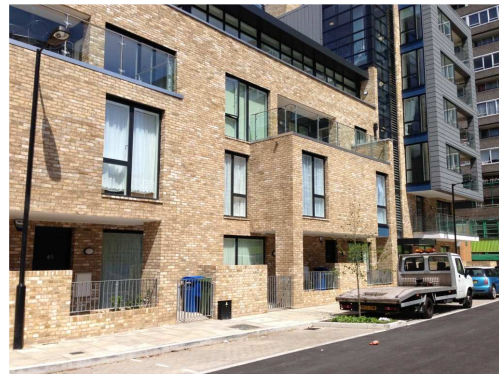
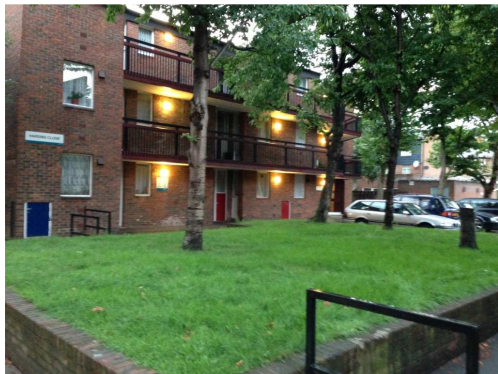


CREATE streets

Why aren't we building more streets in London?



Research Paper One, October 2013

Nicholas Boys Smith

Acknowledgments

I could not have written this paper with the wisdom and advice of the wider Create Streets team to all of whom I express my thanks: Paul Murrain, John Moss, Graham Stewart, Ed Staite, Robert Gluckman, Tom Smith, Patrick Inglis, Susannah Farrow, Will Fulford, Simon Kingston and Heneage Stevenson. The counsel of Alex Morton from Policy Exchange has also been crucial.

About Create Streets

Creates Streets is a social enterprise encouraging the creation of more urban homes with terraced streets rather than complex multi-storey buildings. Our core work as a Research Institute underpins all our activities.

About the author

Nicholas Boys Smith was a political advisor and strategy consultant at McKinsey & Co. before becoming a director at Lloyds Banking Group. He is a Consultant Director of the think tank Reform and a Board member of the Swan Foundation. He is the founding director of Create Streets.

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Executive Summary

- The complex planning system in London has ended up requiring too many homes in multi-storey blocks designed by committee rather than streets for which there is greater popular demand
- We are building homes for stakeholders not people. Most people strongly prefer houses and low rise flats on streets and are happier when they live in this way
- There is an opportunity to deregulate and simplify the London Housing Design Guide so that it is easier and cheaper to build the types of high density conventional streets in which most people want to live
- This would help solve the housing crisis and deliver more, and more popular, housing
- There is currently an important and material bias in the London Housing Design Guide against terraced streets. This is because London is gold-plating national housing standards
- This bias is despite strong support in the introduction of the London Housing Design Guide for terraced houses and a 'street-based urban arrangement'
- We have identified eleven key barriers to building streets in London embedded in the London Housing Design Guide and in the London Plan
- Six fundamental barriers need to be removed:
 - Super-high density targets make it hard to achieve planning agreement to build conventional terraced houses and low-rise flats
 - The ban on recycling open space between buildings into private gardens makes it is very hard to redevelop estates into streets
 - Requiring lifts, wheelchair lifts and stair-lifts in all cases makes it more expensive to build conventional vertical flats off one staircase
 - The national 'best-value' test is misinterpreted to favour higher initial land value over the type of long-term (but ultimately higher) investment returns typically associated with street-based developments. This forces developers' to favour smaller unit, repetitive, high-rise blocks built quickly for quick payback
 - Rules against staircases being too narrow or too steep make it harder to build the conventional tall but thin London terraced houses
 - A requirement that ten percent of homes be fully wheelchair accessible and for all homes to be built to 'Lifetime Home' standards biases the system in favour of large, partially off-road, blocks
- Four contributory barriers need to be removed or reformed:
 - A dislike for on-street parking biases the planning system against conventional terraces and streets

- Heavy requirements for bike storage, make it much harder to build terraced flats and conventional terraced homes
 - Heavy requirements for bathrooms on storeys with bedrooms make it harder to build the conventionally tall but thin modest London terraced homes
 - Requiring ‘weather protection’ over front doors adds yet more cost to terraced streets with multiple entrances
- A range of rules on windows and room heights also make it harder to build houses which obey the classical rules of proportion and ‘fit in’ with historic neighbourhoods
 - We make detailed and specific recommendations as to which rules need to be scrapped or altered to reduce this material bias in the London planning system against terraced streets – the most popular form of housing in London which can meet the densities required to solve the housing crisis
 - Underlying all our recommendations is the belief that local communities should be given more power to choose to what degree they wish to impose these standards on new builds
 - The current Government review of Housing Standards presents City Hall with an excellent opportunity to cease gold-plating national standards. This would encourage more development and more popular development
 - All of London, and all Londoners, would benefit.

Introduction – The Create Streets report

On 24th January 2013, we launched Create Streets in conjunction with Policy Exchange. Our full report can be downloaded from www.createstreets.com or from www.policyexchange.org.uk.

Our report argued that the future of our built urban environment (especially social housing) should largely be one of high density terraced houses and low-rise apartments in conventional streets rather than the off-street, high rise, slab blocks, a style which has dominated development for much of the past seventy years – and which planning rules adopted ten years ago have brought to the fore yet again.¹

This is not about imposing a particular style on others. We argue for terraced streets on deeply empirical grounds. Neither do we oppose all and every high rise proposal. But high rise living must not be forced, directly or indirectly, on the people of London. The evidence, and people's support for streets, is quite clear. Most people want most new development to be street-based, and this can be achieved while building high density.

1. Street-based new homes are provably more popular with the vast majority of the public over many years. In one poll of 1,018 people, not one single respondent wanted to live in a tower block
2. Multiple studies in many countries and over many years show that multi-storey housing is heavily correlated with bad social outcomes for the people forced to live in it *even when economic conditions are identical*. This is particularly the case for children
3. The long term economic returns to the landowner of developing and then owning terraced housing beat those of owning multi-storey housing in all but luxury developments – due to lower build costs, lower financing costs, lower maintenance costs and higher value appreciation over time
4. Building terraced houses can readily reach the population densities that we need to solve the housing crisis. Due to the wasted space between existing tower blocks and the inefficiencies of estate layouts, conventional streets of terraced houses and low rise flats can almost always match their population densities

Create Streets believes that those living near proposed development or in redevelopments should be given the final say. We believe in most cases that this will result in street-based development. This issue of local support and consent is crucial if London is to see the scale of new development we need.

Create Streets – the response on the ground

Many estate and tower-block residents contacted us following publication. They were, without exception, strongly supportive of our argument. A few points they have made to us are cited below. They testify eloquently to the unpopularity, mental-strain and cost of multi-storey living – particular for those

¹ Boys Smith, N. & Morton, A. (2013) *Create Streets*, pp. 15-6 for a more detailed explanation of these changes. The points made below are explored at length in chapters 2,3,6 and 7 of the same report.

with children and particularly when the additional cost of running multi-storey buildings cannot be met by social landlords. This is why multi-storey living often works better for those on high income than for those on lower incomes.

'Could not agree more after living in one for over 15 years with much burden and witness to misery. . . . One day authorities will actually listen to what residents want and not what the authorities want for their coffers. Such buildings should be condemned as unfit for purpose especially when they are in the hands of inept management, as demonstrated over the years by not upholding the most basic of tenancy agreements. Listen to the residents of the Bacton Tower Block about their unmaintained windows being replaced with unsuitable expensive options that only benefit those that will fit and maintain them. Perhaps the planners would consider this option of bulldozing Bacton Tower Block.'

