



A DIRECT PLANNING REVOLUTION FOR LONDON?

The next Mayor should stop asking
how to build more homes
and start asking how to make new
homes more popular

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Introduction

London and the South East have a housing crisis. France has overtaken Britain as a home-owning democracy. So far, so anodyne. But why? "NIMBYs" incant frustrated developers. "Greenbelts" invoke irate LSE professors. "Timid politicians refusing to reform the planning system" shout furious lobby groups. But they are all wrong. Or at any rate they are insufficiently right. They are dealing with symptoms not maladies.

One of the key reasons we have a housing crisis is because new housing, new neighbourhoods and new multi-storey blocks are consistently, unambiguously and predictably unpopular with most people most of the time. This is (very nearly) as true of London as it is the rest of the country. And looked at through this prism, the London housing crisis is a problem of lack of sufficient political consent for new development. Politicians trying to 'fix' the problem have been consistently asking the wrong question. They have been asking; 'how do we build more homes?' They should have been asking; 'how do we make new homes more popular?'

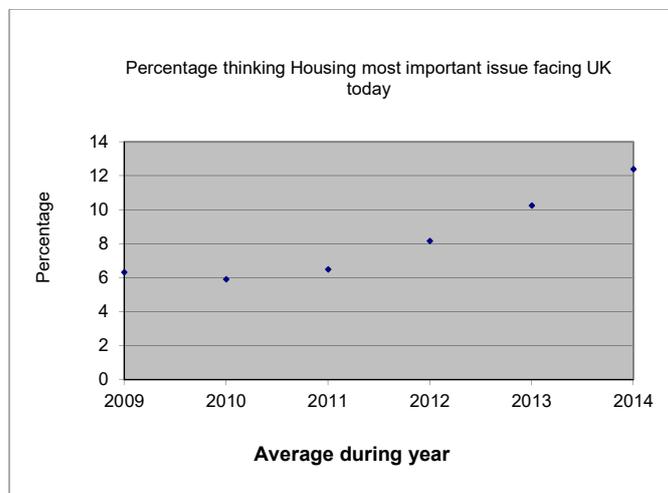
If you could make Londoners not just accept but *love* new buildings and neighbourhoods, *argue* for them, *lobby* for them, then most other problems would, over time, fade away like ghosts at cockcrow. If this seems overly-simplistic then consider the evidence. And, if you dare, consider what you *could* do about it by turning the entire planning system on its head and using the planning system to help the market deliver the homes people actually want to see built in their communities rather than continuously frustrating it.

1. What do Londoners want?

1.1 The UK Context

As some things change, others stay the same. Ben Marshall of Ipsos-MORI has described the recent change in public attitudes on new housing as 'one of [the] most remarkable shifts in public opinion in the last five years.'¹ It is certainly stark. In 2014, according to the British Social Attitudes survey, 56% of English adults supported the building of new homes locally. This was double the proportion in 2010. This is great news but (as we shall see) it remains highly conditional. Meanwhile, housing has been rising in importance as a political issue for some years. By the 2015 general election, 69% of Britons agreed that 'unless we build many more new, affordable homes we will never be able to tackle the country's housing problems.'

Figure i – Percentage thinking Housing most important issue facing UK today²



But *what* should we build? What will British people support and what do they want to see built near them? Here the views of the British public seem to be remarkably consistent over time and place. And when you ask these questions, you begin to understand the problem. Put simply, too many of us do not like the typology (typically flats), lay out (smaller), urban arrangement (few 'normal' streets) or style of too many new homes.³ Two thirds of British adults say they would never even consider buying a newly-built home and only 21% say a new home is their preferred option.⁴ And, as our research shows, most of us crave a 'sense of place' that most contemporary housing just fails to provide.⁵

Figure ii sets out a summary of our wider research (not London specific) on what seems to work for most people most of the time or to be correlated with good wellbeing outcomes. In a nutshell it could be summarised as well-connected walkable streets nearly always at human scale, with green space interleaved throughout, with variety within a pattern and normally with at least a good

¹ Marshall, B. (9 June 2015), *Build, build, build (but don't forget quality)*, www.blog.shelter.org.uk/2015/06/guest-blog-build-build-build-but-dont-forget-quality/ Accessed August 2015.

² www.ipsos-mori.com/researchpublications/researcharchive/2905/Issues-Index-2007-onwards.aspx Accessed August 2015.

³ Boys Smith N. & Morton, A. (2013) *Create Streets*, pp. 21-8.

⁴ See RIBA (2009), *Improving Housing Quality*, p.8. HomeOwnersAlliance (2015), *In the rush to build more homes – concern that new homes standards are slipping*. www.hoa.org.uk Accessed June 2015.

⁵ See Prince's Foundation (2014), *What People Want*.

proportion of the architecture feeling like it 'belongs' locally. People like a 'sense of place'. High rise should normally only be for the rich or for commercial uses and almost never for children.

To pick up on a couple of specific points, in poll after poll it is clear that most British people (and most people around the world) would rather live in houses in streets than flats and would almost always avoid tower blocks. In the most recent national survey, in December 2013, 80% of respondents wanted to live in a house and 6% in a flat in a modest building consisting of fewer than 10 units. Only 3% wanted to live in a building with more than 10 units in it.⁶ In 2012 YouGov ran some focus groups on living in skyscrapers. They found that most people would not want to live in a skyscraper due to their desire to go for a walk, their desire to have a garden or their concerns of being trapped if the lift broke down. As one participant put it: 'Too impersonal and large. They're not a home really, they're more for offices etc. Also they're too high, I wouldn't want to live that far off the ground - also there'd [be] no gardens or anything so not really child friendly.'⁷

Figure ii – what should streets and buildings look and be like

What should streets & buildings look and be like	Create Streets
Connectivity	<ol style="list-style-type: none"> 1. Streets that 'plug into' city 2. Highly walkable
Space	<ol style="list-style-type: none"> 3. Minimal internal semi-private space (unless high end residential) 4. Control over who meet, how & when (no corridors) 5. Open space below normally <90m in breadth
Greenery	<ol style="list-style-type: none"> 6. Lots of green space but mainly (not entirely) modest in scale (squares, pocket parks) 7. A high proportion via private or communal spaces 8. Street trees wherever possible
Height	<ol style="list-style-type: none"> 9. Human scale height (2-7 storeys) 10. Limited high rise & only with commercial or high end residential. No children in high rise
Size	<ol style="list-style-type: none"> 11. Blocks not too big or too long 12. Buildings as buildings not blocks 13. Fewer than ~10 units in apartment blocks
Homes	<ol style="list-style-type: none"> 14. As many houses as possible 15. Homes in conventional streets 16. Maximum private gardens 17. Minimal children in flats
Design	<ol style="list-style-type: none"> 18. Strong sense of place "Couldn't be anywhere" – including style & use of materials that normally at least reference memory & locational heritage (though not exclusively) 19. Variety of streets types, design, green spaces 20. Streets that bend & flex with contours of landscape – some surprises !
Density	<ol style="list-style-type: none"> 21. Dense enough to be walkable while providing space 22. From suburban to ~ 230 units / hectare – much harder beyond that

There surveys are consistent with surveys done in the last decade. One 2001 Ipsos-MORI survey found that only 2% of 1,018 British respondents said they wanted to live in a 'modern loft style apartment.' 0% (not a single person) wanted to live in a 'tower block flat'. In contrast, 89% wanted to live in a house in a street.

In another MORI national survey, 67% did not want new tower blocks built for living accommodation. Even if they were not personally forced to live in them, people clearly oppose new

⁶ ING (2013), *Homes in Europe*. Underlying data which was requested directly from ING.

⁷ Globyte, E., *Skyscrapers: why most Lab participants would not live in one* (2012).

high-rise towers.⁸ In a third survey in 2005, less than 1% wanted to live in any sort of high-rise apartment at all.⁹

Though there is a very definite (largely international) market for luxury high-rise (of which more see below), in the round and not surprisingly, given these public preferences, older homes in traditionally-conceived neighbourhoods normally sell for a material premium to new ones on a per square foot basis. This is despite their much lower insulation standards and higher running costs. For example, the Halifax house price data series shows that the prices of 'traditional' pre-1919 homes in a 'conventional' street format in the UK have risen 54% faster since 1983 than their post 1960s equivalents.¹⁰

1.2 London – less different than you might think

Some readers of a more reductionist nature may be thinking none of this matters. Surely design is a second or even third order compared with pounds, shillings and pence? And sophisticated, global Londoners cannot possibly share these pitiable *petit bourgeois* 'prejudices'? No. Design matters. Londoners *do* share these views – or at least most of them do.

A 2013 Ipsos-MORI survey of London's views on architecture and design found that when asked to rank the importance of good architecture and design on a scale of 1 to 10, 62% gave an answer between 7 and 10 and only 9% said between 1-3. Similarly, when asked to rank how important it was that 'buildings and public space in your local area look good and work well' 71% gave an answer between 7 and 10 and only 5% between 1 and 3.¹¹ A series of local studies conducted in 2008 in which approximately 38% of the respondents were from London corroborates this. It asked participants what factors were an 'incentive' in moving to their new home. 'Good interior space' came first (85%) followed by three purely design-based elements: 'appealing design of home' (83%), quality of finish of home (79%) and 'architecture' (76%).¹²

If design matters, what do Londoners want? Some polling as well as pricing data can provide pretty good answers. Another recent Ipsos-MORI survey in London was limited to those aged over 64 (a group *less* likely to support tower block living) and included those between 16 and 18 (a group *more* likely to support tower block living).¹³ Despite this, the results were still clear-cut. Only 27% of those polled would be 'happy living in a tall building.' In contrast 56% would not be happy. The desire not to live in a tall building was also more strongly held. 29% felt strongly about *not* living in a tower

⁸ Most desirable housing types overall were the bungalow (30%), the village house (29%), the Victorian terrace (16%) and the modern semi (14%). *Bungalows are people's choice in England*, MORI 2002. *Tall Buildings – public have their say for first time*, MORI 2001.

⁹ Evans, A., Hartwich O.M. (2005), *Unaffordable housing*. pp. 21-2.

¹⁰ www.lloydsbankinggroup.com/media1/economic_insight/halifax_house_price_index_page.asp. Accessed December 2013.

¹¹ MORI (20 Sep 2013), *New homes: more Londoners prioritise building quality over quantity*, www.ipsos-mori.com/researchpublications/researcharchive/3268/New-homes-more-Londoners-prioritise-building-quality-over-quantity.aspx. Accessed August 2015.

¹² Bretherton, J., Pleace, N. (2008), *Residents' View of New Forms of High Density Affordable Living*, p.20. This corroborates UK-wide research by Savills which found that the two most important issues people search for in their home are the 'neighbourhood' and the 'external appearance.'

