



Healthy Homes Act
Campaign



no place for place-making



the impacts of permitted development rights on
place-making, and what they tell us about
the government's planning reforms

No Place for Place-making: The Impacts of Permitted Development Rights on Place-making, and What They Tell Us about the Government's Planning Reforms

Published by the TCPA and written in collaboration with the Regional and Urban Planning Studies group at the London School of Economics and Political Science
September 2020

Contributors:



Town and Country Planning Association:
Dr Daniel Slade, Jack Dangerfield, and Dr Hugh Ellis



London School of Economics and Political Science:
Dr Nancy Holman, Katie Mulkowsky, and Martina Rotolo



To find out more about the TCPA's Healthy Homes Act campaign, visit:
www.tcpa.org.uk/healthy-homes-act



The Healthy Homes Act campaign is funded by the Nationwide Foundation.

Cover image: Office-to-residential conversion under permitted development at Harlow, taken by Katy Lock

O

executive summary

What is the minimum we expect from new homes?

What is the minimum we should expect from homes built in England today? Most of us would expect windows in the main rooms. We would also expect enough space to move around freely and store our belongings; and our collective experience of COVID-19 tells us that access to a private balcony or outside space is more than a 'nice to have'. Most of us would also demand walkable pavements, access to some external green space, and basic local services.

Since 2013 and the introduction of new permitted development rights (PDRs) that allow new homes to be converted from offices and light industrial buildings without planning permission, over 100,000 new homes have been built in England without any requirements for these features. With the unprecedented expansion of PDRs on 1 September 2020, we risk seeing many more. Homes built in place of demolished commercial buildings, two-storey extensions on existing houses, and homes converted from shops will all now bypass the planning system.

What can we learn from homes produced through PDRs so far?

The planning reforms announced in the government's *Planning for the Future* White Paper have attracted a great deal of commentary and criticism – but in their immediacy and scale, the changes to PDRs made prior to the publication of the White Paper may prove to have been even more radical. It is therefore important to be clear about the impacts that deregulation of the planning system through extended PDRs have had on people and places.

The evidence on the quality of new homes being produced through extended PDRs is well documented – and grim. Issues such as poor construction quality, overcrowding and lack of access to natural light and private outdoor space are so prevalent that

the [government's own research](#) has found that homes built in this way are generally worse for occupiers' health, wellbeing and quality of life than homes that are planned. The [One Year On report of the TCPA's Raynsford Review of Planning in England](#) describes such homes as '21st century slums'.

However, there has been less discussion about the impacts of these unplanned homes on wider places and communities, despite the fact that [Public Health England](#) and other bodies have been clear that our neighbourhoods are crucial to communities' health and wellbeing. The research reported here focuses on these wider impacts of permitted development, and particularly on how PDRs undermine councils' efforts to plan for healthy, safe and thriving places.

Based on an analysis of case studies collected by the TCPA and the London School of Economics, we found that four types of impact were particularly significant:

- **Permitted development has made real place-making impossible** in many places by effectively removing acres of land in key areas from councils' influence, preventing them from securing and co-ordinating development in sustainable, safe places. At the same time the government is critical of the planning system for the design quality of the places it produces.
- **Permitted development has deprived councils of funding for the infrastructure - green space, community facilities, healthcare facilities, roads, and affordable housing - that is essential to new and existing communities' wellbeing** because councils are unable to collect Section 106 payments on developments delivered through this route.
- **Permitted development threatens local jobs and businesses** because councils are unable to stop employment land in their areas being converted to housing. This potentially forces local people into unsustainable communities.
- **Permitted development has undermined local democracy** and left communities unable to influence their local environment as it changes over time.

Each of these issues is closely related, and they come together to produce neighbourhoods and places that are unsustainable, unattractive, and damaging to communities' wellbeing. By allowing even more new housing to bypass the planning system, the government's expansion of PDRs in September 2020 will inevitably exacerbate these problems.

'A symptom of a strange sickness' - why we need a Healthy Homes Act to prevent the development of 21st century slums

The current approach, which results in homes in the middle of industrial estates, is clearly not working. It is not only at odds with the government's commitments to 'building back better', but is simply immoral. Extended PDRs powerfully symbolise just how broken our overall approach to housing is, and are **a symptom of a strange sickness** in which all regulation of the built environment is seen as a burden, regardless of what it aims to achieve.