Resident of Bacton Tower, NW5²

Another resident was even more forceful about the challenges for her and her child.

'Since I have been put in this tower block against my will I have had nothing but problems. Every night a neighbour somewhere either above me, below me or to the right of me blares their music out throughout the night and the council do nothing about it despite me ringing and emailing them. Also the family above me start banging and drilling sometimes until midnight. There have been fights in my tower block, parties from all angles, there's been stabbings, kids sit on the stairs and smoke drugs in the communal halls. People urinating in the lifts and on the inside and outside walls, graffiti everywhere. There's always shouting and arguments. A long time ago I lost a lot of confidence in going out. In fact last night the police were attending my tower block with forensics and blood was splattered over all the walls by the main entrance next to the lifts so I'm guessing there was a murder or attempted. Anyone could have walked in with their children and seen that as it was right by the main doors with huge windows so people could have even seen it happen from the outside. . . . I do not want to go outside now with my son.

It's easy for strangers to get into the block if someone's coming in or going out. People buzz on anyone's buzzers to try to get into the property and the majority of the time someone lets them in. I'm not sure if you know this but there's 4 tower blocks where I live and in marine tower 2 women died from a deliberately started fire, and in my block last year there was another fire ... you still have only one front door to try to get out of your own flat and only one lot of stairs for 64 flats worth of people to get out of before you get to the fire exit which I think is pointless because if the fire was on the ground, there would be no way

² Private correspondence to Create Streets.

out. Is the demolishing of the high rise flats a definite thing that's going to happen? I would totally support that.'

*Resident of tower block in Lewisham*³

In the period since publication, we have also started to have some very promising interactions with estate residents on potential neighbourhood plans.

Create Streets – the response from media and stakeholders

Perhaps the reason our report struck a cord is that this is not a narrow partisan issue. According to MORI, 89 percent of Britons want to live in a house on a street. 0 percent want to live in a tower block and only 2 percent in an apartment. Children in social housing *are sixteen times more likely to live on or above the fifth floor than children not in social housing*. Those who can afford to chose, chose streets.⁴

The media gave our report major attention and was broadly supportive. Dave Hill in *The Guardian* wrote that the report, 'argued strongly that London's high-rise social housing should be replaced with traditional streets, citing studies that find most people prefer them and adding that no present high-rise resident should be made to move. It's an appealing thought.'⁵ On the right, Harry Mount in *The Telegraph* was also strongly supportive.

'Good for Policy Exchange, the think tank that has just suggested knocking down the tower blocks and replacing them with the terraced houses. Of all the misguided government programmes that have wrecked our cities over the last 60 years, the tower block was the worst by far. The tower block had turned into an outdated yet iconic image of hellish urban living. Here's hoping the rest of them will be torn down and replaced with good, decent, terraced housing – Britain's greatest contribution to domestic architecture.'⁶

More widely, the report was covered on the BBC News website, by print media including *The Independent*, *The Daily Express*, *The Guardian*, *The Telegraph*, *The Evening Standard* and *The Daily Mail*, and given widespread broadcast including the Today Programme, ITV News, Radio 5 Live, and Channel 4 News as well as many local broadcasters. The Mayor of London, Boris Johnson, welcomed our recommendations on national television.⁷

Stakeholders were broadly supportive, though not as enthusiastic as residents or the general response in the media. *The Guardian* ran an online poll (77% supported our recommendations) and commissioned Caroline Field, the regeneration project manager at Orbit Homes, to describe the five-year scheme to demolish seven tower blocks in the borough of Bexley replacing

³ Private correspondence to Create Streets.

⁴ Boys Smith N, Morton A., *Create Streets* (2013), pp. 21-8.

⁵ Dave Hill, *The Guardian*, 26th March 2013.

⁶ Harry Mount, *The Telegraph*, 24th January 2013.

⁷ ITN News, 24th January 2013. Available at www.itv.com/news/london/update/2013-01-24/boris-welcomes-changes-to-housing-in-london/ Accessed on 15th April 2014.

them with houses and low-rise apartments. Not surprisingly, once given the chance to be involved, the local community had opted to pull down the tower-blocks. Field concluded that ‘the ideology behind the think tank report is appropriate for this community. We are giving residents the chance to get involved and rebuild a new neighbourhood for themselves and their families.’⁸

The Royal Institute of British Architects stated that they recognised local people must be given control over how redevelopment occurs, though they also stated they opposed the demolition of all high rise residential buildings, (as would we):

Decisions on high rise developments and their future should be made at a local level and include the existing population. We would not advocate the demolition of all existing high rise residential buildings, especially in a time of housing need and where existing communities may be flourishing.⁹

Create Streets agrees that decisions on high rise developments should start to be made locally. That is not yet happening. Many consultations a notional exercise and cases of very high density developments being opposed by local residents – just as they were fifty years ago. The consistent evidence, including the work led by Orbit cited above, is that when local residents are truly consulted, they consistently opt for conventional streets.

The only real criticism we faced was from some professional architects and planners online. None of them however were able to engage with the actual detail. Some argued that high rise developments are needed to solve the housing crisis. (This is not true. Terraced streets can be very high density). Others argued that estates normally work abroad. (Again, incorrect as the evidence to the contrary stretches far beyond the UK). Others cited the (almost unique) success of the Barbican whilst ignoring the deeply atypically wealthy nature of its residents or the high service charges that are required to make the complex work.

We did not argue that all high rises could or should be demolished. High rise can work for some people sometimes (though they tend to be more expensive to maintain). Estate-based developments have a less good record. But the key point is that for the vast majority, multi-storeys are unsuitable and unpopular as homes. There is a key distinction between opposing all high rise proposals in all circumstances and arguing that local residents should have the final say in development and redevelopment. It is perhaps a sign of the strength and popularity of our argument that it had to be turned into a paper tiger by its opponents.

The eleven key barriers to building terraced streets

Since we published our report several officials, developers and financiers have contacted us. One strong theme has emerged from our conversations.

⁸ The Guardian, 8th February 2013.

⁹ Press release from RIBA, 24th January 2013.

Some developers genuinely *want* to build more conventional streets. They cost less to build. They are very popular. They can be sold at a premium.

Eleven key barriers to building streets in London emerge from the conversations we have been having¹⁰. All of these barriers have, no doubt, been created from the best of intentions. They are embedded in the London Plan, the London Housing Design Guide and the London Housing Supplementary Planning Guidance. This is statutory guidance issued by the Greater London Authority which assumes that, left to their own devices, developers and social landlords would not choose to build acceptable homes and to which all local plans developed by London boroughs must adhere. Many derive from the very laudable desire to make all homes more accessible to the infirm or to those with disabilities. The rules in London are far more stringent than in the UK as a whole – in part due to their decision to adopt as mandatory for all new homes the optional national Lifetime Homes standards.¹¹ Unfortunately, as so often with regulations and guides from on high, unintended consequences are legion.

While there is a very strong case for public buildings to be accessible to those in wheelchairs or with mobility issues, private housing is a quite different matter. Without for a moment wishing to prevent sufficient or a very large number of homes being accessible to all, it must be open to question whether every single new home in a large and complex capital city needs to meet these demanding criteria – particularly when there are material and malign unintended consequences. Surely not every home needs to work for everyone? In a city as large and complex as London to even attempt to do so is ridiculous. And yet that is what the rules currently stipulate. The same logic would require that ever new building works for those who are partially sighted or with mental health issues. People do not have the same needs or tastes. It is quite absurd to pretend that they do. Similarly, while London should be densely populated, the last decade's super-high density requirements only serve to embed public opposition to many new developments by requiring slab-blocks and tower-blocks.