¹³ If this statement seems contentious, 33% of those polled aged 16-34 were 'happy living in a tall building' but only 17% of those aged 45 – 64.

block. Only 10% felt strongly about wanting to live in one.¹⁴ This survey was corroborated by a YouGov poll which found that only 33% of Londoners supported more-high rise residential towers.¹⁵

The same patterns emerge locally. A recent study compared three West London estates. They interviewed residents of Old Oak - a post-First World War development of 'homes for heroes', a network of streets and houses with some two storey flats. They interviewed residents of White City - a large 1930s estate with 2000 flats and large balcony blocks with outdoor corridors. Finally, they interviewed residents of Edward Woods - an estate of 900 flats in high and medium-rise concrete blocks. Asked whether they liked living on their estate, residents living in the only low-rise estate with streets (Old Oak) were far happier than the residents of White City and Edward Woods. Six out of ten of the residents of Old Oak interviewed would recommend it as place to live. Only two out of ten would not. By contrast only 43% of the Edward Woods residents interviewed and only 8% of White City residents interviewed would recommend those estates as a place to live. 36% would not recommend Edward Woods as a place to live and 58% would not recommended White City. The difference is stark.¹⁶

Figure iii – Findings of Ipsos-MORI poll into support for brownfield building



Most Londoners prefer not just more human scale homes but also more conventionally-designed ones. An Ipsos-MORI poll that Create Streets recently commissioned asked respondents what buildings they would support being built on brownfield land near where they live. This survey found that 68% of London adults supporting the building of new homes locally on brownfield land. 11%

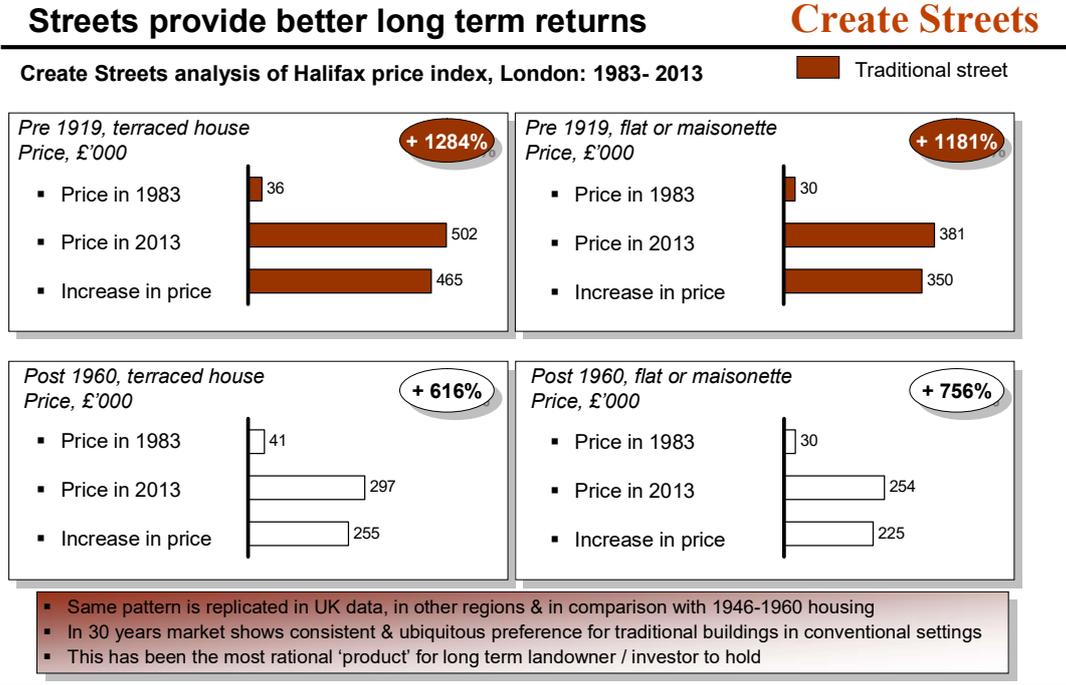
¹⁴ MORI (27 March 2014), *High rise in the capital: Londoners split on merits of more tall buildings*, www.ipsos-mori.com/researchpublications/researcharchive/3361/High-rise-in-the-capital-Londoners-split-on-merits-of-more-tall-buildings.aspx. Accessed August 2015.

¹⁵ Savills (2015), *Regeneration and Intensification of housing supply on Local Authority Estates in London*, p.5.

¹⁶ Lane, L. and Power, A. (2009) *Low income housing estates*. In fact four estates were studied but no detailed interviews were conducted at the fourth so this has been excluded from our synopsis. P. 7, pp. 44-52.

oppose it. These were slightly higher than but still very similar to the views of the wider British public. (64% and 14% respectively). Respondents were then shown five photos illustrating different types of housing and, for each, asked if they would support or oppose the building of 10 similar style homes in their local area. Although Londoners were consistently more supportive of building than in Britain as a whole, *precisely* the same pattern of design preferences emerged in London as in the rest of the country. The most conventional in form, style and building materials won 79% and 77% support. Less conventional, more innovative homes won 37% and 54% support. Based on the wider British data, popular design can clearly change minds. Among the 14% who opposed building 'in principle', half changed their mind for the most popular option.¹⁷

Figure iv– Streets provide better long term returns



Source: Halifax UK Price Index. Other sources & regions demonstrate similar trends

Pricing data corroborates this polling. The same Halifax data series cited above is even more marked in London than in the UK as a whole reflecting the galloping market for Prime London property. 'Traditional' pre-1919 homes in a 'conventional' street format in London have risen by 1284% in price since 1983. Their more modern contemporaries have risen by half as much. Older homes are worth 50-70% more as well.¹⁸

¹⁷ Ipsos-MORI interviewed 1,000 adults aged 15+ across Britain, face-to-face, in-home in May 2015. Data is weighted to the known population profile. www.ipsos-mori.com/researchpublications/researcharchive/3586/Design-influences-public-support-for-new-build-homes.aspx

¹⁸ www.lloydsbankinggroup.com/media1/economic_insight/halifax_house_price_index_page.asp. Accessed December 2013.

Meanwhile, Savills research shows how parts of London which are well-connected and in the form of high-density terraced streets and squares are more valuable, other things being equal, than areas which are not.¹⁹

If this polling and pricing data is correct then proposing more conventionally conceived and designed housing should prove more popular 'on the ground' in London. And it does. The evidence over the last decade could hardly be clearer. It almost shouts at you. For example, in a 2004 survey of residents' views about the redevelopment of the failed forty year old Packington Estate, 91% of respondents wanted no development greater than 3-5 storeys, 81% opposed proposals to build up to 8 storeys and 86% wanted a new development to reinstate the traditional street pattern.²⁰ In 2007, over 80% of residents of one of the iconic British multi-storey housing developments, Robin Hood Gardens, wanted them pulled down.²¹ In 2007, the chairwoman of the tenants association of another London development (the Aylesbury Estate in Southwark) also scheduled for demolition and for rebuilding with more flats and multi-storey housing commented simply, 'I'd rather live in a council house.'²² Of course many other factors influence local views of estate regeneration. The economic offer to tenants, the honesty of consultation and the proposed 'decanting' process also play crucial roles in garnering or not garnering support.²³ But, people's preference for conventional design still shines through.

In 2012, the East London Community Land Trust consulting on how to develop the site of a former hospital, St Clements, near Mile End, found a clear preference from the members for conventional houses in conventional streets.²⁴ And one of the objections made in cases such as Affinity Sutton's (foolish) attempt to demolish the Edwardian Sutton Estate in Chelsea was the preference to keep the existing buildings over the proposed new development (with 350 signatures of protest versus only about 25 supporters).

Create Street's own experience working with communities in London backs this up without exception. We consistently find strong opposition not to development *per se* but to the type of very large and very high buildings which is increasingly typifying too much London building and regeneration. By contrast we find strong support for more conventional street-based developments.

At a 2013 meeting in Southwark a group of largely Somali and Eritrean mothers expressed a very strong, emotionally-charged, preference for a high density conventional urban form typified by such developments as Notting Hill or New York brownstone developments over post-war tower blocks²⁵

¹⁹ Savills Research, (2010), *Development layout*.

²⁰ *Packington Estate Planning brief, Appendix 4* (2005), available at www.isllington.gov.uk accessed in December 2011. The most popular spontaneous feedback to the survey was a request to prevent any building above four storeys.

²¹ Cited in Stewart, G. (2012), *Robin Hood Gardens – the search for a sense of place* (Wild Research), p. 16.

²² Jean Bartlett cited on BBC news report by Jon Kelly, dated 12 July 2007. Available at www.bbc.co.uk accessed in December 2011.

²³ Neville, F., (2015), *Is it right to regenerate down?*. Available at www.createstreets.com. In our experience, normally as or more important in winning support for estate regeneration are the economic offer to residents, approach to decanting and the right to return but design and type of development can and often do play a key role as well. Estate-regeneration is proven to be stressful (not surprisingly) and when economic offer is wrong, consultation is wrong, process is poorly managed no issues of design are likely to compensate – certainly not in the short to medium term. Also see Halpern and Reid, 'Effect of unexpected demolition announcement on health of residents', *British Medical Journal* 304, 1992, pp.1229-1230.

²⁴ Private conversation. *The Guardian*, 20 February 2012.

²⁵ I would like to thank Paul Murrain for his generous help at this (and many other) meetings.

Between 28 June and 12 July 2014, the Mount Pleasant Association asked 258 residents to compare a 'blocks in space' design for the Mount Pleasant site in central London with our more conventional and street-based approach. There was an almost absurdly high 99% preference for the *higher-density* streets-based approach backed up by many of the verbal responses we received. As one neighbour put it 'the whole of London would fight for Mount Pleasant Circus.'²⁶

Figure v – Mount Pleasant proposals



In January 2015 we participated in a short study of how well community-engagement had been run for an estate regeneration for a potential funder. The process had been procedurally well-managed but had been one of what you might term responsive consultation ('this is what we're proposing – what do you think?') rather than true engagement ('what do you like?').

The key questions had therefore never been asked. The tenants had never been asked 'what they liked best' & 'what they most wanted.' The 'tenant's friend' (paid for by the Registered Social Landlord) was even surprised when this issue was checked. 'Why do you ask that?' he said to us. The reason we asked was that the answer from tenants was a stunningly emphatic preference for traditional streets with small private gardens. 'Terraced houses just like in the old days....the old terraced houses were fabulous....we had little yards and we'd talk over the back fences....you could pop over the road....such a strong community.'

The architect had previously said that maximising open space and river views had driven the entire design. When asked if they would trade off some of this for a more conventional urban form, the answer was 'yes, yes, yes.' Given the size of the estate and the densities being targeted something much closer to the apparent preference of the community would have been possible but it was clearly never even considered. It is a tale that could be repeated a hundred times.

²⁶ Boys Smith *et al*, (2014), Mount Pleasant Circus and Fleet Valley Gardens, p. 30.

