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Better housing for London: how on earth did we pull that off?

Richa Mukhia

It [the London Housing Design Guide] is quietly radical. It demonstrates that it is still possible for public authorities to direct city building for the better.

– Rowan Moore, *Slow Burn City*¹

The London Housing Design Guide (LHDG) was arguably the boldest and most influential of all the projects of Design for London (DfL). It was a conviction-driven mission, fighting for a better standard of housing for the average Londoner.

This fragile project survived against the odds and steered a new course for housing in London. In essence, the LHDG proposed 90 standards that set out a confident vision for housing quality in the capital. Of the suite of standards, the most controversial were the minimum space standards. These have now been transplanted into national policy through the *National Technical Standards* published in March 2015. Now, for the first time in history, Britain has minimum space standards for all housing tenures. London really did lead the way, under the watch of a Conservative mayor and a Conservative government and during a turbulent era of financial crisis and public-sector cutbacks in Britain.

Writing this chapter has presented a valuable opportunity to revisit this story, speak to the protagonists involved and learn lessons from a most unlikely success story. The focus of this text is the process of delivering the LHDG and not the standards as published. These can be found in the guide itself.²

UK housing standards: historical background

Since the publication of the London Building Act of 1667, London has always had some form of regulations concerning housing design. These were often put in place with urgency after national disasters or wars and were invariably at the mercy of politics and economics.

In the late nineteenth century, the Disraeli government passed a raft of legislation to tackle poor and insanitary housing, including the Public Health Act 1875, which set out construction bylaws for terrace housing, and the Artisans' Dwellings Act 1875, which empowered councils to buy and demolish slum housing and construct new public housing. The Tudor Walters report (1918) arose from the Homes Fit for Heroes campaign after the First World War and sought to raise the standard of housing in the country. Crucially, it acknowledged the importance of housing quality in improving living conditions and made the link to space standards by proposing minimum floor areas for a range of dwelling types. The Dudley report (1944) and the *Housing Manual* (1949) built on this legacy. These standards applied to public housing and did much to bolster quality.

In the 1950s, as private house building accelerated and political priorities shifted to increasing the supply, there was a notable deterioration in housing quality. The amount of space in homes was falling just as living standards were rising and people were demanding more space. In response, Sir Parker Morris was appointed to chair a committee tasked to 'consider the standards of design and equipment applicable to family dwellings and other forms of residential accommodation, whether provided by public authorities or by private enterprise, and to make recommendations'.³ The committee was open and outward-facing, and consulted with a wide array of stakeholders and interested parties. There was also a great deal of fieldwork, with visits to over 600 dwellings supported by a functional analysis of needs and requirements of 'new patterns of living'. The committee's hugely influential report *Homes for Today and Tomorrow* was published in 1961 (Figure 4.1) and made the case for space standards: 'Additional floor space takes first priority in the evidence, and this call cannot and must not be ignored, for a good house or flat can never be made out of premises which are too small.'⁴

The Parker Morris standards were derived by examining how residents used their homes, what equipment and furniture they needed, and the space required to perform household activities. The report concentrates on the usability of a home but also devotes an entire chapter

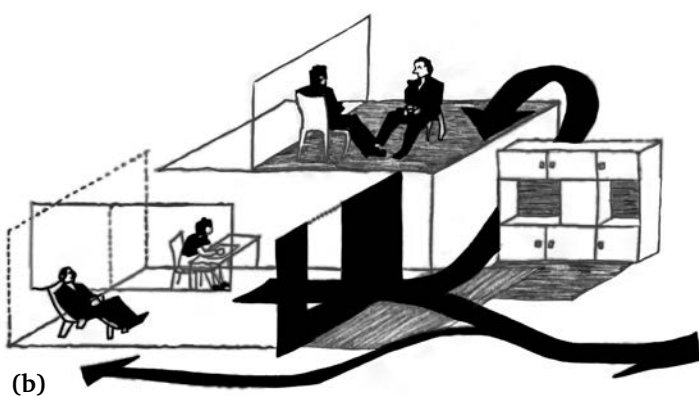
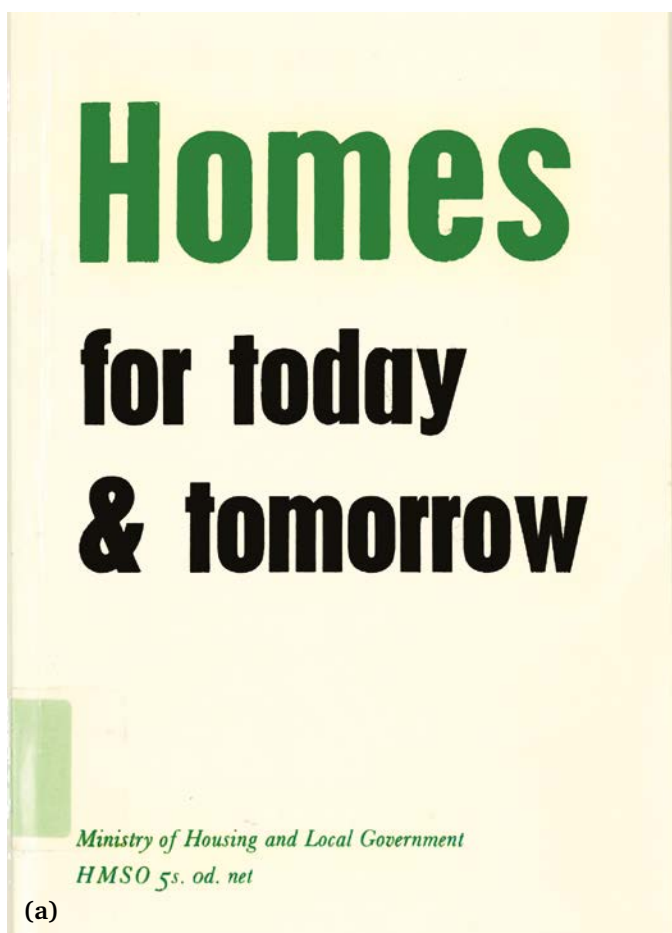


Figure 4.1 The Parker Morris report: (a) Cover; (b) Livable housing.
Source: *Homes for Today and Tomorrow*, HMSO, 1961.

to 'The Home in Its Setting', focusing on the relationship of the dwelling to the street and surrounding context. Initially, the standards were applied through good practice guidance, but in 1967 they were made mandatory, first for the New Towns and subsequently (1969) for all new council housing.

While the standards had an influence on the private housing market, the ambition to apply the guidance across tenures failed to materialise, apart from in the New Towns. However, since local authorities remained the primary deliverers of housing in the 1960s and 1970s, this ensured a legacy of well-sized and functional housing stock from this period.

In 1980 a new Conservative government, led by Margaret Thatcher, rescinded the Parker Morris standards and introduced the Local Government, Planning and Land Act. The Act had further far-reaching consequences for the delivery of housing in the UK. New financial controls curbed local authority house building, and as a result housing associations became the main providers of social housing and private enterprise the main supplier of housing overall. This marked a structural shift in the way housing was delivered in the UK and sowed the seeds for the market-led approach to housing that defined the following decades.