Based on our discussions, six of these barriers would appear to be critical in fundamentally biasing the planning system against terraced streets and in favour of large slab-blocks. A further four are unhelpful. Finally a range of rules do not make it hard to build terraced streets *per se* but they do make it difficult to construct buildings which obey the classical principles of design and proportion in order to 'fit-in' with existing neighbours.

¹⁰ In fact, as this work went to publication discussion with some experts has led to further rules and standards being identified as potential barriers to creating functioning conventional streetscapes. These include rules on dual aspect rooms and the Secured by Design standards. For example, see Minton A & Aked, (2012) J, *Fortress Britain*.

¹¹ The London Plan and Housing Design Guide in addition to following the Building Regulations minimum also subscribe (for all homes) to the non-official Lifetime Homes scheme. This scheme was developed by the Habinteg Housing Association and the Joseph Rowntree Foundation in the 1990s. Create Streets is fully supportive of the principle of designing homes that are accessible for as many people as possible. We are however, concerned that imposing the Lifetime Home criteria on *all* new homes in a high density area such as London is having material unintended consequences on the quality of our built environment. Lifetime Home criteria would appear to have been developed with much lower density areas in mind. At any rate their impact in London is to bias the system against streets and in favour of large multi-storey blocks. London's gold-plating of national standards is particularly striking as the proportion of disabled people in London is slightly lower than in the country as a whole (around 16.9% vs 17.3%). Office National Statistics, Annual Population Survey.

Fundamental barriers that need to be removed

1. Super high density targets make it hard to achieve planning agreement to build conventional terraced houses and low-rise flats in many central and urban contexts
2. The ban on recycling any open space between buildings into private residential gardens makes it is very hard to redevelop (unpopular) estates into (popular) streets
3. Going beyond national rules to require lifts, wheelchair lifts and stair-lifts in every home makes it more expensive to build conventional vertical flats off one staircase in the form of a terraced house and much more difficult to build conventional London terraced houses which might have a bedroom on the second floor.
4. The UK-wide 'best-value' test is required of all developments on public land or involving social housing. Unfortunately it is typically interpreted to favour higher initial land value (and thus faster cash returns) over the type of long-term (but ultimately higher) investment returns typically associated with street-based developments. This biases developers' economic modelling in favour of smaller unit, repetitive, high-rise blocks built quickly for sale rather than street-based developments which actually maintain value rather than lose it. Particularly due to the use of 'price-paid' evidence this test forces maximum possible value for land-disposal up front. This discourages the provision of social housing and makes it very hard to invest in the quality of a place through good design or materials
5. The London Design Guide is rich with rules against staircases being too narrow or too steep and banning them from street to the front door or down from the house into the garden. These make it harder to build the conventional tall but thin terraced houses so typical of London in the past and so good at providing high-density living. They also make it hard to 'match' historic homes or flats in places such as Notting Hill, Pimlico or Kennington where many buildings have external steps to the front door, creating unnecessary planning system opposition to homes
6. Going beyond national standards to require that ten percent of homes be fully wheelchair accessible and for all homes to be built to 'Lifetime Home' standards biases the system in favour of large, partially off-road, blocks. It assumes that private and social landlords would not seek to meet the real demand for wheelchair accessible homes without regulation. We need to find a more flexible way of ensuring an adequate supply of wheelchair accessible homes

Contributory barriers that need to be removed or watered down

7. A dislike for on-street parking biases the planning system against conventional terraces and streets

8. Heavy requirements for bike storage make it much harder to build terraced flats and conventional terraced homes and bias the system in favour of large, partially off-road, blocks
9. Requirements for bathrooms at entrance level and at every level with a bedroom make it harder to build the conventionally tall but thin modest London terraced homes
10. Requiring 'weather protection' over front doors adds yet more cost to terraced streets with multiple entrances and makes it harder to 'fit-in' to streets where other houses have no porches

Making it hard to match the London vernacular

11. A range of rules on windows and room heights make it harder to build terraced (or indeed any) buildings which obey the classical rules of proportion in order to 'fit-in' with existing neighbours

Underlying all these points, it should be made much clearer to developers, architects, planners and councillors that there is some limited scope to derogate from the London Housing Design Guide on occasions. Although the Housing Supplementary Planning Guidance which embeds the standards in the planning system does mention this, we failed to find a single developer or professional advisors who thought that this was a practical or advisable way of approaching development.

Barrier One: super high density targets

The London Plan demands densities often far higher than London has ever seen. In some neighbourhoods, these all but oblige large multi-storey buildings. This contributes to the fear of development that makes it so hard to build sufficient London homes. They are only necessary because so much space is 'wasted' in moderate density and disliked non-street based multi-storey estates from the 1950s-70s.

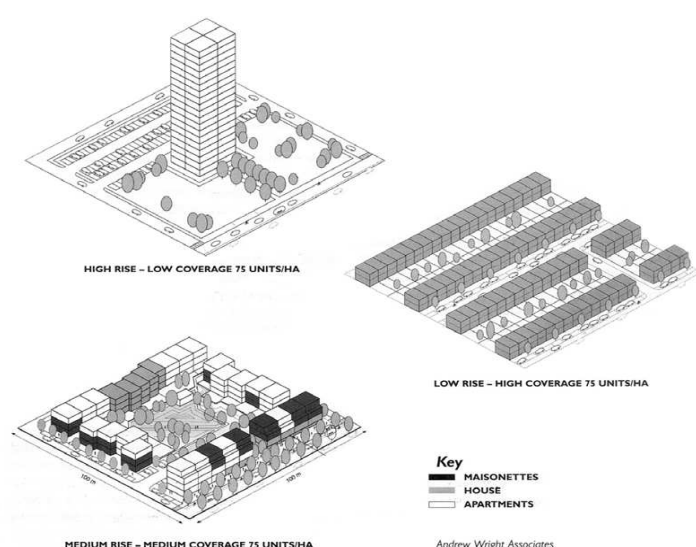
The 2004 London Plan set density targets which have dominated development planning over the last decade. These targets related to what was termed the 'PTAL'. The PTAL is the standard UK measure of public transport accessibility taking account of distance to transport hubs and the service level at the morning peak (from 08:15 to 09:15). The idea behind it is that the more public transport there is then the higher density any development should be.

A score of 1 indicates a very low access to the location by public transport. A score of 6 indicates excellent access by public transport. Hr/unit gauges typical home size by measuring habitable rooms (Hr) per unit (house or flat). U/ha is a density target defined as number of units (house or flat) per hectare. Hr/ha is a measure of existing density defined as habitable rooms per hectare.

In London most areas have quite a high score on the PTAL measures, because London public transport is quite extensive. This means that new developments are often required to be very high density. The targets are set out below.

London Plan 2004 and 2011 London Housing Density targets¹²

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150-200 hr /ha	150-250 hr/ha	200-350 hr/ha
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
Urban	150-250 hr /ha	200-450 hr/ha	200-700 hr/ha
3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha
Central	150-300 hr /ha	300-650 hr/ha	650-1100 hr/ha
3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	140-290 u/ha
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha
2.7-3.0 hr/unit	50-110 u/ha	100-240 u/ha	215-405 u/ha



This graphic from the 2001 Urban Taskforce shows how terraced streets can normally match (or even beat) densities of post-war estates

Failure to hit these targets is a valid reason to reject planning applications. Depending on the size of buildings and the proportion of flats versus houses, the typical density of conventional London terraced streets ranges from 75 units/hectare to about 180 units/hectare.¹³ In historical terms, this is actually a very high development density. It is four to eight times the average density of

¹² GLA (2011), *London Plan*, p. 78. This is embedded in the London Design Guide clause 2.1.1 which is a Priority 1 Standard which must be met in full.