Fig vi – a traditional East End Street of the type that was more possible than was realised (though with an extra storey or two) – and what they're getting²⁷



Finally, over the last six months we have helped several London communities run a range of local polls to discern local preferences for built form in their neighbourhoods. The results are consistent and further demonstrate with sharp clarity that medium rise developments can secure not just the passive acceptance but the active support of London communities;

- In March 2015, in a survey of 147 residents near Oval, 92% wanted streets and squares of Kennington to act as a template for development and only 8% agreed that the high rise towers of Vauxhall & Nine Elms should be the template. 91% wanted any development to be 8 storeys or below. Only 9% supported development above 9 storeys
- In July 2015, in a survey of 184 residents in Kingston, 83% supported a development of a town centre site at 9 storeys or below. Only 17% supported development above 10 storeys. More generally there was 88% preference for a 'typical' London neighbourhood as opposed to high rise or modern shopping centre and 88% preference for the historic parts of Kingston as opposed to 2% support for 1960s elements and 9% preference for more recent developments²⁸

Some political problems are intractable due to the diametrically opposed view of large sections of the population. The good news is that in the type of housing we should provide at least we do not face this problem. The preference for a clear majority of Londoners for a more conventional model of development is abundantly clear.

The Wisdom of Crowds

As an important aside, this 'prejudice' for a house wherever possible and for a more conventional urban form would appear to be deeply rational²⁹. As so often there is wisdom in crowds. Most people in tower blocks and very large buildings are the least happy with their homes. In seven controlled comparative surveys of people living in multi-storey and in low-rise housing, the people in high-rise blocks were the least satisfied – even if their social and economic status was identical. The evidence also suggests that living in large multi-storey living is correlated with less good social outcomes even when you adjust for socio-economic circumstances. The majority of controlled studies show that the residents of high-rise blocks suffer from more strain

²⁷ Photo on left by © Petr Brož.

²⁸ Survey carried out for Kingston Residents Alliance by Create Streets. www.kingstonskyline.weebly.com

²⁹ For a more detailed study of the points in the following section, also read Boys Smith N. & Morton, A. (2013) *Create Streets*, pp. 29-38. Create Streets will also shortly be publishing more on this subject.

and mental health difficulties than those in low-rise buildings, even when socio-economic status is identical.³⁰

The data would appear to suggest three key reasons for these observed differences. Firstly, the difficulties that multi-storey buildings pose for those bringing up children. It appears to be much harder to bring up children in large blocks of flats – particularly high-rise ones. Several studies show that children go outside less when they live in high-rises and that they spend more time playing alone or in restricted play. This is not without consequences.

Secondly, although none of us are controlled by our environment, the atomising and dehumanising size of multi storey buildings appear to makes it harder for some of us to form relationships or behave well to our neighbours. As Winston Churchill put it (admittedly in a very different context); 'We shape our buildings, and afterwards our buildings shape us.'³¹

Finally, multi-storey buildings can create myriad opportunities for crime due to their hard to police semi-private corridors, walkways and multiple escape routes. More information is available on this subject in *Create Streets* published in 2013.

2. What is spatially necessary and possible?

Here is more good news. We could solve the London housing shortage for a generation, indeed for several generations, without building a single building above five or six storeys and with an entirely conventional urban arrangement interspaced with squares and pocket parks.

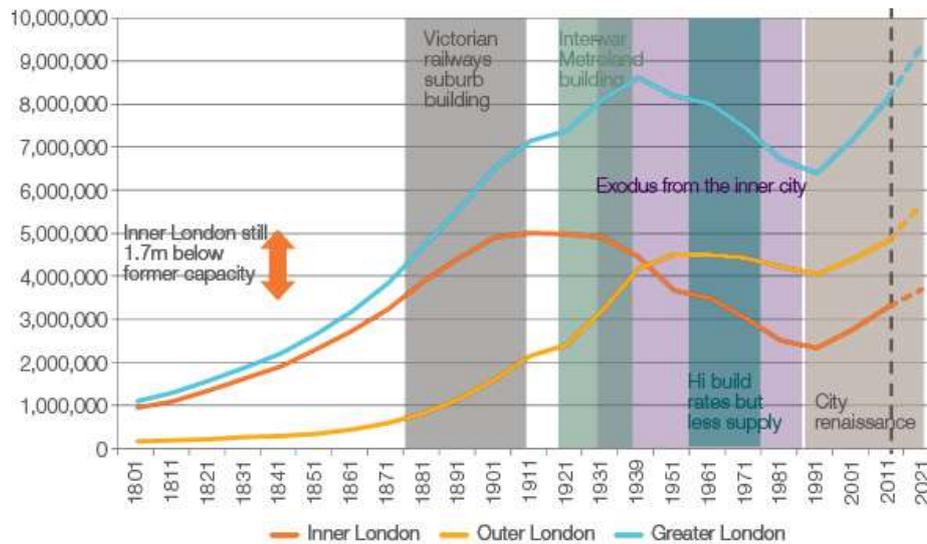
To understand how and why, a little bit of history as well a little bit of geography is necessary. As Yolande Barnes, the Director of World Research at Savills, has pointed out there was a 'dramatic decline' in London's population from its pre-war peak until the mid 1980s. In fact, only in 2015, after 76 years, did London's population exceed the peak (8.65m) of late summer 1939 as Hitler planned his Polish invasion and anxious London parents considered the need to evacuate their children away from the threat of bomber and poison gas.

Even that broad picture hides a more telling fact. The old inner London boroughs had been so overcrowded that their population fall was even more dramatic with an average 67% reduction. Populations in Westminster, Hackney, Southwark, Camden, Islington, Tower Hamlets, Newham, Hammersmith and Fulham, Lambeth and Haringey are all still substantially below their historic peaks.

³⁰ Of a total of at least 82 peer-reviewed academic studies which contrasted socio-economically comparable groups living in high and low-rise accommodation, 67 (or 82%) found that high rise wellbeing was negatively associated with some aspect of wellbeing. Nine (11%) found no association either way. And six (7%) found a positive association between high-rise residency and wellbeing. See Gifford, R. (2007), "The Consequence of living in High-Rise Buildings" in *Architectural Science Review*, vol. 50. See also our forthcoming publication on this subject.

³¹ He was talking about how the House of Commons should be rebuilt following its destruction in a German air raid in 1941. Hansard, 28th October 1943.

Fig vii - population rise, decline and rise in inner and outer London, 1801–2021³²



More crucially still, most of the post-war developments in Britain were influenced by the Le Corbusier ideal of shared spaces. This meant that they surrounded their tower blocks and linked slabs with large open communal spaces. And where more conventional streets of houses were built there were normally of suburban not urban densities – even in inner London. The consequence was that most post-war London developments actually very materially *decreased* housing density. For example, during the post-war rebuilding period the population density of Southwark, the borough that built more high rises than any other comparable area - 9,640, actually *decreased* by two thirds.³³ In Newham the population fell by 20% from 1951 to 1971 as the council built 6,740 tower block dwellings.³⁴ Yolande Barnes has concluded that, ‘the era of very high house-building during the 1950s-70s resulted in a managed decline in housing density which both responded to and accelerated the population exodus....it has proved to be an inappropriate response in the light of subsequent, fast-rising population.’³⁵

Just returning to *half* of the borough-wide historic densities in inner London would provide 17 years housing supply at current projections.³⁶ Almost by definition, such densities should not normally require high rise or large multi-storey blocks. Densities *twice* as high were previously contained within a purely low rise (though unacceptably overcrowded) form.

For the simple fact is that historic urban forms *can* provide high density housing within a dense network of streets, modest private gardens, larger communal gardens, thin terraced houses and medium rise mansion blocks without any over-crowding at all. It is often asserted that London is ‘low density.’ This is wrong. For example the frequent comparisons to Paris often erroneously compare the much larger Greater London region (about 17 people per hectare) with the much small central Paris areas (213 people per hectare). However, if you compare the wider area density of London and Paris - the correct comparison - the contrast is one of 17 people per hectare (London)

³² Savills analysis in Adonis, A., Davies, B. (2015) *City Villages*, p.57.

³³ Coleman, A. (1985) *Utopia on trial*, p. 82.

³⁴ Dunleavy, P. (1981), *The Politics of mass housing in Britain*, p. 48, pp. 205-7.

³⁵ Adonis, A., Davies, B. (2015) *City Villages*, p.57.

³⁶ Barnes, Y. (2015), A tale of Seven Cities, pp. 2-3. Adonis, A., Davies, B. (2015) *City Villages*, p.11.

to 7 people per hectare (Paris). The world median is 9. In fact, a recent comprehensive survey of world city densities by Savills found that;

*'London's population density, expressed as the number of people per hectare, is well above the median for the World City Ranking and only behind the Asian cities of Singapore, Hong Kong, Shanghai, Tokyo and Seoul. London's metro has a higher population density than all the European, American and Australian cities in the ranking.'*³⁷

The same report also found that most of the highest density neighbourhoods were not based on high rise but on dense street grids:

*'High density does not automatically mean high-rise. Very small, core areas like San Francisco's Chinatown accommodate 287 people per baseball field and the Centro district of Madrid, 286. Both of these districts are notable for not housing skyscrapers. Both are a mix of mid-rise, 7-8 storey buildings and lower 2-4 storey terraced city houses, perhaps with a scattering of small towers. Public open space takes the form of streets, some very pleasant and tree-lined. Both environments achieve a higher population density than high-rise, urban Hong Kong –albeit over a much smaller area. London's central character is very similar but over a wider range of boroughs and interspersed with a great deal of open space in the form of gardens, squares and parks. Areas of London which are being redeveloped, more in the style of Manhattan, or the centre of Asian cities are unlikely to achieve such high densities when interspersed with London-style proportions of open space.'*³⁸

In the context, figure viii sets out some of the most popular and perennial types of London street together with the densities they typically provide today (*without* historic over-crowding).³⁹

Figure viii – different densities and urban forms

	Description (example area in London)	Storeys	Homes/ hectare	Habitable rooms/ hectare
1.	Terraced houses (Victorian/ suburban e.g. Wandsworth)	2-3	~50	~250
2.	Terraced houses (Georgian format e.g. Kennington)	4-5	~75	~300
3.	Terraced houses plus a few flats (e.g. Notting Hill)	4-5	~100	~300
4.	Mixture of flats plus some terraced houses (e.g. Pimlico)	4-6	~175	~525
5.	Terraced flats (e.g. Ladbroke Grove)	5-7	~220	~600
6.	Supercharged terraced flats (e.g. Ladbroke Grove with some higher buildings)	5-7 & some up to ~10	~300	~800

Options 5 or 6 might be a reasonable default for zones 1, options 4 or 5 for zones 2 and 3 and then options 1,2 and 3 for outer parts of London depending on other factors. While low rise cannot compete with tight clusters of towers, often very high rise towers actually fail to maximise density.

³⁷ Savills (2015), *The World and London*, p.8.

