

# Royal Institute of British Architects in conjunction with Care and Repair England, Centre for Ageing Better, Chartered Institute of Housing, Disability Rights UK, Habinteg, Housing Learning and Improvement Network, and the Town And Country Planning Association

Housing, Communities and Local Government Committee  
New inquiry: Permitted development rights  
April 2021

## Introduction

This response is submitted by the RIBA of behalf of ourselves and Care and Repair England, Centre for Ageing Better, Chartered Institute of Housing, Disability Rights UK, Habinteg, Housing Learning and Improvement Network, and the Town And Country Planning Association. These organisations are also part of the [Housing Made for Everyone coalition](#).

### **The expansion of permitted development is undermining government policies on housing, sustainability, and economic recovery**

While we recognise the need for new homes, the deregulation of the planning system has been proven to be a poor method to achieve this. If the government is serious about promoting beautiful, well designed places, that are accessible to all, it needs to rescind the recent expansion of permitted development rights.

### **The expansion of permitted development has significantly impacted on the accessibility and sustainability of new homes**

We support the principle of a democratically accountable planning system that seeks to balance the needs of new and existing residents with the economy and the environment. We are concerned that the expansion of permitted development has been of serious detriment to the planning system's ability to deliver sustainable development goals and support the mental and physical health of disabled and older people.

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No. RC000484  
Registered Charity No. 210566  
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The planning system exists to ensure that homes are built in walkable environments, close to critical public infrastructure such as hospitals and public transport and are near to green spaces which are vital for physical and mental health. Homes built through PDR bypass these requirements and thereby are damaging to the wellbeing especially of older and disabled people who rely on this infrastructure for their independence and quality of life, and also to access employment opportunities. The expansion of permitted development rights has, and will continue to, disproportionately negatively impact disabled and older people, as well as other vulnerable groups, unless it is urgently reviewed.

We are concerned that the rapid expansion of the permitted development regime amounts to a new shadow planning system which prevents positive planning, marginalises the voice of local people, damages the economy of town centres and produces extremely poor housing design outcomes which are inaccessible to older and disabled people. All these negative impacts will only act to further exacerbate the ingrained inequalities towards disabled people that have been heightened through the Covid-19 pandemic.

### **Changes to permitted development have generated opposition from across the economy**

It is particularly disappointing that the government has progressed its most recent expansion of permitted development rights despite the wide range of organisations that raised concerns about them.<sup>1</sup> There has been unprecedented consensus from all sectors including business, environmental and social housing sectors that expansion of permitted development rights will have a detrimental impact on our town centres, on the provision of affordable homes and on the health and wellbeing of the residents of these housing units. Permitted development being exempt from providing affordable housing contributions has led to the loss of tens of thousands of affordable homes since its introduction in 2013.

As well as this, under PDR, schemes only need to comply with the building regulations, which address limited technical issues such fire safety, energy efficiency, ventilation, soundproofing, and now the provision of space and “adequate” light. However, without full planning application, not even the default basic position of Building Regulations under Part M Category 1 (“visitable dwellings”) can be required of all newly created dwellings under current PDR. That means that many older and disabled people would be unable to live in these homes once converted, which will fail to address the housing crisis that is already disproportionately affecting these groups.

In response to the 2020 MHCLG consultation on raising accessibility standards for new homes, we recommended that government must include making the accessible, adaptable design standard M4(2) the mandatory baseline for all new homes. Millions of people, particularly people who are older or disabled, live in homes that do not meet their daily needs. England’s housing stock is not suitable for the diverse and changing needs of its population. The new permitted development rights

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<sup>1</sup> See for example this letter from 27 organisations - [BPF - Industry bodies warn Secretary of State: uncontrolled conversions to residential will damage high streets](#)

only act to increase this problem, allowing new homes to be built without proper scrutiny from local authorities.