Royal Institute of British Architects

Construction Industry Council call for evidence: Building 1.5 million quality homes in this Parliament
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The Royal Institute of British Architects is a global professional membership body driving excellence in architecture. We serve our members and society in order to deliver better buildings and places, stronger communities and a sustainable environment. Being inclusive, ethical, environmentally aware and collaborative underpins all that we do.

RIBA welcomes this opportunity to respond to this call for evidence on building 1.5 million quality homes over the course of this Parliament. Given the scale of need across the country, we welcome the Government's ambitious target, however, delivering housing at pace must not sacrifice quality. The homes and places we build must prioritise good design, sustainability and accessibility to meet people's needs now and be adaptable to meet the changing needs of future generations.

RIBA recommends that the Government:

- Involves architects in the creation and development of new homes and places from the earliest possible stage.
- Ensures that a vision for high-quality design is a core component of spatial development strategies (SDSs).
- Uses the UK Net Zero Carbon Building Standard to adopt and standardise construction metrics.
- Sets targets for operational energy use and embodied carbon for new homes in the Building Regulations.
- Launches a consultation as soon as possible on measuring and reducing embodied carbon in new buildings.
- Requires post-occupancy evaluation (POE) as a condition for new homes.
- Commits to piloting the model outlined in RIBA's report Foundations for the Future to deliver new, urgently needed housing for social rent and for market sale.
- Works with the housing sector to examine how this model could be adapted to facilitate the further delivery of social homes.
- Explores how local authorities can retain and reinvest all proceeds from the sale of local authority-owned stock.
- Examines the role of incentives in supporting the use of MMC.
- Takes a holistic approach to housing delivery, taking into account access to transport infrastructure, employment opportunities and opportunities for growth.
- Prioritises diversity in housing typology and tenure, including through the promotion of mixed use development, to meet current and projected need across all tenure types.

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How do we balance economic viability with high quality, and what are the current barriers to that?

With research by the Competition and Markets Authority (CMA) noting that "housebuilders are not necessarily incentivised to compete on quality", or to take creative approaches to placemaking, it is clear that there are structural barriers to ensuring quality alongside viability.

One way to balance this is the use of strategic masterplanning to support economic viability. This can be done by distributing activity across multiple centres, integrating uses, phasing development to allow adjustment to changing conditions, incorporating productive landscapes, and building in flexibility.

We are pleased to see that introducing a strategic approach to planning is a key aim of the Planning and Infrastructure Bill through the use of spatial development strategies (SDSs). To guarantee that good design is a key part of these, we recommend that the Bill contains a requirement for SDSs to contain a design vision.

A design vision is a clear articulation of what an area or project should be like in the future, developed with the local community and stakeholders. This includes identity and character, sustainability and resilience, connectivity and accessibility, and user experience. Requiring SDSs to include a design vision is vital for high-quality design to be prioritised in the strategic planning process.

Further to this, brownfield remediation is a barrier which can affect the ability for large sites to be brought forward for housing and infrastructure delivery. Remediation and decontamination works can be expensive and complex, and may involve removing or diverting existing infrastructure such as highways, services or drainage. The scale of risk, when there is risk involved in the remediation of a site, is usually large – which can be unattractive to potential developers and therefore not conducive to unlocking growth.

How can we ensure that new homes are environmentally friendly and energy-efficient?

In the UK, we have been making progress on ensuring that new builds are net zero aligned, but there has been no single, agreed-upon methodology to verify net zero carbon buildings. The UK Net Zero Carbon Building Standard (UKNZCBS) provides a set of consistent rules to create a level playing field around such claims. The Standard is a single, robust methodology for defining the characteristics a building must meet to be considered "net zero aligned" and in line with the nation's carbon budget.

The metrics within the Standard are already recognised by those working in the UK built environment industry. The metrics have been identified by professionals from across the industry as key to the carbon accounting required in the drive to measure and reduce in line with the UK's net zero ambitions. These are the metrics against which reporting should be required consistently at a national level. Therefore, the Government should adopt and standardise construction reporting metrics consistent with the Standard. Ultimately, we would like to see targets for operational energy use and embodied carbon (two of the metrics in the Standard) for new homes in the Building Regulations. These figures should be aligned with those set out in the Standard.

In the meantime, the previous Government promised to consult on the approach and interventions to mainstream the measurement and reduction to embodied carbon in the built environment. The current Government should honour this commitment and consult as soon as possible. This would send a strong signal to the sector that the Government is serious about reducing the carbon impact of the built environment and set a clear direction for reducing the embodied carbon in our buildings.

To further enhance environmental protection, we recommend that the Government requires post-occupancy evaluation (POE) for new homes built under the Future Homes Standard. POE is the process of obtaining feedback on a building's performance after it has been built and occupied. It collects information on building and energy use, as well as user satisfaction. It informs building users if their building is energy efficient and reveals if it is being used as intended. At present, the lack of information about how well new

buildings are performing is hindering improvements in new homes. Completion of POE can drive up standards through "lessons learnt", fostering iterative design. Addressing these issues can help reduce operational costs and provide data to help understand how buildings are performing compared to their design intention. Without this data, the construction industry will unknowingly continue to make the same mistakes, wasting time and money.

What strategies can be implemented to make housing more affordable for all income levels?

Historically, the private sector has not delivered the numbers of homes needed, and this is unlikely to change in the future. As part of any measures to increase housing supply, the Government must invest in new social housing.

