Review article

Housing quality and design standards in England: the driving forces for change and their implications

Barry Goodchild*

Professor of Housing and Urban Planning, Sheffield Hallam University (Emeritus)

Abstract

The control and promotion of housing quality, design and standards in new build is a fundamental aspect of housing policy and one that deserves more consideration. In England, the main governmental priority of the past twenty years has been to contain pressures for increased regulation in the face of opposition from the house building industry and a fear that increased regulation might reduce housing completions. In managing these contradictory pressures, governments have created an increasingly complex regulatory framework and one in which implementation and enforcement can no longer be assumed. Three overlapping types and fields of research agenda are suggested: understanding the dynamics of regulatory change; assessing the outcomes of regulation as implemented and promoting socio-technical studies that link users and different professional and interest groups.

Keywords: Building regulations, Town planning, Urban design, Housing user research, Volume house building.

Introduction

Low rates of house building have long been of policy concern in England and the UK. In the past few years, however, the public discourse has encompassed new concerns about the build quality of recently completed schemes, about the quality of the environment in which the homes are located and about whether current practice can properly be said to have promoted sustainable development. The report 'Living with beauty' (BBBBC, 2020) provides a widely cited example of this renewed interest in quality. In addition, in the aftermath of the Covid 19 pandemic and the tragic Grenfell Tower fire of 2017, health and safety have again come to the fore and concepts of health have widened to encompass how it might be possible to promote a sense of well-being in towns and cities. The 'Quality of Life Foundation' (2021) has expressed exactly this sentiment. 'The Coronavirus pandemic has demonstrated to us all how important where we live is in determining our quality of life'.

Maintaining and raising the quality of the places where we live involves interventions in the existing building stock and external spaces. Maintaining and improving the standards of new housing is, nevertheless, a necessary aspect of policy and a necessary aspect of a healthy, liveable environment. Failures to maintain the quality of new housing have long-term consequences and are very expensive to correct in the case of failure.

Yet, as Imrie (2004) once noted, the regulatory framework has generally been neglected in social research and even more so in social theory. Imrie was talking about the building regulations, but the same neglect is also apparent in the relation between planning and the building regulations or between new build standards and housing policy. There has, for example, been no attempt to replicate the detailed analyses of new build design standards undertaken by Karn and Sheridan (1994) for the Joseph Rowntree Foundation. With the exception of studies of how low energy and low carbon housing is or might be regulated (Goodchild and Walshaw 2011; Rydin, 2013; Payne and Barker, 2018), the neglect of regulation has continued almost to the present. In the past few months, however, new reports by the Place Alliance (2020) and by the UK Collaborative Centre for Housing Evidence (CaCHE) (White et al., 2020) have provided new insights into the character and quality of newly completed schemes.

This paper is intended to offer a literature review that defines the scope for social research in the regulation of new housing and that also identifies the likely implications of recent policy announcements. The emphasis is on the social scientific literature and on policy papers. The 'grey' literature, comprising specialist or trade journals, newspapers and work published online only, is mentioned where necessary to clarify or support the argument.

In successive sections, each of which defines a separate overlapping field of study, the paper:

- Identifies the underlying driving forces in the changes to regulatory frameworks since about the year 2000.
- Outlines the issues that have arisen in the implementation of housing design and quality criteria.
- Indicates how debates about housing quality, design and standards might be become more proactive and reflexive.

Existing forms of regulation: a shifting compromise of opposites

The current regulatory framework for new build housing in England comprises the planning controls and the building regulations, with this latter supplemented by the activities of building insurance companies, notably the National House Building Council (NHBC). Private and social housing agencies undertake development within the same regulatory framework, with some contextual differences for social housing. The national regulatory agency for social housing, currently Homes England, monitors the standard and quality of new build and rehabilitation schemes but does not lay down specific design pre-conditions.

Regulation is the product of a long process of historical evolution. In its present form, it is the product of a collision between opposing policy priorities- between the maintenance or enhancement of standards and a desire to promote affordability, meet housing shortages and increase the rate of house building. Put slightly differently, the conflict is between quality and quantity in housing and is not new. The conflict was strikingly apparent in the housing policy debates of the late 1940s (Goodchild, 2008: 82-83). Over the past two decades, however, the conflict has taken new forms.