¹³ Boys Smith, N. & Morton, A. (2013) *Create Streets*, pp. 60-2. Higher densities are largely areas such as Pimlico with street-based flats.

developments between 1981-1991 which was 22 homes per hectare.¹⁴ The existing density targets are historically hard to defend. However, they certainly do make it, if not impossible, certainly very hard to build non high-rise terraced streets in many central or urban environments.

An example of what could be done ...


Aylesbury Estate, Southwark

- 2,759 units
- All council-owned flats in large slab blocks apart from 50 houses and 300 right-to-buy leasehold
- Built 1963-1977
- Density 115 dwellings per hectare (346 rooms per hectare)
- Poor scores on nearly all wealth, health, welfare & attainment metrics




A few very large buildings – correlated with low sense of community & high crime

And lots of 'wasted' space – leading to low much lower densities than (more popular) surrounding streets




... by 'replacing' Aylesbury estate with Pimlico


- Replace with street typology of Pimlico less than 2 miles away
- Mixture of flats in terraced streets & private houses
- Est. density of 173 units/hectare*
- 50% more dwellings (2,759 to 4,140)
- 100% of social homes replaced
- Still space for modest back gardens & gated communal square gardens (and Burgess Park is to immediate south)
- Near city-centre & excellent transport links to both city and West End
- Currently difficult due to
 - London Housing Design Guide
 - PTAL density targets
 - Lower short term income compared to uber-high density scheme




Dense flatted six storey buildings. Mixture of social, market rent & owner-occupied



Flats & houses



Traditional streets. No space wasted. Correlated with resident satisfaction & long term value growth



* Estimate of Pimlico density based on comparable sites analysed in *Housing Density Study*, Maccreanor/Laingbox Architects, 2012

As our report *Create Streets* discussed, we can increase the densities of the post-war estates by replacing them with conventional terraces. On a mass scale this would provide a popular way to build the homes we need. In

¹⁴ *Better Neighbourhoods; Making Higher Densities Work*, CABE, 2005

contrast, trying to impose ultra-high development continues to make developments unpopular and lowers the number of new homes the planning system and politicians can actually deliver. Of course, if local people approve of a particular very high density scheme then this should be allowed. The question is to whether or not such very high densities should be *required*.

Although the 2011 London Plan has reduced the verbal focus on increasing density, the change of political leadership from Ken Livingstone to Boris Johnson has not changed the London Plan's strong focus on putting more people and higher buildings into less space one iota. The actual density targets remain exactly the same although the positioning is one of "optimising." These targets should go. They contribute to the fear of development and prevent a popular alliance in favour of development.

Recommendation one: the impact on social housing for families of PTAL targets in the 2011 London Plan above 150 units/hectare should be reviewed. Some of the ultra-high density targets currently being demanded should be reduced or removed as they are counter-productive.

Barrier Two: making it hard to recycle wasted space between tower blocks into streets or gardens

The London Plan Key Performance Indicator 3 is to ensure 'no net loss of open space... due to new development.' Gardens do not count as open space. However, the often wasted small spaces on housing estates do count as open space. This makes it very hard to redevelop unpopular and low density estates into the sort of popular and high density terraced streets with gardens that most Londoners prefer.

Evidence has shown for many years that people prefer private gardens (however small) to less usable communal space. In an early 1980s survey of residents' views of London multi-storey housing, there were 258 specific and spontaneous negative comments about multi-storey housing and 67 spontaneous positive ones – a ratio of nearly four to one against. The main dislike was the way the estate was set out and the lack of individual gardens with 54 complaints.¹⁵ Recent evidence from RIBA supports this and points clearly to a preference for private gardens over communal space. In a survey of apartment block residents they found that, 'private gardens were preferred to shared gardens'. This was particularly true in London. 'Those in urban London [were] most keen across all the groups to have some outside space in their new property.'¹⁶ RIBA found that typical apartment block residents interviewed 'appreciated that the properties were set in a natural area [but] they felt that this space was difficult to use as a personal outdoor area as sharing the area with others did not tend to work well.'¹⁷ The evidence is clear. Given the choice, people want gardens rather than communal space.

¹⁵ Coleman, A. (1985), *Utopia on trial*, p. 33.

¹⁶ RIBA (2012), *The way we live now*, p. 49.

¹⁷ RIBA (2012), *The way we live now*, p. 52.



RIBA research shows that people would rather have private gardens than this type of open space

And yet the London Plan makes it nearly impossible to achieve this. This shows how the current rules lead to the provision of houses and environments that planners and 'stakeholders' want rather than the ones that real people want. Key Performance Indicator 3 states that there should be, 'no net loss of open space designated for protection in Local Development Frameworks due to new development.'¹⁸ This sounds reasonable. Who would want to support the loss of valued green space in a busy city like London ?

Unfortunately in reality open space is not quite as special as it sounds. It is defined as 'all land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use'¹⁹. This includes the many scraps of green space around buildings that are often little used, sometimes dangerous. These are the types of spaces that estates are rich in and which contribute so much to their low densities. In Hammersmith and Fulham, these 'green spaces around premises' account for 45 hectares or 12 per cent of the total open space in the borough.²⁰

We know from RIBAs research and other evidence that most people would sacrifice this space for small private gardens. But they cannot. The GLA are quite categorical that, 'the definition of open space ...does not include private residential gardens.'²¹ Put sharply, anyone redeveloping a large estate has to

¹⁸ GLA (2011), *London Plan*, p. 260.

¹⁹ GLA (2011), *London Plan*, p.305.

²⁰ LBHF (2008), *Parks and open space strategy*, p. 14.

²¹ GLA (2013), *London Plan Annual Monitoring Report 2011-12*, p. 19.

recycle open into land open land but not into private or gardens even if nearly everyone can have one.

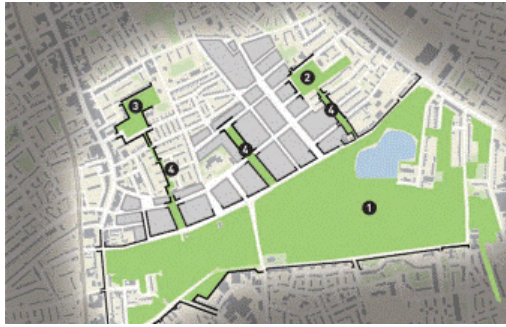
In case this sounds overly-theoretical, the real impact of these interacting rules can be seen very clearly in the actual plans that have been put forward for actual places. One of the most notorious and unloved estates in London is the Aylesbury Estate in Southwark. Despite being to the north of a large park (Burgess Park) it is also one of the most amply provided in green space with large open spaces between huge concrete blocks. The density is, unsurprisingly, very low at about 115 dwellings per hectare or 346 rooms per hectare.



Aylesbury Estate from the air. Lots of open space and some large buildings

Clearly this wealth of greenery has not made the Aylesbury popular or successful. Streets of conventional housing just to the North and West have far less open space and only modest access to private gardens. Nevertheless they are far more popular and there is a ready market to buy flats there. Even before there was talk of redevelopment, a functioning market never emerged for the flats of the Aylesbury.

Renovating the Aylesbury Estate would cost around £350m and no one argues that it should be kept. Unfortunately, the Area Action Plan that has been proposed repeats many of the spatial errors of the existing estate with large areas of open space that are neither park nor street nor garden. As can be seen below, this wasted space then obliges the planners to propose a series of large slab and tower blocks in order to reach the high densities that the London Plan requires.



Area Action Plan proposals for the Aylesbury Estate. Similar typology to the existing buildings with large open space, slab-blocks and tower blocks

Recommendation two: the London Plan key performance indicator 3 should be adjusted to permit the recycling of open land into streets or gardens when the plan is approved by a local community via a neighbourhood plan referendum. More radically, with local community support, it should perhaps be possible to count replacement of open space as private or shared gardens at 150 per cent towards the replacement of lost ‘open space’ to reflect the greater value placed on them by residents.

