



Community Planning Alliance submission: Permitted development rights consultation
2023 6th September

[Consultation on additional flexibilities to support housing delivery, the agricultural sector, businesses, high streets and open prisons; and a call for evidence on nature-based solutions, farm efficiency projects and diversification - GOV.UK \(www.gov.uk\)](https://www.gov.uk/consultation-response/consultation-on-additional-flexibilities-to-support-housing-delivery-the-agricultural-sector-businesses-high-streets-and-open-prisons-and-a-call-for-evidence-on-nature-based-solutions-farm-efficiency-projects-and-diversification)

Thank you for the opportunity to respond to this consultation. We have decided to respond by email as the points we wish to make repeat across the 88 questions in the consultation and can be better summarised here.

We are in principle very supportive of the need to re-use existing buildings for housing and, in the countryside, also for commercial purposes. We see the benefits in protecting greenfield land of this approach and, when buildings in towns are converted to housing there is often a locational advantage to higher density housing near public transport and services. We want to see a thriving rural economy, too.

That said, our key concerns about the proposals outlined in the consultation are as follows:

1. Permitted development powers are already extremely wide ranging - in some cases far too wide ranging. For example, already buildings can be expanded in protected areas and SSSI's, and that power should be revoked so that planning permission must always be sought in protected areas. Likewise the ability of prisons, hospitals and schools to expand under permitted development rights is too great and we do not support the proposal to include open prisons in the legislation.

2. The cumulative affect of PDR's is not taken into account. It can have very detrimental affects:

- too many conversions to dwellings under PDR can lead to a shortfall in services and infrastructure in an area;
- rural sprawl can continue unchecked and can result in over-development of the countryside. There is also a risk that we will see 'housing via the backdoor' in highly unsustainable locations under expanded PDR;
- no affordable housing;
- impact of new businesses on rural areas including noise, smell, traffic, industrialisation;
- no biodiversity net gain.

Therefore the planning system needs to be involved to ensure that while encouraging housing & business in conversions/barns, the adverse affects are managed and addressed.

3. We welcome proposals to ensure that rural conversions to dwellings result in smaller, more affordable housing units.

In summary, while wishing to support conversions to dwellings and a thriving rural economy, we do not believe that relaxing the PDR's further is the right solution. The planning system, even if light touch, must be involved to ensure that the detrimental affects of PDR set out above are addressed.

Rosie Pearson
Chairman