

RIBA Response to Housing Green Paper; ‘Homes for the future: more affordable, more sustainable.’

Introduction

The RIBA is one of the most influential architectural institutions in the world, and has been promoting architecture and architects since being awarded its Royal Charter in 1837. The 30,000-strong professional institute is committed to serving the public interest through good design. It also represents 85% of registered architects in the UK through its regional structure as well as a significant number of international members. Our mission statement is simple – to advance architecture by demonstrating benefit to society and promoting excellence in the profession.

The Royal Institute of British Architects has always maintained that good design is crucial in delivering sustainable housing. We are pleased that the Government is taking design quality increasingly seriously and welcome the recognition of this in the Green Paper.

The RIBA has a public duty to promote excellence in the architectural profession. We take that duty extremely seriously and nowhere is this more important than in housing. We want to work closely with Government and other delivery partners to produce well-designed, sustainable housing. Housing and planning policy now will have an immeasurable effect on the population for generations to come. Strong, design-focused measures will make this a positive legacy rather than a social and environmental burden. Design quality must be entrenched in the planning system through legislation, guidance and structures if better quality homes are to be built.

Our response broadly follows the structure of the Green Paper.

Summary

- The RIBA welcomes the Government’s commitment to design issues in the Green Paper. We cannot afford to let bad design turn the consumer against sustainable homes.
- Design must be properly entrenched within the systems that will deliver the country’s housing needs. Local planning authorities should have recourse to local design review panels.
- The Government’s Eco-towns programme is an opportunity to showcase the very best in terms of socially and environmentally sustainable design. They should be easily replicable elsewhere and their locations must be chosen carefully to avoid the creation of carbon-heavy “eco-islands”.
- We repeat our call for the re-introduction of minimum space standards in England.
- Care must be taken over proposals to develop Design Quality Assurance Scheme. Schemes must be robust and contain an element of objective

assessment against sound criteria. Self-certification without an element of oversight will be unacceptable and open to abuse.

Section I : Progress and Challenges

The RIBA has seen increased importance being placed on design matters over the last decade. Design has been given a greater emphasis in Planning Policy Statement 1: *Delivering Sustainable Development* and Planning Policy Statement 3: *Housing*. PPS1 states:

“Good design ensures attractive usable, durable and adaptable places and is a key element in achieving sustainable development. Good design is indivisible from good planning.”

PPS3 goes on to state:

“Good design should contribute positively to making places better for people. Design which is inappropriate in its context or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should be rejected.”

Our engagement with Kate Barker on design issues in her review of land use planning has been a truly positive step. Alongside CABI, we have pushed for better architecture and are working to draw attention to important issues such as space standards in housing.

The CABI National Housing Audit of new housing developments completed between 2001 and 2006 shows just how far there is to go. The size of many homes in the lower and middle sectors of the market has continued to shrink and new home completions have not come close to meeting increased demand. New social housing construction is low. Indeed, overall the number of new housing ‘starts’ on approved applications has fallen in the past year, despite the revised target of achieving 240,000 new homes per year by 2016. Achieving this target will require a concerted effort by the design, planning and construction sectors and it may be necessary to provide a higher number of homes in order to meet demand due to demographic changes and an increasing population.

Section II: More homes to meet growing demand

Delivery without needless delay – continuing planning reform (Chapter 2)

In its response to the Planning for a Sustainable Future White Paper the RIBA stated that while deregulation must be welcomed, it should not proceed at the expense of design quality. Similarly our response to the Barker Review on Land Use Planning said that to focus solely on the deregulatory recommendations without addressing the essential checks and balances offered by those that add value through design would be unacceptable, and quite contrary to the achievement of well-designed places in which to live and work. We must prevent poor-quality planning decisions simply being made more quickly. The RIBA believes that the planning process could be streamlined in the following ways:

- Planning policy must be more strategic and efficient. Clarity and lack of repetition within policy frameworks must be ensured.

- Needless delay must be eliminated but current time targets (8 and 13 weeks) are often a hindrance, preventing the smooth progression of many developments.
- PPS1 should be maintained as a parent document for all subsequent planning policies. But its clear messages on the value of good design must not be diluted.