Too often the debate about standards is framed as a zero-sum game - those lobbying for further deregulation argue that it is the only way to deliver more housing and solve the housing crisis. But the only period since the Second World War in which the nation built anywhere near the 300,000 new homes a year which the government claims we need - between 1955 and 1975 - was defined by strong planning powers and investment in social housing. In other words, we need not less regulation, but better regulation which guarantees that all new homes and neighbourhoods - whether delivered through permitted development or the government's reformed planning system - support residents' health and wellbeing.

The TCPA, with the support of many other organisations, has developed draft legislation - the '**Healthy Homes Act**' - which, if put into effect, would be a huge step towards meeting this aim. It defines and would enshrine in law the principles that define healthy homes and neighbourhoods. And, although it would not end permitted development, or block the government's planning reforms, it would effectively outlaw the creation of new homes and neighbourhoods which undermine people's health, safety, and wellbeing.

1 introduction and policy context

The expansion of permitted development rights has left thousands of people living in homes that undermine their wellbeing

New homes created through permitted development rights (PDRs) in England do not need planning permission: they bypass the regular planning system and require only very basic checks as part of a 'prior approval' process before development is allowed to proceed. Councils have little ability to prevent poor-quality or inappropriate new housing that comes through this route; local residents cannot object; and developers do not have to contribute to infrastructure or affordable housing to support their developments.

Despite this, successive governments have expanded PDRs in an attempt to speed up and increase housing delivery. Since 2013 it has been possible to convert office buildings and light industrial buildings into homes through permitted development, and, based on government 'Live Table' data (from Table 120), it is likely that more than **100,000 homes** have been created through this route.

The government further expanded PDRs in September 2020. It is now possible to add additional stories to homes, demolish commercial buildings to replace them with homes, and turn shops into homes, all without planning permission. This is unprecedented. Not since the birth of the planning system have councils had so little control over the quality and location of new housing in their areas.

There is both **growing public concern** and a mountain of **evidence** that this largely unregulated development is leading to homes of such low quality that they are having serious impacts on residents' health and wellbeing. Indeed, on the same day that the government announced its most recent expansion of PDRs, it also published **comprehensive research** on the quality of homes

delivered through office-to-residential permitted development. This research concludes (on page 70) that such conversions:

'create worse quality residential environments than planning permission conversions in relation to a number of factors vital to the health, wellbeing and quality of life of future occupiers.'

Of the 639 buildings that the authors examined, only 22.1% met nationally described space standards, 72% had only single-aspect windows (ten units appeared to have no windows at all), and only 3.5% had access to private amenity space. This matches the picture painted by other research into permitted development outcomes, including **our research**, and high-profile investigative journalism from newspapers and TV channels, including the **BBC**. It is highly likely that a significant proportion of the roughly 100,000 homes delivered in this way between 2015 and 2018 are of similarly poor quality, and that the government's expansion of PDRs will lead to many, many more.

The 'indirect' impacts of permitted development homes matter

Less often discussed are the wider 'indirect' impacts of permitted development on communities' health and wellbeing. As schemes delivered through PDRs bypass the planning system, councils are unable to co-ordinate development, plan vital infrastructure and services, and generally create successful, pleasant places which support health and wellbeing. The impacts of thousands of substandard homes on their individual residents clearly matter, but these larger, neighbourhood-scale, place-making impacts matter, too. Local councils have not had so little control over development in their areas since the Second World War – and we need to understand what this means for people's wellbeing.

It is also important to understand these wider impacts because they provide an insight into our future. As well as extending PDRs, in early August 2020 the government announced, through the *Planning for the Future* White Paper, its intention to further reform the planning system. While many of the White Paper's proposals are contradictory, vague or currently lack substance, we are concerned that the government intends to:

- greatly reduce the number of factors that councils can consider when assessing new developments;
- give more new housing developments 'permission in principle' should they meet basic design criteria; and
- reduce or even remove the ability of local politicians and communities to oppose new developments which meet these reduced plan requirements.

