

LONDON SUSTAINABLE DEVELOPMENT COMMISSION (LSDC)

RESPONSE TO CONSULTATION ON A HOUSING DESIGN GUIDE

September 2009

1. Introduction

The LSDC is grateful for the opportunity to comment at this stage on the Proposals for the Housing Design Guide.

We are pleased that it has been possible to address many of the comments raised by others and ourselves in the consultation on 'Planning for a Better London' and the Housing strategy.

We are also pleased that so much progress has been made in relation to supporting sustainable homes over the past few years.

1.1 The LSDC supports the guidance outlined in the document providing clear proposals which housing providers can address when considering a new development.

However, we do have a fundamental concern that the guide will need considerable support in order that developers will take on the issues outlined in the guide.

In particular, we would advocate that a full life cycle analysis and feasibility guide, showing savings over time should accompany the next iteration of the guide.

The feasibility guide, including costs similar to that which accompanied the London Renewables SPG the London Renewable toolkit would be most helpful.

We also would recommend that since developers evidently need clear support in order to follow the Guidance more connections are made to existing London wide supporting documents and funding opportunities. This would enable developers to be more positive about the sentiment expressed in the Guide. Particularly in relation to climate change adaptation and renewable energy.

1.2 The LSDC feel that the guide needs to clarify the difference between a guide and a standard – both are different things and put different requirements on house builders. It is not clear from the present guide where the standards addressed are guidance only or are required.

1.3 The Commission understands that at present these standards will only apply to the public sector. We feel strongly that these standards also need to be applied to the private sector as well. As the guide at present only applies to public and social housing, this immediately puts the social housing sector at a disadvantage against private developers.

There needs to make links across to the London Plan to ensure that these standards are adopted as policies that are applied to all housing tenures.

1.4 We are aware that the recent expansion in housing has not resulted in Londoners being happier in their homes; we are most concerned about recent CABE and Shelter studies¹, which refers to overcrowding and residents poor quality of life. We would expect London's Housing stock and the quality of our homes to relate to:

- Meeting the need to reduce carbon emissions within the timescales required by the UK, EU and in particular those set by London's Climate Change Action Plan;
- Reducing the adverse impacts of the current patterns of consumption and production not only on the environment but also on society and the economy;
- Adapting to climate change so as to minimise the significant impacts of the changes that cannot now be avoided;
- Supporting sustainable lifestyles ambitions, including addressing issues such as community cohesion.

1.5 As indicated in our own latest research, the new homes and how we live in them, directly contribute to London's high levels of resource consumption². The current levels of resource use are unlikely to be sustainable particularly from an environmental perspective, beyond the short term.

1.6 The Commission understands that a cost benefit analysis is currently being undertaken on the design guide. Commissioners are keen that wider health/social benefits are factored in and thereby make the cost-benefit more comprehensive. By including these issues the analysis would demonstrate that expenditure would decrease in other areas with good quality housing e.g. crime, health etc. We would encourage that these issues are included in the tender specification for CBA.

1.7 There may be concern from developers that the proposals outlined in the guide may be too financially punitive. However, we feel that, the true environmental and social cost of less sustainable homes be made apparent and taken into account at the design stage. Overuse of our resources, are more likely to contribute to both a reduction in the planet's critical natural capital and irreversible climate change. Over and above the costs of not tackling climate change (as described by Lord Stern), any increase in demand for those very same resources (resulting from any global return to business as usual) is likely to see rising commodity prices, which could in themselves, undermine any attempt to make economic recovery sustainable in all meanings of this word.

1.8 We would refer you to the recent publication of climate change projections by the Government in June. The UKCP09 climate projections are the latest data to show that London should plan for hotter, drier summers and warmer, wetter winters. UK scientists have been advancing techniques of climate modeling and the new projections provide an increased level of detail and a more sophisticated way of looking at the uncertainty

¹ <http://www.cabe.org.uk/press-releases/new-homes-are-too-small-for-everyday-life>

² LSDC, London's Quality of Life Indicators 2008-09 Report, May 2009

inherent in planning for the future. The LSDC feel that more needs to be added to the design guide in terms of climate change adaptation measures particularly in the issues of overheating and flooding.

1.9 Long-lived infrastructure and buildings must be top priority. Anyone commissioning or designing aspects of the built environment should take account of the way the climate is likely to change over the life of the structure. The London Climate Change Partnership has produced a checklist for developers and their architects and engineers. And they have also reported on how the existing housing stock needs to be upgraded with measures, which will make them more comfortable and cheaper to run now. We would recommend that the Housing Design Guide refer to this guidance and the UKCIP projections as the current code for sustainable homes does not provide the support that developers need.

2.0 The London Energy Partnership and London Renewables provided explicit guidance on how feasibility studies into the provision for renewables should be applied. This includes explicit guidance on cost and long-term investment. One of the aims was to address the issue of the cost of renewables and worked with real time examples and case studies. There is also specific enabling support from the Green Energy Fund that has been set up by the London Energy Partnership.

2.1 Although some of the solutions to these problems will have to follow national agreement and statutory guidance (The HCA is producing its own design guide in April 2010), the London Plan and the Mayor's associated strategies provide the main opportunities to set the long term goals for London that will deliver the above outcomes and provide the necessary framework for their delivery. We also consider that by making these statements and by showing appropriate guidance London will be leading the way. They will also have influence on the national scene given the tendency for London's response to such matters to be regarded as a signal of how to act.