We welcome announcements made by the Government to increase social housing delivery, including the March 2025 announcement of £2 billion of new grant funding in the Affordable Homes Programme. However, with almost 1.3 million households in England currently on social housing waiting lists, this figure does not come close to meeting the scale of need.

To meet this need, we require a range of innovative new approaches. We have identified one way to deliver more social homes via a new model, which requires an initial investment from central government to local authorities. This is then used by local authorities to build homes for both social rent and market sale on land which is free at the point of use, such as local authority-owned land.

The receipts from market sale homes are retained then reinvested to build further homes for both market sale and social rent. Not only does this promote mixed-use development, but reduces reliance on continuous central government funding to secure social housing provision. Further information on this model can be found in our report, Foundations for the Future.

There is also a role for planning policy in making sure that there is affordable housing available for people at all income levels. We welcomed the Government's decision to revise the National Planning Policy Framework (NPPF) to explicitly include an expectation that local planning authorities (LPAs) should consider the needs of those who require social rent homes.

How can modern construction methods and technologies accelerate the building process while maintaining quality?

A barrier to investment in new and innovative technologies is a lack of consistency and certainty. Modern methods of construction (MMC) can result in a 20% - 60% reduction in construction programme time, 20% - 40% reduction in construction costs, 70%+ reduction in onsite labour, and greater programme certainty. There are also a number of clear environmental benefits, with MMC use allowing for significant reductions in energy consumption during the construction process and reductions in onsite waste compared to traditional construction methods.

However, we need investment to ensure a pipeline of MMC projects. Getting a factory up and running is a big investment and without a pipeline of projects, the private sector is unlikely to invest. A consistent pipeline of work is vital to ensuring that MMC is able to develop and sustain itself, which is hard to achieve should uptake not be consistent. Unlike traditional construction methods, where elements of the supply chain and attached workforce can be employed on a flexible, demand-oriented basis, MMC relies on a vertically integrated factory model for production with specifically trained employees. If the potential of MMC is to be fully realised, Government support and aggregated demand are crucial to fostering MMC procurement routes. Investment into research and development would drive noticeable advances in the sector. There are levers available to the Government to ensure that its funding programmes contribute directly to the increased use of MMC. Attaching conditions for the use of MMC to funding is an important tool.

What changes in policy and regulation are necessary to support the rapid construction of quality homes?

Boosting capacity in the construction sector is vital for the Government to achieve its ambition of building 1.5 million homes and its longer-term aim of creating well-designed places, including new towns and urban extensions. Skills England's own analysis of current and future skills demands highlights that the Government's growth ambitions will require an increased number of architects. Planning departments must also be allocated the comprehensive resource needed for quality development to be brought forward in a timely manner. Planning departments have experienced one of the most severe cuts in terms of real terms budget allocation from 2010 to 2020, with research showing that spending on planning is still down 40% from 2010/11. This impacts the ability to recruit and retain experienced staff, leading to delays and sometimes affecting the level of scrutiny afforded to applications.

While this has wide-ranging implications, it has had a clear impact on access to design expertise within local authorities. Data from the Ministry of Housing, Communities and Local Government has shown that 54% of local authorities surveyed in 2023 reported skills gaps in urban design and architecture. This must be rectified to ensure that high-quality design is foregrounded. Design quality – ensuring that homes and places meet the needs of residents and communities in practice, and adhere to principles of safety, sustainability and accessibility – has wide-ranging positive impacts for both people's health and wellbeing and the longevity of the built environment itself. Architects are well-placed to rectify these skills gaps and should be involved in the design and development of new homes and places.

With regards to social housing, the Local Government Association has called on the Government to allow local authorities to permanently retain 100% of receipts from Right to Buy. It has also urged the Government to remove restrictions on local authorities' ability to combine receipts with other funding and on the percentage of new homes that can be funded by receipts in order to boost delivery.

How can we ensure that new housing developments are well-integrated with local communities and infrastructure?

To deliver long-term infrastructure projects and drive growth, we must prioritise investing in regional spatial planning. There must be a commitment to long-term funding settlements in order to ensure best value for money, as well as certainty for developers and other partner organisations.

An emphasis on strategic planning must be supported by spatial strategies that include consideration of spatial development patterns, social infrastructure, housing, the economy, green infrastructure and transport. Not only does spatial planning optimise the allocation of land through analysis of site opportunities and limitations, but also prioritises the importance of placemaking. There is a clear role for architects in this: the role of design must be prioritised throughout the creation and delivery of new homes and places, rather than treated as an afterthought.

Neglecting to plan for homes and infrastructure in a strategic way can lead to adverse outcomes. Research has shown that a lack of integration in the planning process has led to an increase in the car dependency of new homes. Additionally, infrastructure relevant to active travel – promoting cycling and walking – creates a number of health benefits, but can also be beneficial to the success of retail and leisure amenities due to an increase in footfall, generating growth and contributing to local economies. This link between physical and social infrastructure is intrinsic; with considerations such as accessible public transport making a significant impact on social inclusion, access to employment and overall wellbeing.

It is crucial to ensure that new towns have high-quality social infrastructure, including healthcare, schools, community centres and sports facilities. These should be sequenced early in the development process to provide community focus and cohesion, together with ensuring private sector amenities are facilitated such as pubs, cinemas and retail.