delegated powers Design & access statement (DCLG 01/2006 Section 3) PPS1: Delivering sustainable development Regional spatial strategy Local development framework PPS3: Housing PPS9: Biodiversity & geological conservation PPS17: Planning for open space, sport & recreation PPS24: Planning & noise Specific guidance for schemes dependant on context eg: CABE PPS25: Development & flood risk CABE guidance: as relevant to application Natural England guidance: as relevant to application Natural England English Heritage guidance: as relevant to application English Heritage National guidance eg: Planning and Design for Outdoor Sport and Play Fields in Trust Manual for Streets The Play Strategy Play England Urban Design Compendium 1 & 2 National housing standards eg: Building for Life Building for Life assessment eferences standards as evidence of co Secured by Design - New Homes 2010 Crime prevention design adviser Lifetime Homes Code for Sustainable Homes Code for Sustainable Homes assessment Category 1: Energy & CO2 emissions Category 2: Water Category 3: Materials Category 4: Surface Water Run-off Category 5: Waste HCA investment management system HCA core standards Category 6: Pollution Category 7: Health & Wellbeing Category 8: Management Considerate constructors scheme monitor Category 9: Ecology Ecology report Approved inspector/local authority building control Acoustic testing consultant Building regulations Part E (Resistance to the passage of sound) Robust details accredited details Robust details plot registration & check list Part F (Ventilation) Part L (Conservation of Fuel & Power) As built pressure test Part M (Acces to and Use of Buildings) Accredited construction details (Energy Savings Trust) Detailed calculations by expert (BRE doc: BR 497) SAP (standard assessment procedure) assessment Part A. B. C. D. G. H. J. K. P Default value - low performance value Other regulations eg: Insurance standards (NHBC etc) Flood & Water Management Act (sustainable drainage) National SuDS standards Local water authority Water regulations (mains supply) Private water company Water regulations (sewer) Local water by-laws Local water authority Highways regulations (278/38) Highway control Other utilities standards (eg gas, electricity, telecomms) Environmental regulations (eg site waste management plan) Environment Agency

Planning

Process relating to

Process relating to: Process relating to Building for Life National housing standards



Process relating to: Other regulations

Certification

Planning approval

Planning approval notice



Building regulations final certificate
Acoustic testing results
or
Robust details compliance certificate
Pressure testing results
Energy performance certificate (EPC)

Insurance certificate sign-off
Sustainable drainage approval
Section 51A agreement - adoption of mains water
Section 104 agreement - adoption of sewer
Section 278 and/or 38 agreement - adoption of highways

Diagram produced with the assistance of Richard Partington

What we could have - simpler and better

While there are obvious problems with the current standards framework, it is important not to throw out the baby with the bath water. Of course, standards need to be made simpler and more responsive locally, but they also need to lead to consistently better housing, for all the reasons set out above.

So we argue that there is a strong case for rationalisation – to improve the quality and sustainability of new homes, to ensure viability, and to underpin local decision–making. We believe that a simpler, consistently applied set of standards could help all those involved in the decision making process, particularly communities, to be proactive and positive about new housing. It would help to reduce the red tape associated with designing and delivering new homes, with advantages for all who are those planning for, permitting, building, funding, buying and enjoying the benefits of new homes and neighbourhoods.

If we are to achieve consistency, simplicity and increased supply, CABE believes that in place of the plethora of current standards we need a robust and comprehensive national standards framework, focusing on standards for both houses and housing. This framework should be shaped according to the following aims:

- Avoid duplication and overlap we should not have standards that overlap and mean aspects of performance are measured in several places for different purposes.
- Clarify what elements belong in planning and what should be included within building regulations. For example the requirements in Lifetime Homes for size of parking spaces should be included in planning policy, whereas the detailed requirements for switch heights should be included in building regulations.
- Demonstrate clear linkage to an enforcement process. Standards need to be linked with the process that will enforce them.

- Prevent unnecessary compliance, for example by requiring information at planning stage showing compliance on detailed items when fundamental issues may be wrong.
- Ensure that standards are driven by the public interest. Standards should not be owned by the private sector or single interest groups; however, certification and enforcement may be led by private sector organisations such as NHBC.

A national framework for housing standards should then do three things:

1. Create a single set of measures by which developments can be designed, judged and developed through the planning system, under the oversight of elected local representatives

2. Specify the standards, to be delivered through the planning system, into two areas, addressing:a) housing layouts and the wider development; andb) the design of individual homes

3. Identify those that should be delivered through building regulations or included in them in future

From this framework, a basic minimum requirement could be drawn, which addresses the policy principles required to meet our environmental commitments and the basic needs of communities and residents.