Looking at the wider impact of PDRs can give a sense of what these changes could also mean for the future of place-making and the wellbeing of communities across the country.

This report

This short report, co-produced by the TCPA and researchers from the London School of Economics (LSE), is based on an in-depth analysis of case studies that both organisations have collected over recent years. Key sources included the TCPA's **Raynsford Review of Planning in England**, the government's own **review of office-to-residential PDRs' impacts**, research independently commissioned by the TCPA from the author of the government's review, local newspaper reports, and research independently collected by the researchers at the LSE. The examples and case studies presented here illustrate impacts that we have found to be important and/or common in our wider research.

Each section summarises the place-making impacts of permitted development under different themes, and the final section examines how a Healthy Homes Act would radically improve the way that we regulate the built environment and so end the construction of 21st century slums.

2 permitted development undermines real place-making

New homes in unsuitable places

A local council's most important role is to develop a vision for its local area and then work towards achieving it. This requires work to co-ordinate new homes and infrastructure, manage demand for services (whether bus routes or utilities), and prevent development (including of new homes) which does not align with this vision – and the planning system is one of the most powerful tools councils have to do this. But councils are unable to refuse planning permission for new homes in unsuitable or unsustainable locations when they come through permitted development. This means that inefficient and damaging land use patterns can emerge as housing comes forward in locations that do not have the infrastructure to support them. There are numerous examples of new residents finding themselves with no local shops, services or green spaces within walking distance of their homes, as well as no access to safe walking and cycling routes, thus severely limiting opportunities for cheap active travel and exercise.

Councils are also unable to require that new homes delivered through permitted development have access to public transport. This not only has implications for people's health and wellbeing, but also has consequences for climate change, local air quality, and road congestion. **Huntingdonshire's Local Development Plan**, for example, sets out policy which concentrates development in locations supported by a range of important infrastructure, services, and facilities. However, with the council unable to intervene, a number of agricultural-to-residential permitted development schemes in the area have resulted in homes in clearly unsustainable locations.

As well as homes built in locations that do not support residents' wellbeing, permitted development results in homes being built in locations that are actively damaging to residents' health, such as industrial estates (see Case Study 1 on page 11). Residents of an office-to-residential conversion in Mitcham, London,

have raised concerns about the health implications of industrial pollution, and over their children having no option but to play on roads used by heavy goods vehicles.

The cumulative impacts of permitted development and the problem of scale

While there is no limit to the number and size of dwellings delivered through individual permitted development schemes, there is no limit to the number of schemes in a particular area. This means that locations such as Hounslow (see Case Studies 1 and 2 on pages 11 and 12) and **Harlow**, which have great concentrations of permitted development outcomes (**more than half** of the homes created in Harlow in 2018/2019 were through permitted development), have seen several large schemes come forward within as little as half a mile of each other. The cumulative impact of these developments is that councils effectively lose the ability to properly influence several acres of land in strategically important locations. This impedes their ability to implement coherent masterplans or place-making policy.

Councils can apply for an Article 4 Direction to prevent permitted development conversions in unsuitable locations, but these are tightly circumscribed by central government and can only be deployed when councils demonstrate special local circumstances. They also require extensive evidence, can be modified by the Secretary of State, and can leave councils prone to legal challenge.

Case Study 1

Development in a damaging location - New Horizons Court, Hounslow



A former Sky TV headquarters comprising four separate office blocks was converted into 297 flats following the submission of a prior notification (i.e. an application for prior approval) in October 2017.

Hounslow Council considered the scheme's impact on three issues - transport, contamination and noise disruption - and denied the scheme prior approval on the grounds that the development would lead to a harmful increase in traffic. Among the reasons for refusal were the poor pedestrian links and the scheme's relative distance from amenities and public transport nodes, which the council argued would lead to residents relying on car-based travel. The council's decision was overturned at appeal.

As the satellite image above illustrates, the new homes (location shown by the blue dot) are adjacent to a major road, and within a business park that includes factories and a waste transfer station.

