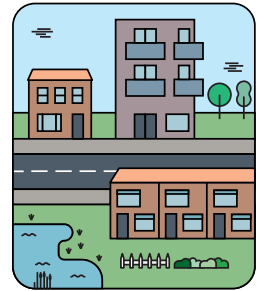


## NLA Expert Panel Whitepaper:

# Housing



## Key Recommendations for the London Agenda

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### **Introduction**

Over the past year and a half, the Housing Panel have been enthusiastically engaged in debating how to successfully deliver affordable, sustainable and joyful homes to all Londoners. During this relatively short period, the challenges and opportunities, (but increasingly the challenges) facing housing supply in the capital have shifted significantly.

Global energy prices, the war in Ukraine and inflationary pressure on constructors and customers has caused a slow-down in the implementation and sales of homes. Regulatory frameworks continue to be opaque and increasingly in conflict, with abrupt policy changes, such as the introduction of a mandatory second staircase in taller residential buildings (now at anything over six storeys), leading to the cancellation of whole housing programmes.

At the same time, the panel continue to highlight creative solutions to circumnavigate the challenges faced with a distinct focus on mitigating the social and environmental impact of delivering new homes. Here, the health, well-being and future resilience of London's communities, alongside a pursuit of net zero carbon targets, has driven a incisive shift to consider a 'retro-fit first' approach to existing buildings for residential uses.

Our recommendations to The New London Agenda reflect these dynamic circumstances and needs.

### **Panel Working Groups**

Informed by the broad knowledge and experience within the panel, our discussion has been guided throughout by the themes of People, Place and Planet.

**People – How London's communities can shape and contribute to their own neighbourhoods**

**Place – How residential districts across London are commissioned, designed and managed**

**Planet – How we accelerate truly net-zero carbon homes in the face of other pressures on housing supply**

We have also considered how our recommendations reflect the New London Sounding Board aims to take collective responsibility, provide clarity and build trust.

The panel was organised into 3 working groups, each including a balance of both private sector developers, residential providers, local authorities and consultants. The recommendations are summarised here:

### **Recommendations People**

Early panel discussions centred on existing London communities with many directly involved with regeneration of housing estates. The topics of empowerment, choice and stewardship emerged as key components to successful long-term regeneration. This led us to scrutinise the residential ballot process and gather best practice from our collective experience, to encourage equality across boroughs and give clarity to a policy which was intended to deeply empower communities and give a voice to those on the threshold of change.

As noted, the shift in the panel experience during the 2022/23 sessions has been the increased consideration of refurbishment and infill in favour of wholesale renewal. The recommendations reflect this change:

1. Update current GLA guidance—‘Better Homes for local people. The Mayor’s good practice guide to estate regeneration, February 2018’ to include estate ballot guidance for infill (at scale, see below) and retrofit, not only full regeneration. We would suggest that a ballot is required if decanting is necessary to achieve deeper retrofits.
2. Review reducing the additional homes required to trigger the ballot. The report ‘Altered Estates 2, How to address changing priorities in estate regeneration, June 2022’ recommends 50 homes as the threshold; which we would advocate.
3. The current ballot choices are overly simplistic: Yes means: “redevelopment”; No means: “no change/ no improvements at all”. Additionally, the time and cost for development agencies to prepare a full design on which to seek a ballot decision adds unnecessary risk. Review a two-stage ballot—an initial resident offer outlining those commitments that can be fixed such as rent levels and the sizes of new homes; followed by an endorsement vote based on outline planning design (including parameter drawings). This process promotes a deeper engagement and increased resident involvement from the outset.
4. Strengthen the offer to estate tenants to a commitment of a single move, and to a better home! Where a first phase cannot be achieved without off-site decanting, a commitment to return should be included.
5. Update the GLA guidance with a commitment to dialogue with communities post-ballot, to ensure continuity and trust (especially for large multi-phased regenerations) while development personnel change and design proposals evolve and become more defined.

### **Place**

These recommendations are driven by the perception of the panel that urgent and emerging regulatory agendas supporting building safety, climate change and design quality are not currently joined up. The result is often a string of unintended consequences that have the potential to stall housing delivery, but more importantly, negatively impact the quality of our residential environment. The motivation of the panel is not to generate more regulation, but rather consolidate and prioritise existing components. Regulation should focus on the principles and performance to be achieved leaving flexibility for variety and innovation in housing solutions.

