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Rt Hon Robert Jenrick MP
Secretary of State for Housing and Planning
MHCLG
Fry Buildings
2 Marsham Street
London
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By email: PSRobertJenrick@communities.gov.uk

21 July 2020

Dear Secretary of State,

In response to the announcement made today on the extension of permitted development rights, the largest organisations to represent built environment professionals are writing to express their concerns.

Permitted Development Rights (PDRs)

The Royal Town Planning Institute (RTPI), Royal Institute of British Architects (RIBA), Royal Institution of Chartered Surveyors (RICS), and the Chartered Institute of Building (CIOB) represent a combined membership of over 175,000 skilled professionals. Our members are fundamental to delivering the built environment in the UK and adhere to the highest professional standards that our organisations develop and promote.

Build, build, build

We firmly believe that when addressing the housing crisis, quantity and quality are not mutually exclusive. We stand ready to support “build, build, build”, while insisting that we must get this right by delivering safe, high-quality and well-connected homes fit for the 21st century.

Quality of housing, as well as proximity to green space and essential facilities such as shops and healthcare, have shaped the divergent ways in which we have all experienced the Covid-19 pandemic. Those in poor quality, overcrowded and badly located homes have experienced a very different lockdown to those in well planned, designed and built communities.

Early evidence suggests our built environment has had a significant impact on both physical and mental health outcomes, as well as on our ability to adapt to different ways of working. We need to

take a holistic view of good design, place-making and building, in recognition that development now will shape our communities into the future.

Use of PDRs

It is in this light that we share our concerns around the use of PDRs, which should not be considered unless subject to clear space, building and design standards.

You will no doubt be aware of the comments of the Building Better, Building Beautiful Commission, who concluded that PDRs had inadvertently created “future slums”.¹ Automatic permissions for the conversion of office spaces to housing, without requirements relating to quality, size, sustainability and design, has led to spaces detrimental to the wellbeing of residents.

We are concerned that further PDRs, including the ability to demolish and rebuild on existing sites — if implemented without significant safeguards—will lock in more unacceptable standard development, the consequences of which we will live with for generations or must rectify later at greater expense.

We welcome the recent move, via a statutory instrument, to require natural light in homes created from office conversions.² However, this situation should never have arisen, and homes without windows, as well as other egregious example of such poor quality living conditions, must never be allowed to happen again.

Our offer of help

We have seen further announcements related to PDRs, including:

- Extra storeys on residential building without the need for planning permission
- Demolition of empty buildings if replaced with residential, without the need for planning permission
- Further reforms to use class orders, to expand the commercial presences that can be repurposed to residential without planning permission

We are concerned around how these PDRs will be implemented, and the potential impact on the quality of life of future residents and local communities. All PDRs must require minimum space, building and design standards, and should be implemented in such a way as to ensure they contribute towards affordable housing and community infrastructure.

Having these safeguards does not mean delays in construction, it means that the homes built in the early 2020s will not become the social disasters of the 2030s.

While we stand ready to advise on how to create the best possible outcomes under a PDR regime, we strongly urge proactive rather than reactive planning of this sort for the built environment. A longer term, more sustainable solution would look at interventions earlier in the building process, rather than retrofitting buildings that are fundamentally not suitable as housing. The creation of buildings which are properly suited to undergo various different uses during their lifetime would be preferable to the change of use of buildings which are not suited and which need proper conversion.

¹ Building Better, Building Beautiful Commission, [Living with Beauty](#), January 2020

² Legislation.gov.uk, [The Town and Country Planning \(Permitted Development and Miscellaneous Amendments\) \(England\) \(Coronavirus\) Regulations 2020](#), June 2020

We stand ready to engage with you constructively regarding our concerns, to together deliver the good-quality, safe and well-connected housing we so greatly need.

Yours sincerely,



Victoria Hills MRTPI FICE
Chief Executive
Royal Town Planning Institute



Professor Alan Jones FRIBA FRSA RIAS
President
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Matthew Howell
Managing Director, UK & Ireland
Royal Institution of Chartered Surveyors



Eddie Tuttle
Director—Research, Policy & Public Affairs
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CC:

Christopher Pincher MP, Minister for Housing and Planning
Simon Clarke MP, Minister for Regional Growth and Local Government