



Last chance to secure Healthy Homes

Report Stage of the Levelling Up and Regeneration Bill: a briefing by the TCPA

September 2023

1 Why do we need mandatory Healthy Homes standards?

A decent, secure home defines the entire arc of our life. It is the foundation of our health and well-being and crucial for our life chances. The Levelling Up and Regeneration Bill (LURB) is the ideal opportunity to place the health and wellbeing of people at the heart of how we design homes and communities. That is precisely what the Healthy Homes Principles, promoted by Lord Crisp, will achieve. As the LURB completes the Report stage in the House of Lords we need your support to seize this once in a generation opportunity.

The Government's position is that the current rules and policies already address the [Healthy Homes Principles](#). However, the Government proposals for new standards are not mandatory, meaning that councils and developers can take them into account but do not have to act on them. In practical terms this means that it is likely standards would not be enforced in many areas, with lower income areas likely to be worst affected. Furthermore, existing policies are failing to ensure that new homes are not only safe but resilient for the future. For example, revisions to Part L of Building Regulations do not meet the new 2035 and 2050 net zero carbon targets¹.

The case for new legislation on housing standards is partly driven by the radical deregulation of the planning system, including through the expansion of Permitted Development Rights (PDR). This allows for the conversion of a wide range of commercial and agricultural buildings into residential use regardless of the suitability of their location and without the need for full planning permission. PDR conversions have been shown to produce homes that are [no better than slums](#), undermining local democracy and not contributing to local communities, highstreets, or place making². Changes to PDR requirements in 2021 were insufficient and do not ensure that new homes will address all the [Healthy Homes Principles](#), including: access to amenities, transport, nature and play areas; climate resilience to floods, droughts, heat stress and excess cold; accessibility, adaptability and inclusion; air quality; and limiting noise pollution.

The current government consultation proposes to further extend PDR, removing the minimum safeguards on the size of buildings that can be converted and allowing such development in National Parks and ANOBs. The system will also apply to hotels and hostels with no commitment to ensure national space standards or standards on adaptability and inclusion in such conversions. The proposals will further reduce developer contributions towards affordable homes, local infrastructure and amenities through cutting local tax, CIL and Section 106 requirements.

¹ [Decarbonising the built environment \(UK GBC, 2022\)](#)

² See: [Research into the quality standard of homes delivered through change of use permitted development rights \(MHCLG, 2020\)](#); [Impact of extending development rights to office-to-residential change \(RICS, 2018\)](#); [Emerging problematics of deregulating the urban: The case of permitted development in England \(Ferm et al, 2021\)](#); [Our Fragile High Streets – Death by Permitted Development Rights? \(TCPA, 2021\)](#); [Government plan for uncontrolled conversions to residential will not save our high streets \(British Property Federation: 2021\)](#)

2 The cost of inaction

The [evidence is clear](#) that existing regulatory and policy frameworks are failing not only to protect people from harm but importantly to positively promote people's health. Looking at overheating alone, over half of UK homes (55% or 15.7 million homes) fail to meet the bedroom overheating criterion³, and 791 excess deaths are associated with overheating each year in England and Wales⁴. The [Sunday Express](#) recently highlighted the woeful state of the nation's housing stock. In an accompanying [comment piece](#), Lord Crisp said, "*we need compulsory minimum standards. Without them, we are building the slums of the future.*"

Creating poor quality homes is a false economy. They lead to much higher costs not only in terms of remediation of buildings but also to health care and other public budgets. The latest BRE report indicated that not investing in healthy homes will result in health costs of over £135 billion in the next thirty years⁵.

3 Three all parliamentarian groups endorse the Healthy Homes Principles

The APPG for Healthy Homes and Healthy Britain endorsed the Healthy Homes amendment to the LURB in its new manifesto. Lord Best highlighted the health cost of ignoring poor housing and called on all peers to support the Healthy Homes amendment. Focusing on the poor-quality homes created through PDR conversions, the joint report of the APPG for Housing Market and Delivery and APPG for Ending Homelessness called for the inclusion of the Healthy Homes Principles in the Levelling UP and Regeneration Bill⁶, stating:

"We support the Healthy Homes Principles and their inclusion within the Levelling Up and Regeneration Bill... If introduced, these standards would also level the playing field in terms of costs, as currently developers can and do lower standards in order to save on costs."

4 Vote to ensure Healthy Homes for all!

We ask for your vote at Report Stage to support the Healthy Homes amendment to the LURB. The Healthy Homes Principles establish a clear mandatory obligation on the Secretary of State to ensure all new homes, across all tenures, both protect and promote people's health.

The amendments are tabled by [Lord Crisp](#), with Lord Young of Cookham, Lord Blunkett, Lord Stunell as sponsors. The Healthy Homes amendments are currently as follows (according to [Marshaled list of amendments, 18 July](#)):

- [Amendment 191a](#): After Clause 88 insert: "*Secretary of State's duty to promote healthy homes and neighbourhoods...*"
- [Amendment 191b](#): Before Schedule 7 insert: "*SCHEDULE HEALTHY HOMES Policy statement on healthy homes principles...*"
- [Amendment 286](#): Clause 231, page 272, line 30 at end insert: "*(ca)under section (Secretary of State's duty to promote healthy homes and neighbourhoods);*"

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³ [Addressing overheating risk in existing UK homes \(Arup, 2022\)](#)

⁴ [Small-area assessment of temperature-related mortality risks in England and Wales \(Gasparrini et al, 2022\)](#)

⁵ [Poor housing will cost over £135.5bn over the next 30 years without urgent action \(BRE Group, 2023\)](#)

⁶ [Rethinking Commercial to Residential Conversions \(Joint APPG report, 2023\)](#)