6. Clarity on when new guidance or policy is to be published and deployed on projects at different stages of design and delivery. This is essential to build industry confidence and reduce disruption to communities (especially multi-phase housing programmes).
7. Leverage the GLA’s ability to deliver guidance that is aligned with the NPPF, reducing the need for Local Authorities to develop and monitor additional guidance, where possible.
8. Evolve guidance to a set of performance requirements, with a focus on outcomes that are data driven, rather than overly prescriptive and which limit site specific innovation. The panel acknowledge the LPG framework but are concerned that, for example, the Housing Standards SPG requirements and diagrams preclude typologies that would be essential to provide the homes needed for the diversity of London’s sites and communities.
9. Support Local Authorities in developing both skills and capacity to help officers interpret, monitor and successfully implement increasingly complex regulatory guidance. This could take the form of initiatives to promote public-private knowledge sharing and upskilling of planning officers in design matters, leveraging the capital’s concentration of world class experts in the built environment, as well as increasing capacity within local authorities through building on initiatives that the GLA has supported/delivered in the past, such as Public Practice and the Homebuilding Capacity Fund.
10. Enable open-source POE tools to improve health and wellbeing outcomes by monitoring performance in-use and using real data to inform design guidance.
11. Aligning increased regulatory standards with additional grant support for affordable homes; including where existing affordable housing stock is upgraded.

### **Planet**

The Planet working group have been exploring recommendations to help remove the barriers to achieving net zero carbon homes. The group combined forces with the NLA Net Zero panel to inform and align recommendations and have focused on retro-fit and upgrading existing housing stock. This is where the panel believe support and guidance is most needed and will potentially

have the greatest impact. (Currently there are circa 3.6 million homes in London of which 1.25 million are leasehold).

**Key barriers to achieving net zero homes:**

**Behavioural** – A lack of knowledge and an inability to assess the performance and suitability of existing buildings for upgrade, discourages clients and individual homeowners from upgrading their homes towards net zero.

**Economic** – There is insufficient targeted funding available for net zero upgrade projects. Those that exist for individual homeowners are poorly advertised. Without harmonising VAT on retrofit with that on new build alternatives, the viability of upgrading is overly prejudiced.

**Planning** – Whilst the GLA has integrated Whole Life-Cycle Carbon and Circular Economy policies into the London Plan, there remains a lack of clarity in how upgrading existing homes are supported in planning policy—this is further challenging in conservation and heritage settings.

**Capacity & Skills** – The shortage of skills and knowledge throughout the whole supply chain means funding, designing, constructing and monitoring homes to achieve net zero is restricted. The panel see that AI could be well placed to address this skills gap.

**Regulatory** – Competing agendas are causing confusion. For example, the conflict of prohibiting the safe use of timber for residential buildings is delaying the drive to net zero at scale.

**12. Support individual homeowners to achieve net zero**

- Public messaging. Clear messaging to improve knowledge of options available for retro-fit and access to grants.
- EPC B rating. Guidance on how to achieve, and route map to uplift further to net zero.
- Easy wins to more complex interventions—clear guidance on cost versus impact.
- Exemplar projects—robust, detailed case studies in the UK and abroad needed, including lessons learned.
- Implementation of a GLA dedicated fund to invest and move technologically forward to create a catalyst effect reinvigorated version Retro-fit Accelerator). Reference: [Energiesprong UK](#)—a standard and funding approach for whole house refurbishment and new build financed by energy and maintenance savings.

**13. Unlock retro-fit funding for housing at scale**

- GLA Funding – adjust grant rates to offer incentives for higher energy performance. Consider ring fencing funding specifically to achieve net zero.
- Cost benchmark – establish benchmark cost for retrofitting to a net zero standard.
- Carbon off set funds – provide transparency on payments received and how monies are spent.
- Provide a framework for how this is to be spent in the future and how it could be used for cross benefit.
- Lobby government to remove VAT on retro-fit.
- Publish wider health and well-being benefits and socio-economic impact of net zero environments. Reference: Clarion Housing - Retro-fit demonstrator project for the Social Housing Decarbonisation Fund (SHDF).

**14. Establish planning framework for retro-fit homes**

- Expand planning guidance (recognising what is/ is not achievable) to promote retro-fitting homes
- Include clear guidance and support for homeowners with heritage buildings.

**15. Apply UK Net Zero Carbon Buildings Standard to new and existing homes**

- The UK Net Zero Carbon Buildings Standard will provide the GLA with a much needed universal standard to define net zero, and will provide a robust methodology to local authorities, developers and the public in delivering net zero homes.

## Case Study 1, People: Barnsbury Estate, Islington



**Client:** Newlon Housing Trust

**Location:** London Borough Islington

**Key data:** 1,225 homes 2018-current

**Sustainability credentials:** Passivhaus Net Zero

### Project Summary

PTE's masterplan for the Barnsbury Estate in Kings Cross includes for 275 homes to be fully refurbished and 351 post-war homes redeveloped for existing residents, with a further 550-600 new homes provided across the estate. The masterplan also provides commercial space, a community centre and new landscaped spaces including play, outdoor gym equipment and growing areas.