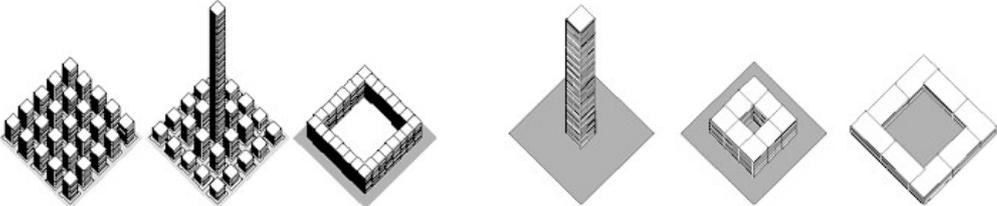
³⁸ Savills (2015), *The World and London*, p.9.

³⁹ Densities provided by built form change over time. For example areas such as Ladbroke Grove saw densities shoot up at the end of the nineteenth century as singles houses were converted into multiple occupancy and then become slums. Density then fell post war as over-crowding was eased. However most buildings remain flatted so densities remain higher (~200-230 dwellings / hectare) than first planned when the area was developed. Densities of residents will less discrepant to historic intent due to large Victorian households including servants living under one roof. Thus the built form of a traditional street pattern has proved very adaptable to changing local economic fortunes and wider social patterns.

As figure ix shows perimeter blocks with a spacious courtyard both in practice and in theory can often match the floor space of a tall tower. And they can do so with a lower lifetime costs and with a higher percentage of the floor space being useable (a better net:gross ratio as the industry puts it).

For the land clearly *is* there to build *en masse* at such liveable and popular densities. We don't need to build at hyper-density to 'solve' the London housing crisis. Some of this could be on post-war estates (where, for the avoidance of doubt, existing residents should not just be at the heart of the design process but have a firm right to return on similar terms and with normally only one move). But there is a lot of other publicly-owned land out there which could be built on as well.

Figure ix – different ways of delivering the same volume in theory as in practice streets and square often equal towers⁴⁰



How much? The short answer is that at present no one quite knows. The public sector has estimated to own 40% of land suitable for development.⁴¹ However, given the very poor state of some public sector data management, we suspect that this is an under-estimate. When the London Chamber of Commerce recently asked the 33 London boroughs how much brownfield land they owned via Freedom of Information requests only seven were only able to give full responses. Only 13 boroughs provide information to the (voluntary) National Land Use Database.⁴² Transport for London claims to own 2,307 hectares (which seems low).⁴³ We have not been able to find reliable data for the NHS though one very rough estimate (based on available valuation and Gross Internal Area data which is available) is that they might own around 1,800 hectares around London. Lord Adonis has estimated that there are 3,500 council estates around London. And we are aware of another professional estimate that post war estates account for around 12,500 hectares. The London Land Commission initial January 2016 estimate (apparently a 'starting point') is that 130,000 homes could be built on 40,000 public sector sites across London. At the time of writing it is not yet clear what density this is based upon.⁴⁴ Figure x sets out some of the currently available data. It appears as if available public sector land in London is the equivalent of between 150 and 190 Hyde Parks.

⁴⁰ March, L., 'Mathematics and Architecture Since 1960' in Williams, K., Ostwald, M. (2015), *Architecture and Mathematics from Antiquity to the Future*. p.555, p. 562. I would like to thank Ben Derbyshire for drawing this to my attention.

⁴¹ DCLG, (2011), *Accelerating the release of public sector land*, p.6.

⁴² London Chamber of Commerce, (2015), *Unlocking London's Housing Potential*, p. 2.

⁴³ See www.tfl.gov.uk/info-for/business-and-commercial/commercial-opportunities/property-development. Accessed July 2015.

⁴⁴ See www.ft.com/cms/s/0/c2635fc4-c1fd-11e5-993a-d18bf6826744.html?ftcamp=engage/email/emailthis_link/ft_articles_share/share_link_article_email/editorial Accessed February 2016.

Figure x – some estimates of public sector land in London⁴⁵

Public body / nature of land	Estimated amount of land, hectares	Number of homes if 75% developed at 80 u/ha ⁴⁶	Number of homes if 75% developed at 200 u/ha ⁴³
Housing estates	12,500	281,250 ⁴⁷	1,406,250
Boroughs brownfield (boroughs brownfield <i>pro-rated</i>)	3,730 (9,468)	223,800 (568,108)	559,500 (1,420,269)
Transport for London	2,307	138,403	346,007
NHS	1,845	110,700	276,750
GLA	840	50,400	126,000
Total (total with boroughs <i>pro-rated</i>)	21,222 (26,960)	804,553 (1,148,860)	2,714,507 (3,575,276)

Of course, not all of this land could or should be built on for homes. Some estates will be more appropriate for infill rather than regeneration. Or nothing at all. Much NHS and TfL land may be unusable due to necessary ongoing requirements. Some land should be used for new schools or commerce. And, indeed new developments should be 'mixed use' (i.e. with commercial, social and retail uses interweaved with residential). This will further push down achievable densities but at the benefit of typically more popular, higher value, more walkable and better developments.⁴⁸ There will also be major capacity constraints from the industry (not enough builders, not enough bricks).

In planning to regenerate post-war estates one advantage is that their basic infrastructure is in place. But of course estates are peoples' homes. If managed badly or with only tokenistic 'consultation' then the process of estate-regeneration can be not just unjust but expensive and slow as well. In contrast ex-industrial land may need decontamination or very expensive primary infrastructure – particularly in parts of East London.

Figure xi – Number of additional homes that could be built on 21,000 hectares of public land together with estimates for number of years' housing supply

Percentage that can be developed for housing	Low housing density (75 homes per hectare)	High housing density (175 homes per hectare)
33% usable	309,440 (7 years)	1,013,690 (24 years)
59% usable	600,850 (14 years)	1,860,320 (44 years)

NB: Assumed mixed-use residential and commercial. Homes per hectare figure is for the residential area only. Figures are net of estimated homes replaced on post-war estates

Figure xi sets out a range of highly indicative estimates of available potential based on different assumptions about land available and densities achieved taking account of other land uses. Given the imperfect data the range of scenarios is necessarily very wide but, as can be seen, the potential

⁴⁵ London Chamber of Commerce, (2015), *Unlocking London's Housing Potential*, pp1-3. Savills, (2014), *Spotlight: Public Land – Unearthing Potential*, p.7. Unpublished research. The pro-rated figure for London boroughs is a guesstimate scaling up from 13 boroughs who provided information to the National Land Use Database to all 33 London authorities (including the City of London due to their extensive holdings elsewhere).

⁴⁶ This is to give orders of magnitude and is categorically not to say that 75% is the most appropriate proportion of land for ultimate development. For some (borough brownfield land) it may be too low. For others (e.g. NHS land) it will all be too high. See figure xi for more finely worked up scenarios.

⁴⁷ Netted off against existing homes at assumed density of 50 units hectare. In estate regeneration Create Streets would always advocate like for like replacement for existing tenants and leaseholders if they wish.

⁴⁸ For one of the many studies linking walkability with greater value see Alfonzo, M. and Leinberger, C. (2012), *Walk this way*.

for meeting London's needs with a conventional urban form is immense. It ranges from around 7 years supply to as many as 44. And this analysis does not include the potential from private sector owned commercial or 'big box' retail sites developed at very low densities.

Long term maintenance costs

It is also worth stressing that the long term evidence is fairly consistent that larger buildings do not just hold their value less well. They also cost more to run per square foot due to their inherent complexity. That cost also goes up faster over time as embedded technology fails, standards evolve, institutional memory is lost and ownership structures become more complicated. Certainly that has always historically been the pattern. By 1964 high-rise schemes were already costing 53% more to maintain than low-rise schemes. By the mid 1970s, as labour costs rose and as the buildings aged, this cost differential had increased to 100%.⁴⁹ The service charges today at Shakespeare Tower in the Barbican are £8,000 a year. It is startling to reflect that 11% of this (£880 per year per flat) is on window-cleaning alone – an eloquent testimony to the far higher running costs of larger, higher buildings.⁵⁰ £880 is around 500-700 times what the owners of most, much larger, houses would pay over twelve months to clean their windows every four to six weeks. Recent research on the renaissance of high-density, medium or high-rise buildings for social tenants strongly corroborates this and shows how these extra costs can be pushed onto tenants who (if they relying on Housing Benefit won't be able to afford it). A 2012 study by the Cambridge Centre for Housing and Planning Research found that nearly 95% of new-build flats (as opposed to 62% of new-build houses) had service charges and that service charges for flats were both higher and rising as densities increased. They concluded 'despite the preference of most tenants for a house rather than a flat' flats often cost tenants more to rent than houses due to the high charges.⁵¹

Despite the spirited defences of some architects for the technology in today's towers ('the windows clean themselves') there seems no reason to believe that this will change. Technology always fails in the end and standards and expectations always evolve. Andy von Bradsky, the chairman of PRP Architects, has concluded that 'it is inevitable that tall buildings have much higher management costs' and that it is 'much easier to spread the cost in mid-rise developments.'⁵² He is right.

⁴⁹ Dunleavy, P. (1981), *The Politics of mass housing in Britain*, p. 89.

⁵⁰ HTA, Levitt Bernstein, PTE & PRP (2015), *Superdensity the Sequel*, p. 38.

⁵¹ Jones, M. (2012) High density housing – the impact on tenants, pp. 2-3.

⁵² Speaking at launch of *Superdensity the Sequel* on 22 May 2015.

3. What is the problem?

So what on earth is going wrong? Consistent and strong majorities of the public in the UK and in London prefer a certain built form. Such a built form and style could very easily provide sufficient homes to meet London's housing needs. Given differential maintenance costs and historical valuation it is even a very good long term investment. Such a built form historically has normally cost less to maintain and has held its value better. It would even appear to be more sustainable.⁵³

And yet we don't build it – or at least not sufficiently or in such a way as to garner widespread public support let alone enthusiasm. To examine 'case studies' of exemplar schemes or appropriate densities authored by architects or developers is, too frequently, to observe a depressing litany of glass towers and large blocks with very few densities below about 250 homes per hectare and (at best) a sort of simplified brick sub-vernacular that our polling tells us most people simply do not like.⁵⁴ Meanwhile tower blocks, not just by the edge of the Thames but in outer suburbs, are leading to a clear and entirely unnecessary backlash against building thus slowing down the process of achieving the increase in the number of homes we need.⁵⁵

Even some professionals are prepared to voice concern. A large number of architects put their name to the launch of the Skyline Campaign in March 2014 protesting at the quality and design of many of the 260 towers being built in or planned for London above 20 storeys. And in a series of 30 interviews Create Streets conducted during summer 2014, many experts evinced a material concern about what we are building at the moment and that we are not optimising for the long term. Though some believed that we have learnt lessons from the past (above all with better connectivity and greater use of front doors), many others think we are replicating too many errors.