Case Study 2

Intense development without local engagement or control - Great West Plaza, Hounslow



Property developer Quinata Global bought the 5.5 acre Riverbank Way site in Hounslow, London, in 2016 (location shown by the blue dot in the satellite image above). Several rounds of prior notifications followed in the years after, the first of which was to convert one office complex on the site into 132 self-contained residential flats. Hounslow Council turned down the first two prior approval applications on the grounds that the infrastructure provided as part of the scheme was insufficient and the development would lead to excessive strain on local residents. The council approved Quinata Global's third notification.

Two further prior notifications followed, which led to the conversion of two further office complexes into residential buildings of 135 apartments each in June 2019. During the same year, prior approval was also granted for the conversion of other offices on the site into 30 apartments. Finally, in April 2019, 42 apartments were added to the redevelopment scheme when the last prior approval was granted.

A planning officer from Hounslow Council commented that the numerous rounds of applications submitted on the same site were extremely time consuming to process, and difficult to properly process. Worse still was the confusion among local residents, who found out about the development only when an application for external alterations was made, which required planning permission and therefore consultation. As was noted by the planning officer, it was upsetting and almost impossible for local communities to understand how such a large number of new homes could be built without any consideration for local residents.

3 PDRs deprive councils of funding for infrastructure and essential services

No way to redress the negative impacts of new homes on places

Section 106 agreements are legal agreements between a local authority and a developer that make a development acceptable in planning terms. They can require a developer to contribute financially towards the maintenance of existing – or the provision of new – infrastructure local to the development. These contributions and agreements are crucial because developments may, for example, put pressure on local roads and public transport, increase the demand for places at local schools and colleges, or put pressure on doctors' and dental surgeries, community centres, and other local facilities. The construction of new homes can be, in itself, in the public interest. But without the capture of 'planning gain' through a process such as a Section 106 agreement there is no way to ensure that developers redress any negative impacts of their developments on existing residents and their local areas.

No way to ensure that new residents have the services they need, or that the public interest is delivered

There is also no way to ensure that the developer of a permitted development scheme contributes to the provision of the infrastructure needed to support the new residents of the homes being built. Indeed, extended PDRs also seriously undermine the provision of new homes themselves, because Section 106 agreements are used by councils to deliver the majority of affordable housing in England. The Local Government Association has **recently estimated** that more than 13,500 affordable homes have been lost over the past four years as a result of extended PDRs. Without a supply of affordable housing, local residents can remain on local authority waiting lists **for longer**, living in temporary accommodation which is often of poor quality (and has itself often been created through

permitted development) and which can seriously affect their health. Children who live in temporary accommodation for over a year are **three times more likely to develop a mental health condition**.

This is essentially a matter of the public interest; without mechanisms to fund new affordable housing and infrastructure there is no way to ensure that developers, who benefit financially from having planning permission (whether through PDRs or granted through the normal route), contribute some of those profits towards delivering positive impacts from new developments for both new and existing residents.

The detrimental impact on local authority resources and the overall financial impact of PDRs on councils

Research carried out by the Royal Town Planning Institute has revealed how a decade of austerity has left many local authority planning departments **financially dependent on developer contributions and application fees** to deliver their services. However, developers pay much lower fees for the prior approval applications needed for permitted development than the fees for full planning applications. For example, Derby City Council only received £160 for a large permitted development application that would have brought in **£37,000** in planning application fees. The expansion of PDRs reduces councils' planning budgets, **further eroding** their ability to plan proactively for new development and healthy places.

A **study of the impacts of extended PDRs** across five local authorities published by RICS (the Royal Institution of Chartered Surveyors) estimates that they lost a combined total of £10.8 million in Section 106 funds over a four-year period as a consequence of extended PDRs, while as many as 1,667 affordable homes were lost. These local authorities lost a further £4.1 million in reduced application fees. The study's authors concluded (on page 11):

'Overall, office-to-residential PD has been a fiscal giveaway from the state to the private sector real estate interests, while leaving a legacy of a higher quantum of poor quality housing than is seen with schemes governed through full planning permission.'

Case Study 3

Lost revenues for infrastructure and services - Delta Point, Croydon



A prior notification was received by Croydon Council to convert a former office building, Delta Point, into 404 residential units (location shown by the blue dot in the satellite image above). Despite being a very dense development, no amenity space was provided, and only 100 units met national space standards.