Public sector land use (Chapter 3)

One of the key demands in the RIBA's 2005 *A Manifesto for Architecture* was that the development of publicly-owned land should be used to pioneer sustainable design and construction techniques, together with mixed tenure. As a major landowner, the Government has a unique opportunity to lead the development of sustainable communities.

In this regard the RIBA has been very keen to see issues of good design take an increasingly important role in developments supported by the Housing Corporation. The Housing Corporation and English Partnerships' joint work in updating the Urban Design Compendium offers all those working on projects involving publicly-owned land a strong set of design reference points. Similarly, the Housing Corporation's Design and Quality Standards make sure that sound, proven design principles are included in the development of new housing. The RIBA endorses these vital design briefings and would like to see them become the basis for national policy on housing.

The disposal of public land can be a catalyst for regeneration and so the RIBA welcomes the Green Paper's aim to further identify and develop of surplus public land. To date it has been the public sector that has pioneered the adoption of the Code for Sustainable Homes (to at least Code Level 3) on all new schemes. The RIBA is pleased to see the public sector taking such a firm and clear lead. We now look to the commercial sector to follow suit.

The RIBA welcomes the creation of the new Homes and Communities Agency from the merge of English Partnerships and the Housing Corporation as it offers the prospect of an increased level of involvement between design professionals, local authorities, government and the wider sector in delivering better new houses. We will be pushing for good design to be further entrenched in the working of the new agency, something that would be strengthened by the increased use of design review panels. We stand ready to work with the Government as the Homes and Communities Agency's agenda develops.

Section III: How we create places and homes that people want to live in

Infrastructure: Planning Gain Supplement (Chapter 5)

The RIBA was pleased at the announcement that proposals to introduce Planning Gain Supplement would be abandoned in this month's Pre-Budget Report. The RIBA had been concerned that PGS, as framed, presented a serious threat to development. We also had concerns that PGS could threaten the quality of good housing design by diverting funds away from the design and innovation elements of new projects. We maintain that more investment on infrastructure is needed and welcome the

Government's intention to introduce a more equitable planning charge alongside a streamlined system of negotiated developer contributions for site-specific matters.

Well designed homes and places (Chapter 6)

Raising design standards

The RIBA welcomes the importance placed on good housing design in the Green Paper. The document notes the negative impact that poor design has had on people's quality of life. Promotion of good design has always been a priority for the Institute and recent responses to government consultation have made this point strongly. Our recent response to the CLG's Planning White Paper made it clear that streamlining of the planning system, while welcomed, must not come at the expense of good design. The explicit statement in PPS1 that good design is indivisible from good planning must be upheld and enforced.

The RIBA was glad to see that the Green Paper has taken on board the disappointing findings of CABI's National Housing Audit. The stark figures, which found that only 13% of new housing could be considered as "good" while 82% was deemed to be "poor" or "average", clearly demonstrate that the design quality of new housing is a major problem. We believe that poor design should not be tolerated by planning authorities or planning inspectors.

It should also be noted that much new housing in the UK today is built with little input from architects. It is important to recognize that while *per se* architect involvement is not a guarantee of design quality, involving good designers with a wide range of skills and considerations is a key component in the creation of well-designed, sustainable and successful communities.

It is the RIBA's opinion that too little design innovation in new homes is seen by the British consumer today. Many modern techniques such as off-site manufacture and modular construction, advanced materials, passive heating and cooling and onsite energy generation, remain largely unknown to or out of reach to the average buyer or occupier of a new house. Design innovation remains the preserve of one-off, usually higher end projects. It is regrettable that British consumers have far less exposure to high quality, urban family housing than their Dutch, French or German counterparts.

The RIBA agrees wholeheartedly with the Green Paper's assertion that 'good design is not just about how a place looks'. We have repeatedly argued that good design is essential in bringing about flexible, efficient and uplifting homes, and safer communities. It enables us to create more sustainable buildings that sit more comfortably in their context and surrounding environment. We therefore call for a solid framework that enables good design to be engrained within the systems that deliver England's future housing needs. If the Government wants to see the country building 'more homes and better homes', as the Green Paper states, various measures need to be firmly set in place.