For Ferm et al. (2020) and others, the novelty of recent policy is that the mostly Conservative governments in power since 2010 have managed conflicting requirements through deregulation, based on a neoliberal policy orthodoxy. While it is possible to identify examples of neoliberal deregulation, this is only half the story. Successive governments have continued to respond to a multiplicity of new demands that stem from calls for more consumer protection and for new or enhanced policy objectives of sustainability, resilience and carbon reduction (Meacham et al., 2005). Calls for improved flood protection have for example, led to a series of additional complexities and requirements. To reduce surface run-off developers are now commonly required to provide sustainable urban drainage systems, meaning open water collection areas. In addition, building in a floodplain if permitted at all, now requires a variety of protective measures including 'raising floor levels' (EA, 2020: 35-36). At a local level, moreover, authorities face calls for the conservation of historic buildings and streets and for the protection and promotion of amenities (for example Civic Voice, 2021b). In addition, local authorities are pursuing marketing strategies that depend on the heritage and distinctive qualities of place in their area (Historic England, 2016) and therefore require developers to respect that heritage.

On the other hand, and this is the aspect that most closely follows the principles of deregulation, developers and builders have complained about the increased burden of regulation and starting in 2010 successive governments have sought to simplify and ease regulatory requirements, notably in the statutory planning process (Goodchild and Hammond, 2013). As private house builders provide the main means of reducing housing shortages, they and their national federation, are in a strong position to lobby government to limit the impact of regulatory requirements.

In response to the contradictory pressures, governments have adopted a set of shifting and sometimes tortuous compromises. Meijer and Visscher (2017) have identified three main devices that governments in different European countries have used to simplify control, without undoing the system: the privatisation of technical controls; the use of outcomes-based regulation; and the provision of exceptions outside control. All of these devices can be evidenced from England. However, the existence of the same devices elsewhere in Europe shows that the pressures for 'reforming' regulatory arrangements are not confined to the UK or to Conservative governments.

The privatisation of building control in the UK started through the Building Act 1984 which made provision for the introduction of independent regulation via a system of certificates and that together with subsequent legislation encouraged the use of private assessors (Bright, 2019; Designing Buildings Wiki, 2021a). Outcomes-based regulation (or performance-based regulation as it is also called) is more a philosophy in favour of flexible regulation and varies in extent, from the piecemeal redrafting of the specific regulations so that they are better related to their purpose to setting outcome targets but leaving designers a choice in how the outcome is best achieved.

The exceptions are in part long-standing and taken for granted. For example, it has been possible for many years to build greenhouses and garden sheds without either building regulations approval or planning permission. Small house extensions require building regulation approval and sometimes other permissions or consents but not planning permission and the extent of permitted development, measured in terms of the size of the extension, has been progressively relaxed. More significant is the policy, introduced in 2013, to extend permitted development rights so that first offices and then in a subsequent extension shops can be converted into housing without planning permission (Clifford et al., 2018; Ferm et al., 2020).

Outcomes-based regulation remains a commonly stated approach. It is repeatedly endorsed, for example, in 'Building a Safer Future' (HM Government, 2018) prepared

after the Grenfell fire disaster. Much depends, however, on the clarity of the guidance, the clarity of the stated responsibilities amongst professionals and, like any regulatory regime, on whether the provisions are adapted to the latest technological innovation (HM Government, ibid; Meacham, 2010). As such, the use of outcomes-based regulation implies a different, but not necessarily weakened style of regulation. In contrast, the same governmental report (ibid 42) is highly critical of private building approval, noting its unusual character that 'the person undertaking the building work can choose and purchase who specifically provides their building control regulatory oversight.'

Finally, the extension of permitted development rights has had mixed outcomes, with some unfortunate consequences. To give an example of the latter, 'Living with Beauty' reports an office to housing conversion scheme in Watford where a planning inspector allowed an appeal, even though the converted property had no windows. Subsequent government decisions have required all permitted development schemes to have natural light and to meet minimum space standards (MHCLG, 2020, 30 September).

Another policy device is to shift control from planning to the building regulations. Building regulations involve a fixed obligation of conformity, at least in principle, whilst planning controls in the UK are discretionary, subject to local variation and are, to that extent, more unpredictable for developers. Planning controls also involve public consultation, so adding another layer of complexity.

The preference for building rather than planning is evident in the 'Housing Standards Review' (DCLG, 2013). The review involved extensive consultation with the construction industry and sought to place within the building regulations all matters relating to the dwelling, including matters relating to disabled persons' access and to sustainable building design. An exception was made for floorspace standards, as these require flexibility in application in the view of the government at the time and flexibility could best be assured through the planning system. The introduction of floorspace standards in planning was itself a new initiative, again showing that increased complexity has proceeded alongside partial deregulation. However, the review did end the attempts of local planning authorities to promote sustainable housing through requiring developers to achieve specific levels of sustainability as defined by the Code for Sustainable Homes (CfSH) (DCLG 2008).

