



25th January 2021

RESPONSE TO PERMITTED DEVELOPMENT RIGHT CHANGE OF USE CONSULTATION

Housing “need” figures are being inflated by the Government by its use of out of date 2014 ONS figures as a starting point. These figures are old data which in reality have been reducing steadily since 2014, as subsequent ONS figures show. Moreover, the Government then applies an uplift to these already inflated figures, which in the case of South Bucks is a 54% uplift. Councils are being tasked with finding space for too many homes; homes which will not be truly affordable. This impedes Plan making. The Government’s formula for calculating housing “need” does not work and the Government’s affordable housing policy does not result in truly affordable homes in expensive areas.

On top of this, we are now having to consider the prospect of commercial premises (e.g. shops, offices, gyms, crèches, light industrial, services) being permitted to change use to residential use without the need for planning permission for change of use.

We oppose this for the following reasons:

1. This will not breathe new life into the high street; it will simply enable change of use to more profitable use at the expense of local services.
2. The limited list of prior approval matters will not ensure good residential environments. It will result in un-planned, haphazard environments.
3. Conservation Areas will be compromised.
4. Green Belt areas must be excluded from such permitted development rights, to preserve the openness of the Green Belt.
5. Effective engagement with local communities is essential not only in relation to public service infrastructure development (such as hospitals) but also change of use generally.
6. The risk to towns is that they will lose gyms, child care facilities, garden centres and other facilities and services without communities having a voice.
7. Major development to hospitals, Universities and prisons for example would be enabled with no effective local community engagement.
8. No size limit to the buildings that could benefit from the new rights compounds the problems listed above.
9. The right should not apply in AONBs, Green Belt, Conservation Areas, National Parks, or within 5.6km of SACs.
10. If change is needed, it should be managed change with the requirement for planning permissions, not merely opportunistic conversions.
11. High Streets would become fragmented and there would be a negative impact on surrounding businesses.
12. Conservation Areas could lose their character and heritage could be lost.
13. Over-populated town centres could result.



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14. Loss of local shops and facilities would impact the elderly and people with poor mobility.
15. De-regulating the planning system by removing the need for planning permission for change of use and local consultation will lead to the consequences listed above and to the inevitable exploitation of loopholes as the rules would not be able to legislate for all circumstances.
16. Local communities and LPAs will lose control over how a local area should develop, including high streets which need specific support especially right now during the pandemic.
17. We disagree with the proposal to reduce the timescale for determining major/public developments from 13 weeks to 10 weeks and reducing the minimum consultation/publicity period on proposals from 21 days to 14 days. Major developments involve many complex documents and understanding. It is easy for consultation periods to be missed even currently and that would only worsen if the period is reduced to 14 days. People could easily miss a 14 day consultation deadline due to holidays for instance.

Yours faithfully,

Alison Wheelhouse
Chairman
The Beaconsfield Society