Case Study: Great Bow Yard

Location: Bow Street, Langport, Somerset

Architect : Stride Treglown

Client : South West Eco Homes Ltd.

Completion Date: December 2005

Architects Stride Treglown were given a brief to create a group of houses that fitted into a conservation area context but were educationally informative and could prove that green design could be inspiring as well as commercially viable. Good design skills have enabled the project to fulfill all of this. Green features of the design include: rainwater harvesting for dual flush toilets, thermally efficient timber wall panels constructed off-site, very high levels of insulation using cellulose (made from recycled newspaper), roof-mounted photovoltaic panels, the implementation of a sustainable urban drainage scheme, non-toxic finishes to the interior and an ecological planting system. The resulting houses are not only eco-friendly but visually add rather than detract from their sensitive surroundings.

All of the 12 houses were sold immediately despite prices being slightly higher than similarly sized local properties. Feedback from residents has been extremely positive. Low heating costs have been experienced by all, many saying that heating was rarely used. Maximum use of sunlight heats much of these south facing houses, leading to warm bright rooms even in Winter. Excellent design skills have resulted in a highly desirable, easily marketable mixed group of houses and flats.

Design review panels

Design review panels, which bring experienced design professionals together with planning officers and other relevant voices in order to review schemes at the pre-application process, need to be introduced uniformly at a local and regional level. These should be integrated within the pre-application process for major projects.

Design review panels enable developers and their design teams to engage with a well-supported panel representing the local authority and other interests. Comments are given without prejudice, and enable participants to develop a positive dialogue about their respective aspirations for the urban environment. Other benefits include raising the standard of design through informed criticism of proposals. Reports by design review panels can be used by local planning authorities to better understand the design quality of submitted schemes. By bringing decision-makers into a forum of informed discussion, vital skills and understanding can be shared and communicated at a political level.

The CABE and RIBA partnership design review panels being developed at the regional level should be used as models for a more widespread systematic implementation. RIBA members all over the country are currently participating in many local design review panels free of charge and in their own time. These have had a very positive impact.

Design review panels need full autonomy to give unfiltered verdicts to planning committees. They are the best objective, professional, design focused tool that exists to ensure the delivery of large-scale, quality housing developments.

Case study; Places Matter! North West regional design review

Places Matter! is a joint initiative of Renew North West, the North West Regeneration Agency and RIBA North West which delivers a programme of activity to drive up the quality of design in the North West region. Places Matter! is currently establishing a regional design review panel to consider schemes of more than local significance and is intended to stand alongside both the CABE national design review and any local planning authority panels. The panel will meet on a monthly basis in up to six locations to ensure a spread of service throughout the region.

Local planning authorities, regeneration agencies, developers and design teams will be encouraged to consider any recommendations made by the panel. Planning officers are also being urged to include the panel's views in planning committee reports alongside any consequent changes to proposals.

Design champions

In the RIBA's *A Manifesto for Architecture* we called for design champions to be appointed to Regional Development Agencies and local authorities cabinets – a view that was strongly backed in Kate Barker's Report on land use planning. Design champions are being used but they need to be properly empowered, invested with sufficient authority within their organisations to make a difference by insisting upon the importance of good design.

Design quality assurance schemes

The RIBA recognizes the need to implement a system that promotes pre-application design discussions for new developments. We agree that time and resources are wasted frequently on reworking basic design principles after schemes have been submitted and often refused. This inefficiency results in part from the unrealistic time targets laid down for the processing of larger projects in particular. In its current form, the system leads developers and planning authorities to treat important design issues as a rushed, retrospective after-thought.

Therefore the RIBA is keen to ensure that careful consideration of design related matters taken by the developer be rewarded in terms of more expedient planning approval. We are interested in the proposal contained in the Green Paper for a design quality assurance scheme and feel that Building for Life could provide a good starting point for laying down the potential criteria for such a scheme. We do, however, have some reservations.