Since the highest level of the CfSH was a zero carbon standard, the abandonment of the CfSH also amounted to an abandonment of previous commitments to zero carbon housing. A series of working parties later reformulated aspects of the CfSH in a simplified form for the building regulations, but subsequent government announcements in 2015 and 2016 meant that no attempt was made to pursue zero carbon through either the building regulations or planning system (Designing Buildings Wiki, 2021b). Developers seldom build to standards that exceed the building regulations, unless this is obviously marketable (Goodchild and Furbey, 1986; Imrie, 2004) and they did not use the CfSH ratings in their advertising. In any case, consumers typically regarded the eco-features identified in the CfSH and other sustainability design standards as a bonus to their principle aim of obtaining a comfortable, good quality home (Goodchild et al., 2014). Therefore the abandonment of zero carbon standards meant that private developers faced reduced pressure to work out ways of further reducing energy consumption in the home.

The UK national carbon reduction delivery plan (DECC, 2011) states that to meet statutory and international targets 'By 2050 the emissions footprint of our buildings will need to be almost zero' (ibid 30). The failure to upgrade standards in accordance with that plan has left a legacy of dwellings in need of subsequent adaptation at considerable expense. Government consultations on zero carbon standards and the adequacy of the building regulations have now restarted. In January 2021, the government announced a

timetable for new homes to produce, by 2025, 75-80 per cent lower carbon emissions compared to current levels (MHCLG, 2021: 19 January).

To say that planning should only be concerned with the external environment, as was a central theme in the Housing Standards Review of 2013 still implies an extensive field of responsibility. The logic of planning controls is to ensure that a proposal has no adverse effect on its surroundings. In addition, from the time of the so-called Urban Renaissance policy agenda (UTC, 1999), planning authorities have been urged to mould development through the specification of design codes and through master planning exercises that have a strong urban design content. Aldous (1992: 82-84) suggests, for example, urban design involves the application of four types of code covering infrastructure, urban form, architecture and public space.

Urban design codes are intermediate in flexibility between building regulations and planning control. They are less flexible than general planning policies but their application is likely to involve more discretion than building standards. Their use in controlling urban development offers, therefore, a way of making the operation of planning more similar to that of the building regulations so, in principle speeding up the approval process and removing the need for further public consultation. The use of design codes also makes the planning system in England closer to the so-called zoning systems adopted in many other countries, including most European countries and that involves different rules for different zones as specified in a local plan. Planning by zoning regulations likewise enables the removal of consultation after the preparation of a local plan. And this is the exact aim of the current White Paper 'Planning for the Future', with its call that local plans 'are built on standardised, digitally consumable rules' (MHCLG, 2020: 21).

It is another question, however, whether design codes and their rules can ever be made as rigid in operation as the building regulations and so simple that their application can be tested through the use of automatic software. A close reading of the White Paper suggests, in any case, that the full application of rules-based design codes will only apply to designated growth areas and this raises further issues- where and at what scale growth areas will be designated.

Implementation issues

Given the efforts over the past thirty years in favour of urban design, it might be expected that the quality of new housing estates would have improved in recent years. In 2001 and 2006 the former Commission for Architecture and the Built Environment (CABE) undertook national audits of the quality of recently completed schemes measured against a checklist of good urban design quality and found that most were either poor or 'mediocre'. Using the results of these earlier audits as a benchmark, a non-governmental organisation, Place Alliance (2020) has assessed the extent of progress through a new design audit of 142 schemes throughout England.

Because private developers are responsible for most housing completions, the Place Alliance report is an evaluation of estates where private, rather than social housing developers have taken the lead. It is more specific than this, however, as it deals with the style of development associated with the 'volume' house builders whose business model combines and integrates all the various stages of development- from land assembly, through making an application for planning permission, infrastructure provision, design, build and finally marketing. Though commonly taken for granted in the UK, housing development does not have to be integrated in this way. Elsewhere in Europe, development is split between a land assembly and infrastructure stage,

commonly undertaken by a public agency and then a separate stage of design and construction undertaken by architects and building contractors commissioned by the land assembly agency (Studdart, 2009).