A new millennium: housing in London

The year 2000 was significant for governance and planning in London. Ken Livingstone was elected as Mayor of London in May 2000. The same year, *Planning Policy Guidance 3 (PPG3)* was launched, sanctioning higher densities and development on urban and brownfield sites. As David Birkbeck notes: 'Prior to *PPG3* no one built very high or very dense. After it launched everything changed very quickly. Developers who had been building four-storey blocks were suddenly building 12-storey schemes with very little thought given to design or the particular challenges of living at higher density.'⁵

The first mayoral *London Plan* was published in 2004. It promoted London as a high-density global city, giving developers another charter to densify. Critics voiced concerns that 'the quality debate had been blindsided'.⁶ In the publication *Towards a Strong Urban Renaissance*, Lord Rogers and his fellow Urban Task Force members demanded that:

the design of individual housing units must be improved, and the quality increased to reflect advances in new technologies, construction techniques and environmental efficiency. The Urban

Task Force did not address the issue of the private residential sector in detail, but it is clear that new measures are needed to ensure that private housebuilders – despite their best intentions – do not build a new generation of mono-functional enclaves based on lowest common denominator design.⁷

At City Hall, the focus remained on housing output and the ever-growing pressure to ‘get the numbers up’. Housing targets were in the low 20,000s in 2000, after which they rose steadily, reaching a target of 42,000 by 2015. In 2000 densities in London (56 dwellings per hectare or dph) were already higher than the national average (25 dph), as observed by Christine Whitehead, who further states: ‘By 2005 national average densities had increased by almost two thirds to 41 dph. Densities in London had doubled to 112 dph – almost 175% above that average.’⁸

Community groups were increasingly concerned about the impact of this growth on their communities. They put pressure on members of the London Assembly, who in turn began to discuss the issue of housing ‘quality’. In 2003 *Housing for a Compact City* was published by Richard Rogers, as the mayor’s Chief Advisor on Architecture and Urbanism, and the Architecture and Urbanism Unit (A+UU; [Figure 4.2](#)). This promoted successful high-density housing projects from across Europe along with a clear message about quality: ‘In seeking to meet our targets, we must not put quantity before quality. We must provide future generations of Londoners with the best of contemporary housing, creating places that will accommodate and sustain London’s vibrant and diverse communities. High quality design and increased densities are critical to this equation.’⁹

The London property market showed no sign of slowing down. A rising population, ready access to credit and international investors fuelled the booming housing market. Despite the warnings about quality, little changed, and it was clear that self-regulation by the private housing market was not working.

The A+UU and, later, DfL were at the front line in reviewing housing proposals across the capital, and these were of increasingly poor quality. The prevalent typology was the double-loaded corridor serving two-bedroom, low-ceilinged, single-aspect flats. Homes seemed to be shrinking at a startling rate and there was real concern that a sustainable housing stock was not being created. Our instinct and awareness told us London was in danger of leaving an alarming legacy of poor housing for future generations to sort out. Of course, we were not alone in observing these

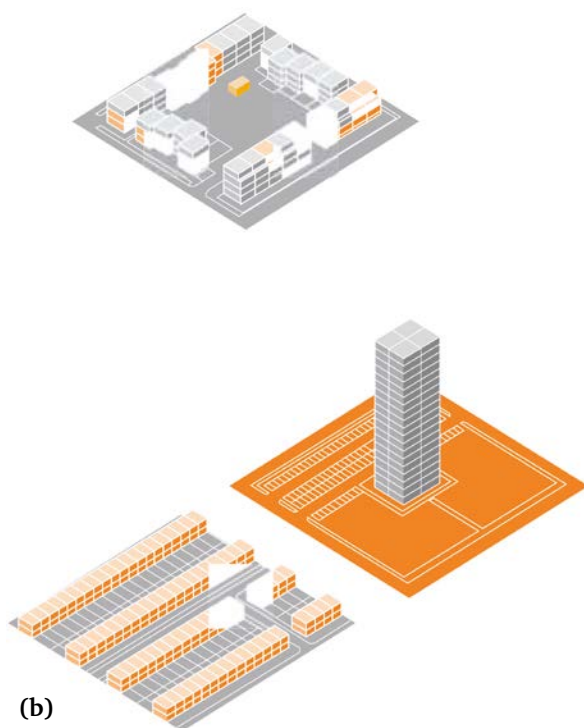
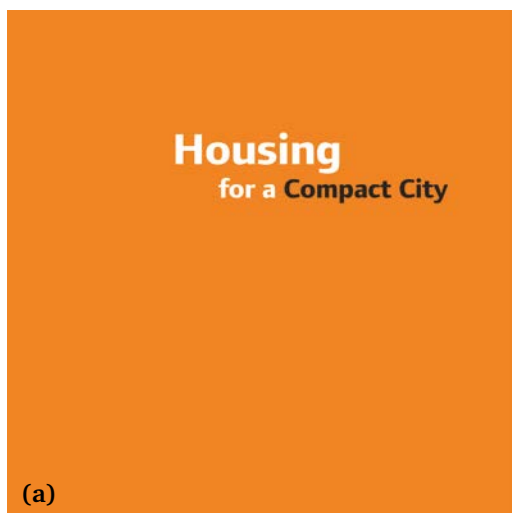


Figure 4.2 *Housing for a Compact City*: (a) Cover; (b) Three alternative approaches to designing at the same density. Source: Architecture and Urbanism Unit, *Housing for a Compact City*, Greater London Authority, 2003.

worrying trends, as shown by this anonymous post from the blog of the Commission for Architecture and the Built Environment (CABE):

Where does one start? The shrinking new builds since 1980 and the Thatcher removal of mandatory space standards? The disappearance of the bath to be replaced by a shower only in new flats? The disappearance of the kitchen to be replaced by a corner unit stuck in the living room without a window over the sink or being in its own four walls? The loss of what was formerly loft space in a building by bedrooms with Velux and not dormer windows such that the occupant has no direct view out? The increase in double loaded corridor apartment blocks leading to vast numbers of poky single aspect flats in blocks that will stand for 30 years at least? Much has been built that even a lay person would find unacceptable as a flat dweller and I am one such, not an architect but you don't need to be an architect to see that rooms are too small, ceilings too low, that places lack storage space, and that there is an absurd number of toilets and showers in newly built flats. Since when did people refuse to share a toilet? I could show you the floor plan of a two bedroomed flat in Essex that has three toilets, one in each ensuite and one presumably for visitors. Are we now so precious about our backsides that sitting on a toilet somebody else has used is anathema? I don't think so.¹⁰

Research, articles and campaign documents published by CABE, the Royal Institute of British Architects, the Joseph Rowntree Foundation, HATC, Shelter, Design for Homes and others added to the groundswell of concern. The studies confirmed that London was producing some of the smallest homes in western Europe.^{11,12} Not only were these homes small, but also only 18 per cent of schemes assessed by CABE were rated as 'good' or 'very good', 'revealing overall a disappointing picture of housing quality, and demonstrating that consumers are getting a raw deal when it comes to new homes and neighbourhoods'.¹³

In response to this growing pressure, the Greater London Authority (GLA) commissioned the housing consultants HATC to produce a report investigating 'the potential role of internal space standards for dwellings ... to be considered within the forthcoming review of the London Plan ... The purpose of this study is to attain an understanding of the evolution, role, operation, and impact that space standards have had and may have in the future within London and to propose policy for incorporation in the London Plan and related guidance'.¹⁴

As Andrew Drury of HATC explained, 'We were being asked to answer two fundamental questions: 1. Should the GLA establish minimum space standards? and 2. Could the GLA legally establish minimum space standards? Our answer was yes and yes.'¹⁵ There was a clear case for space standards and associated guidance on design quality. Homes in London were shrinking and there was a case for the GLA to intervene.