A quality assurance scheme must be sufficiently robust to ensure high quality outputs for the consumer. This means ensuring that a certification mechanism is developed that does not strip the local authority of any of the decision making powers they have to achieve the best specific design strategies for their communities. Therefore we agree wholeheartedly with the principle of complete local authority involvement in the realisation of this pilot scheme. A degree of objective assessment must also form part of any such scheme: self-certification without an element of oversight could clearly be open to abuse. We feel our work with CABE in the development of design review panels could provide a basis for creating an element of oversight within design quality assurance schemes.

Design quality assurance schemes must not become futile ‘pre-application applications’, or in other words another layer of red-tape. They must be light-touch yet meaningful whereby a developer’s proven commitment to tackling design issues from the earliest stages of a project’s conception can be scored against simple criteria. Developers who encourage early community involvement with design issues, for example, should be rewarded. The fast-tracking of a developer’s application would be justifiable if a level of compliance to clearly laid out design criteria could be demonstrated transparently. It should also be stressed that assessment of compliance to any criteria should remain independent ensuring that vested interests are kept in check.

Case Study: Coopers Road Estate

Location: Coopers Road, London SE1.
Architect: ECD Architects
Client: London Borough of Southwark and Peabody Trust
Completion Date: December 2005

This group of 190 flats and houses including 121 for rent, 33 for shared ownership and 36 for sale replaces a 1960s estate that was demolished. The design process began with a series of workshops involving local residents. This formed the basis of the architects’ masterplan which amongst other things ensured that communal and semi-private space was given preference over entirely private open areas. A large courtyard emphasises a feeling of community as well as allowing natural surveillance. Timber clad façades along with steel balcony railings and lamp posts give the estate a distinctive modern identity.

Sustainability measures include enhanced standards of thermal insulation compared to 2002 Building Regulations; high performance double glazing, accessible riser ducts, community heating with combined heat and power, low flush WCs and ample cycle storage and re-cycling facilities. Architects and the Local Authority have carefully worked together to create housing designed with community involvement which is also more environmentally sustainable.

More family homes – space standards

The RIBA was pleased the Green Paper paid some attention to the important issue of house sizes (*More Family Homes* section 6). We observe that England is the only country in the EU which has no minimum space standards for housing.

Anecdotal evidence has shown that the average size of homes at the lower and middle end of the housing market has decreased sharply in recent years, whilst at the higher end of the market, the average size of 4 bedroom homes and above has increased.

Internal space in the average home built today is often insufficient for basic requirements such as storage space, room for relaxation and privacy, or space for children and teenagers to socialise. Cramped conditions are a particular problem for people and families in more deprived communities where the social impacts – such as a lack of places for young people to go – are more acutely felt. The campaigning organisation for housing Shelter, has shown that insufficient space standards in housing quickly leads to occupant dissatisfaction and more frequent house-moves, which in turn can create a transient society with little social stake in particular neighbourhoods. Overcrowding is, however, part of the larger, more fundamental

failure of many new houses in Britain today to provide adequate levels of space for their occupants.

The reduction in space (particularly bedrooms) that we have seen in recent years is particularly important given the imperatives of climate change. Increasingly, high temperatures in summer combined with a decrease in room sizes (which heat up faster) are resulting in the increased use of air conditioning and other cooling technologies, with a resultant increase in carbon emissions.

In its recent policy paper *Better Homes and Neighbourhoods*, the RIBA has already called for the re-introduction of minimum space standards in England and Wales. In partnership with CABI, we are currently involved in research which aims to identify how residents use their homes and how they feel about space. We look forward to developing this work with CLG in the near future.

New homes in the UK are primarily marketed on the basis of the number of bedrooms they contain, with little information provided by housebuilders or re-sellers about their size or area. We feel it would be beneficial to consumers if housing - both new and resale - was marketed with the square metre area of the property clearly displayed, and suggest that this should be included as a mandatory component in Home Information Packs.

Greener homes with more green spaces

The RIBA has welcomed the Government's commitment to creating better places in which people can live. We are glad to see the recognition of the need to provide good quality parks and open spaces as a core element of creating sustainable communities.