The project will achieve 50 per cent affordable housing with a mix of home types and sizes to suit the needs of residents. The masterplan layout is the result of a comprehensive consultation programme with existing residents of the estate. PTE's design was approved by residents in March 2021, in a ballot that returned a 73 per cent yes vote.

### Lessons Learned

Allow for flexibility in the engagement strategy—to speed up or slow down based on resident feedback, to change presentation techniques or focus on areas of interest.

Align planning and engagement programmes so feedback can be shared in both directions. Many residents were difficult to engage until their individual offers were available.

Maintain engagement post-planning.

Break into smaller groups to allow quieter people to be heard.

Have material translated into multiple languages. Whatever font size you think of using, increase it! There's always someone who will struggle to read it.

Allow plenty of time to prepare for resident workshops. Getting the material and wording right takes time.

### **Is this case study scalable, How does it demonstrate value, and how can this be measured over time**

In terms of the retro-fit element, London has a vast stock of mansion blocks from 1930's slum clearance, remaining today an important component of affordable homes and a valued part of the capital's heritage.

The successful upgrade of these buildings, at scale, is key to London's sustainable future housing.

The Barnsbury project is currently testing the upgrade of a single block balancing the existing challenges of small home areas, narrow gallery access, maintaining the decorative brick finishes, avoiding (or minimising) resident decant.

The prototype block will be measured for performance and the design work reviewed ahead of refurbishing the remaining buildings.

## Case Study 2, Place: Urban Design Learning



**Location:** London-wide

### Project Summary

Achieving well-designed buildings and places across an area the size of London, requires the right design infrastructure to support the skills needed for plan-making and decision-making that achieves high quality development in each local authority. Part of this infrastructure must be the support to build knowledge and confidence about what good design looks like, how it is achieved and what tools and processes can be used to help achieve it.

For 20 years, Urban Design London (UDL), now called Urban Design Learning, a not-for-profit organisation, has supported local authorities and practitioners across the capital by providing training, networking opportunities and learning materials on a huge range of policy and practice issues effecting the built environment. Primarily funded through TfL and an annual subscription programme, UDL is the hub for information on local design review panels as well as running its own panel to review TfL streets and public space projects and hosting site visits to see examples of good practice. It has built an online library of learning material and written good practice guidance.

Before the 2021 London Plan was formulated UDL held a range of workshops on what the London Plan should say on design. This led to a clear steer to remove the density matrix and instead use a design-led approach to site capacity. The GLA picked this up and changed the London Plan approach. UDL then held a number of training sessions and surgeries to help boroughs understand how to apply the new approach.

To support the application of London Plan policies, the GLA has developed a suite of guidance documents that relate to the design coding process for London boroughs. UDL ran bespoke workshops to help the boroughs understand how to apply these.

Working with the GLA and TfL environment teams, UDL has developed and delivered comprehensive training programmes on these issues that include workshops, site visits and surgeries.

One of the 10 key insights from the GLA's biennial survey of placeshaping capacity in local authorities published in March 2023, highlighted that "There is huge demand for knowledge sharing and upskilling existing teams [and that] Authorities value GLA resources that upskill or assist in knowledge sharing, notably Urban Design London, Good Growth by Design and Transport for London guidance."

Over 2022–23, UDL ran 78 events as part of their London Programme, covering a variety of training topics and networking opportunities across 13 series. 270 people attended eight site visits throughout the year. On average, there were 165 event bookings per borough over the year, an increase of just over 5 per cent on the previous year.

### ***Lessons learned***

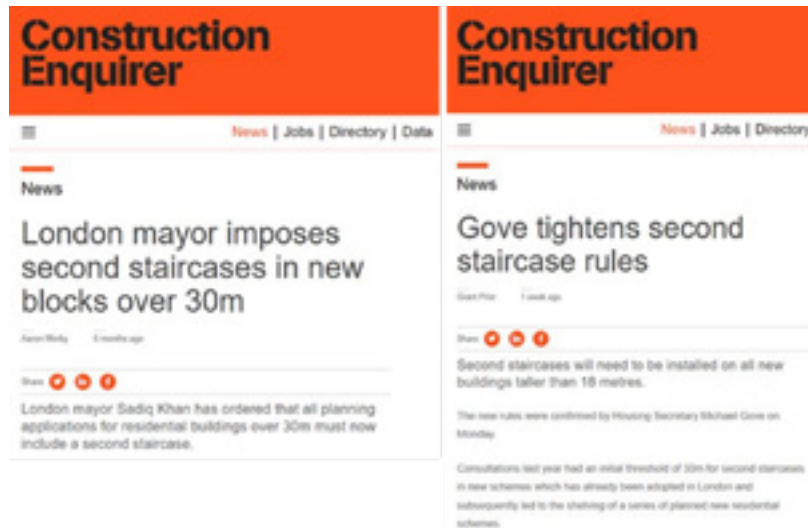
Supporting organisations that can help cross-sector and cross-disciplinary learning is an important low-cost resource to help build knowledge and skills.