Barrier Three: requiring lifts, wheelchair lifts and stair lifts

Though well-intentioned, Lifetime Homes and disability requirements for lifts and stair lifts in the London Housing Design Guide make it very hard in a high density area such as London to build terraced houses either as flats or as individual houses

The London Housing Design Guide sets out certain requirements as Priority 1 Standards. These must be met in full in order to obtain planning permission. Clause 3.2.6 of the London Housing Design Guide is a Priority 1 Standard and states that:

‘All dwellings entered at the fourth floor (fifth storey) and above should be served by at least one wheelchair accessible lift, and it is desirable that dwellings entered at the third floor (fourth storey) are served by at least one such lift. All dwellings entered at the seventh floor (eighth storey) and above should be served by at least two lifts²².’

This rule, which goes beyond national building regulations, is intended to improve access for disabled or elderly people. Who would want to argue with that aim? Unfortunately its impact is to make all but impossible, cost-effectively, to build house-style low or medium-rise flats. Many of the ‘grand’ Georgian or early Victorian houses of central London (think Pimlico, Notting Hill or South Kensington) are in fact nothing of the sort. They are four, five or six storey blocks of flats all accessed from one staircase. This is a perennially

²² All references to the London Housing Design Guide are to the Interim Edition printed in August 2010 which came into force from 2011 and which is available from <http://www.london.gov.uk/priorities/housing-land/publications/london-housing-design-guide>

popular building type which is externally elegant and very secure due to the limited number of flats using the same front door. It benefits from less noise irritation from noisy neighbours (brick walls to either side) and, perhaps crucially, can be intermingled with single occupancy buildings seamlessly. Without looking at the number of doorbells, it is often difficult to tell which buildings are houses and which are flats. However the London Housing Design Guide is making this popular high density form of housing very difficult to build due to the high cost of a lift and the opportunity cost of the space it takes up.²³

A range of associated rules and principles only add to this effect. London Housing Design Guide Clause 3.2.7 is also a Priority 1 Standard and states:

‘Every designated wheelchair accessible dwelling above the ground floor should be served by at least one wheelchair accessible lift. It is desirable that every wheelchair accessible dwelling is served by at least two such lifts.’

Clause 3.2.5 is a Priority 2 Standard which is ‘strongly recommended as best practice but not required.’ It states that:

‘for buildings entered from communal circulation at the first, second or third floor where lifts are not provided, space should be identified within or adjacent to the circulation core for the future installation of a wheelchair accessible lift.’

These clauses only heighten the impact of clause 3.2.6 and make it hard to build flats in terraced houses.

Priority 1 Clause 4.3.2 makes it just as hard to build conventional terraced houses as individual homes. It requires that:

‘dwellings of more than one storey should incorporate potential for a stair lift to be installed and a suitable identified space for a through-the-floor lift from the entrance level to a storey containing the main bedroom and an accessible bathroom,’

This rule makes it very hard to build narrow terraced houses with bedrooms potentially on the second floor. Other than in very large houses, stairs tend to be too narrow or too steep. Windows are often required on middle landings to provide light which this rule makes difficult. Often, there is just not the space for a through-the-floor lift without ruining the modest intervening rooms.

All of this stops streets being created. Not all houses suit all people. Many older people may prefer to live in streetscapes, even if this is not as easy for them. If not, developers will build homes that take account of these standards voluntarily. People should be free to choose what homes they live in, not have this dictated to them. As noted earlier, while for public buildings it seems reasonable to require particular rules so that all can access them, private

²³ In very high cost areas higher rents can justify the higher costs and lost space of building a lift for a relatively small number of flats.

residences are not the same, and nor should they be treated as such. At any rate it seems over the top to require all new homes in a densely developed city such as London to meet these criteria.

Recommendation three: clauses 3.2.6 and 4.3.2 should be made Priority 2 Standards or they should be changed to stipulate that they are only required for a certain percentage of new units. There is no need for London to be regulating more tightly than statutorily required.

Barrier Four: the best value test

The need to demonstrate 'best value' in all housing developments in which land is being disposed biases the planning system in favour of smaller unit, repetitive, high-rise blocks built quickly for sale, not street-based development which provide slower but normally higher long term returns. By extracting maximum value for land disposal it also squeezes the investment available on the quality of the development.

Local authorities and other public bodies are required to secure 'best value' when disposing of assets and land under the 1999 Local Government Act. 'Best value' is also demanded when existing housing is being redeveloped. In the primary legislation 'best value' was deliberately defined broadly to permit local and specific variation.

'A best value authority must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.'²⁴

Given the range of individual circumstances, it is not unreasonable that the concept of 'best value' has been left open to local interpretation. The problem is that, absent hard and fast rules, local authorities and public bodies have typically found it safest to focus on higher initial land value (and thus much quicker cash returns) over long-term (but ultimately higher) investment returns accruing over time via a co-investment. This is despite the fact that several government studies make it clear that consideration *may* be given to the wider benefits of regeneration.²⁵

It is right that public bodies should be very focused on 'best value' for the taxpayer and discouraged from (essentially) co-investing in property developments by tying a sale price to long term cash flows. However, the unfortunate consequence is that the focus on cash now, warps developers' economic modelling in favour of smaller unit, repetitive, high-rise blocks built quickly for sale. The best ultimate customers for these types of developments are investors rather than owner-occupiers. They worry less about whether this is a 'nice place to live' and are well able to calculate how London's soaring demands for homes can provide their property investment with a very respectable return. Indeed, a startling 74 per cent of recent new build sales have been to non-resident investors seeking a London 'hedge' for their

²⁴ 1999 Local Government Act.

²⁵ For example, DCLG, Valuing the benefits of regeneration, (2010).

exposure in other, less well-established, markets.²⁶ Thus development is biased against the sort of street-based development which provides slower but normally higher long term returns.²⁷

There is a broader problem with the best value test as currently being applied. By effectively forcing maximum value for land-disposal up front, it makes it hard to invest in the quality of a place through good design or good materials which will endure over time. Again, this reduces the long term value appreciation of a development as well as making it a less nice place and a less durable one. As we pointed out in our report *Create Streets*, some recent multi-storey developments have been of very poor quality internal build and design. Such buildings are unlikely to last much longer than their ill-conceived 1960s and 70s predecessors.²⁸

Finally, best value also works hand-in-hand with viability assessments, used by local planning authorities to assess whether or not the developer is making a fair contribution via affordable housing or other social contributions. These assessments use a model called 'price paid' which is based on actual comparable prices paid for land in the market. The problem is that, rather like head-hunter's salary benchmarking exercises, this just bids up land values. Once one developer has paid one price in the hope of securing low levels of social housing provision, it is hard legally to justify selling for less. Thus we have created a vicious circle of high values with low social housing not just justifying but obliging further high value sales with poor design. Developers then need to cover this by seeking consent for ever larger schemes, with lower costs, which again pushes them to build higher-rise, higher-density, largely apartment-led development for quick sale to buy to let investors. This has resulted in land values not reflecting the true cost of the social obligations policy might otherwise require.

The good news is that the Social Value Act 2012 requires public commissioners or local authorities to take into consideration the social value a provider bidding for a community offers when bidding for a public contract. The Act defines social value as, 'a concept which seeks to maximise the additional benefit that can be created by procuring or commissioning goods and services, above and beyond the benefit of merely the goods and services themselves'. This may give public authorities promoting development more scope to go for the option which pays better in the long term rather than in the short term.

Recommendation four: We propose that in anything other than a simple transfer of a building from the public to private sector, the best-value test should include approval of local people either via a vote or neighbourhood plan. Redevelopment should have to win local consent. The mayor may also wish to commission a study of what further guidance could be given to London public bodies on how to take into account the long term returns and wider social impact of development

²⁶ <http://www.bbc.co.uk/news/uk-england-london-22825881>. Accessed in June 2013.