- The MD of one London-based regeneration firm told us that most 'blocks of flats' currently being built were 'pretty shoddy.'
- One very senior industry insider who has personally worked on many towers being built in London was alarmingly clear about the consequence of his work: 'This is a ticking bomb as more and more will need maintenance. There are long term issues around renewing cladding, lifts etc in tower blocks – how will this be funded and who will be willing to? I worry that we are creating ghettos of tall buildings'
- Anna Mansfield of Publica added that, 'there is quite a big gap between what we are building and how people want to live.' Her colleague, Lucy Musgrove, agreed: 'We learnt through the 60s that we could create hectares of space left over after planning. My fear is that we're doing this again, that the master planning we are doing now is leaving lots of hectares of space left

⁵³ Empirical controlled data from Hong Kong show a marked positive correlation of total electricity use per m² with height in office towers. Every additional 10 storeys add roughly 30 kWh/m² to the intensity of electricity use. Lam J C *et al* (2004) 'Electricity use characteristics of purpose-built office buildings in subtropical climates', *Energy Conservation and Management*, 45, pp.829-44. I am grateful to Professor Steadman of UCL for drawing this research to my attention.

⁵⁴ Of course there are exceptions. And the one design element that is consistently improved on from a previous generation is spatial arrangement. Most new developments are much better 'plugged in' to the surrounding city. The best three current estate regenerations that we have visited or studied are the Packington in Islington, Portobello Square in North Kensington and Myatt's Field in Lambeth.

⁵⁵ For example current controversies in Acton, Swiss Cottage and Kingston could probably have been entirely prevented by medium rise, high-density schemes.

over after planning. . . . Quite a lot of our environments are quite hostile because of their amplified scale.”⁵⁶

Why have we not sufficiently learnt from the past? Why do developments such as Mount Pleasant, which so please GLA planning officials, so displease the public? What noxious cocktail of supply, demand, investment and regulation is leading to this? What are the barriers to more popular development in London? And what can we do about it?

3.1 Barrier one: Land rationing

Contrary to received wisdom, planning is not new in the UK or in London. It’s just different, wider in its scope, slower and much less predictable.

In the sixteenth and seventeenth centuries there were several concerted attempts to prevent London expanding beyond pre-defined boundaries, a sort of (only episodically effective) proto-green built policy.⁵⁷ In the eighteenth and nineteenth centuries regulations instead typically focused on the urban form though a fairly limited number of factors: ratios between street width and height, building materials, window design and control against fire. That said, by contemporary standards they could be surprisingly consistent and rigorous. Landowners could develop but they had to follow a limited number of very clearly set-out rules. Interestingly, landowners developing via the leasehold system (whereby builders were offered developing leaseholds on initially peppercorn rents) often *added* to statute setting down a clear street pattern and ‘urban code’ to builders as to how they should develop. That is why much of historic London is so elegantly consistent.⁵⁸

British planning changed again, and radically, in 1947 when the axis of control shifted back to what might be called historically a more ‘pre-modern’ approach. Instead of demanding consistency of exterior form the state controlled (indeed initially banned) the right of private landowners to develop their land at all.⁵⁹ And they did so via the tool of the local plan. Local plans are meant to be comprehensive but also to leave room for case-specific interpretation. Individual planning decisions are then made in the light of this plan and of a large (though recently reduced) corpus of housing and building regulations which has increasingly focused on the inside of buildings more than the outside. The process has proved slow, inconsistent and hard to predict. The economic consequence of this approach has been to limit the supply of land, delay building and, absent wide-scale government intervention, shift most of the value of a building from its built form to the land on which it stands or, more precisely, the permission which has (or has not) been granted to that land. For example, in 2010 granting planning permission to agricultural land in or near outer London increased its value by an absurd 20000% - from around to £19,000 a hectare to more like £4million per hectare.⁶⁰ Meanwhile in 2011, the build cost of a £220,000 house typically represented only slightly over a third of the cost with land cost and planning gain representing around 55%.⁶¹ This is not to say that there are not inherent inefficiencies in land markets (higher capital costs, greater risk, potential for opacity) but it seems impossible to escape the conclusion that the UK planning

⁵⁶ Create Streets research and interviews, June – July 2014. Not previously published.

⁵⁷ For example Elizabeth I’s 1580 proclamation, her 1589 Act and Royal proclamations of 1608 and 1625. They were only periodically effective but could result in houses being pulled down and builders imprisoned. Knowles, C. and Pitt, P. (1972), *The History of Building Regulations in London*, pp.8-20.

⁵⁸ Cruickshank, D. & Wyld, P. (1973), *The Art of Georgian Building*, pp.22-33.

⁵⁹ From 1947 until the 1950s the 100% Betterment Levy was charged on any rise in land value consequent on private developments. This was meant to ban private development. This attempt at state monopoly was rapidly abandoned.

⁶⁰ KPMG, Shelter (2014), *Building the homes we need*, p.35.

⁶¹ Morton, A. (2013), *A Right to Build*, p.16.

system, which is particularly unpredictable in international terms, is not massively enhancing these problems.⁶²

While public policy in the 1980s unpicked most elements of the post-war state this was assertively not the case for planning. In parallel with reductions in state-financed house-building, the 1991 Planning and Compensation Act specifically required that a local authority's development plan be a 'significant factor' in what might or might not be permitted. In 1999 an influential report by the McKinsey Global Institute argued that planning constraints were one of the most important breaks on British economic growth.⁶³ Since then Governments of all political hues have attempted to loosen the constraints of the planning system.⁶⁴ However, with a brutal irony they have largely done so not by ripping up the development control system but by increasing the targets and pressure from the centre to build – in short by centralising the nature of government intervention not reversing them. With one hand the government makes it hard and expensive to build and erects barriers to entry through high capital costs and complex regulatory unpredictability. With the other it now insists that local authorities get lots built. The consequence is missed targets and bad buildings.

The further design consequences of most value coming from getting land zoned for housing or securing planning permission is that building a home that someone really *likes* is commercially too often a rounding error. The approval of planners and the compliance with a (still not that small) bible of codes and regulations necessarily trumps what people actually want in the built environment.⁶⁵ For planners and architects value different attributes and (provably) prefer different types of buildings to most people.

3.2 Barrier two: the 'design disconnect' – men are from Mars, professionals are from Venus

In 1987 a young psychologist was conducting an experiment into how repeated exposure to an image changed perceptions of it. A group of volunteer students were shown photographs of unfamiliar people and buildings. They were asked to rate them in terms of attractiveness. Some of the volunteers were architects and some were not. And as the experiment was ongoing a fascinating finding became clear. Whilst everyone had similar views on which people were attractive, the architecture and non-architecture students had diametrically opposed views on what was or was not an attractive building. Correlations 'were low or non-significant'. The architecture students' favourite building was everyone else's least favourite and *vice versa*. The disconnect also got worse with experience. The longer architecture students had been studying the more they disagreed with the general public on what is an attractive building.⁶⁶

The young psychologist was David Halpern and he is now a highly influential man. He runs the Cabinet Office Behavioural Insights team (often called the 'Nudge Unit'). Two decades on, he is very

⁶² For a good summary of the problems inherent in land markets see KPMG, Shelter (2014), *Building the homes we need*, pp.32-44. On the point of comparable unpredictability in the UK planning system see the discussion in Boys Smith *et al* (2014), *Mount Pleasant Circus and Fleet Valley Gardens*, p. 9-10. Countries as historically and ideologically contrasting as the US, Germany and France all start with the presumption that a landowner may develop without challenge as long as they fit within a local plan on land use or design. By contrast the UK system nearly always denies landowners development rights without formal consent.

⁶³ McKinsey Global Institute, *Driving Productivity and Growth in the UK economy*, 1999.

⁶⁴ Though they have not dared, materially, to touch the all enveloping green belts.

⁶⁵ Even when codes are only guidance all the pressure on developers is to comply in order to win permission as quickly as possible.

⁶⁶ Halpern, D. (1995), *Mental Health and the Built Environment*, pp. 161-2.

clear that 'architecture and planning does not have an empirical, evidence-based tradition in the sense that ... sciences would understand. There are very few studies that ever go back to look at whether one type of dwelling or another, or one type of office or another, has a systematic impact on how people behave, or feel, or interact with one another.'⁶⁷

If he is right then the process of a professionally-derived borough plan, of planning consent and of expert design review is the very worst way imaginable to build our towns and cities. The very act which confers value on a site (the granting of planning permission) is a process whose key players are, empirically, the very worst judges available of what people want or like in the built environment.

But is he still right? Perhaps more than two decades of 'market pressure' since the state largely removed itself from house-building has obliged the profession to value what their clients not their training appreciate. A glance at the criteria of architectural prizes is not reassuring. Few if any place value on evidence of popularity or provable correlations with wellbeing. Certainly RIBA's prizes specifically demand evidence on sustainability but not on what members of the wider public think.⁶⁸ Similarly, in a 2004 study into attitudes to housing conducted for the Joseph Rowntree Foundation, nearly 60% of the public said they disliked flats. Only a little over 20% of 'experts' shared that view.⁶⁹

To investigate this further Create Streets recently conducted an informal poll. We asked our twitter followers and the members of our e-mail distribution list (in total about 4,000 names) to take part in what we termed a 'pop-up' poll. In total 283 took part. We asked respondents 'which of these would you most want to see built on an urban street very near to where you or a close friend live?' and presented four options whose order was randomised. We also asked their profession. 37% of respondents worked as architects, planners or in creative arts.

We were not surprised to find that among our overall respondents place trumped time. 87% of our respondents preferred the two options which most clearly referenced historic housing forms (at the top of figure xii) and which had a very strong sense of place. This was nearly seven times more than the 13% who preferred the two more original forms which prioritised a sense of time over a sense of place (below in figure xii).

We also found that the sharp and important distinction between what non-design specialists and design specialists would like to see built is still there. 25% of supporters of the more popular two options worked in planning, architecture or creative arts. 46% of supporters of the less popular two options worked in planning, architecture or creative arts. People are from Mars. Professionals are still from Venus.⁷⁰

⁶⁷ *The Psychologist*, Vol 24, (2011), 'An interview with David Halpern', pp. 432-4.

⁶⁸ Though it is reassuring to see the August 2015 launch of the RIBA Journal McEwan Award to fete projects 'a clear social benefit, right across society.' This is a step in the right direction.

⁶⁹ Platt, P. Fawcett, W., de Carteret, R. (2004), *Housing Futures*, p.40.

⁷⁰ Ours is not the only research with this finding. For one study and to see a summary of others see Brown, G., Gifford, R. (2001), 'Architects predict lay evaluations of large contemporary buildings: whose conceptual properties?', *Journal of Environmental Psychology*, 21, pp.93-9.