### ***Is this case study scalable, How does it demonstrate value, and how can this be measured over time?***

The opportunity of extending this programme nationally will require the close working of a network of similar design-led organisations to ensure quality of the programme is maintained and improved to meet local and regional needs.



## Case Study 4, Place: Transparency, Clarity and Alignment in relation to new guidance and regulatory changes



**Location:** London-wide

### Case Study Summary

This recommendation seeks to build trust and clarity by proposing that GLA guidance is aligned with regulatory changes at Government level and that all guidance is consulted, published and implemented in coordinated and reasonable manner. This will help mitigate the scale of unintended consequences we are seeing in relation to the way that guidance around the requirement for a second stair has been publicised and implemented, which reportedly has stalled more than 20,000 yet-to-be-built homes in the capital\* largely due to the lack of clarity in the guidance itself and the absence of a reasonable transition period.

In December of 2022, DLUCH published a consultation on the threshold for the introduction of a second stair in high risk buildings. In February of 2023, the GLA announced a requirement for second stairs in buildings over 30m to be incorporated to all schemes in Planning before those schemes being allowed to proceed. Six months later, DLUHC has announced that the new threshold for second stairs will be 18m once the new Part B guidance is updated and that there will be reasonable transition periods following the publication of this new guidance. Details of the proposed date for the publication of this new guidance and associated transition periods remain unknown, causing more projects to go on hold, delayed and potentially no longer viable.

\*<https://www.architectsjournal.co.uk/news/over-20000-unbuilt-london-homes-caught-in-second-stair-havoc>

### Lessons learned

The sudden introduction of high impact guidance such as the requirement for a second stair has led to significant unintended consequences which could have been avoided through alignment between GLA and DLUHC guidance, absolute clarity around the performance requirement and more transparency around transition periods and upcoming changes.

The lack of joined up thinking in terms of what the safety threshold should be (ie. 18m vs. 30m) has resulted in what could be read as a subjective interpretation of a technical consideration, ie. technically, only one of the two thresholds would achieve the performance requirement, the other is either a redundancy or a deficiency. The introduction of two thresholds has resulted in a two-tiered approach between GLA and DLUHC guidance, with the upcoming DLUHC guidance being the more onerous one. This will likely generate confusion for future residents, home owners and insurance providers of homes without a second stair in new buildings between the 18m and 30m threshold.

This recommendation asks for all GLA guidance, specially where the impact is of this magnitude, to be joined up with Government regulation, to be technically validated and aligned in terms of performance outcomes, and to adopt reasonable transition periods to allow the industry and supply chain to be ready for these changes.

More recently DLUHC's has suggested there will be a proposed transition period for the

introduction of the second stair threshold once guidance is updated, however the date of publication for this update and the length of transition periods remain unknown.

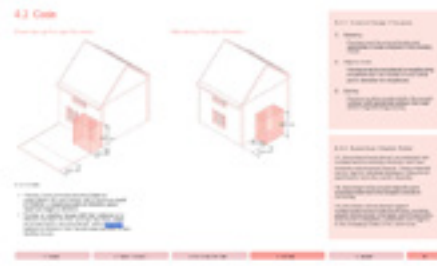
***Is this case study scalable, How does it demonstrate value, and how can this be measured over time***

Only through transparency, clarity and reasonable transition periods can new designs appropriately respond to new guidance. These three elements will be vital in helping the industry and the Planning system focus it's resources in resolving the challenges ahead without compromising the quality and quantity of homes being delivered.

By way of comparison, the recent 18-month transition for parts L and O has proven to be a challenge for the industry, supply chain and assessors to be ready to implement the changes. New GLA guidance with major viability impact should at least allow for the same transition period as other important regulatory changes being implemented by DLUHC, and should be proportionate to the scale of change, upskilling and supply chain preparation required.