Despite the mounting evidence, there was little change to the status quo. The house builders out-lobbied everyone else, insisting that the introduction of space standards would be catastrophic for delivery. The spectre of housing targets loomed over the politicians, quantity was prioritised over quality and the HATC report and recommendations regarding the introduction of standards were shelved.

Design for London

Design for London (DfL) was established in October 2006, two months after the publication of the HATC report. There was an awareness from the outset that the team was a political creation that was unlikely to last. In Mark Brearley's words,¹⁶ 'Design for London was inherently vulnerable, not likely to survive for many years, as there was no legal or procedural requirement for us to exist. Hence we made a concerted effort to have as big an impact as possible, as soon as we could.' During their time at the A+UU, Mark Brearley and Richard Brown had realised that work on strategy and policy had a greater impact than location-specific projects. With the establishment of DfL, the involvement with policy work increased. The team was involved in a wide range of policy work on Opportunity Areas, the London Plan, industry, high streets, streetscape guidance, public space and housing. As Peter Bishop commented, 'We were given freedom to ask big questions, which civil servants embedded within the GLA could never do. Design for London was allowed to initiate policy debates. We had an open brief and the productive naivety of having direct access to the mayor. We had licence to generate ideas and licence to upset people.'¹⁷

In the early days we did not always have a seat at the table when housing policy decisions were being made, but the team continued to push the conversation on housing quality and worked to build momentum for the cause. Mark Brearley observed: 'We were conviction-driven people and we found others who supported the mission and were interested in positive action. It was an innocent mission – we wanted to make the city better.'¹⁸

Although at arm's length from City Hall, DfL were still consulted when policy drafts were circulated. We also had direct access to the London Development Agency (LDA), particularly their land development team. A last-minute review of the mayor's draft Housing Strategy by Deborah Mathieson¹⁹ revealed that 'there was virtually no mention of design or quality. I sent some comments about design just before it got sent to the mayor, and Alan Benson (Head of Housing Strategy at the GLA) agreed that the document must include a narrative about quality.'²⁰ The GLA agreed that a supplementary guide focusing on housing design should be produced. This was to give very general design guidance, focusing solely on consolidating existing standards. No one wanted us to include anything new or propositional, as this would have been far too controversial politically. We agreed but, of course, did not abide by this. In stealth, we looked at the issues holistically, produced a one-page brief and sought out a sympathetic collaborator at the LDA, who funded the project.

In parallel, the DfL team continued 'making the argument for standards in different ways to different levels and layers of the bureaucracy. They were out there convincing people. A project like this needs leaders who have the ear of politicians.'²¹ For example, when a group of prominent housing architects and Design for Homes informally presented the findings of a report on living at superdensity in 2007,²² the team capitalised on the opportunity to build up sympathy for the cause within the LDA. As David Birkbeck commented, 'Peter Bishop stage-managed a presentation to David Lunts and the LDA.'²³ (Lunts was the executive director for regeneration at the GLA.)

Peter Bishop later recalled:

There was no appetite from the mayor's office for any kind of housing standards, his senior aides fearing that they would discourage investment from house builders. The agreement (already brokered with the agencies concerned) was that the team would produce standards that would only apply to LDA land holdings and HCA-funded schemes – the argument being that if there were cost implications, then they would be reflected in lower land values (that the LDA was willing to accept) or higher subsidies (that the HCA were willing to accept). In other words, I explained as politely as possible that it was none of the GLA planners' business. Design for London then secured support (with strings attached) to test some of the emerging principles on an LDA-owned site in Bow (St Andrews).²⁴

There were many mountains to climb. The project was deeply contentious; there were many cooks, many stakeholders; the evidence needed pulling together; there was a complex web of existing regulations to navigate that were often contradictory or onerous; there was a well-funded lobby from the house builders, and scepticism and reluctance from the delivery community generally. There were, however, many voices lobbying for change and they all contributed to the growing momentum to address the problem of housing quality. DfL was fortunate to take the lead on the project. Strict instructions from the GLA and the LDA ensured that our brief and public statements on the project would apply to publicly funded projects only. However, in truth the prize was always the application of standards to all tenures across London. In the early days this seemed like a fragile, distant ambition rather than an inevitability.

Doing the homework

The project started with an intensive research period. We looked at historical precedents (Parker Morris, *Housing as if People Mattered*,²⁵ the Smithsons' writings on housing²⁶) and at best practice across Europe and beyond. We pooled our collective knowledge about what makes good housing. Richard Rogers was a strong advocate for balconies and private outdoor spaces; others brought experience from practice and design reviews. There was also considerable observation and reflection, drawing on the team's own experiences of living in London.

DfL was an atypical policy-making unit. It was a diverse group of individuals from different backgrounds. Many of us had trained as architects and brought with us experience of working in practice and delivery. Most of us had experience of living in other cities and countries, and very few fitted the stereotype of white-collar civil servants living in suburban homes in the commuter belt. We brought with us experiences of living in studios, in homes with no storage and with poor insulation and security, in single-aspect flats with no outdoor space. Such experiences were highly relevant but unusual given that decision-makers are often far removed from the realities of some issues. Personal experiences helped us to pitch action and policy with added persuasiveness.

We knew we needed support with the project as we were not in a position to devise standards or check for consequences. Unlike the Parker Morris committee with its 19 members, we had one officer, working with Mark Brearley, leading the project (Deborah Mathieson from 2006 to 2009 and Richa Mukhia from 2009 to 2011). As with all DfL projects,

we started by pulling together the best team for the project. The tender for the draft LHDG was won by a team led by Urban Initiatives and supported by Proctor and Matthews Architects and Mae Architects.

The project team began by addressing the pressing need for consolidation and consistency. The guidance was to be primarily a consolidation of existing standards, bringing together existing policies and guidelines already embraced by the mayor (Lifetime Homes, Code for Sustainable Homes, Building for Life and Secured by Design). A survey of existing regulation revealed inconsistencies. Standards varied depending on whether schemes were funded privately or publicly and this added to the complexity of delivering mixed-tenure schemes. Additionally, it was clear that some of the guidance developed at a national level did not relate well to the high-density London context.

