



London Housing Design Guide – Draft for Consultation

G.15 Response

Introduction

G15 is a group of London housing associations and comprises:

A2 Dominion Group	Metropolitan Housing Trust
Affinity Sutton	Notting Hill Housing
AmicusHorizon Group	Network Housing Group
Catalyst Housing Group	Peabody
Circle Anglia	Southern Housing Group
East Thames Group	The Hyde Group
Family Mosaic	The L&Q Group
Genesis Group	

G15 makes a significant contribution to London life. Collectively, G15 associations house around one in ten Londoners and manage around 410,000 homes. We build over 10,000 new homes every year. We invest over £25m annually in economic and community development to create thriving, sustainable neighbourhoods across the capital.

G15 welcomes the opportunity to participate in this consultation process, we are supportive of the higher design standards across all tenures and we are keen offer to work with the GLA to identify and seek to resolve issues which we feel will arise through the implementation of new standards and any transitional arrangements which may need to be put in place.

We believe that G15 associations have a key role in delivering much-needed homes across the capital – both now and in the future. Housing associations have, over a number of years, delivered large-scale building programmes. We have the resources, access to finance and skills to continue to do this and to move quickly. G15 organisations have a good history of working with the GLA, HCA and local authorities and we look forward to continuing and expanding our partnerships.

Comments and Observations

We have some observations relating to some of the areas dealt with in the consultation document:

- 1.0 We believe it is vital that the final version of the standards is applied, regardless of tenure, to all new developments. We would be concerned if different standards were required for grant funded homes. This is because the design implications of higher floor to ceiling heights and larger units on structural grids are likely to encourage the provision of affordable housing isolated in separate buildings, in the less favourable locations on sites, and in some cases, off-site altogether. Applying different standards to grant funded homes could have detrimental implications for mixed and balanced communities. G15 has worked hard over many years to promote mixed tenure, this is borne out of our experience of the failure of mono tenure in both our own stock and in that which we have taken via stock transfers from Local Authorities.

We urge the GLA to apply the new standards on a level playing field.

2.0 We have concerns that the new standards will increase costs. While we support the requirement for standards on both grant funded and private sale homes to be the same this will reduce contributions from S106 as well as cross subsidy from homes for sale developed by Housing Associations, further increasing grant requirements (unless rent restrictions are relaxed). Particularly - space standards, floor to ceiling heights, room sizes and fenestration, presumption against single aspect - all have implications on achievable land use densities, resulting in lower residual land values and fewer sites coming forward.

2.1 There are particular risks with regeneration schemes. Almost all our projects are on brownfield land. These sites often have substantial clean up costs. Lower density and/or higher building costs may reduce the residual value of such sites below zero or existing use value, making it impractical for landowners to dispose for redevelopment.

We seek flexibility on applicability and funding to enable projects to remain viable.

3.0 In London we already have a plethora of existing local authority design guide standards many of which are adopted policy, in addition to Lifetime Homes, CSH and Building Regulations. Some of these already conflict, and the Draft London Housing Design Guide contains some conflicts with existing standards. Conflicting guidance is confusing and creates delays through the planning process.

The Guide should be flexible enough to complement not conflict with existing standards and funding requirements. We seek a clear and unified approach to interpretation.

4.0 London is celebrated for its diversity and rich urban grain, new development in London is by definition diverse in its type and size of scheme, setting, location and social make-up. Around half of the HCA's programme in London is delivered on smaller infill sites and we have concerns that the increased standards, in particular the requirements for balcony space and presumption against single aspect, may make these sites unviable.

4.1 In addition it is not yet clear what implications these standards would have on the plans to encourage an active market rent sector funded by institutional investment. It is considered they are likely to create additional obstacles.

We call for the guide to be flexible enough to recognise the diversity of London and whilst setting broad principles also allow viable solutions in all locations.

5.0 A large part of our new construction in London is in the re-development of old poor quality estates. There is a general presumption against no net loss with increases in density to create cross subsidy. An initial review of example schemes indicates that the new space standards may typically result in a 10% reduction of dwellings on site, with implications on the overall numbers in the programme, and for the London wide housing targets. The current funding model is already under severe stress and we have some concerns that application of the new standards will have a large impact upon the business plans for regeneration projects.

5.1 In addition, there will be an impact on larger phased schemes, especially regeneration schemes where the financial viability has been based on current standards. Careful consideration will need to be given to the timing of the introduction of new standards, and how they will affect schemes with existing planning permissions. Transitional arrangements may need to be agreed for these schemes. This will be particularly important where affordable housing has been brought forward and market sale deferred to maintain progress during recent difficulties.

We suggest a need for transitional funding arrangements or applicability restricted to un-consented schemes only.

We hope these thoughts are helpful in shaping the guide as a template for shaping a better designed London of the future and reiterate our keenness are to develop these thoughts with you as part of the consultation process leading up to the finalisation of the Guide and plans for its implementation.

Stephen Howlett
Chair G15
45 Westminster Bridge Road
London
SE1 7JB

020 7021 4229
stephen.howlett@peabody.org.uk
www.g15.org.uk