The private sector-led, integrated development process in the UK has been established since at least the 1980s. Amongst different types of private developers, the volume builders became dominant after the economic crisis of 2008 (Archer and Cole, 2014). By 2014, the market share of the top ten builders in Great Britain was over 40 per cent of all completions. The proportion has subsequently fallen to about 35 per cent, still sufficiently high for the UK housebuilding industry to be described as in effect an 'oligopoly' (Elder, 2020).

In this context, the Place Alliance report suggests that, compared to 2001 and 2006, the improvement in design quality of recently completed schemes has been marginal and where the quality of design had improved, this mostly involved the application of security principles and an increased attention to the provision of a mix of houses of different sizes and tenures. Though private developers have led the projects, planning policies have required them to provide a proportion of social housing. As a result, tenure segregation is less of an issue in new development than, say 15 years ago. However, the Place Alliance (2020: 9) audit also shows 'a continued trend (by a factor of ten) towards delivering sub-standard design outcomes for less affluent communities.'

The design of new housing carries markers of social status and identity, alongside or in combination with tenure (Becker, 1976). Comparing the Place Alliance report to the earlier study by Karn and Sheridan (1994) reveals a subtle difference in how these markers are manifest. Karn and Sheridan (ibid, 3) (who were mostly concerned with the quality of the interior) considered design distinctions as a reflection of the status difference between 'tenants and owners' and the way these were viewed by providers. In the context of mixed tenure development, the variations in quality have become associated with the affluence of the local community.

There are other recent studies of place quality in new build. Adams et al. (2011) have examined development practices and the marketability of housing in a case study of a planned development in Bedfordshire. The CaCHE (White al., 2020) have undertaken case studies in all four nations in the UK, using a combination of semi-structured interviews, the analysis of documents and archives and direct observations. The conclusion (ibid iii) is that in all UK nations 'there is an endemic culture of deprioritising design in the housebuilding industry' and that as a result 'the design quality of new homes and neighbourhoods across the UK remains stubbornly low'.

There is no equivalent comparative study of building design standards. Even a cursory review reveals concern, however. Putting aside the particular issues associated with the regulation of fire risk, a briefing paper prepared by Wilson (2020) for the House of Commons has noted political disquiet about the build quality of newly completed privately developed dwellings and the ability of consumers to rectify post completion defects. Concerns were also significantly widespread for the government to propose in February 2020 the introduction of an independent 'New Homes Ombudsman' with the ability to require developers to give redress to consumers (MHCLG, 2020: 24 February). The investigatory powers of the ombudsman are not specified in detail and it remains unclear as to the extent to which the ombudsman will be able, independently, to resolve complaints and change industry practices.

The review of European building regulation undertaken by Meijer and Visscher (2017) concludes that outcomes-based regulation implies more emphasis on regulating the quality of the builders and by implication other professionals in addition to regulating the object of design. The introduction of more effective mechanisms of consumer redress,

such as the New Homes Ombudsman for private housing, are consistent with such a direction. It is also clear that following the Grenfell tower fire, the legal liabilities of building professionals will be clarified and increased.

The liability and enforceability of urban design and planning professionals are less easily achieved, given that urban design is a collective process. A move towards the application of design codes on the model of the building regulations therefore makes sense as a means of increasing the accountability of developers. Place Alliance (2020, 83) found that the use of design codes and design review were 'by some margin' the most effective way of delivering quality. Adams et al. (2011) likewise suggests that design codes have the potential to raise design quality, with potential marketing advantages for developers.

Support for design codes is however qualified. Developers were sceptical of the business advantages, according to Adams et al. (2011). Perhaps owing to such scepticism, Place Alliance (2020: 83) recognises that the codes have to be correctly framed and consistently applied and enforced, even in the face of unexpected cost pressures. Though the Place Alliance report does not say this, the implication is that planning authority staffing levels have to be adequate for the task. The CaCHE report (White et al., 2020: xxiv) states for example, 'A chronic lack of resourcing and a scarcity of design skills in local authorities means that design governance is severely restricted and design policy and guidance is not always enforced.'

Looking to the future

Much of the current concern with housing quality and design standards is a reaction to the failures of the immediate past. While it would be naïve to suggest that failures and mistakes can be eliminated from any complex policy process, it is relevant to ask how a more proactive and reflexive view of quality and standards might be envisaged.

Establishing a proactive view requires, in turn, a brief consideration of the nature of housing design and quality. Franklin (2001) suggests that, against the background of a weakly constructed policy agenda, housing quality and housing standards have become trapped in the fragmented discourses of interest groups, regulatory bodies and professions and that, as a result, the built environment has become 'expressive of a particular set of social structures, political ideologies, and social relations' (ibid, 89). As Franklin recognises, once housing quality and design is conceptualised in this way, it becomes impossible to identify piecemeal or practical ways of changing practice.