Figure xii – Options in Create Streets Pop-up poll⁷¹

Q1: which of these would you most want to see built on an urban street very near to where you or a close friend live? (order randomised in Pop-up Poll)

Create Streets



* Prize-winning. Total of nine awards for these two options

2

The melancholy implication of this is that architectural awards are a good indicator of popularity – but only if you invert them. We are aware of nine architectural or planning prizes awarded to the two least popular two options. We are not aware of any architectural or planning awards garnered by the most popular option has received.⁷²

These prejudices of too many in the design and planning establishment are not just idle personal preferences. They palpably influence what actually happens. In a 2014 design meeting for a major London site, the 'traditional' built form of conventional developments was openly ridiculed and dismissed as unworthy of discussion even though it is *what the public most like*.⁷³ Similarly, in a June 2015 meeting of very senior officials and architects at which Create Streets was present the Director of Housing and Regeneration at an important London borough spoke (without apparent irony) of the 'horrid Edwardian streets that most of us live in' and complained of 'dreary terraces.' When a senior and respected decision-maker does not just disagree with the vast majority of the public but is actually contemptuous of their views it must be time to ask if the whole public procurement and planning prioritisation process needs dramatic rebuilding from the bottom up. Certainly, in public sector design competitions for city-centre development and estate regeneration marks are routinely (in our experience always) awarded very materially for 'innovation of design'. In at least two cases that we are aware of this was despite the explicit request from councillors that a more conventional, even traditional, design would be more appropriate.

The point is not that design innovation is necessarily bad. Clearly it is not. It is often excellent. But it needs to be balanced with the familiar. And in at least two case, design competitions was being

⁷¹ The poll ran online between 1 April and 22 May 2015.

⁷² The second option has not been built so is not able to win awards.

⁷³ Private information. A member of Create Streets was at the meeting which was for an (ultimately) public sector client.

run in contradiction to what had been requested by council leadership. It is hard to conclude that the system is under effective democratic control.

3.3 Barrier three: misconceived regulation with perverse outcomes

Promoting large developments in London is difficult and, above all, expensive. The approach of maximising density on any given site often leads to slow, confrontational and unpopular development. By maximising the number of units on a relatively small number of sites and by imposing a top-down model, we constrain the number of sites that get developed or regenerated.

Current large projects are carried out mostly in partnership with commercial developers. They typically have several common features. To start with they normally need rapid returns from the early sale of many units. This is for a range of reasons: Firstly, land values are very high, driven by constrained supply of sites as we have seen. Secondly, there is an increasing expectation that uber-densities will be permissible which in itself drives up values further. Thirdly, a cumbersome and lengthy planning process pushes up costs even more. So does a strong demand both from domestic and international investors, eager to buy in to what they see (certainly wrongly) as a one-way bet on capital values.

The best way for commercial partners (who are mostly cash-flow businesses, quite reasonably looking to maximise short-term profit from sales) to cope with the high land and rental values and meet their investors requirements is to build big and build high.

Even when land is not being bought, Council and Housing Association land owners typically require private sector support to fund and manage redevelopment. Replacement homes must be funded from private sector sales and the cost of development finance (typically 7-8%) and the profit targets of investors (typically 20% in a fairly short time frame) then require the same high fairly quick returns.

It is even hard for public bodies to dodge this dilemma. Under the 1999 Local Government Act local authorities and other public bodies are required to secure 'best value' when disposing of assets and land. '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.'*⁷⁴

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.⁷⁵ In practice, (though there are increasingly exceptions) too often the best value test thus turns into a maximum density test. In a survey of development professionals we ran last year the 'Best Value' test emerged as the second most important batter to conventional street-based development with a score of 7.3 out of a

⁷⁴ 1999 Local Government Act.

⁷⁵ For example, DCLG (2010), *Valuing the benefits of regeneration*.

maximum of 10. The Managing Director of First Base, Elliot Lipton, commented starkly, 'If they [councils] sell they are constrained by best value considerations to maximise density.'

This has interacted malignly with 'viability assessment' in the planning process. These not just accept that the price paid for land is an admissible development cost. Their lack of transparency has also led to widespread suspicion that some developers are deliberately exploiting the system to reduce social housing. Certainly, in private, several developers have admitted to us that it is very possible to manipulate viability assessments and that councils 'just don't know what they are doing.' The system allows developers to argue that because they paid so much for the land, their proposed schemes can only be viable with less policy-compliant levels of Affordable Housing. As developer 'A' secures consent for 40% provision, then developer 'B' thinks they can achieve 35% and so on. The result is developers increasing bids for land in the hope of securing more development and Planning Authorities accepting higher levels of development than their policies might justify, in order to maximise the number of homes developed. Developer mis-representation of costs only accelerates this vicious circle.

Then, density targets and design rules in the London Plan and the London Housing Design Guide often make it hard to build conventional high density normal streets. In the survey of 30 professionals we ran last year, a majority felt that London Plan density targets acted as a barrier to street-based regeneration. In our prompted survey of barriers to street-based regeneration the 'Need to build higher unit numbers / volume to meet London Plan density targets' and the 'Need to build different unit /building types to meet London Plan density targets' achieved score scores of 5.9 and 5.5 respectively (out of a possible 10). This issue can be simple. As Richard Blyth, Head of Policy and Practice at the RTPI put it 'there is a drive for numbers at the exclusion of nearly all else.' It can also involve a complex interaction between high level rules, density targets, economics and the physical constraints of a particular site. As Mike De'Ath of HTA Design put it 'The issue in the London Plan we find is that it mitigates against certain approaches to creating density that work quite well. So although we're great fans of double aspect, it is not the case that single aspect is always bad for market rent.

Other rules kick in as well. Borough rules on light seem to tend to larger blocks with more open space between them as opposed to narrower streets. They also make it hard to trade off high levels of light in some rooms versus less light in others. A recent report by four important residential architectural firms explained;

*'Given their enduring popularity (and value) you might suppose that they [Edwardian Mansion blocks] would provide the ideal model for today. But, sadly, modern planning and building regulations outlaw some of the key design features that enabled Edwardian architects to create such opulent buildings on such small footprints. Apartments of this era typically offer spacious and bright front rooms with bay windows and balconies forming their distinctive street facades. Meanwhile the rear rooms are quite dark and have privacy distances way below current standards. To us it seems a satisfactory trade-off, which should be encouraged rather than prevented.'*⁷⁶

Rules on streets themselves matter too. In our 2014 survey, a majority felt that (borough-level) highway rules acted as a barrier to street-based regeneration. In our prompted survey of barriers to street-based regeneration the 'Need to build wider or different streets to meet council rules' achieved a score of 5.9/10. Many industry practitioners were particularly vocal on this point with some

⁷⁶ HTA, Levitt Bernstein, PTE & PRP (2015), *Superdensity the Sequel*, p.14.

of the most emphatic comments we received criticising the impact of highway engineers on good design and place-making via issues such as required turning circles, refuse collection standards, lines of site and road access. Alastair Mellon, of Providence Developments, was clear that 'Highways engineers should not be allowed close to any development. They insist on a whole series of regulations that kill a development.' Mike De'Ath of HTA Design agreed; 'the worst streets are designed by highway engineers and refuse collection people. They're dead but technically proficient.' Others complained about inappropriate minimum road widths. There was, however, a sense that the situation was improving with John Spence, an architect at Calford Seaden and also a member of Create Streets, one of several commenting that their impact 'seems to be getting less.'

The ban on recycling open space between buildings into private gardens can make it is very hard to redevelop estates into streets. 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.'⁷⁷ When estates are regenerated this can and has impacted this metric.⁷⁸

However, we also know that most people would sacrifice poor open space for small private or communal gardens.⁷⁹ But they cannot. The GLA are quite categorical that, 'the definition of open space ...does not include private residential gardens.'⁸⁰ In our 2014 prompted survey of barriers to street-based regeneration the 'Need to include more open space to meet the London Plan' and the 'Need to include more open space to meet local council's requirements' both achieved scores of 5.6 out of 10 as a barrier. It was generally felt that planners cared about this more than residents. In the same survey the 'Need to include more open space to satisfy local residents' only achieved a score of 4.9/10. Ingrid Reynolds, Director in Housing and Public Sector at Savills summarised the majority view when she said that, 'the reduction of open space is potentially a barrier. It is more likely to be the planners saying you've got keep or add to the open space than residents. Part of the general planning strategy is to retain public open space.'

Although not as widely felt, in our prompted survey of barriers to street-based regeneration 'Difficult to build this form of flats and comply with London Plan' achieved a score of 3.9/10. 'Difficult to build this form of houses and comply with London Plan' achieved a score of 3.6/10. The impact of national rules on building terraced flats and houses was felt to be less. (3.2/10 and 3.1/10 respectively to the same questions). Andy von Bradsky the chairman of PRP, one of the architectural practices designing many homes in London at present, commented; 'Lifetime homes are potentially a barrier. .. [for example requiring] level access from street to threshold. But sometimes a raised ground floor is a benefit in terms of house typology.' Alastair Mellon also complained about 'the insistence on elevators over four storeys.' (this has now reduced to any non-ground floor entrance). Nigel Franklin of Calford Seaden and a member of Create Streets was more concerned about the impact on spatially efficient terraced houses: 'The London plan works well for flats. It is less easy for houses. Stairs have to be shallow pitched – this needs more floor-space. The through the floor lift is easy for

⁷⁷ GLA (2011), *London Plan*, p. 260.

⁷⁸ GLA (2014), *London Plan Annual Monitoring Report 10, 2012-13*, p.19.

⁷⁹ 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, the main dislike was the way the estate was set out and the lack of individual gardens with 54 complaints. Coleman, A. (1985), *Utopia on trial*, p. 33. Recent evidence from RIBA supports this. 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.'⁷⁹ 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.' RIBA (2012), *The way we live now*, p. 49, p.52.

⁸⁰ GLA (2013), *London Plan Annual Monitoring Report 2011-12*, p. 19.

two storeys. It is difficult for three or four storeys. It adds challenges all round and costs as well as less ideal storage provision due to the area required for stairs and lifts.'

To summarise the access and internal barriers;

- Requiring lifts in all apartment buildings makes it more expensive to recreate the typology typical of many dense, street-based areas of London with apartments on a number of floors off one staircase. This also incentivises higher building as the cost of lifts does not increase substantially as more floors are added, once the initial cost is incurred.⁸¹
- Rules against staircases being too narrow or too steep make it harder to build the conventional tall but thin London terraced houses⁸²
- 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 blocks⁸³
- Four contributory barriers add to this;
- A dislike for on-street parking biases the planning system against conventional terraces and streets⁸⁴
- Heavy requirements for bike storage, make it much harder to build terraced flats and conventional terraced homes⁸⁵
- Heavy requirements for bathrooms on storeys with bedrooms make it harder to build the conventionally tall but thin modest London terraced homes⁸⁶
- Finally, requiring 'weather protection' over front doors adds yet more cost to terraced streets with multiple entrances⁸⁷

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.⁸⁸ Regrettably the situation is currently getting worse. Proposed changes to the London Plan will require lifts in all blocks with apartment entrances on more than one floor (currently only required in blocks of four or more storeys). A better disincentive to building human scale terraced streets, particularly in the suburbs, it is hard to imagine. Hopefully the next Mayor will stop this insanity.⁸⁹

It should be stated that not *all* practitioners agree with this analysis. Some feel they have evolved adequate work-arounds which allowed them to deliver good schemes under the current rules. Alex Ely of Mae Architects (and one of the authors of the London Housing Design guide) told us unambiguously in 2014 that 'Planning and design is not a barrier' and that the current rules made it 'easier for streets.' Most, however, at least in private, seem worried by their cumulative impact. Peter Redman (the former head of Notting Hill Housing and of the housing teams at both Lambeth

⁸¹ Key rules are clauses 3.2.5, 3.2.6, 3.2.7 and 4.3.2.