This started a long period of consultation and dialogue. We went back to the commissioners and authors of existing guidance. We worked out where there was scope for flexibility (particularly in standards developed by single-interest groups) and negotiated clarity and compromise where the standards produced by different groups seemed contradictory or overlapped.

As well as rationalising the plethora of existing guidance, it was clear that to really improve quality, the guidance would have to plug the missing gap in terms of space standards. Alex Ely of Mae Architects later recalled another issue:

Developers were focused on promoting a certain type of residential block layout that was leading to other problems. The double-loaded corridor plan created a high proportion of single-aspect dwellings, many of which received no sunlight or alternatively suffered from overheating. Given that there was a growing trend towards apartments [80 per cent of dwellings produced were flats], we felt something should be done about access to outdoor space as well.²⁷

Minimum space standards, private open space, ceiling heights, dual aspect and shared circulation were the key new additions that the research suggested would make the greatest difference. The spatial and ergonomic parameters that formed the basis of many of the new standards are universal. The amount of space required to live comfortably in a home does not vary from borough to borough, and therefore it was appropriate that the issue was addressed at a strategic level by City Hall. Alex Ely later commented:

We did a huge amount of research into housing standards across the UK and internationally. The most widely used were the Housing Corporation's Housing Quality Indicators, English Partnerships' Quality Standards Delivering Quality Places and Habinteg's Lifetime Homes Standards. To some extent our commission was about synthesising these standards into one set of requirements. Nonetheless, I was interested in the whole history of standards from the Tudor Walters report of 1918, which promoted low-density solutions for housing that complemented the garden city movement of the time, through to the Parker Morris report of 1961, *Homes for Today and Tomorrow*, which, for the first time, linked space standards with occupancy. The report took a functional approach to determining space standards in the home by considering what furniture was needed in rooms, the space needed to use the furniture and move around it, and the space needed for normal household activities. We were then able to adapt this approach to arrive at a suitable set of standards for today.²⁸

There was an extensive consultation process involving different interested parties, public-sector investment partners, key external stakeholders, registered social landlords, private house builders, expert consultants, and a core group of respected housing architects and other industry experts. There were meetings, working groups, workshops and building visits; there was formal and informal feedback, as well as a public consultation on the draft document.

St Andrews, Bow: live project research

St Andrews, an LDA-owned site in Bromley-by-Bow, East London, was an ideal opportunity to test some of the emerging ideas in a live project. The tender for the project to build housing on the nine-acre former hospital site was won by Barratt. Mark Brearley explained:

There was a good relationship between the LDA and Design for London and a sense that there was a great opportunity for live project research. We steered the LDA towards the process of upfront specification parameters and an offer was made to Barratt on that basis. We made an agreement to use the project to test some of the key requirements that were being considered.²⁹

As Peter Bishop commented:

This was the first LDA project that the team was able to influence at the procurement stage. Barratt came in with the best financial bid but a poor scheme. We worked behind the scenes at the LDA to persuade them to accept Barratt's offer only if they changed their architects. This they duly did.^{30,31}

Allies and Morrison were appointed as the new masterplanners. Hendrik Heyns of that practice later commented:

St Andrews changed the way residential units were built in London. The typology of units changed. Daylight requirements and the move towards dual-aspect dwellings meant the proportions of units changed. There was also a move away from the two-bed-unit dominant scheme to a more interesting mix of tenures and types. At St Andrews, 50 per cent of homes were affordable and 30 per cent family housing.³²

Parker Boris?

In 2008, progress on the LHDG was stalled by the pre-election purdah. Ken Livingstone was standing for re-election against the Conservative candidate Boris Johnson. A Conservative win would have significant consequences for the future of the LHDG but we knew nothing of Johnson's view on housing quality. After Johnson's win in May 2008, we seized every opportunity to promote the work of DfL and pitched as many projects and ideas as we could. The opportunities were more formal and orchestrated than they had been under Ken Livingstone. They were also heavily vetted by the mayor's advisors, who would often require pre-presentation. Guessing that housing standards were not very high up on the mayor's agenda, we knew it was crucial that we pitch an irresistible, compelling case to get the new mayor on board. Mark Brearley was adept at making arguments and had mastered an engaging, seemingly off-the-cuff style of delivery. He used this skill to make the case for a host of projects and ideas: public space, high streets, regeneration spending, streetscapes, opening up procurement and, of course, housing standards.

As Brearley said later:

We managed to get through to the mayor and he supported it. I gave a structured PowerPoint making the argument for the LHDG to the

mayor. We were surprised by his response, with words something like ‘I want this to happen, I think this is right’. After that, Boris publicly stated his belief that we shouldn’t be building what he referred to as ‘hobbit homes’, and success became possible. The fragile initiative was sustained because of support based on belief, from the mayor, at odds with the doom-mongering of the house builders. A huge amount of luck allowed this venture to succeed. We were well aware that our team’s existence was itself a lucky occurrence, resulting from the earlier one-off coincidence of Richard Rogers’ support and input, and Ken Livingstone’s way of handling politics and interests. But that unique alignment during Ken’s years never fully empowered us; in fact we were kept at arm’s length. We were surprised by Johnson’s enthusiasm for the introduction of new housing standards.³³

Like most new mayors, Johnson was looking for quick wins when he came to power; the LHDG was well progressed, but not yet public, so ‘up for grabs’ in many ways. However, it did (and still does) seem unlikely that a Conservative mayor would champion a project that seemed so against the thrust of traditional Conservative neoliberal ideology. Housing standards clearly was an area that Johnson was interested in. Peter Bishop believed that it chimed with a nineteenth-century Conservative ideology:

When briefing Johnson on anything, you had to find a turn of phrase or an obscure historic reference if you were to have even a remote chance of engaging his interest. In this case it was referencing the [Conservative] Disraeli government’s reforms in the latter part of the nineteenth century. He loved the turn of phrase of ‘the Artisans’ Dwellings Act’ and kept repeating it. Referencing the LHDG back to nineteenth-century ideals of ‘Tory democracy’ got him genuinely excited. Even so, it was a complete surprise when he wanted the LHDG to be incorporated as the standard in the London Plan.³⁴

A conversation with Kieran Long revealed a similar speculation:

There are lots of ways to be conservative. There is a way to be conservative which is about deregulating markets; there is also a way to be conservative which is about preserving things – conserving a certain quality of life or understanding London as

having a certain character that housing contributed to. It became a conversation about architecture which transcended the clichéd ideological camps. It didn't work under a radical mayor but it worked under a conservative mayor.³⁵

Although 'Boris got the bit between his teeth'³⁶ on the housing quality issue, we soon learnt that he relied heavily on his advisors to deal with the content. Sir Simon Milton had a detailed knowledge of planning policy and was comfortable in signing off the detail. Without a sympathetic mayoral advisor, we would probably not have been able to withstand the fervent campaign from the house builders. The happenchance of a supportive mayoral team just when the LHDG was emerging meant that, for the first time, London-wide cross-tenure design guidance for all new homes was a real possibility.