²⁷ Boys Smith, N. & Morton, A. (2013) *Create Streets*, pp. 52-4 for evidence on this point.

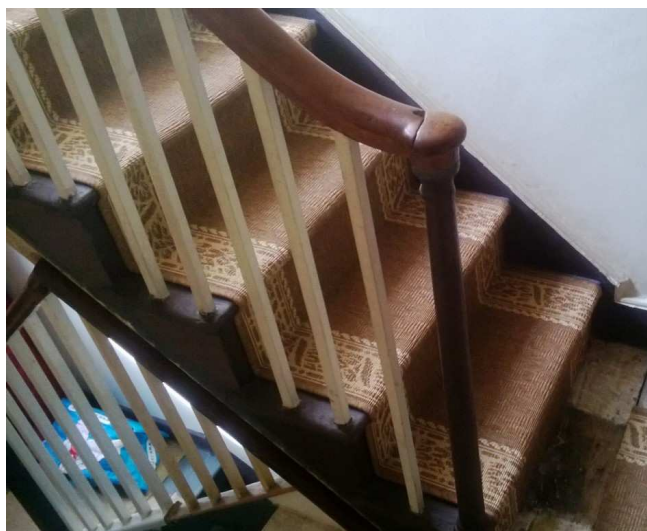
²⁸ Boys Smith, N. & Morton, A. (2013) *Create Streets*, p.18.

decisions to cease biasing the system in favour of fast cash returns versus higher value in the long term. This could specifically include the implications of the Social Value Act 2012 and the right approach to viability assessments.

Barrier Five: rules against staircases

The London Design Guide is rich with rules against staircases being too narrow or too steep and banning them to the front door or into the garden. These make it harder to build the conventional tall but thin terraced houses so typical of London and so good at providing high-density living. They also make it hard to 'match' historic homes or flats in places such as Pimlico or Kennington where many buildings have external steps to the front door

Priority 1 Standard Clause 3.2.8 requires that 'principal access stairs should provide easy access regardless of whether a lift is provided.' An easy access staircase is in turn defined as 'one having maximum risers (the height of the steps) of 170mm, minimum goings (the depth of the treads) of 250mm and a minimum width of 900mm measured 450mm above the pitch line.' Such a wide and shallow staircase makes it harder to build all but the largest narrow but tall terraced homes. Several conventional London terraced homes tested in the inner suburbs and worth between £0.5m and £1m failed one, two or all three of these tests²⁹. Desirable homes are being stopped due to over-zealous regulation.



These typical London terraced house stairs fail the London Design Guide

Priority 1 Standard Clause 3.1.3 demands that, 'the approach to all entrances should preferably be level or gently sloping' following Lifetime Homes Criterion 3. Similarly, Priority 1 Standard Clause 4.10.2 requires that 'private outdoor space should have level access to the home.' Again these are in principle laudatory requirements to make new homes wheelchair-friendly but in practice bias the system against the type of tall narrow house on multiple

²⁹ Even more startlingly so too did some 1920s semi-detached houses in the outer suburbs.

levels in which London historically excelled. In order to squeeze in an extra storey without too much additional cost, many of these had lower and raised ground floors. That is now impossible. This rule (like several others) is less constraining for larger houses. It is more difficult when attempting to design smaller terraces of houses and low rise flats.

Not all homes need to be suitable for all people at all times of their lives. Different sites will naturally demand different types of housing and people should be able to choose the homes that suit their needs. To demand that all central London homes be built to accommodate those with mobility constraints is well-intentioned but taking a hammer to crack a nut.

Recommendation five: clauses 3.1.3, 3.2.8 and 4.10.2 should be made Priority 2 Standards or they should be changed to stipulate that they are only required for a certain percentage of new units. There is no need for London to be regulating more tightly than statutorily required.

Barrier Six: requirement that ten percent of homes be fully wheelchair accessible

A requirement that ten percent of homes be fully wheelchair accessible does not sit neatly with the uniformity of terraced houses and biases the system in favour of large, partially off-road, blocks.

Priority 1 Standard Clause 4.9.1 states that ‘Ten percent of new housing should be designed to be wheelchair accessible or easily adaptable for residents who are wheel-chair users.’ This in turn requires (according to Priority 1 Standard Clause 3.2.7) that ‘every designated wheelchair accessible dwelling above the ground floor should be served by at least one wheelchair accessible lift’ and preferably by two lifts. This makes a terrace of say ten externally identical houses much harder to build. No one would want to argue with the principle of adequate levels of wheelchair access across the housing stock as a whole. But why does this need to be centrally stipulated? Is it so unlikely that developers and social landlords will meet the demand for wheelchair-accessible buildings? And, even if it does need to be centrally stipulated, it is surely perverse that *every single development* needs to provide ten percent of wheelchair accessible housing. As above, not all homes need to be suitable for all people at all times of their lives. Different sites will naturally demand different types of housing and people should be able to choose the homes that suit their needs. To demand that all central London homes be built to accommodate those with mobility constraints is well-intentioned but counter-productive.

Rather than insisting that every development has ten per cent wheelchair access, why not permit one development of a street of medium sized blocks with lifts where 100 per cent are wheelchair accessible (not everyone who lives there has to be in a wheelchair) and permit other streets to be developed with fewer restrictions. Within the external form of a conventional terraced street it would be perfectly possible to develop laterally accessible flats which are perfectly wheelchair accessible. These could span three, four or even five

'houses.' Vertical houses or more cheaply developed and modestly proportioned vertically accessible flats could then provide the rest of a new street in a cheaper and higher density format.

Recommendation six: clauses 3.2.7 and 4.9.1 should either be made Priority 2 Standards or else should be replaced with a requirement on the local authority to ensure that an adequate supply of wheelchair accessible residences are provided in their community. In some outer London neighbourhoods this might be more than ten percent. In some inner London communities with a younger population, it might be lower.

Barrier Seven: dislike for on-street parking

A dislike for on-street parking biases the planning system against conventional terraces and streets. Priority 1 Standard Clause (3.3.3) states that:

'Careful consideration should be given to the siting and organisation of car parking within an overall design for open space so that car parking does not negatively affect the use and appearance of open space.'

We understand that this rule is often used by planning authorities to prevent on-street parking (though such parking does not seem to turn Chelsea, Notting Hill or Pimlico into dangerous slums). It is reinforced by Priority 1 Standard Clauses (3.1.2 and 3.3.4) which contain detailed rules for the clearly preferred model of 'car parking within the dwelling plot.' Yet again the rules are biased against terraced streets which require cars parked in streets. It is sometimes possible to design gated mews in blocks of terraced houses that permit off-street parking but this comes at a cost and lowers densities. Local people should decide what type of parking is suitable for their area through neighbourhood plans on major redevelopment, not London-wide requirements.

Recommendation seven: clauses 3.3.3 should be re-drafted to make clear that on-street parking is a perfectly acceptable form of parking provision in many circumstances.

Barrier Eight: heavy requirements for bike storage

Heavy requirements for bike storage make it much harder to build terraced flats and smaller terraced homes and bias the system in favour of large, partially off-road, blocks.

Priority 1 Standard Clause 3.4.1 requires that,

'All developments should provide dedicated storage space for cycles at the following levels:

- 1 per 1 or 2 bedroom dwelling; or
- 2 per 3 or more bedroom dwelling.'

Again, few would argue with the aim of a less noisy, less polluted city with fewer cars and more bicycles. But again, unintended consequences kick in. These rules provide no problem for large multi-storey buildings with much communal space. They are much more difficult to meet for some densely terraced homes perhaps with no real front garden and modest back gardens. It is possible to design blocks of terraced houses with small gated mews behind which permit easy bike storage. However, this is not possible on all sites and it comes at a cost in density. Yet again the system is unintentionally biased against conventional narrow but tall London terraced 'homes' – particularly if they are flatted.