⁸² Key rules are clauses 3.2.8, 3.1.3 and 4.10.2.

⁸³ Key rules are clauses 4.9.1 and 3.2.7.

⁸⁴ Clause 3.3.3.

⁸⁵ Clause 3.4.1.

⁸⁶ Clauses 4.6.2 and 4.6.3.

⁸⁷ Clause 3.1.4. This is not as material a cost as others mentioned above.

⁸⁸ Clauses 4.4.6 and 5.4.1. The point is not that new streets should necessarily obey classical rules of proportion but it seems perverse actively to prevent them – particularly when the consequent buildings seem to be so popular. Boys Smith, N. (2013) *Why aren't we building more streets in London* explored these issues in more detail There has been some consequent movement (for example the relaxation of standard 3.2.5). Mayor of London, *Funding Prospectus* (2013), p. 26.

⁸⁹ 'Boroughs should seek to ensure that units accessed above or below the entry storey in buildings of four storeys or less have step-free access.' GLA, (May 2015), *Minor alterations to the London Plan*, p.8.

and Southwark), told us that the 'standards required by those who lay down the rules' mean that 'attractive streets just don't conform.'

When we started to complain about the way that some (well intentioned) regulations were making it harder to build our most popular street forms and housing types it was a lonely battle. One very senior London politician even commented privately that there was no political chance of opening up these issues. Another told us we would be ignored at best, eviscerated at worst. It seems that the situation is, slightly, beginning to shift and that more planners and architects who care about the built form of London are daring to put their head above the parapet and to challenge the collective 'group-think' to which the whole industry has subscribed in recent years. Richard Lavington (of Maccreanor Lavington Architects) said in evidence to the GLA in March 2014:

'One very efficient way of delivering family housing at a certain density is with narrow-frontage terraced houses, but actually Lifetime Homes [embedded in the London Plan] is very obstructive to making that work particularly well. Once you get to three bedrooms, you need a very large bathroom on the entry level and that actually obstructs the width of the plan; which means you have to go into a very narrow kitchen and through that into a living space at the back. . . . you are prioritising the lifetime use of the home and disabled access over its efficiency and use for a family; a family without disabled kids and things like that, admittedly. We are applying that across every new-build single home in London.'

Then at a talk to the National Housing Federation, in December 2014, Ben Derbyshire the Managing Director of HTA Design, one of the larger London residential practices, agreed: 'it's actually quite difficult to design streets which are streets in the sense that citizens will recognise.'⁹⁰ The architect Peter Barber echoed this in a lecture to the Royal Academy in July 2015: 'planning law makes it very difficult to design streets.'⁹¹ The report cited above, *Superdensity the Sequel*, rightly picked up on these concerns. Andrew Beharrall of PTE architects stated publically at the launch that 'it is time for a review' of the London Housing Design Guide which is 'leading to rising homogeneity' and, he stressed, making it impossible to build well-loved housing types such as the Edwardian Mansion block.

The Mayor of London, Boris Johnson, has agreed with much of this analysis though also made clear he plans to do little about it. In GLA Questions in July 2014 he stated;

*'One of the difficulties of course is that within the London Plan there is this stipulation that any building above 3 storeys must have a lift. Now we could take that out and say that you wouldn't need to have a lift till you were at 5, 6, 7, 8, 9 storeys. The trouble is that I think we've got to the stage now where people would find that suddenly a restriction on the accessibility of the building and people would say 'are you really seriously taking going to take lifts away when we have so many elderly people, so many disabled and so on and so forth. Walk ups which are so attractive are limited in their flexibility. And that is one of the problems that we face. If you put in a lift for a building of 4,5,6 storeys people will say well why, the economics of it won't add up. You'll be spending an awful lot on the core and shaft of the lift and not actually maximising the potential habitation in the building.'*⁹²

Hopefully, the next mayor will be bolder. Because it *does* matter. In case this discussion about regulations seems abstruse, here are two real world examples of the impact that the rules are

⁹⁰ Ben Derbyshire, lecture to National Housing Federation, London Development Conference, 2 December 2014.

⁹¹ Cited by Peter Murray, the Chairman of New London Architecture on twitter, 3rd July 2015. www.twitter.com/PGSMurray

⁹² London Assembly, 23 July 2014.

having. Firstly, in January 2015 an architect in East London explained to us in the presence of senior DCLG officials that he had not been able to meet residents' passionately felt preference for streets of terraced houses. 'Of course we couldn't do that, we wouldn't have got planning...the council would have insisted on open spaces, you just can't build houses like that anymore, all the space standards, all the rules....'

And currently being built in a (good) development in Kensington and Chelsea are a row of terraced houses to the north of Portobello Road. They are in the right of figure xiii.

Figure xiii – Terraced houses from 1825 and 2015



The houses are mainly 7.5 or 7.9m wide and are shallow with wide corridors and gently-sloping wide stairs. Of course they are fully compliant with all national, London and borough requirements. But they are also grossly inefficient terraced houses in consequence and compared to historic norms. The house on the left of figure xiii was built in 1825. It has narrower staircases, a narrow corridor and is slightly deeper. It fails current London rules on at least 13 separate points (and probably far more). It is also, like many thousands of similar houses across London both very valuable (because very popular) and a very spatially efficient way of building a house - the preferred type of home for about 80-90% of Britons.⁹³ It has an almost identical Net Internal Area as the new homes which are 35-45% wider than it. If the modern homes had been built on the template of (though not necessarily in the style of) the historic homes there would have been about 22 of them not 16. That is an example of the 'price' of the London Plan. We are sacrificing what most Londoners want on the altar of narrow codes and ill-informed dogma.

3.4 Barrier four: the glut of short term capital in the super-prime market

In January 2015, Peter Wynne Rees, the former City of London Corporation's planning officer, complained of 'piles of 'safe-deposit boxes' rising across the capital. These towers, many of dubious architectural quality, are sold off-plan to the world's 'uber-rich', as a repository for their spare and suspect capital.⁹⁴ There certainly is an intense debate raging about foreign purchasers of London property.

Create Streets has never made as much of the argument about foreign purchasers of new homes as many of our supporters have urged us to do. London is and always has been an international

⁹³ See section 2.1 above.

⁹⁴ The Guardian, 25 January 2015.

entrepôt attracting the world's brightest and best. It is a city built unashamedly with the capital flows from generations of world trade. We tinker with its free-market heritage at its peril.

Almost more importantly, overall the London property market remains very British. Even at the top end buyers with some sort of UK link dominate. Convincing 2013 research by Savills found that;

- 'Less than half (46%) of Prime London sales are to international buyers;
- International buyers are invested in the capital, 93% have an occupation or business interest in the UK;
- Many international buyers are settling in London. 65% of resales to international buyers are for main homes; and
- Last year international buyers added around 3,000 homes to London's rental stock.⁹⁵

However, our own experience with surveyors as well as increasing evidence is beginning to point to the fact that these aggregate statistics are hiding a very different project-specific reality. Look at new builds and things look different. One study of Land Registry records found that more than half of the 127 apartments in one recently built block in east London were sold to overseas buyers. Around 500 of the 866 flats proposed in the first phase of the Battersea Power Station redevelopment were sold in the Far East. Similarly, 2014 research by the consultancy Molior for the British Property Federation found that over 70% of new-build London sales in developments of more than 20 units and in the £1,000-£1,500 per square foot range were to investors.⁹⁶

Some might say 'so what' if the homes are subsequently let out to those less cash-rich than these fortunate foreigners seeking a sterling investment. However there are four worrying straws in the wind.

Firstly, are sufficient homes being let? Are too many lying empty? Research by Islington Council found that that was precisely what was happening. As many as a third or more of homes in some new developments were potentially vacant. Of almost 2,000 units built in blocks in the borough since 2008, 30% have no registered voters. The percentage rises considerably when social housing is filtered out. For example, of the 58 private apartments in the One Lambs Passage development, 71% had no voter registered, while 65% of the 106 in Worcester Point had no one registered.⁹⁷

Secondly, and crucially, international preferences are starting to dominate physically what we design. Despite the fact that consistent large majorities would rather have more street-based high-density designs we are building ever bigger and higher. In a fascinating recent meeting with an experienced London surveyor, it was startling the degree to which Middle Eastern and Far Eastern high-rise preferences are clearer dominating what developers seek to get consented. But these buildings cannot be made to disappear once the international capital flows that preferred them have dried up or gone home again. Nor do we need these blocks to solve our housing needs.

Thirdly, have 'international trade flows' become something else? Recently the National Crime Agency made the startling claim that 'foreign criminals are laundering billions of pounds through the purchase of expensive properties, which is pushing up house prices in the UK.' Its Economic Crime Director told *The Times* that London prices were being artificially driven up by criminals 'who want to sequester their assets here in the UK' and that 'the London property market has been skewed by laundered money.' This cannot be right. There is a philosophical, as well as a legal,

⁹⁵ Savills Spotlight (2013), *The World in London 2013*.

⁹⁶ British Property Federation, (2014), *Who buys new homes in London and why?*

⁹⁷ 'Property investors in Islington who leave homes empty could face jail', *Guardian*, 4th December 2014.

distinction between permitting international capital flows and attracting dodgy money. We seem to be in danger of being on the wrong side of that divide.⁹⁸

For similar reasons, and without getting into issues of how affordable housing should be defined and funded, most believe there is a need for some type of more affordable homes *within* London if it is to continue to function as a complex community. But the massively higher running costs of towers and large building make this much harder not easier to achieve on a high density site. As Duncan Bowie, the author of much of the London Plan put it in May 2015 at the launch of *Superdensity the Sequel*; 'the report should be re-titled 'Against Hyperdensity' ... you're not going to get social housing at hyperdensity and not much at superdensity.'

London is an international city, made and marked by two thousand years of extra-territorial commerce. It would be historically unnatural and economically foolish to ban foreign investors or purchasers. But given that the developments being bought (though not always occupied) by some non-UK buyers are actively undermining the very qualities that (most think) make London special, it is worth asking whether the development and planning process should be kowtowing to their preferences rather than protecting the high density urban form most Londoners prefer. Surely if there is to be a democratically-controlled planning system at all it should be mediating between what the 'pure' market would build and what most residents want to see built. Otherwise, what purpose does it serve?

4 What should we do about it – a Direct Planning Revolution for London

The public are very clear about what they see as the answer. The 2013 IPSOS-Mori survey of Londoners cited above found that 'redevelopment of run-down areas' was the most popular development proposal to meeting London's housing needs. 40% felt this should be the mayor's priority. In contrast only 21% felt the priority should be building new social homes, only 17% building new homes for first time buyers and only 12% new homes for families. *Where* it is and *what* it is matters more to the public than *who* lives there. (Quite rightly, well designed housing can change its use over time).⁹⁹ An indicative survey run by Create Streets in 2015 agreed with this with densification of post war estate with medium rise streets being the most popular option for helping hit London's housing needs.