Draft LHDG and consultation

Officially, the guidance was still focused just on publicly funded projects, but the introduction indicated that there was an ambition to level the playing field between public and private housing delivery and therefore the guide would be considered as part of the London Plan review. In July 2008, the draft LHDG was published for consultation ([Figure 4.3](#)). We knew there would be protest from the house builders and others in the industry, but we were bold with the content and ready to test the waters on some of the more contentious issues, rather than reining back for fear of causing controversy. Again, being at arm's length from the GLA and having a 'licence to generate ideas and upset people' enabled us to be more radical than conventional policy-makers. As Rowan Moore commented, 'You wouldn't have had the same outcome without Design for London being involved. The GLA is run by civil servants – they are administrative, not proactive. The mayor has to have a vision, but the civil service is, by nature, cautious.'³⁷

The formal consultation on the draft ended in September 2008. A team at the LDA trawled through the feedback and produced a comprehensive review of comments. A new team began work on refining the document in response. The consultant team was led by Emily Greeves and supported by Kieran Long and by Julia Park from Levitt Bernstein and Alex Ely from Mae Architects. As project manager and editor, I was supported by Fenna Wagenaar. A new phase of collaboration with the GLA and the London board of the Homes and Communities Agency

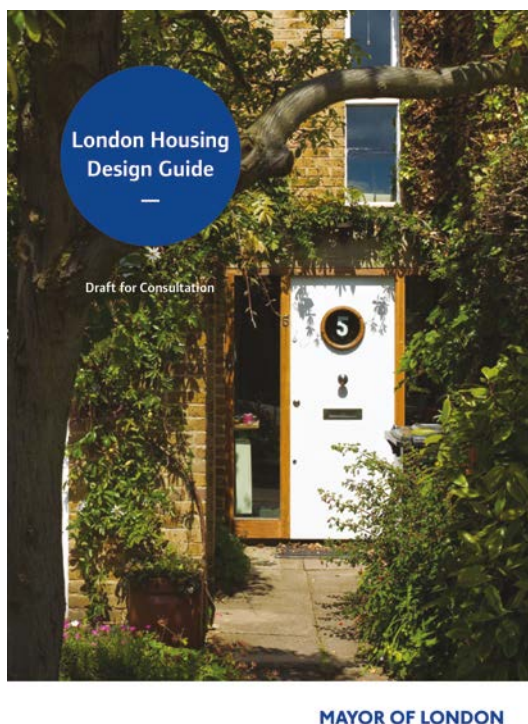


Figure 4.3 Cover, *London Housing Design Guide*, consultation draft, 2008. Source: GLA.

(HCA London) then began. There was now momentum for the final set of standards to be included in the mayor's Housing Supplementary Planning Guidance (SPG), as well as forming the basis of the HCA London design standards (for publicly funded projects). Effectively this would mean that the standards might eventually apply to private development and publicly funded projects.

Complexities and compromises

Although we were closer to the goal of cross-tenure application, there were still many obstacles to overcome. There was the complexity of dealing with so many stakeholders with varying political agendas. There was also the bureaucracy involved in trying to make anything happen in local government: briefings, sign-off procedures, board approvals and so on. These were cumbersome but necessary procedural hurdles, and

the project required us to keep track of approval processes for all three agencies. Cross-agency working was challenging, but there was an underlying collaborative attitude among many of the players involved, born from a realisation that the downward trend in housing quality had to be stemmed. The officers involved seemed willing to push aside the usual party lines; architects and specialists attended meetings pro bono in return for a seat at the table, realising that this was something that needed to happen.

HCA London needed the standards to be precise and prescriptive because their funding process was about demonstrating strict adherence to requirements. However, the GLA was concerned with planning and housing outputs so was keen to ensure that there was flexibility and room for negotiation. Key allies such as John Lett (Strategic Planning Manager at the GLA) facilitated negotiations with City Hall. The solution was to have a two-tier system of standards where Priority 1 standards were the baseline and Priority 2 the best practice. This meant that standards were flexible enough to be included in planning policy,³⁸ while the entire suite of standards could potentially be prescribed for publicly funded projects. It was a compromise, but crucially enabled a cross-tenure set of standards.

The consultation and subsequent lobbying efforts also had a significant impact. Some of the most fiercely debated issues concerned studio flats, ceiling heights, dual-aspect dwellings, minimum space standards and private outdoor space. There were many compromises (for example, the ceiling height standard was lowered from 2.6 m to 2.5 m, the dual-aspect standard was watered down, and studio flats were permitted in certain scenarios), but the core principles of private outdoor space and minimum space standards were protected.

Cost and delivery

To address concerns about the impact of the standards, a Cost and Delivery Impact Assessment study was commissioned jointly by the LDA, GLA and HCA London. GVA Grimley and Sheppard Robson produced a report that concluded:

Overall, it is not believed that introduction of the Guide will lead to the delivery of fewer dwellings on any given site other than in those locations where constraints are so strong that it is likely to be difficult to accommodate as many dwellings as might previously have been the case in the absence of the Guide.³⁹

The report did speculate that an increase in build costs might occur (of 1–5 per cent by 2013 for developments where sale values did not drop below the London average). There were also warnings about the viability of some schemes, but the counterargument was that clear rules become priced into land values rather than build costs, so the costs would fall on the landowner, not the developer.

We believed that any cost implication would be outweighed by the certainty and simplicity that a single set of design standards for all new housing would bring. There was nothing too bold in the LHDG: indeed, the standards were mostly a reminder of what had previously been required, and any extra demands were cautious and well chosen. Some of the new standards, such as those for private outdoor space, would add a cost, but they would also add value and might enable properties to be sold more rapidly.⁴⁰

Fundamentally, we did not think we were asking for very much. For example, we wanted a bedroom to have enough space for items such as a bed, wardrobe and chest of drawers, and to have sufficient circulation space and the most basic provision for wheelchair access. These are reasonable, basic ergonomic requirements that are as relevant in Hackney as they are in Kensington. They are not place-specific but concern ordinary furniture and equipment and the everyday things people need to do to live in a dwelling.

Crafting the document

We realised that the clarity of the content, the quality of the writing and the graphic design were all crucial to the success of the document. We were lucky to have a like-minded core group of contributors at this stage. Emily Greeves led the writing, with Julia Park and Kieran Long reworking sections, while I incorporated the various markups into the final version. The process involved countless edits, with every word, sentence and implication pored over. We were determined that the content should be straightforward and concise.

Again, our engagement with the industry meant we were able to find the right people for tasks. Engaging Kieran Long, a journalist, was key to making the content more accessible, and he also helped us craft a confident voice:

I was switching lots of language around – asking, ‘Can we say this in a clear way using active verbs, using subject–verb–object grammar?’