However, we must point to our recent policy document *Better Homes and Neighbourhoods* which tackles the important matter of density. Higher density levels in suitable areas can prevent unnecessary sprawl and create attractive, vibrant communities. Low-densities in existing urban and suburban areas represent an opportunity to build more homes, workplaces and facilities in locations where infrastructure such as public transport already exists. Suburban areas need to be re-imagined and revitalised as sustainable communities without destroying the conditions that make them attractive to so many people, including the provision of ample green space.

Successful communities need a balanced mix of housing type. Density levels must be set at a fine grain and guided by a special strategy (and where appropriate, a spatial masterplan). The current measure of dwellings per hectare is too simplistic and we call for density to be measured using a ratio of floor space to site area.

The RIBA feels that green or outdoor space provision for individual residential units is also important. Some form of private outside space allowing access to fresh air should be provided where at all possible, the benefits of this being integral to our views on new housing space standards.

Greener Homes (Chapter 7)

The RIBA welcomes the Government's continuing drive to make our new and existing housing greener and more environmentally sustainable. There is a huge amount to be done and we feel that the Government should not back away from expanding the implementation of current good policy.

We are pleased, therefore, to see the Government launch a consultation on making a rating against the Code for Sustainable Homes mandatory for new homes. Whilst the RIBA supports this, we feel that an even stronger level of enforcement would encourage homebuilders to build to better sustainability standards.

We welcome the lead shown by the Government in requiring that all new homes built with support from the Housing Corporation and English Partnerships must achieve Code Level 3. Research undertaken on behalf of English Partnerships and the Housing Corporation has found that the average additional cost of achieving this is likely to be around 3% more than the old standard of Eco-homes 'Very Good', which would see a 25% reduction in carbon dioxide emissions per home, and water-usage savings of 21 litres per person per day.

Whilst welcoming this positive step, the RIBA would like all new houses to reach the same level of sustainability as soon as possible. We strongly urge that the Government's timetable for all new housing to reach Code Level 3 by 2010 is not be allowed to slip.

Despite the RIBA's support for the introduction of the Code for Sustainable Homes, we feel that it could have gone further in developing an integrated framework for greener homes and communities. Transport, landscape, ecology, density and adaptability are all matters that were omitted from the Code's six "essential elements". The RIBA urges Government to provide for the inclusion of these vital factors in future planning policy or revisions to the Code.

Local authorities and the planning system

The RIBA strongly believes that local authorities should be free (and encouraged) to require developers to aim for higher building standards than those set down in the Code (operating within a common framework).

The London Borough of Merton has set an excellent example in this field. The 'Merton rule' (as it has become known) requires developers to ensure at least 10% of all energy production for new development comes from renewable energy equipment on site. The RIBA is encouraged by the 151 local planning authorities that have so far fully adopted the policy or are actively progressing towards its adoption; some of which have raised the threshold beyond the requirement for 10% of energy to come from renewable supply for all new development (including Bracknell Forest, Islington, Manchester, North Devon, Redbridge and Sheffield: as of Sept 2007).

The RIBA believes that individual local authorities can play a huge role in driving innovation and can become beacons of sustainability. If local authorities lose the ability to set higher standards, we believe this will only be detrimental to the government's goal of reducing carbon emissions from buildings.

Encouraging innovation

Building the kind of homes that will truly meet the environmental challenge requires the constant adoption of innovative architectural and construction technology. This must go hand in hand with providing people with an attractive, socially successful built environment. Good design, through the implementation and maximised use of design review panels and design champions is the best way we can meet this challenge. This should be part of a more design focused ethos within both local government and the housebuilding industry when tackling climate change.

The RIBA notes that the setting of a “clear timetable and process for changing the Building Regulations to set the standards needed to meet these new standards,” is high on the Government’s agenda. This comes after various proposed changes to the current building regulation system to address climate change, (supplement to PPS1, the Code for Sustainable Homes and *Building a Greener Future* consultation). We are concerned, however, the respective roles of planning control and building regulations in assessing the environmental performance of buildings are becoming increasingly blurred. We submit that the building regulations should remain the focus for addressing building performance issues as they provide clear targets against which constructed buildings can be measured and recommendations made for improvements made.