The developer did not have to pay any contributions towards local infrastructure and services, meaning that the council missed out on as much as £1,858,400 (£4,600 per unit). When a council is faced with losing contributions from numerous dense schemes such as this through PDRs, their ability to fund the provision of important local infrastructure is severely diminished.

4 permitted development removes local jobs

Permitted development stops councils from preserving employment opportunities

Part of the government's rationale for introducing office-to-residential PDRs was that it would boost economic growth. It is therefore ironic that some of the most damaging impacts on places relate to the loss of local jobs.

So far, we have examined how new permitted development homes have undermined the ability of local authorities to create thriving places. However, extended PDRs have also prevented councils from *retaining* existing uses that are essential for prosperity. Most significantly, because office buildings can be freely converted into homes through PDRs, many councils have seen huge reductions in office space over the last seven years. This has led to the loss of local job opportunities, and to local people being forced either to move in search of work, or to begin long and unsustainable commutes that can **undermine their wellbeing**. Businesses are forced to relocate, which can lead to loss of revenues for local authorities, and the reduction in floorspace per worker can result in declining productivity for businesses. This is particularly damaging for small and medium-sized enterprises (SMEs) – which constitute 99.9% of all businesses – and the voluntary sector, both of which **depend on the availability of low-rent office space to survive**.

Thousands of lost jobs

This loss of office space has provoked serious concern among councils across England, many of whom are seeing serious shortfalls in the employment land they needed before office-to-residential PDRs were introduced. The scale of the problem is huge. Up to May 2019 London lost **1.6 million square feet** of office space to permitted development, which equates to 6% of its total office stock.

But this is a problem that is not confined to London. Wycombe district (abolished as an individual local authority area in March 2020) is a fairly typical example: in March 2018 the former Wycombe District Council calculated that it had lost approximately 462,848 square feet of office floorspace (5% of its total) to permitted development over the previous five years – equivalent to the loss of **about 3,500 jobs**. Similar figures have been reported across the country.

Again, councils can respond to the loss of employment space in their areas by applying an Article 4 Direction, but this is a measure that is resource intensive and difficult to apply outside of very special circumstances. Faced with no other option, some **councils have started purchasing employment sites** they deem to be at risk of conversion to housing.

Case Study 4

Loss of employment floorspace – Hertfordshire Local Enterprise Partnership study

In 2019, Hertfordshire Local Enterprise Partnership undertook a **study** into the extent and implications of – and solutions to – the substantial loss of employment floorspace in the region in the preceding ten years. The study found that during that period there was a total net loss of over 771,000 square metres of commercial floorspace across Hertfordshire, equivalent to the total office stock in St Albans, Watford and Welwyn Garden City combined. The study concluded that extended PDRs were by far the greatest driver of the increased rate of loss in employment floorspace since their introduction in 2013-2014, and had created serious imbalances between supply and demand in the market. This has several implications locally:

- **Constraining growth:** A lack of office space inhibits growth potential across the county. Smaller office units are often at greater risk of loss to permitted development, thus making it more difficult for SMEs to find affordable office space.
- **Forcing relocations:** Businesses are being forced to relocate outside of Hertfordshire.
- **Limiting productivity and performance:** The reduction in floorspace per worker causes operational difficulties for businesses.
- **Deteriorating image:** There is a risk that, as a consequence of the above, Hertfordshire may be perceived as ‘closed for business’.

5 permitted development hollows out local democracy

Extended PDRs hollow out local democracy

It is right that local people should have a say on the decisions that will shape their wellbeing and quality of life for years to come. From this perspective the planning system is a cornerstone of democratic engagement in England. Unlike elections, which happen every few years and can be focused on abstract concepts, every year thousands of people participate through the planning system to respond to and help shape concrete decisions about their local environments and lives. For many, it is the most direct way to have a democratic say in the decisions that shape their lives.

But this is not the case for new homes delivered through permitted development, regardless of how large the schemes are. Because homes delivered through permitted development do not go through planning committees, local councillors do not get to have a say, though planning committees, on new applications; and no consultation or community participation takes place following a prior approval application for permitted development. Local communities are often completely unaware of major permitted development schemes until after they have been completed.