Bringing something of a journalistic sensibility to it, I hoped, ensured you are immediately in the topic. One of the reasons it was easy to do that was that the guide was built on very high-quality research, a thoughtful sensibility, and officers felt confident with the material. When I asked, ‘Can we put this in an active verb? Can we be less vague about this – can we be more specific?’, you [Richa] would say, ‘Yes, of course we can, because we know that this works. We are totally committed to this conclusion.’ Our intention was, therefore, not to hide behind a passive voice but to make conclusions and draw these conclusions out. It would be lovely to imagine this is one of the reasons why it feels as if it has a relevance today, because it ended up very serious but very readable.⁴¹

Julia Park, Head of Housing Research at Levitt Bernstein, noted: ‘The final narrative and phrasing really struck a chord with people – for example, “Home as place of retreat”, “From street to front door”.’⁴²

We made a conscious decision at an early stage not to get bogged down in trying to illustrate the document. However, as with all DfL documents, the graphic quality was very important. The interim LHDG (Figure 4.4) marked a departure from Richard Rogers’ preferred

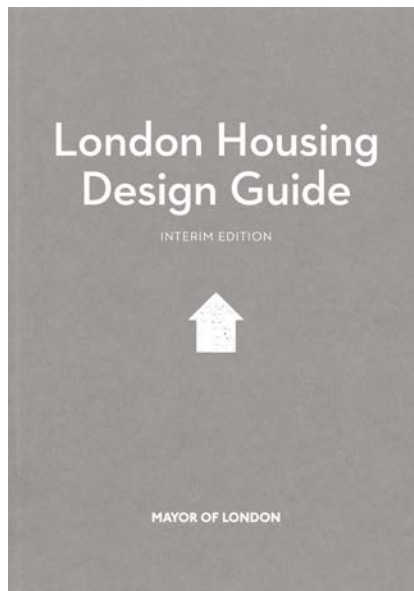


Figure 4.4 Cover, *London Housing Design Guide*, interim edition, 2010: clear, austere and easy to navigate. Source: GLA.

neon as used in most of the previous publications. We were well aware of the risk that the standards might not make it to the final policy stage, so we were keen that the document be taken seriously immediately on publication.

The graphic designers Atwork were given a brief to design the document to be as austere, sombre and clear as possible. Many users appreciated the ‘Swissness’ and ‘austerity chic’ of the final grey document. As Kieran Long noted later:

Design for London were skilled at making documents that cut through, felt of their time but felt aspirational. If designers are not in the room, these documents take a completely different form and would be received and used differently as a result. You simply can’t imagine the LDA coming up with it. It wouldn’t have happened.⁴³

The PR bluff

At the time of publication in August 2010, the interim LHDG had no material weight outside LDA developments and projects on mayoral land. In truth there was very little development that it applied to. Our months of compromise and close working with the GLA and HCA meant that we were hopeful (but not certain) that the standards would find a larger audience. The spectre of the Examination in Public on the draft Replacement London Plan (dRLP) loomed large as the forum in which the wider applicability of the standards would be decided.

We realised that a successful launch was important if the industry was to accept the LHDG as the future for housing in London. As with most DfL projects, we had very little budget and no press team to support us. We fought hard to get 1,000 copies printed and there was no scope for a big launch. Instead we listed everyone we wanted to influence – planners, policy-makers, those in the GLA ‘family’, house builders, developers, contributors and architects – and posted copies to all of them on the same day (personally stuffing copies in envelopes). Even though it was not policy, it helped that a copy of the document landed on the desks of key decision-makers, that it had ‘Mayor of London’ on the cover and that it contained very accessible and engaging content. The immediate uptake by the industry implies that the strategy worked. According to Hendrik Heyns, ‘People have a copy on their desk and use it all the time. People take it as the bible.’⁴⁴

Judgement Day: Examination in Public

The space standards were in the dRLP so were part of the Examination in Public process. On the day of the examination, the house builders' lobby was not as fierce as anticipated. Some of the concessions seemed to have pacified them, and the Home Builders Federation even conceded that the standards might bring greater clarity to the planning process. Subsequently the dRLP was adopted and a Housing SPG published containing the full suite of standards.

According to Julia Park:

Opposition to the GLA standards (including the space standard) soon weakened and the vast majority of designers and developers quickly conceded that having a single set of rules was better than having different requirements in every borough. Because dwelling 'footprints' were interchangeable in terms of tenure, it also meant that designs could remain fluid for longer.⁴⁵

We were braced for a negative reaction from the press but surprisingly this did not materialise. Much of the reporting was in fact jubilant and congratulatory. Headlines included: 'Boris is Brave to Think Bigger',⁴⁶ 'Room to Change the Way We Live'⁴⁷ and 'Standards Can See Off the Sharks'.⁴⁸

London vernacular

The LHDG was deliberately agnostic on design aesthetics. The external characteristics of this new 'vernacular' are widely acknowledged to be brick cladding, deep reveals and recessed balconies, described by critics as 'Weetabix architecture'. Some detractors feel that the emergence of this typology has stifled creativity and narrowed the spectrum for designers. During the drafting process, there was a conscious effort to avoid entering into discussions about aesthetics and style. A conversation between Peter Bishop and Boris Johnson did touch on the question of appearance and vernacular:

At one meeting the mayor suddenly became surprisingly excited about architecture, in particular ornamentation. He declared that all great architecture had used ornamentation and he wanted a new vernacular for London that reflected this [self-evident truth]. Apart from being wrong, this was not the purpose of the LHDG.

In the ensuing conversation, I referenced the simplicity of the Georgian terraces of Islington [where he lived] as examples of a vernacular that grew out of the available materials, technology, and cultural and social values of the time. I also reminded him of the Artisans' Dwellings Act and the lasting importance of standards over style. The idea of a London vernacular was never mentioned again.⁴⁹

Following this debate, we included in the interim LHDG a brief narrative about 'a new London vernacular', promoting the view that the 'best housing comes from robust guidelines in planning and regulation' and that 'London's housing should not be striving for "iconic" architecture, but should focus on great background architecture made of durable materials that weather well.'⁵⁰ As it happened, the publication of the guidance coincided with the revival of brickwork – coincidence rather than design. It is true that some of the standards had an impact on forms and massing. For instance, dual-aspect guidance affected configuration, and guidance on private outdoor space affected the proportions and arrangements of windows, apertures and so on. There was no intention to instigate a new stylistic trend; rather, there was an acknowledgement that, historically, where there have been clear ideas and thinking about how cities should develop, this has often seeded a vernacular. For example, various Housing Acts gave rise to Victorian housing in the UK, and zoning laws shaped the development of New York City. Mark Brearley recently commented:

I think of a vernacular as something positive. A vernacular is understood, it's copied, not appraised afresh with each project. It's a way of doing something because it is obvious that it's the best way. A strong vernacular reflects a period of maturity, of running in a line, whereas we are currently going through a shift, a time of immaturity, of type invention, and such periods are usually filled with mistakes and uncertainties, until they find the way ahead that best fits with needs.