Given the range of market forces, capital flows, UK regulation, borough strategies and industry prejudices what practically *can* the next Mayor of London do to re-align what we build with what people want and with sufficient building to meet the historic shortfall? And what pressure does the next Mayor need to place on central Government or on London councils?

Overall, we believe that the logic of the evidence in this essay suggests that the GLA should lead a city-wide programme of popular, nearly always street-based home-building. Actions should be considered to;

⁹⁸ Cash from crime lords drives up house prices, *The Times*, July 25th 2015.

⁹⁹ *New homes: more Londoners prioritise building quality over quantity*, IPSOS-Mori September 2013. www.ipsos-mori.com/researchpublications/researcharchive/3268/New-homes-more-Londoners-prioritise-building-quality-over-quantity.aspx

- Better inform planning officials in boroughs and the GLA about what the public like and will actively support and embed this in local strategies, development control decisions and public sector tenders;
- More effectively empower local people actively to influence what gets built, how it is arranged and what it looks like rather than the purely binary NIMBY 'no';
- Spearhead a very active programme of popular and genuinely community-influenced house-building on public land throughout London (including estate regeneration); and
- Change national, London and borough rules and strategies to make it easier to build the types of home people prefer (or at the least give local communities the right to over-rule them).

Specific steps that the next mayor could take include:

1. **Building a richer understanding what people like and want targeted at available public sector land.** In conjunction with the London Land Commission which will report for 2016 immediately commissioning a full study of what housing would be possible *and popular* at street-based densities and typologies on publicly-owned land identified by the Commission;
2. **Using the Mayor's powers of call in to**
 - a. **Build fewer towers (unless they are popular).** Making it clear within the first two weeks of the mayoralty via a clear public statement that super-density developments or residential tower-blocks that are not able to demonstrate very convincing evidence of local support are highly likely to be called in and rejected by the Mayor (particularly beyond zone 1 and perhaps in 4 or 5 other areas);
 - b. **Encourage popular design-code and street-based approaches.** Making it clear within the first two weeks of the mayoralty via a clear public statement that design-code¹⁰⁰ led approaches with demonstrable support from local people and which permit the type of medium to high density developments correlated in most data with better long term outcomes are the least likely to be called in by the Mayor and the most likely to attract any GLA financial support;
 - c. **Encourage a much tighter upper and lower limit to possible densities.**
3. **Rewriting first the London Housing Strategy and then the London Plan to;**
 - a. be far shorter, clearer and more consistent with fewer but far more clearly defined and consistent rules and principles
 - b. Place a far greater emphasis on evidence of what people want and like in the built environment;

¹⁰⁰ A form-based design code was defined in the 2006 Planning Policy Statement 3 as 'a set of illustrated design rules and requirements which instruct and may advise on the physical development of a site or area. The graphic and written components of the code are detailed and precise, and build upon a design vision such as a masterplan or other design and development framework for a site or area.' Codes primarily regulates what a place looks like rather than the development control process. Although design codes were the *de facto* approach used in much of the UK in the eighteenth and nineteenth centuries, design codes have not sat easily with the post 1947 UK Planning system. In consequence, design codes are now far more common abroad. Today, design codes in various forms are used internationally, for example in Germany, France, the Netherlands, Australia and the United States, as a means to focus on the delivery of high quality with popular support.

- c. Abolish current density targets which no longer serve much purpose and which are used to justify a range of tower blocks and large multi-storey blocks wherever transport links are tolerably decent. Replace them with unbreakable upper (and lower) density caps;
 - d. Abolish or relax the rules in the Housing Supplementary Planning Guidance which create perverse incentives against the most popular forms of housing or at the very least give local people the right to override such rules. Examples would include access codes and open space rules;
 - e. Identify and prioritise for co-design¹⁰¹ development a wide range of publicly-owned strategic sites for comprehensive development (see below);
 - f. Demand improved quality and democratic control of estate regeneration via (i) co-design with a community and obligatory neighbourhood plan style referendums, (ii) presumption for design-code approach in estate regeneration, (iii) setting out clearly that social tenants will not be required to move more than once or to see changes to their tenancies as a result of redevelopment (iv) encouraging long term strategic investment partners rather than standard short term development model;
 - g. As far as possible within UK legislation require neighbourhood plans, co-design or robust evidence of popular support in order to avoid Mayoral call in for any sensitive sites or sites which require Environmental Impact Assessment;
4. **Spearhead a city-wide programme of popular, nearly always street-based, home-building on brown field sites and post-war estates** in conjunction with long term investors;
- a. Identify and prioritise for co-design development **two dozen** publicly-owned strategic brownfield sites for comprehensive development. Certainty should be granted by pre-approving a certain high density medium rise built form as far as legally possibly in advance and in conjunction with national government's proposed brownfield zoning rules;
 - b. Demand improved quality and democratic control of estate regeneration via (i) co-design with a community and obligatory neighbourhood plan style referendums, (ii) presumption for design-code approach in estate regeneration, (iii) setting out clearly that social tenants will not be required to move more than once or to see changes to their tenancies as a result of redevelopment (iv) encouraging long term strategic investment partners rather than standard short term development model;
 - c. As far as possible within UK legislation require neighbourhood plans, co-design or robust evidence of popular support in order to avoid Mayoral call in for any sensitive sites or sites which require Environmental Impact Assessment;
5. **Creating a GLA team with expertise not just in strategic planning but also in community-led planning** to spearhead and enable a London-wide programme of popular and (normally) street-based development on public land (including but not limited to estate-regeneration).

¹⁰¹ By co-design we mean true and ongoing engagement between neighbourhood and design team rather than *post hoc*, often superficial, consultation. These often (but not always or necessarily) use methodologies such as charrettes. After taking part in one, the Director of the East London Community Land Trust, Dave Smith, wrote: 'the Charrette enabled us to cast aside the pessimism and low-expectations that accompany most tawdry "consultations" and the masterplan now truly reflects our community' stated aims.' Civic Voice (2015), *Collaborative Planning for All*.

This team should lead a revolution in the provision of publicly-owned land in London for high density-housing in London. Core elements of this programme should include;

- a. Co-design with the local community often (though not necessarily always) leading to locally-supported design codes;
 - b. Simpler, clearer rules on urban framework and appearance; and
 - c. As wide a range of firms as possible with a focus on long-term value not short term value;
6. **Using guidance and rules underpinning Housing Zones, Development Corporations and the Mayor's Affordable Homes Programme** to encourage the same model of popular development. Specifically the residential high-rise approach being taken by the Old Oak and Park Royal Development Corporation needs to be dramatically reconsidered.¹⁰²
7. **Set up a feed-in group to central government** to;
- a. argue for more GLA powers of land assembly for public sector owned land;
 - b. ensure that specific requests for further liberalisation of Housing and Building Codes are made to DCLG;
 - c. lobby for a shift to a zone-based planning system *but* one which is very firmly anchored in clear evidence on what people like and support in the built environment;
 - d. continue to argue for raised borrowing caps by London boroughs secured against housing;
8. **Putting boroughs under pressure** to;
- a. end anti-street policies often embedded in borough strategies via parking, highway, street width and light policies (any GLA support to boroughs might be contingent of this);
 - b. improve estate regeneration via (i) co-design with a community and obligatory neighbourhood plan style referendums, (ii) presumption for design-code approach in estate regeneration, (iii) setting out clearly that social tenants will not be required to move more than once or to see changes to their tenancies as a result of redevelopment (iv) encouraging long term strategic investment partners rather than standard short term development model;
 - c. better interpret the Best Value test with an understanding of long term value not just short term cash flow;
 - d. make Viability Assessments public documents required as part of the planning application process and end the practice of accepting 'price paid' for land or 'land valuation' as an allowable development cost.¹⁰³

¹⁰² There are limits to what will be doable. For example the national Affordable Housing Capital Funding Guide sets out the rules and procedures for delivering homes under the AHP in London. Some limited London variation is possible. Likewise, it will not always be possible or wise to change Housing Zone rules mid-flight but new opportunities can be tendered differently.

¹⁰³ A true "residual" valuation would deduct from the value of the completed development a reasonable profit, then the cost of construction, fees and finance, leaving a land value. However, if developers are allowed to include either the price paid for land, or an assessment of its value based on comparable evidence, and this results in the total cost of development, including land being higher. Planners then allow a reduction in the provision of affordable homes to increase the end value of the

9. Creating from existing GLA funds a **range of revolving-funds** to support the creation of design codes for estate regeneration and neighbourhood plans and to encourage long-term investment models;¹⁰⁴ and
10. **Opening up the GLA developers' panel** to *much* larger number of providers and focus all development funding partnerships and support on long term investors not the short term development model.

These actions would, we believe, be the first steps in a London-led Direct Planning revolution to solve, systemically and for a generation, the housing crisis in parts of the UK. It would do so *not* by forcing hated high rise or 'could be anywhere' developments on reluctant communities but by unleashing the power of popular support for beautiful places.

The plan-led, supply-constrained, short term capital model of development has failed in this country. It was initially propped up by state-building but, too often, the state built places most people sought to avoid when they could afford to. Subsequently the system has just failed to build enough homes. It is time for a Direct Planning revolution to bring the system back under democratic control and to empower a long term understanding of value rather than a short term bet on obtaining planning permission. It is time to stop asking 'how do we build more homes?' and to start asking 'how do we make new homes more popular?' Only that way can we create the streets, homes and walkable neighbourhoods in which most of us actually want to live and work.

development, rather than insisting on policy compliant provision. The incentive therefore is for developers to overpay for land in the hope of negotiating a reduced provision of affordable homes. The result is land prices higher than what a true "residual" approach would produce, effectively being supported by an under-provision of affordable homes.

¹⁰⁴ More detail on how this might work can be found in the Direct Planning (Pilot) Bill introduced into the House of Lords in 2015.

Acknowledgments

This essay builds on Create Streets' research, consulting, polling, community engagement and urban design work for several councils and landowners as well as our interactions with a very wide range of officials, politicians and design, planning and property industry professionals. If our comments about some of the core assumptions underlying many standard industry views are quite forthright, I would nevertheless like to put on record that the intentions of everyone we have met or worked with have been good, that there are many brilliant exceptions and that we have been met with (nearly) nothing but kindness and generosity despite our, at times, quite challenging propositions. I would particularly like to thank Ben Marshall of Ipsos-MORI, Chris Walker of Policy Exchange (this is a longer version of an essay published for Policy Exchange), Paul Murrain, John Moss and Edward Staite for invaluable help on this essay.

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Create Streets

Creates Streets is a social enterprise that encourages the creation of more urban homes in conventional, terraced streets rather than complex multi-storey buildings. They do this through research, arguing for policy change, working with communities and consulting to councils and landowners. Their work has created considerable controversy and discussion as well as support from both sides of the political spectrum. According to Sir Simon Jenkins, former Chair of the National Trust, 'Create Streets speaks London's language'.



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