

## Government press release

# PM: Build, Build, Build

Published 30 June 2020 with key sections below marked in yellow and comments in red by Michael Bach, Chair of the Planning Environment and Transport Committee of London Forum of Amenity and Civic Societies and its Chairman, Peter Eversden MBE.

Boris Johnson has announced the most radical reforms to our planning system since the Second World War, making it easier **to build better homes where people want to live**.

It does not discuss “better homes” nor “where people want to live” – neither does the NPPF!

New regulations will give **greater freedom for buildings and land in our town centres to change use without planning permission and create new homes from the regeneration of vacant and redundant buildings**.

The first part seems to suggest anything can be converted to anything – but it is limited to exclude key community uses – that list needs expansion (See NPPF section 8: Promoting Healthy and Safer Communities paras 91 and 92)

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- (a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
  - (c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;
  - (d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community

There is a need to reconcile this policy with the proposed Permitted Development Rights (PDRs) – this argues for fleshing this out in the proposed Statutory Instrument and/or the use of Article 4 Directions.

The phrase “vacant and redundant buildings” was used to justify offices to housing in 2012/13, but it turned out to include buildings that were occupied. But the suggestion below is that it is primarily about turning anything to housing.

Under the new rules, **existing commercial properties, including newly vacant shops, can be converted into residential housing more easily**, in a move to kick start the construction industry and speed up rebuilding.

The changes include:

- More types of commercial premises having total flexibility to be repurposed through reform of the Use Classes Order. A building used for retail, for instance, would be able to be permanently used as a café or office without requiring a planning application and local authority approval

Suggesting that ground floor units in a town centre would turn into offices is disingenuous. What has been the take-up to date and why/how would “dead frontages” be good for a town centre?

Pubs, libraries, village shops and other types of uses essential to the lifeblood of communities will not be covered by these flexibilities. This is the beginning of a reality check on what are key uses for neighbourhood and town centres – the list needs expanding to include other social and community uses, including post offices, GP and dentist surgeries, launderettes, premises for the voluntary sector

- A wider range of commercial buildings will be allowed to change to residential use without the need for a planning application. This is not limited to “vacant or underused” but would include all commercial uses and would encourage asset stripping – would it apply to all town centre uses? Is it contrary to the NPPF
- Builders will no longer need a normal planning application to demolish and rebuild vacant and redundant residential and commercial buildings if they are rebuilt as homes. This is another invitation to asset strip – the planning system does not distinguish between vacant and redundant buildings and those that are occupied. Compare what happened with offices to housing since 2013
- Property owners will be able to build additional space above their properties via a fast track approval process, subject to neighbour consultation. This is purely to extend existing buildings (not just houses) and is not about increasing the number of homes.

These changes, which are planned to come into effect by September through changes to the law, will both support the high street revival by allowing empty commercial properties to be quickly repurposed and reduce the pressure to build on green field land by making brownfield development easier. Developers will still need to adhere to high standards and regulations, just without the unnecessary red tape.

This sounds like introducing secondary legislation (Statutory Instruments) to grant further permitted development rights. Again, suggesting that it would primarily to deal with “empty commercial properties” is nonsense – planning does not distinguish between vacant premises or occupied premises, and there is no indication that the proposed permitted development rights would or even could discriminate between empty and occupied units.

Just as a rising tide does not raise all ships, only where there is an active market will these permitted development rights have any real effect, but even so, it will not just be tackling “vacant and underused” property.

To re-energise our town centres, for example, they need positive planning – a clear strategy, supported by investment and proactive and participative management. The proposed free-for-all is a blunt instrument – a top-down, imposed solution rather than a locally-determined strategy tailored to local circumstances.

The Prime Minister also announced that work will begin to look at how land owned by the government can be managed more effectively.

Ahead of the Spending Review, a new, ambitious cross-government strategy will look at how public sector land can be managed and released so it can be put to better use. This would include home building, improving the environment, contributing to net zero goals and injecting growth opportunities into communities across the country.

**Public sector land must be released at existing use value, not what it would be worth with many homes built on it, otherwise those homes would not include genuinely affordable ones.**

These announcements come alongside a package of measures to support home building across England. These include:

- A £12bn affordable homes programme that will support up to 180,000 new affordable homes for ownership and rent over the next 8 years, confirmed today.  
**What does the Government mean by affordable homes?**  
**The majority should be for rent at maximum 35% of take-home pay.**
- Included in the affordable homes programme will be a 1,500 unit pilot of 'First Homes': houses that will be sold to first time buyers at a 30% discount which will remain in perpetuity, keeping them affordable for generations of families to own.  
**'First Homes' would be unaffordable in London to most buyers and their delivery might not fund affordable homes elsewhere, nor the required infrastructure.**
- Funds from the £400m Brownfield Land Fund have today been allocated to the West Midlands, Greater Manchester, West Yorkshire, Liverpool City Region, Sheffield City Region, and North of Tyne and Tees Valley to support around 24,000 homes.
- The Home Builders Fund to help smaller developers access finance for new housing developments will receive additional £450m boost. This is expected to support delivery of around 7,200 new homes.

Also announced today, the government will launch a planning Policy Paper in July setting out our plan for comprehensive reform of England's seven-decade old planning system, to introduce a new approach that works better for our modern economy and society.

**The reform will "work better" only if it delivers homes that people can afford and the social infrastructure, facilities and public transport that the development requires is delivered.**

Later this year, we will also bring forward a Local Recovery White Paper detailing how the UK government will partner with places across the UK to build a sustainable economic recovery, launch our National Infrastructure Plan and legislate for wider de-regulatory reforms.

**Regeneration should be tailored to local needs – central, top-down imposed change removes local control over decision-making and prevents being able to have a local regeneration strategy. It is hard to spot the likely winners, except niche developers. who can see opportunities to carve out development projects, regardless of whether these activities will deliver stronger town centres, business premises or housing.**