Standards need to be made simpler and more responsive locally – they also need to lead to consistently better housing

A new, simpler framework for housing standards

Planning

A core set of standards that relate to **housing layouts** and the entire development, using **Building for Life** as the framework

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A simplified and reduced set of standards that relate to the design of individual homes, bringing together all the existing (and multiple layers of) standards into one coherent set of requirements.

Clear separation of standards and assessment procedures

Building regulations

A **simplified and reduced** set of standards for **homes** that should be delivered through building regulations or identified for future inclusion within them.

Ultimately, a rationalisation of current standards can only happen at the national level where the balance between national minimum standards (national planning policy and building regulations) and local minimum standards (such as those sought by the Mayor of London) can be considered and determined.

This will not happen overnight. However, there is clearly an opportunity over the next year to start this process of simplification, placing quality and sustainability at the heart of any changes. The government has indicated its intention to make significant changes to the planning system, including a series of reforms involving a reduced number of simplified guidance notes which will set out minimum environmental, architectural, design, economic and social standards for sustainable development.

The first step is for government to trigger a timely review of the wider standards framework involving all key stakeholders. CABE is keen to play its part in this review, and is able to bring to the table not only its extensive evidence base but also its ideas, to help inform the wider debate.

> There is clearly an opportunity over the next year to start this process of simplification, placing quality and sustainability at the heart of any changes

Footnotes

1 Good quality housing design is important to people, with 73 per cent saying they would support the building of more homes if well-designed and in keeping with their local area, according to the 2010 Public Attitudes to Housing survey. National Housing and Planning Advisory Unit (NHPAU), 2010. Public Attitudes to Housing survey. www.cabeurl.com/cy

2 Roys, M., Davidson, M., Nicol, S., Ormandy, D. and Ambrose, P., 2010. *The real cost of poor housing*. Bracknell, Berkshire: IHS BRE press proposes a detailed cost model of health and safety hazards derived using data from the EHCS and illustrates the scale of saving that might accrue to the NHS. This excludes costs to other services such as the police, arising from the impact of poor housing from crime.

A study in 1997 estimated that more money – as much as £2 billion per year – is spent on treating illnesses arising from poor housing conditions than is spent by local authorities on their own housing stock. National annual estimates of the increased costs associated with the 7.6 per cent of public sector homes considered unfit for habitation are £3 billion due to poor health, £1.8 billion due to increased crime and £120 million for the cost of fire services. Although not definitive figures, they showed the extent of the problem at the time. Source: Barrow, M. and Bachan, R., 1997. *The real cost of poor homes: footing the bill.* London: RICS

3 In Value of Housing Design and Layout, Savills and Davis Langdon Everest, assessed the value of eight suburban residential schemes, with four pairs of exemplar and conventional schemes. The objective of the research was to analyse the value to the developer in terms of residual land value per hectare and whether exemplar schemes produced a higher value. The research showed that in three out of the four cases, this was the case. Savills and Davis Langdon Everest, 2003. *Value of Housing Design and Layout.* [pdf] London: CABE. www.cabeurl.com/c7 4 A survey of 600 households on a large suburban housing estate with little or no distinctive design quality found that these residents experienced more difficulties in selling and experienced more negative equity than those living on more distinctively designed developments. Source: Forrest R., Kennett T. and Leather P., (1997.) *Home owners on new estates in the 1990s.* Bristol: The Policy Press..

5 Housing audit – assessing the quality of new homes – London, the South East and the East of England. [pdf] London: CABE. www.cabeurl.com/c8 CABE, 2005. Housing audit – assessing the quality of new homes in the North East, North west and Yorkshire & Humber. [pdf] London: CABE. www.cabeurl.com/c9

CABE, 2007. Housing audit – assessing the quality of new homes in the East Midlands, West Midlands and the South West. [pdf] London: CABE. www.cabeurl.com/ca

6 Gallent *et al.*, (2010) Internal Housing Space Standards in Italy and England: Comparing the 'Conditions' of Regulation. [pdf] www.cabeurl.com/cb

7 Mayor of London, 2009. *London Design Guide* – *draft for consultation*. [pdf] London: London Development Agency. www.cabeurl.com/cc

8 HCA, 2010. *HCA Proposed core housing design and sustainability standards consultation*. [pdf] London: HCA. www.cabeurl.com/ce

9 CABE, 2010. *Simpler and better: housing design in everyone's interest.* London: CABE. www.cabe.org.uk/ publications/simpler-and-better

This paper sets out CABE's emerging position on housing standards and complements the CABE report Simpler and better: housing design in everyone's interest. The paper references a number of technical reports which can be viewed on CABE's website at www.cabe.org.uk/ publications/housing-standards. 1 Kemble Street London WC2B 4AN T 020 7070 6700 F 020 7070 6777 E enquiries@cabe.org.uk www.cabe.org.uk

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