Permitted development schemes also do not have to conform either to local development plans, which are drawn up following a strict public consultation process, or to neighbourhood plans, much to the frustration of communities who have often spent a lot of time (on average, five years) and resources to produce them.

6 solutions

Deregulation as an end in itself?

That the wider impacts of extended PDRs demonstrated in this report – on the ability of councils to shape quality places, to build essential infrastructure, to support higher levels of employment locally, and give communities more say over decisions which affect them – are accepted by government tells us something about the emphasis it is placing on increasing housing numbers, with less regard for other issues.

But it also highlights the emphasis that government is placing on deregulation. As a nation we are facing overlapping public health crises in relation to climate change, COVID-19, and obesity; and yet, in weakening the planning system, the government has thrown out some of the most powerful policy levers, both locally and nationally, we have to tackle these challenges. Similarly, the government is eroding its own ability to act on its planning reform rhetoric, which is focused on beauty, building back better, and place-making.

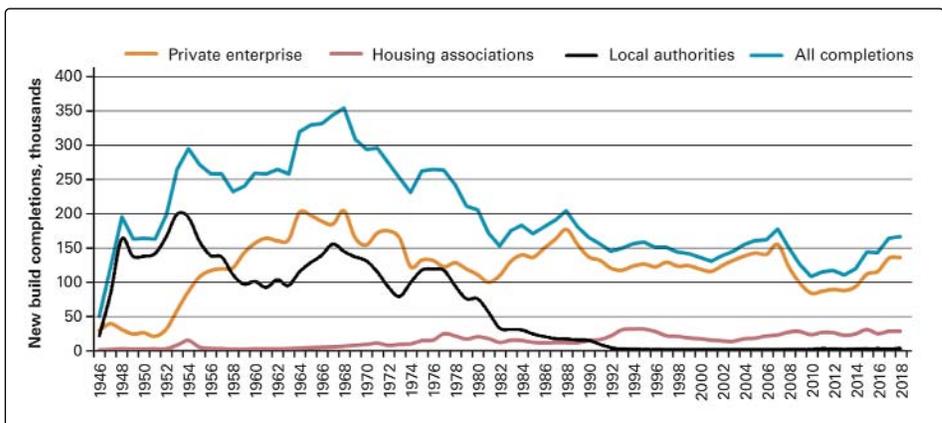
In a tacit acknowledgement that higher standards need to be enforced for permitted development schemes, the government has introduced **legislation** which from 1 August 2020 requires all habitable rooms in permitted development properties to have 'adequate natural light'. Changes will also allow local authorities to consider 'design' in prior approval applications for some types of permitted development. Furthermore, the government's **Planning for the Future** White Paper has proposed to extend planning gain to include change of use through permitted development.

While these changes are welcome, they do not solve the wider issues stemming from unplanned developments outlined in this report.

False dichotomies

Proponents of permitted development present us with a pair of false dichotomies. The first is that we can either support greater housebuilding or high standards for new homes, but not both – if we push for higher standards, we are denying people the new homes they need. The second is that we have a straight choice between the residents of permitted development homes (often some of the most vulnerable individuals in society) being on the streets or in converted warehouses – faced with this choice, surely the latter is better?

We certainly need more homes; but they must be of a decent standard. And history tells us that there does not have to be a choice between more but poor-quality homes or people remaining homeless. The graph below shows the number of permanent new-build housing completions by year in England. The government's current ambition is to build more than 300,000 new homes a year. In the only period in which anything close to this figure was achieved – roughly between 1955 and 1975 – housing and planning policy was defined by a strong planning system, massive state investment in social housing (which in itself has important benefits for health and wellbeing and can be used by councils to **drive up housing quality** in local areas), and high standards for new homes. The 1919 Housing and Town Planning Act – the origin of council housing in the UK – fulfilled Lloyd George's commitment to build 'homes fit for heroes' by introducing standards on space and design, as well as energy, transport, and green space. These **'Parker Morris' design standards** shaped hundreds of thousands of council homes and made an enormous difference to thousands of lives. They survived in different forms until 1980, when all mandatory standards were abolished.