Recommendation eight: clauses 3.4.1 should either be made a Priority 2 Standard or re-drafted to accept that dedicate bike storage will not always be possible in smaller non-multi-storey developments.

Barrier Nine: requirements for bathrooms on every level with a main bedroom

Onerous requirements for bathrooms at entrance level and at every level with a bedroom make it harder to build conventionally tall but thin modest London terraced buildings to be used as homes. Priority 1 Standard Clause 4.6.2 requires that:

'Where there is no accessible bathroom at entrance level, a wheelchair accessible WC with potential for a shower to be installed should be provided at entrance level'

Priority 1 Standard Clause 4.6.3 adds that, 'An accessible bathroom should be provided in every dwelling on the same storey as a main bedroom.'

Again the aims behind this clause are clear and to be supported. Everyone needs to go to the bathroom. Unfortunately, the practical impact of imposing it ubiquitously is to bias the system in favour of homes which are wide and flat (i.e. flats in large blocks) rather than homes which are thin and high (i.e. terraced houses). Tall thin homes with fewer rooms per floor are exponentially more impacted by these rules than wide flat ones. As with some of the rules discussed above, it cannot be logical to assume that all developments in a city as large and complex as London need to be built for those with mobility issues.

Recommendation ten: clauses 4.6.2 and 4.6.3 should be made Priority 2 Standards or they should be changed to stipulate that they are only required for a certain percentage of new units. Yet again, there is no need for London to be regulating more tightly than statutorily required.

Barrier Ten: requirements for 'weather protection' over front doors

Priority 1 Standard Clause 3.1.4 requires 'weather protection' over front doors and adds yet more cost to terraced streets with multiple entrances. Again it makes it harder to 'fit-in' development to streets where other houses have no

porches. As a modern glass porch above door probably only costs around £500 per door, this issue is not as important as any of the other issues listed above. However, it is included for completeness.

Recommendation nine: clauses 3.1.4 should either be made a Priority 2 Standard or re-drafted to accept that porches will not always be possible or appropriate in conventional smaller or on-street developments.

Barrier Eleven: specifications which make it hard to match the London vernacular

Several rules on windows and room heights make it harder to build terraced (or indeed any) buildings which obey the classical rules of proportion and 'look right' as you drive past them. This does not make it hard to build terraced streets. But it does make it harder to build houses or flats which 'fit-in' with existing neighbours or which echo the classic, much-loved London vernacular style of the terraced house.

For several hundred years the Palladian rules of classical architecture were handed down to self-taught builders, developers and joiners (there were no formally qualified architects) in a series of practical and workmanlike guides.³⁰

Without arguing for a moment that *all* new homes should emulate these proportions, it certainly does not seem unreasonable to assume that *some* new homes should be allowed to. This is a decision that those who live near new development seem best placed to make. Unfortunately some rules in the London Housing Design Guide make this all but impossible.

Priority 1 Standard Clause 4.4.6 requires that windows in the 'principle living space should start 800mm above finished floor level (+/- 50mm).' The stated reason for this is 'to allow people to see out while seated' though why this rule requires a minimum height as well as a maximum is unclear. In any case the tall rectangular sash windows so typical of the English vernacular style often fall foul of this rule often by starting *too near the ground*. They are perfect to see out of while seated. However, they fail the London Housing Design Guide.

Priority 1 Standard Clause 5.4.1 requires that habitable rooms must have a floor to ceiling height of 2.5m and are encouraged to have a floor to ceiling height of 2.6m. This seems a very reasonable response to recent (correct) concerns about the pokey proportions of many newly-built homes. The problem is that, unless it is positively large, a conventional terraced house which also obeys the classical rules of proportion is likely to have lower ground and second floors which are about 2.1 and 2.3m tall. This is not to say that single-storey flats should be permitted with diminutive ceiling heights but historic homes with some storeys that fail the ceiling height rules seem to remain very popular. Again greater flexibility would appear to be wise.

³⁰ For example books such as Peter Nicholson's *The Carpenter's New Guide* (1792) or *The Builder and Workman's New Dictionary* (1824) .

If you have ever asked yourself why a superficially ‘traditional’ but nevertheless new building ‘looks wrong’ it will probably be because the relative proportions of the windows and the heights of the upper and lower storeys are ‘wrong.’

Recommendation eleven: clause 4.4.6 should be scrapped and clause 5.4.1 should be re-drafted to make clear that conventionally proportioned buildings with some lower storeys are permissible as long as individual apartments are not entirely constrained within these storeys.

The cumulative impact of these barriers

The current London Design Guide is not a level playing field. It is biased against the most popular form of London housing (the house in a street) and in favour of the least popular (large slab-based, multi-story developments). We are building homes to please stakeholders not people. Worse, the rules interact not just to make *some* types of terraced street hard to build but to make nearly *all* types of terraced streets hard to build.

- **House and flat.** Some rules (e.g. 3.2.5, 3.2.6, 3.2.7 and 3.4.1) make it hard to build vertical flats in street-type buildings Others (e.g. 4.3.2, 4.6.2 and 4.6.3) make it harder to build houses in terraced streets.
- **Large and small.** Some rules (e.g. 3.2.6) hit large terraced buildings much harder. Most (e.g. 3.1.3, 3.2.8, 3.4.1 and 4.10.2) make it harder to build smaller buildings
- **Cars and bikes.** Some clauses (e.g. 3.4.1) assume heavy bike use by residents. Others (e.g. 3.3.2 and 3.3.3) assume higher reliance on cars.

It would seem that under the current rules, terraced streets (and those who want to live in them) just can’t win. If they are flats, they need lifts. If they are houses they need multiple bathrooms. If they are large, they need multiple lifts. If they are small they will struggle to fit round mandatory staircase angles or rules on bicycle storage.

This all amounts to **an important and material bias in the London Housing Design Guide against conventional terraced streets.** This is a shame. Not just because streets are provably more popular with better long term outcomes for residents.³¹ It is also a shame because this anti-street bias is against the stated aim of the London Design Guide itself. The Introduction to the Guide celebrates London’s terraced houses and supports a ‘street-based urban arrangement.’ Unfortunately by making high density conventional terraced houses and flats all but impossible for any scheme which has any social housing (and almost any scheme of ten or more homes does) the London Design Guide is undermining traditional high density busy streets. Certainly many of inner London’s most popular (and expensive) streets would be very hard to build under current rules.

³¹ See Boys Smith, N. & Morton, A. (2013) *Create Streets*, chapters 2 and 3 for extensive evidence on these points.

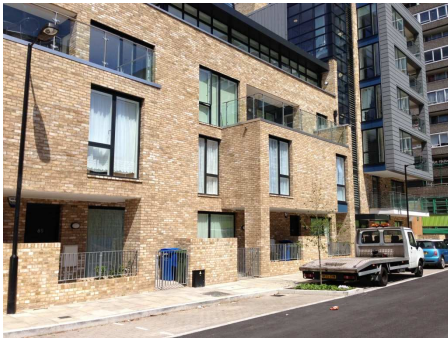


So great is the demand and so limited the supply that houses on this street sell for many millions. They fail the London Housing Design Guide on multiple points

To meet the Guide's requirements many new houses are wider, lower and more lavish in their use of ground floor space than was traditionally the case (though, due to fewer storeys, they are often smaller than historic three, four or five storey houses). The necessary consequence of this, so as to meet demanding density targets, is that a new generation of high rise and large slab blocks is also required to meet demand.