## Case Study 5, Planet: Becontree Design Code, Becontree Estate



**Client:** London Borough of Barking & Dagenham

**Location:** Becontree Estate, London Borough of Barking & Dagenham

**Key data:** 29,000 homes ongoing application



### Project Summary

The design code supports the London Borough of Barking & Dagenham's (LBBD) commitment to improving the sustainability and attractiveness of the Becontree Estate. The Becontree Estate Design Code is written to assist residents adapting their homes. It seeks to enhance the special character of the Becontree Estate and champion sustainable retrofit, while also preventing works that may harm the special historic character and appearance of the estate.

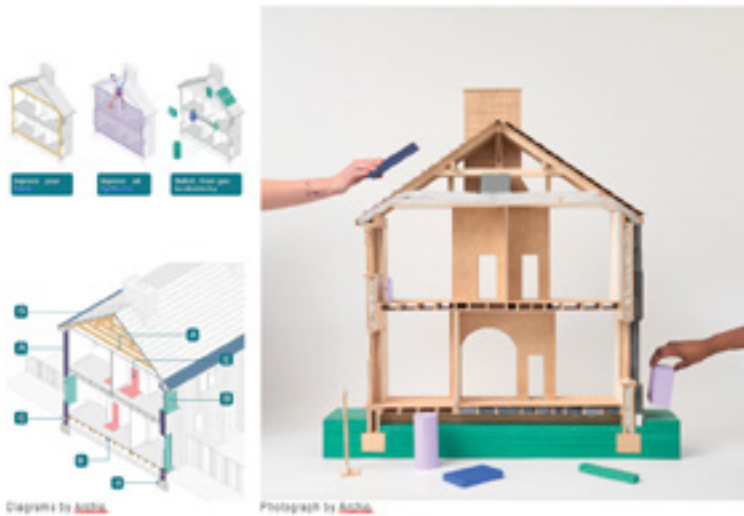
### Lessons learned

- Incentivise retrofit, remove barriers to planning for residents
- Resident engagement is key at an early stage and throughout the production of the code
- Essential to have planning input to determine the scope and scale of the code
- Clarity of language and terms is important

### Is this case study scalable, How does it demonstrate value, and how can this be measured over time

The study is applicable to many garden estates built during the interwar period. The elements covered in the code included the most popular planning application subjects, and value will be determined with an improvement in the quality of the planning applications, a reduction in refusal rates, and enhancement of the Becontree Estate.

## Case Study 5, Planet: Becontree Design Guide, Becontree Estate



**Client:** Be First

**Location:** Becontree Estate, London Borough of Barking & Dagenham

**Key data:** 29,000 homes ongoing application

### Project Summary

The retrofit guide is for Becontree Estate homeowners and landlords who are interested in retrofitting their homes. The Becontree Estate is the largest council housing estate in the UK. The 29,000 homes were built in the 1920s and 1930s on the fundamental principle of creating an environment for people to live a better life. The guide provides a range of proven solutions for reducing energy consumption and embodied carbon which could be applied to thousands of homes on the estate, and suggests community led approaches so that costs can be brought down.

### Key aims

→ Analyse housing types, incentivise retrofit, encourage community led low energy elements

### Lessons learned

- Input and co-design from residents is key to developing proven and proposed solutions
- Cost benefit analysis important for prioritising retrofit

### Is this case study scalable, How does it demonstrate value, and how can this be measured over time

The extraordinary scale and repetition of house types on the Becontree Estate provides a unique opportunity for implementing mass retrofit. The estate has some of the highest fuel poverty rates in the borough and reducing these will be a key metric of success. The implementation of resident led retrofit schemes, alongside local authority schemes, and the transition to sustainable energy generation is a priority for the guide.

## Housing Expert Panel

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Delivering the quality and quantity of housing Londoners need remains perhaps the biggest challenge for London. This Panel focuses on developing thought-leadership around the challenges and opportunities facing delivering both affordable and sustainable housing for Londoners and interrogates these issues through the lens of people, place and planet.

**Chair:** *Carl Vann, Pollard Thomas Edwards*

*Jo McCafferty, Levitt Bernstein*

*Sarah Allan, DLUCH*

*Rachel Bagenal, Hackney Council*

*Jennifer Daothong, LB Lewisham*

*Rachel Ferguson, Pocket Living*

*James Green, City of Westminster*

*Alice Hawkins, Turley*

*John Lewis, Peabody*

*Miranda MacLaren, Morris+Company*

*Oliver Maury, Montagu Evans*

*Darren Parker, L&Q*

*Isabel Pietri, Lendlease*

*Sarah Beth Riley, Be First*

*Amandeep Singh Kalra, Be First*

*Prisca Thielmann, Maccleanor Lavington*

*Kathryn Tombling, BDP*

*Sarah Wardle, BECG*