Another formulation is to link the complexity and variability of housing quality discourses to the functional characteristics of the home as a socio-technical hybrid. For example, a simple, broad classification of design criteria might be as follows:

1. Livability: what makes the home healthy and convenient and generally meets user expectations in terms of privacy, security and access?
2. Sustainability: What design features limit the impact of the home on the wider world in terms of land consumption, ecological impact and carbon emissions?
3. Aesthetic: How well does the home fit into its surroundings? Does it promote a sense of place?

To offer an operational framework, design guidance has to be adapted to its exact context and the broad criteria subdivided into a multitude of separate categories. Moreover, different combinations of criteria are necessary for different tasks. For example, the quality indicator questions currently used to monitor the work of social housing agencies go beyond the building regulations and estate design criteria to cover

the use of a home, including its accessibility to local facilities and open space (HCA 2011: 2015. Further, over time, concepts of quality change in response to changing social conditions and expectations. Housing quality is not just complex, therefore. It is relative to different purposes and different times.

Resolving the multiplicity of design criteria guidance statements, codes and professional advice places a premium on communication- the exchange of information and its translation from one professional or scientific domain to another and, in addition, to the translation of terminology into a form easily understood by stakeholders and non-experts. Communication and the translation of technical terms into easy to understand language have been promoted independently by social researchers in the field of the built environment (Conan, 2015; Lawrence, 2021). They are implicit in recently published reports, notably those prepared by the Quality of Life Foundation (2021) with its insistence on 'engagement with communities, politicians and wider industry stakeholders'. In a different way, moreover, communication and local engagement is necessary in neighbourhood management and regeneration. Here cross-departmental, 'postbureaucratic' working has proved an effective means of countering official neglect, with public employees reporting the complaints and concerns of local communities to multiple levels and type of agency in local government (Jeannot and Goodchild, 2011).

Government policy also echoes the theme of communication in stating that 'local communities will be at the heart of plans to make sure that new developments in their area are beautiful and well-designed' (MCHLG, 2021: 30 January). There are, however, no specific proposals in the White Paper 'Planning for the Future' to strengthen the rights of local groups. Moreover, within the designated growth areas as conceived in the White Paper, the timing of local consultation will be brought forward, from when developers make applications for planning permission to the preparation and approval of the masterplan or local plan within which the planning application is made. The preparation of design codes will still involve consultation, but as a relatively abstract and technical exercise dealing with principles and rules. It is understandable therefore that local groups (Civic Voice, 2021a) prefer to comment on specific proposals as they arise, as is current practice and would, in any case, argue for other forms of design guidance, especially in the absence of fully worked out codes. Technology in the form of visualisations might offer a partial solution, as might the use of new types of representative citizen groups. Given current expectations, however, consultation and citizen involvement in the proposed regime may not be regarded as meaningful by those involved or affected.

The White Paper (MHCLG, 2020: 18) also proposes to establish a new body, an 'Office for Place' MHCLG (2021: 30 January) to support the delivery of design codes. A supplementary technical document (MHCLG, 2021) gives some indication of the variety of design codes. They will be prepared by local authorities and will therefore have a local content, but will also reflect a national typology based on different types of area and the degree of centrality and density (whether in the town or city centre, suburbs or villages). The range of codes is a logical enough response to variations in the urban landscape. The difficulties are likely to arise in their application. The housebuilders argue that local codes should not be too prescriptive ('Housebuilder', March 2021: 26). If the codes are too flexible or lack detail, the developers will not be accountable for what they deliver and design practice will remain as at present.

The proposed design codes are based on the aesthetic and place-based principles of 'Living with beauty' (BBBBC, 2020). It would also be sensible to base the advice given to local authorities on user-based research. To give a specific example of the continuing case for user-based research, Place Alliance (2020) has correctly argued that relatively high average levels of satisfaction can conceal design failures. Equally, however,

standard design criteria tend to favour higher density schemes and may, in doing so, be inconsistent with popular preferences for garden space as a means of promoting well-being. Studies of housing in use are, moreover, especially important in dealing with sensitive status issues or if developers use innovative designs as may prove necessary to achieve carbon reduction targets. The Royal Institute of British Architects (RIBA, 2021: 10) has, in particular, called for the use of post-occupancy surveys to enable designers to learn about the impact of projects after completion.