Number of permanent new build housing completions, by tenure, in England, 1946-2018

Source: *House Building; New Build Dwellings, England: June Quarter 2019*

It is time for a Healthy Homes Act

We are obviously living in very different times, but the Parker Morris standards show what is possible with compassion and ambition, and that the dichotomies described above are patently false. We *can* deliver more homes, affordably and with strong minimum standards.

The TCPA has developed a draft **Healthy Homes Act** as a powerful way to guarantee such minimum standards, and to help the government to deliver on its commitments to create beautiful, successful places. At its heart, it would put into law a series of basic principles which together define what constitutes a healthy home and neighbourhood. These evidence-based principles are, we believe, the absolute minimum that the public expect from their homes, and would apply to all new homes, whether built with planning permission or through permitted development. All government departments would be required to have regard to the principles when making policy, as would all public authorities that have responsibilities relating to planning and the delivery of housing. The Bill that the TCPA has drafted also places new duties on the Secretary of State for Housing, Communities and Local Government to secure the health, safety and wellbeing of people in relation to buildings, and on local authorities to plan for affordable housing in a way that secures the long-term health, safety and wellbeing of residents. These changes and others put forward in the Bill would transform the way we regulate the built environment, bringing certainty and coherence to a fragmented system.

Passing the Healthy Homes Act would not undo the damage that tens of thousands of new permitted development homes will already have done to communities and places, and it would not outlaw permitted development itself, but it would effectively outlaw all substandard housing and neighbourhoods. In other words, it would put health and wellbeing back at the heart of planning and housing policy.

7

conclusion

The unacceptably poor quality of many new homes delivered through permitted development in England has been well documented. However, its wider impacts are just as significant. As this report has demonstrated, permitted development impacts upon the ability of local authorities to:

- **shape coherent places;**
- **build the infrastructure needed to support the wellbeing of residents;**
- **protect the local jobs needed for thriving communities; and**
- **give communities a say on the decisions that will shape their wellbeing and quality of life.**

Following the government's announcement that it plans to further expand PDRs to include yet more types of development, this report has synthesised the existing evidence to highlight just how damaging these wider impacts are and will continue to be in future unless legislation is introduced to guarantee a set of minimum standards that all new homes must meet. By allowing developers to bypass the planning system, permitted development undermines the ability of local authorities to co-ordinate development and the infrastructure needed to support the long-term sustainability of communities. As a consequence, such development is piecemeal in nature and can lead to the building of numerous homes that are cut off from essential services and do not provide residents with opportunities to exercise safely away from traffic. While individual permitted development schemes may not seem significant in terms of their overall impact on communities, local authorities such as Harlow and Hounslow Councils have seen high concentrations of such schemes within a very small area, severely inhibiting their ability to plan coherently as they lose control over many acres of land.

This report has also demonstrated how extended PDRs deprive councils of important funding for services and infrastructure as developers are not required to pay any financial contributions for such schemes. Any negative impacts on

existing communities created by permitted development schemes therefore cannot be readily redressed, and the increased pressure on schools and healthcare services as a consequence of such development cannot easily be mitigated. Furthermore, extended PDRs exacerbate the housing crisis by allowing developers to avoid delivering affordable housing as part of a development.

The third major impact outlined in this report is on the ability of local authorities to protect local jobs. Extended PDRs prevent councils from retaining essential office space as it is lost to residential development. Many local authority areas, as seen in the example of Hertfordshire (see Case Study 4 on page 17), have seen huge reductions in office space as a consequence of extended PDRs. This is constraining growth and forcing residents to travel further for work, which can undermine their wellbeing.

Finally, extended PDRs remove the ability of communities to have a say on planning decisions that shape their wellbeing and quality of life. Regardless of their size, permitted development schemes are not required to follow the democratic procedures associated with the planning application process, and often local residents are unaware of a scheme before it is completed.

Each of the wider impacts of extended PDRs outlined in this report have consequences for the health and wellbeing of communities. But a new Healthy Homes Act could ensure that all new development, whether it has received planning permission or not, meets a set of minimum standards. The evidence-based principles set out in the the TCPA's Healthy Homes Bill would require all government departments – and all public authorities responsible for the delivery of housing – to have regard to these principles when developing policy. By outlawing substandard housing and neighbourhoods, a Healthy Homes Act would put health and wellbeing back at the heart of planning and housing policy.