The RIBA reiterates that good design cannot be separated from sustainability in delivering new homes and improving existing homes. The Code for Sustainable Homes represents a great opportunity to achieve this but innovation and creativity are key; we must try to avoid the stagnation of good design as this will leave us with a banal and uninspiring urban realm. We cannot afford to let bad design turn the British consumer against sustainable homes. It is the consumer who will ultimately allow greener and better new houses to become the norm. This can only be achieved with the implementation of rigorous design standards in conjunction with the Government’s Code for Sustainable Homes.

Eco-towns (Chapter 1)

The RIBA enthusiastically supports the Government’s proposals for a series of Eco-towns to be built, and was pleased by the Prime Minister’s recent announcement that the programme will be doubled from five new towns to ten. We welcome this development as a unique opportunity to showcase the very best of thinking around sustainable communities and the environment in modern British planning and architecture. The RIBA, together with CABI and The Prince’s Foundation, will assist the Government in organising an ideas competition to develop and set the design standards for the programme. The competition will focus both on the practical design ideas and the design and development process.

Eco-towns have the potential to become beacons of sustainability and best practice. No short-cuts must be taken in their design and delivery, and effective involvement with the architecture and design profession is vital. Similarly, the methods employed in delivering new eco-towns should be easily replicated elsewhere if Eco-towns are to be genuine pioneers of new technologies and drivers of emerging markets for sustainable design and products.

One of the most important factors of the Eco-towns programme will be their location and we are following the current competition for sites with interest. Where sites are located away from existing settlements they should be planned with sustainable infrastructure and transport facilities from the outset. Elsewhere Eco-towns could be located on or near existing infrastructure and may form expansions of existing settlements. Eco-islands – new settlements that are carbon-heavy through the creation of new infrastructure or whose residents remain car-dependent in order to access infrastructure and facilities elsewhere – would defeat the object of the programme.

Flood risk development

The RIBA broadly agrees with the stated need to re-assess development on flood plains. The RIBA's in-house think-tank "Building Futures" recently published *Living with water: Vision of a flooded future*, in which were identified some of the key issues that need to be addressed with regard to flood risk development, in the Thames Gateway area in particular. It seems clear that planning, design and construction have not evolved sufficiently to face the future of increased flood risk with confidence. Our paper calls for architects, developers and planning authorities to investigate the best ways to react to flooding and development in flood-prone areas.

Masterplans should be encouraged to include low lying green spaces that are designed to absorb flooding with minimal damage, which can serve as zones for biodiversity, amenity and leisure. The creation of a 'Blue Belt' to curb development on such land should be considered. Entrenching good design practice within this aspect of planning too, can only increase the chances of facing increased flooding with any long-term success. Off-site, flexible, temporary or floating construction techniques can and should be meeting more of the country's housing needs in areas of potential flood risk.

Section V: Delivery: How we make it happen

Skills (Chapter 11)

Developing skills within architecture has always been a vital focus for the RIBA. The Institute is publishing a series of Climate Change Tool Kits which will provide architects with the skills needed to apply sound techniques of sustainability and energy efficiency to new projects, enabling them to meet the needs of increasingly climate-conscious clients, as well as the requirements of greener planning policies and building regulations. We will engage with our fellow built environment professions to share knowledge in this area as multi-disciplinary working is vital to meet the challenges of climate change.

In our response to the Planning White Paper, we strongly supported moves to increase the number of qualified planners and the availability planning skills within Local Authorities. We are glad to see that this issue is raised in the Green Paper. There is much to be done to bring skills and capacity within local authority planning departments to the right standard. Councillors, in charge of making vital planning decisions need to be adequately prepared and supported. Their training should also emphasise the importance of good design and innovation. The RIBA is at the forefront of driving continuous professional development within the architecture sector. There is a need for this kind of focused skills development to be promoted to all built environment professions.

The RIBA is determined to ensure that as a profession, architects engage with housing as fully as they have done in some past periods, and continue to demonstrate how they can work with other design professions, developers and the Government to deliver better homes and better neighbourhoods. We are also aware that more needs to be done to install a greater level of awareness of the social and community aspects of designing homes in the teaching of architecture at university.