

Comments on White Paper proposed expansion of Permitted Development Rights

by Robert Duggan, 20/4/21

The comments (*in italics*) are responses to the outline in the Agenda for the meeting held on 4 April 2021 for consideration on 26/4/21.

With specific reference to permitted development in respect of large-scale development, commercial-to-residential conversions and changes of use between different types of commercial and retail premises:

- What role should permitted development rights (PDR) play in the planning system?

Local Plans should be able to override PDR when this is appropriate and create exceptions by area and class of use, and set standards, such as provision for parking, safe and quiet leisure and play spaces, proximity to public transport and provision for walking and cycling, proximity to schools and retail centres.

- What is the impact of PDR on the quality and quantity of new housing, including affordable and social housing?

PDR conversion to housing should be accounted for in housing SDP allocations.

- What is the impact of PDR on local planning authorities, developer contributions and the provision of infrastructure and services?

New housing from expanded PDR's should make S106/CIL contributions towards affordable homes. Further contributions should be available to relieve the additional pressure placed on community resources and services, such as schools and local authority finances.

- Is the government's approach to PDR consistent with its vision in the Planning White Paper?

PDR will prioritise and encourage poor quality design, create sub-standard housing that will disproportionately afflict the poor and vulnerable in society that is not consistent with the stated aims of the White Paper.

- What is the impact of PDR on the ability of local authorities to plan development and shape their local communities?

PDR takes away and conflicts with the holistic approach that Local Plans provide.

- Is the government right to argue that PDR supports business and economic growth?

No, there is no compelling evidence that the local government planning process impedes economic growth and PDR is not an acceptable route around this. Commercial (E use class) to residential conversion development rights will have limited effect on the housing stock, but would permanently remove the potential for commercial re-growth and cause long-term damage in high streets and town centres.

“Putting ground floor housing in a random and uncontrolled manner within high streets does not draw footfall, does not support new businesses, reduces the potential for business growth and will undermine the viability of existing retail, cultural and commercial activities on the high street and remove convenience stores from local neighbourhoods. This will create a vicious circle whereby the reduced viability of the remaining commercial uses in turn threatens their existence and

incentivises their conversion to residential.” 10/2/21 in letter to Secretary of State, from Jonathan Harrison, Executive Director, ActSmart (+26 others)

- What is the impact of PDR on the involvement of local communities in the planning process?

Changes to PDR should be accounted for by a re-issue of Local Plans. Permissive planning will not improve the overall quality of life for people; It will not create long-term improvements and may even undermine the ambition for the creation of communities with good quality zero-carbon buildings and homes.

- Should the government reform PDR? If so, how?

PDR expansion has a proven track record of undermining standards of design and quality, in respect of carbon footprint and liveability of buildings. Reform should therefore integrate public consultation and democratic process into more aspects of planning, not less. Standards for building design and construction should be subject to stricter rules that encourage consistency and efficiency. Planning authorities should have the resources to encourage and enforce conformance.

In addition, written submissions may touch on any other matter relevant to the government’s approach towards these kinds of permitted development.