A classic example of this is Phase 1A redevelopment of the Aylesbury Estate in South London. Some quite nice wide low rise houses have been built. They are not very obviously from London but they are, on the face of it, good homes. The problem is that their density is probably only half to two thirds that of the density of London houses built in the same space 200 years previously. How do the master-planners get round this dilemma and 'solve' the need to deliver enough 'units'? By building high-rise blocks of course. And that is what they have done. Immediately to the north the new houses are overshadowed by two six and seven storey slab blocks surrounded by indeterminate open space. To the South two even higher new ten storey tower blocks block the light, obscure any onward view to Burgess Park and would appear destined to be surrounded by the same indeterminate semi-private, semi-public space that blighted their 1970s predecessors.³²

³² At time of writing (May 2013) the construction was still unfinished so final status of public realm still not clear.



Nice wide new houses . . .



*. . . but the price is new tower blocks.
Can you spot the difference between
1970s & 2013 ?*

From the outside at least the ‘face’ that the Aylesbury Estate presents to the park appears little changed. A 1970s slab block and two modern tower blocks sit side by side in this corner of the Aylesbury site. From a distance, it is not clear which is which.³³

Just as bad, the cost pressure imposed on entrances and stairwell to be wide, flat and shallow with very ample provision for lifts is pushing designers to ‘hang’ as many apartment entrances off the same stairwell as possible. This is perfectly repeating the design errors of the 1960s and 1970s. Research has convincingly shown that too many front doors off the same stairwell and semi-public, semi-private space are significantly correlated with high crime and a sense of alienation even when you adjust for socio-economic status.³⁴ That is what, too often, we are now providing again. In the new rebuilt sections of the Aylesbury Estate, some doorways lead to over 30 flats and the public have potential access to the stairwell. In addition, streets are not being developed to lead anywhere and street frontage is being wasted in blank walls and ground floor car parks. All the lessons of the 1960s and 1970s would appear to have been forgotten. What makes it all the more depressing is that this appalling urbanism is regarded as best practice and has been nominated for several awards, so divorced has the supply of buildings become from what people actually want.³⁵

³³ The confusion looks set to last. As funding has fallen through on the next phases, the residents of new houses have for the foreseeable future a huge 1970s slab block to their west in addition to the (modern) slab blocks to their South and North.

³⁴ For example see Newman O. (1996) *Creating Defensible Space* or Gifford R. (2007), ‘The Consequences of living in High-Rise buildings’ in *Architectural Sciences Review*, vol. 50. There is a fuller discussion of the literature in chapter 3 of Boys Smith, N. & Morton, A. (2013) *Create Streets*.

³⁵ <http://www.levittbernstein.co.uk/architecture/housing/totters-court?image=4&page=1> accessed in September 2013. The scheme’s defenders point to the large space standards in the new flats and to their dual aspect, facing South or West. It is worth pointing out that the original Aylesbury estate also had very many large flats.



This widely praised and visually elegant new development is a rational response to London design rules. Unfortunately it repeats nearly all the design errors of the 1950s, 60s and 70s which are significantly correlated with high crime and feelings of alienation even when you adjust for socio-economic status. There are multiple front doors of the same stairwell, potential public access to that stairwell and a 'wasted' street that is normally empty due to the limited interest of blank wall and car park entrance to the general public.

Conclusion: summary of policy proposals

In order to end this important and material bias in the London Housing Design Guide against conventional terraced streets we have suggested the following eleven changes to the Guide, the London Plan and the use of the Best-value test in London. Underlying all of these changes, it should become much easier for communities to make decisions about what standards are applied to new builds in their neighbourhoods.

1. Density targets: the impact on social housing for families of PTAL targets in the 2011 London Plan above 150 units/hectare should be reviewed. Some of the ultra-high density targets currently being demanded should be reduced or removed as they are counter-productive.
2. Open space and gardens: Key performance indicator 3 should be adjusted to permit the recycling of open land into streets or gardens when the plan is approved by a local community via a neighbourhood plan referendum
3. Lifts: clauses 3.2.6 and 4.3.2 should be made Priority 2 Standards or they should be changed to stipulate that they are only required for a certain percentage of new units. There is no need for London to be regulating more tightly than statutorily required.

4. 'Best-value' test: in anything other than a simple transfer of a building from the public to private sector, the Best-value test should include approval of local people either via a vote or neighbourhood plan. Redevelopment should have to win local consent. The mayor may also wish to commission a study of what further guidance could be given to London public bodies on how to take into account the long term returns and wider social impact of development decisions to cease biasing the system in favour of fast cash returns versus higher value in the long term. This should include the implications of the Social Value Act 2012 and the right approach to viability assessments.
5. Staircases: clauses 3.1.3, 3.2.8 and 4.10.2 should be made Priority 2 Standards or they should be changed to stipulate that they are only required for a certain percentage of new units. There is no need for London to be regulating more tightly than statutorily required.
6. Wheelchair access: clauses 3.2.7 and 4.9.1 should either be made Priority 2 Standards or else should be replaced with a requirement on the local authority to ensure that an adequate supply of wheelchair accessible residences are provided in their community. In some outer London neighbourhoods this might be more than ten percent. In some inner London communities with a younger population, it might be lower.
7. On-street parking: clauses 3.3.3 should be re-drafted to make clear that on-street parking is a perfectly acceptable form of parking provision in many circumstances.
8. Bike storage: clauses 3.4.1 should either be made a Priority 2 Standard or re-drafted to accept that dedicated bike storage will not always be possible in smaller non multi-storey developments.
9. Bathrooms: clauses 4.6.2 and 4.6.3 should be made Priority 2 Standards or they should be changed to stipulate that they are only required for a certain percentage of new units. There is no need for London to be regulating more tightly than statutorily required.
10. Weather-protection: clauses 3.1.4 should either be made a Priority 2 Standard or re-drafted to accept that porches will not always be possible or appropriate in conventional smaller or on-street developments.
11. Windows & room heights: clause 4.4.6 should be scrapped and clause 5.4.1 should be re-drafted to make clear that conventionally proportioned buildings with some lower storeys are permissible as long as individual apartments are not entirely constrained within these storeys.

The Government is currently consulting on Housing Standards. They would appear minded to go for what they term a 'three tier' approach to housing standards.³⁶ This means that all new homes need to meet a 'national

³⁶ DCLG (2013), Housing Standards Review Consultation, p. 23.

regulatory baseline', some are expected to meet higher criteria for accessibility and a smaller number an even more stringent criteria for wheelchair access. The approach in London is considerably more stringent with all new homes expected to meet criteria that elsewhere in the UK are deemed only mandatory for a far smaller proportion of new homes. The Government's review presents City Hall with an excellent opportunity to cease gold-plating national standards. This would encourage more, and more popular, development. All of London, and all Londoners, would benefit.

CREATE streets

Why aren't we building more streets in London?

The complex planning system in London requires too many homes in multi-storey blocks designed by committee rather than streets for which there is greater popular demand. We are building homes for stakeholders not people. Most people strongly prefer houses and low rise flats on streets and are happier when they live in this way.

There is an opportunity to deregulate and simplify the London Housing Design Guide so that it is easier and cheaper to build the types of high density conventional streets in which most people want to live. This would help solve the housing crisis and deliver more, and more popular, housing.

There is currently an important and material bias in the London Housing Design Guide against terraced streets. This is because London is gold-plating national housing standards. This bias is despite strong support in the introduction of the London Housing Design Guide for terraced houses and a 'street-based urban arrangement'.

This paper outlines eleven key barriers to building streets in London embedded in the London Housing Design Guide and in the London Plan and makes detailed and specific recommendations on how to change them. Underlying all our recommendations is the belief that local communities should be given more power to choose to what degree they wish to impose these standards on new builds

The current Government review of Housing Standards presents City Hall with an excellent opportunity to cease gold-plating national standards. This would encourage more development and more popular development. All of London, and all Londoners, would benefit.

£5.00

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