London is clearly in a shift moment, figuring out challenges afresh, so it makes the emergence of a vernacular difficult. We would like there to be a London vernacular, but we aren't there yet. If people just carry on for another few decades, building in a confident way to house the city, if they do mix in the right way, configured use in the right way, then we could talk with pride of a vernacular. Worries

get raised about sameness, but even if all was built in exactly the same brick with exactly the same windows, it wouldn't trouble me, particularly as you don't have to live very long to realise that ways of building don't last forever. There is no need to worry about the world all becoming the same, it just doesn't happen like that.

Those wonderful chunks of eighteenth-century city, for example, that have worked so well through all kinds of evolutions and changes, that today we understand as finite and precious, admiring their long-forgotten confident vernacular – those were not seen in the same way in the nineteenth century. They saw what had been inherited as loathsome, plain and substandard, hating the Georgian city, just as in the sixties and seventies people loathed the Victorian city, because they were too close to it. My headline on this matter is: 'If you can get to a vernacular then you're laughing!' – laughing because a vernacular indicates a confident and easily growing city.⁵¹

Influence of the LHDG

The London mayor's London Housing Design Guide has arguably been the single most influential piece of design for housing in the capital so far this century.

– Finn Williams⁵²

The reach and influence of the LHDG surpassed all expectations. From Scotland to Brighton, the interim LHDG has had a direct and far-reaching effect on local and regional policy. Many boroughs across the country adopted the standards immediately (for example, Ashford Borough Council adopted the standards in October 2011). In particular, the space standards have been incorporated into the Nationally Described Space Standard (NDSS) published in 2015. This too was a keenly fought battle and an unlikely outcome for a government-led Housing Standards Review which initially focused on reducing regulation. Julia Park later commented:

The government's review of housing standards was all about reining in over-zealous planning authorities – those who set high standards in local policy and guidance. It began in 2010, just two years after the global financial crisis that had seen house building stall across the UK, and the new Conservative/Lib Dem coalition government was desperate to 'get Britain building again'. The

mantra from ministers was deregulation, removing the barriers that developers claimed were holding them back.

London hadn't experienced quite the same setback in terms of falling supply, sales and demand as the rest of the country, and having published the ambitious and comprehensive LHDG just the year before, the GLA was in no mood to give it up, or even compromise. Boris Johnson had been Mayor of London since 2008, and nervous about rocking that particular boat, the DCLG [the Department for Communities and Local Government, later renamed as the Ministry of Housing, Communities and Local Government] was minded to leave London out altogether. But you can't simply delete the capital city from a nationwide review, and many of us knew that London's involvement would be vital if we were to prevent the 'race to the bottom' which seemed to be the implication of the exercise.

So the GLA was invited to join the industry-wide working groups tasked with 'streamlining local standards', albeit a little late. The review took five years in total and there is absolutely no doubt that the quality, clarity and almost universal popularity of the LHDG, coupled with the GLA's steadfast refusal to give way, prevented the national review from becoming a national disaster, in terms of housing quality.⁵³

Critics and supporters alike agree that the LHDG has been hugely influential. Some of its achievements concern championing an ideological shift in how we as a society think about housing. In terms of the cross-tenure debate, government standards have historically only applied to publicly funded housing. Andrew Drury of HATC recently commented:

There was a deep-rooted cultural feeling until the mid-2000s that there should be space standards for publicly funded housing but not for private housing. The reasons given were that publicly funded housing is more intensely lived in; that private housing is more loosely lived in, with a lower household density. But this is not the case over the life of the dwelling. Often, over the decades, existing housing stock is converted to offices, houses in multiple occupation, shops and vice versa. We don't know now what the use of the dwelling is going to be in 50, 70, 90 years' time. People exercising their 'right to buy' and then selling on means that publicly funded housing becomes market housing. Housing associations

and others buying up street properties and refurbishing them turns privately owned housing into ‘public’ housing. Tenure and use ebbs and flows over the decades.

How can we use rules for something as fundamental to the dwelling as space, but tailored only to one household type, when all we know with any certainty is that over the life of the building it will have more than one household type in it? We made that case strongly in our 2006 report, and the GLA accepted it. The LHDG space requirements applied to all housing and it was the first time this position was adopted by an organisation that affected national thinking and behaviour. Well done, the GLA.⁵⁴

In addition, the guidance took a clear position that the ‘design of buildings should be “tenure blind” whereby homes for affordable rent, intermediate forms of tenure and private sale are indistinguishable from one another’.⁵⁵ As Mark Brearley commented, ‘It is what we hoped for, but we weren’t expecting it. Why was cross-tenure application important? Because it is fairer. If something is desirable, it is desirable to all.’⁵⁶

Other achievements are more tangible. According to Hendrik Heyns, ‘The LHDG has changed the way the industry approaches housing in London. Beyond the dwelling and housing block, it fundamentally changes the way streets work.’⁵⁷ There is also now a requirement for new dwellings to have private outdoor space. For Rowan Moore:

It’s a good thing to have more balcony space, but I like the fact that you can walk down the street with a new housing development on it and it has balconies facing the street whereas before it wouldn’t – it probably would have had Juliet balconies if anything. Even if there is nobody on the balcony, it creates a sense of connection between the interior and exterior, between the public and private sphere, which is a modestly good thing to have in a city.⁵⁸

Of course, with the positives come the negatives. Minimums fast become maximums and there is always the risk that rules will be applied doggedly even when not appropriate. We are aware that the document was not all-encompassing and there is plenty of room for improvement. There have been lots of compromises during its development and since then. Although the space standards have endured, many other key requirements have been watered down or lost over time. For example, the original standard for ceiling heights to be 2.5 m has been superseded by the NDSS

requirement for 2.3 m, and the requirement to include furnished layouts is under threat as the GLA may be forced by the DCLG to remove this standard. At the time of writing (2019), the current Housing SPG is weaker on quality than the 2012 Housing SPG, with most of the ‘best practice’ standards having been removed.

Conclusion

Some important lessons were learnt during the process of developing the LHDG:

- *You need champions.* Not every project has a political champion from the outset. The DfL team worked hard to build a compelling case and craft an irresistible argument to deliver to the mayor and his advisors. We played the long game, building support and momentum for the project among politicians and officers.
- *Ask for less, end up with more.* It is often best to get something half-decent on the table and then build up from there. This might go against the accepted rules of bargaining in business, but pushing through change in the risk-averse public sector requires a different approach. You can gain trust with a modest but compelling pitch and build on this once people are on board.
- *Do the homework and you win.* This is a spin on Mark Brearley’s adage ‘Do the drawings and you win’. With policy work, it was about having robust and credible research that we could defend in the face of fierce opposition.
- *Create shortcuts to the politicians.* The more hierarchical structure under Boris Johnson’s administration meant that we lost some of our ‘shortcuts’ to the mayor, which directly impacted on some projects. It is important that the people doing the thinking are able to communicate with the politicians.
- *It helps to be transparent.* Much policy-making is shrouded in secrecy. We sustained an open dialogue with the industry and stakeholders. It meant that the emerging policy was fully informed by their feedback, so that there were no big surprises when it was finally published.
- *If you are developing policy about design, then you need designers in the room.* Clearly, it makes a huge difference to the output of policy development if the designers who will use the policy are involved from the outset.

