

Rt Hon Robert Jenrick MP  
Secretary of State for Housing, Communities and Local Government  
Ministry of Housing, Communities and Local Government  
Fry Building  
2 Marsham Street  
SW1P 4DF

10<sup>th</sup> November 2020

Dear Secretary of State,

**Permitted Development Rights (PDRs): follow up**

The Royal Institute of British Architects (RIBA), Chartered Institute of Building (CIOB), Royal Institution of Chartered Surveyors (RICS) and Royal Town Planning Institute (RTPI) represent a combined membership of over 175,000 skilled professionals.

In July we wrote to you in response to the announcement on the extension of Permitted Development Rights (PDRs). In our letter, we warned of the consequences this could have on space, building and design standards, sustainability, and the quality of future housing.

The recent announcement for future homes delivered through permitted development to meet the Nationally Described Space Standard, was therefore very welcome by our organisations and members. It is also positive to see proposals outlined in the 'Planning for the future' white paper, requiring housing delivered through PDRs to incorporate an element of CIL or Section 106, ensuring contributions are made towards affordable housing and community infrastructure in local areas.

The Joint Institutes stand in support of these measures, which we believe are positive steps towards ensuring better quality homes that enable greater opportunity to address some of the areas of concern we previously highlighted.

With people spending more time at home than ever, it is essential to ensure quality, space and design of all homes is at the heart of any decision making. The introduction of space standards is positive, however, it leaves a number of other issues unaddressed. We believe that there are significant benefits to consistency across all types of new housing and feel that this would have broad benefits for both those looking to develop new homes through permitted development.

- **Sustainable homes**

In order to achieve the governments net zero targets by 2050, it is vital that any future housing has sustainability embedded at the core of it. Housing delivered through PDRs is no exception to this. We would be interested to know what scope there is for homes delivered through PDRs to follow the requirements set out in the Future Homes Standard.

- **Well-located homes**

Location is a primary influencing factor in the choice of a new home, and core to ensuring sustainable patterns of development. Housing delivered through PDRs results in residential dwellings being developed in areas without access to essential infrastructure and public services such as transport, green spaces, and shops. This has significant impact on the quality of life for

residents, while also affecting their ability to access employment, education, and healthcare. It also undermines the ability of planners to create healthy, sustainable and livable places for communities.

- **Healthy homes**

Housing delivered through PDRs are currently permissible as single aspect dwellings, making them more difficult to ventilate naturally and more likely to overheat. This is harmful for residents and can have negative effects on well-being and it is because of the reasons highlighted, that single aspect dwellings are less likely to be granted planning permission under normal circumstances. We would like to know whether the government is open to reconsidering this crucial measure for housing delivered through PDRs.

- **Building safety**

We are concerned that under the new regime proposed by the Building Safety Bill, where PDRs occur for in-scope buildings, the usual Gateway One checks will not apply as there is no requirement for a formal building application to be made at planning stage. Ensuring appropriate oversight at each level of the development process is fundamental to improving the safety and quality of our built environment, and we encourage the government to work with professional bodies and other stakeholders to ensure that the key elements of Gateway One are considered for in-scope buildings created via PDRs.

Housing and construction play an integral role in the country's plan to rebuild the economy post-COVID; good planning is key to ensuring this is delivered while having a positive impact on the quality of the built environment, the health of the public and our environment. We urge the Government to carefully consider our concerns and bear in mind that addressing the housing affordability crisis is not purely about numbers, but also about delivering the types of homes we need where we need them, as part of communities in which residents want to live.

Our organisations value the engagement with your department and stand ready to continue to work together to deliver good-quality, well-placed and sustainable homes that the public and the planet so very need.

Yours sincerely,



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