For user research to act as a useful, critical learning device, its application has to incorporate qualitative interviews or other qualitative data (Ambrose et al., 2017) and avoid a reliance on average satisfaction scores. To explain why this is necessary, an example may be given. Following a recommendation made in the Barker (2004) review, the Home Builders Federation (the representative body of the house building industry) undertakes annual surveys of customer satisfaction, based on the self completion of report forms after purchase and occupation. In apparent opposition to the results of the urban design surveys and other criticisms, the housebuilders argue that satisfaction is very high. The report of the most recent survey (HBF, 2020) comments, 'an overwhelming 89 per cent of new home buyers would 'recommend their builder to a friend'. Crude levels of average housing satisfaction such as this are not however an adequate guide to quality, as has long been recognised (Furbey and Goodchild, 1986). Asking questions about satisfaction with a person's home is close to asking a question about their satisfaction with life. Moreover, the ability for consumers to exercise choice depends on the ability to reject a property in favour of an alternative. Choice for lower income households (whether home owners or renters) is limited, especially in the context of housing shortages.

The quality audits of Place Alliance, like the earlier audits of CABE, but in contrast to the study of Karn and Sheridan (1994) say little about the amenities of the home and the relation between the internal and external environment. The methodology of Karn and Sheridan gives an insight why there has been no repeat study, as it was dependent on the co-operation of the former Housing Corporation (then the regulatory body for housing associations), the National House Building Council and various private developers who gave the NHBC permission to reveal their plans. Such co-operation would probably only arise in the context of a major government inquiry, especially as data has become increasingly seen as a valuable commercial resource.

There is another possibility, however. Local authorities hold and publish online information on the floorplans and external layouts of schemes, submitted as part of a planning application. Floorplans and layouts are publicly accessible. The ability of digital technologies to hold and collate a mass of data is, therefore, a potential resource, not so much in simplifying planning applications, as suggested in the Planning White Paper, but in enabling a more precise monitoring of change. However, there is as yet no way of collating all the relevant information held by local authorities to give an overall picture of what is being developed in the different English regions.

Conclusions

Implementation studies such as those of Place Alliance (2020) or White et al. (2020) are a reminder that the existence of a set of standards or model requirements, set at either the national or local level, is not a guarantee of conformity for the schemes as built. Similar implementation studies need to be repeated and extended. Monitoring quality needs to cover a wider range of examples, including a comparison of private and social housing and, in addition, needs to cover standards of workmanship, internal amenities and floorspace as well as estate design. Some of these studies will almost certainly be

undertaken by trade bodies or by regulatory offices such as the New Homes Ombudsman or the so-called 'Office for Places'. The level of detail in annual and other reports, the extent of publicity and openness (not worrying about commercial sensitivities) will therefore be crucial.

Recording what has happened is the basis for a proactive and reflexive approach to the setting of standards and offers a way of avoiding the fragmentation of discourses and knowledge noted by Franklin (2001). Community involvement raises other issues. Though there is already a considerable literature on community involvement in planning, it is relevant to ask whether local amenity and civic groups have had an effect on housing design and standards (rather than just on spatial planning policy), whether the role of these groups is changing and whether consultation procedures are inclusive and adequate for the task.

The wider context, the drivers for change, also need to be considered. Good design and high building standards are seldom cost free. Even apart from the time involved in more professional design work and more consultation, design for environmental sustainability is likely to involve higher specifications and good quality, place-based urban design is likely to generate exceptions from standardised products and standardised house types. An implication of current initiatives is therefore to encourage private developers to move upmarket, to increase the costs of social housing and therefore to require more public investment to ensure that new housing is affordable. Such is the inevitable and recurrent dilemma between quantity and quality in housing. Yet failure to raise standards also has negative long-term implications.

Government policy is, in any case, inconsistent. The drive for quality in new housing is to an extent undone by the simultaneous promotion of the low cost conversion of non-residential buildings. The enforcement of standards in conversion schemes also deserves continued scrutiny.

Finally, managing the tension between quality and quantity would surely be easier if there existed greater diversity of the type of developer and the type of development practice. The increased technical content and complexity of new housing is likely to favour volume builders that have the resources to hire specialist staff and consultants. Yet, diversifying production also means more than encouraging smaller developers who use the same business strategy as the volume housebuilders. Diversification means the provision of more social housing and the use of alternatives to both private and social housing developers. Further, and this is less widely recognised, diversification of development practices means more schemes where the local authority undertakes land assembly and infrastructure provision.

*Correspondence address: Professor Barry Goodchild. Email: bg4133@exchange.shu.ac.uk

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