History teaches us that these types of endeavour take a long time and considerable effort to develop and put in place, and that they are always under threat and can easily be eroded by changes in leadership and ideology. As Julia Park commented:

Previous major standards (including those produced after the First and Second World Wars, and the Parker Morris standards) were all lost due to new political ideology. ... Housing standards, particularly space standards, will remain vulnerable. We'll always need advocates to defend them.⁵⁹

Others, such as Rowan Moore, are more hopeful: 'It's always easy for politicians to kill off policy. However, the headline "I want to lower housing standards" is not a good one.'⁶⁰

Kieran Long shared some interesting views on this topic:

Maybe space standards are only political if, as a society, you haven't thought it through. ... Of course, a group of housing developers could come and say this is limiting our freedom of choice, our action and our output. I would hope that it is possible to get to a point where some of these topics are no longer political, to get to a point where they are accepted as the tool we have to preserve quality in the most important building type we have in our city, which is housing.

Any statement of quality is always vulnerable. Anything that stands for quality is always vulnerable to the banal critique that 'this is constraining my capitalist rights'. Housing cannot only be left to capitalism. This doesn't mean you have to have a command economy or even social housing, but it does mean we need some set of values around which we can agree. Housing is the primary tool we can use to build the city. If it's just left to the market, it will not provide decent homes for the widest range of people to live in.⁶¹

I hope the optimists are right – that there is now acceptance of the idea that something as important as housing should benefit from having some modest standards and that these standards can improve quality. Implementation has proved that the policy has not reduced housing output, which means that the prevailing argument pre-LHDG is no longer as compelling. Recent changes to permitted development rights (PDRs) that allow office-to-residential conversions provide all the proof we need that without London's housing standards, new homes could be much smaller than they were before the LHDG was introduced. Where the SPG

cannot be applied because of PDRs, we are now seeing new flats of 13 m² and others without windows.

The legacy is visible throughout London. It is easy to spot a post-LHDG building. On a personal level, I feel proud to observe a new development being built with balconies and usable private outdoor spaces. Once residents have moved in, with plant pots and outdoor furniture, I can be confident that similar positive outcomes exist internally as well. It is good to know that we had a hand in achieving that.

The project proves that thoughtful policy work can shape a city for the better. The LHDG has delivered a better standard of housing for the average Londoner. Let us hope the politicians can see the value of this work, protect the hard-won victories from the wolves at the door and build on the legacy for future generations.

Notes

- 1 Moore 2016, p. 265.
- 2 Design for London 2010.
- 3 Ministry of Housing and Local Government 1961, p. iv.
- 4 Ministry of Housing and Local Government 1961, p. 2.
- 5 Conversation with David Birkbeck, Design for Homes, March 2019.
- 6 Conversation with Rowan Moore, journalist, January 2019.
- 7 Urban Task Force 2005, p. 6.
- 8 Whitehead 2012, p. 12.
- 9 Architecture and Urbanism Unit 2003.
- 10 Anon, CABE blog.
- 11 Sheridan, Visscher and Meijer 2003.
- 12 Sheridan 2004.
- 13 Commission for Architecture and the Built Environment 2010, p. 7.
- 14 HATC 2006, p. 5.
- 15 Conversation with Andrew Drury, HATC, 4 February 2019.
- 16 Conversation with Mark Brearley, 26 February 2019.
- 17 Conversation with Peter Bishop and Rowan Moore, 16 January 2019.
- 18 Conversation with Mark Brearley, 26 February 2019.
- 19 Deborah Mathieson worked at the A+UU and DfL on housing policy and design.
- 20 Conversation with Deborah Mathieson, 27 March 2019.
- 21 Conversation with Kieran Long, journalist, ex-DfL, now Director of ArkDes, Stockholm, 16 January 2019.
- 22 Design for Homes 2007.
- 23 Conversation with David Birkbeck, Design for Homes, March 2019.
- 24 Conversation with Peter Bishop, November 2019. The HCA was the Homes and Communities Agency.
- 25 Marcus and Sarkissian 1986.
- 26 Smithson and Smithson 1970.
- 27 Conversation with Alex Ely, Alex Ely Architects, 8 March 2019.
- 28 Conversation with Alex Ely, Alex Ely Architects, 8 March 2019.
- 29 Conversation with Mark Brearley, 26 February 2019.
- 30 Conversation with Peter Bishop, November 2019.
- 31 For further discussion on DfL's use of procurement to get better design results, see [Chapter 7](#).
- 32 Conversation with Hendrik Heyns, partner, Allies and Morrison, 13 February 2019.
- 33 Conversation with Mark Brearley, 26 February 2019.

- 34 Conversation with Peter Bishop, January 2019.
- 35 Conversation with Kieran Long, 16 January 2019.
- 36 Conversation with John Lett, Senior Planner, GLA, 5 February 2019.
- 37 Conversation with Rowan Moore, journalist, 16 January 2019.
- 38 Mayor of London 2012.
- 39 GVA Grimley et al. 2010, p. 4.
- 40 In a conversation at the time with Peter Bishop, the London Director of Barratt Homes reported that the St Andrews Hospital site at Bromley-by-Bow (discussed earlier in the chapter) was one of the group's best-selling schemes. He recognised that the design quality that had been insisted upon by DfL as part of the procurement process was paying dividends. Barratt London became an ally and advocate of good design on later schemes.
- 41 Conversation with Kieran Long, journalist, ex-DfL, now Director of ArkDes, Stockholm, 16 January 2019.
- 42 Conversation with Julia Park, Levitt Bernstein, 16 January 2019...
- 43 Conversation with Kieran Long, 16 January 2019.
- 44 Conversation with Hendrik Heyns, partner, Allies and Morrison, 13 February 2019.
- 45 Park 2017, p. 42.
- 46 Woodman 2010.
- 47 Long 2010.
- 48 Glancey 2010.
- 49 Conversation with Peter Bishop, November 2019.
- 50 Design for London 2010, pp. 5 and 6.
- 51 Conversation with Mark Brearley, 26 February 2019.
- 52 Comment by Finn Williams, Regeneration Area Manager, GLA.
- 53 Conversation with Julia Park, 16 January 2019.
- 54 Conversation with Andrew Drury, HATC, 4 February 2019.
- 55 Design for London 2010, p. 30.
- 56 Conversation with Mark Brearley, 26 February 2019.
- 57 Conversation with Hendrik Heyns, partner, Allies and Morrison, 13 February 2019.
- 58 Conversation with Rowan Moore, 16 January 2019.
- 59 Conversation with Julia Park, 16 January 2019.
- 60 Conversation with Rowan Moore, 16 January 2019.
- 61 Conversation with Kieran Long, 16 January 2019.

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