

Appendix 1 – Council response to Supporting Housing Delivery & Public Service Infrastructure Consultation

About this Consultation

This consultation document and consultation process have been planned to adhere to the consultation principles issued by the Cabinet Office.

Representative groups are asked to give a summary of the people and organisations they represent, and where relevant who else they have consulted in reaching their conclusions when they respond.

Information provided in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), the General Data Protection Regulation 2016, and the Environmental Information Regulations 2004.

If you want the information that you provide to be treated as confidential, please be aware that, as a public authority, the Department is bound by the Freedom of Information Act and may therefore be obliged to disclose all or some of the information you provide. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Ministry of Housing, Communities and Local Government will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties. A full privacy notice is included on the next page.

Individual responses will not be acknowledged unless specifically requested.

Your opinions are valuable to us. Thank you for taking the time to read this document and respond.

Are you satisfied that this consultation has followed the Consultation Principles? If not or you have any other observations about how we can improve the process please contact us via the [complaints procedure](#).

Please confirm you have read this page. *

Yes

Privacy Notice

The following is to explain your rights and give you the information you are be entitled to under the data protection legislation.

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer

The Ministry of Housing, Communities and Local Government (MHCLG) is the data controller. The Data Protection Officer can be contacted at dataprotection@communities.gov.uk.

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

Article 6(1)(e) of the General Data Protection Regulation 2016 (GDPR) provides that processing shall be lawful if processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Section 8(d) of the Data Protection Act 2018 further provides that this shall include processing of personal data that is necessary for the exercise of a function of the Crown, a Minister of the Crown or a government department.

The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Ministry of Housing, Communities and Local Government. The task is consulting on departmental policies or proposals or obtaining opinion data in order to develop good effective government policies in relation to planning.

4. With whom we will be sharing your personal data

We will not share your personal data with organisations outside of MHCLG without contacting you for your permission first.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for 2 years from the closure of the consultation

6. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a. to see what data we have about you
- b. to ask us to stop using your data, but keep it on record
- c. to ask to have all or some of your data deleted or corrected
- d. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Storage of your personal data

We are using SmartSurvey to collect data for this consultation, so your information will be stored on their UK-based servers in the first instance. Your data will not be sent overseas. We have taken all necessary precautions to ensure that your data protection rights are not compromised by our use of third-party software.

If your submit information to this consultation using our third-party survey provider, it will be

moved to our secure government IT systems within six months of the consultation closing date (28 January 2021).

8. Your personal data will not be used for any automated decision making.

Please confirm you have read this page. *

Yes	<input checked="" type="checkbox"/>
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Respondent Details

This section of the survey asks for information about you and, if applicable, your organisation.

First name *

Steve

Last name *

Tremlett

Email address

Steve.tremlett@brighton-hove.gov.uk

Are you responding on behalf of an organisation or as an individual? *

Organisation	<input checked="" type="checkbox"/>
Individual	<input type="checkbox"/>

Organisation (if applicable)

Brighton & Hove City Council

Position in organisation (if applicable)

Planning Team Leader

Please indicate whether you are replying to this consultation as a: *

Developer	<input type="checkbox"/>
Planning consultant	<input type="checkbox"/>
Construction company or builder	<input type="checkbox"/>
Local authority	<input checked="" type="checkbox"/>
Statutory consultee	<input type="checkbox"/>
Professional organisation	<input type="checkbox"/>
Lawyer	<input type="checkbox"/>
Charity or voluntary organisation	<input type="checkbox"/>
Town Council	<input type="checkbox"/>
Parish Council	<input type="checkbox"/>
Community group, including residents' associations	<input type="checkbox"/>
Private individual	<input type="checkbox"/>
Other (please specify):	<input type="checkbox"/>

Please indicate which sectors you work in / with (tick all that apply): *

Education section	x
Health sector	x
Prison sector	
None of the above	

Supporting housing delivery through a new national permitted development right for the change of use from the Commercial, Business and Service use class to residential

The key points we wish to highlight are as follows:

- We do not support the proposals for a new national permitted development right for the change of use from all E classes to residential as set out in the consultation
- It will erode democratic oversight and decision making; lose the opportunity for local community involvement and for proper professional planning consideration in planning processes
- It will further erode the ability of Local Planning Authorities to appropriately plan for the future of their areas in an evidence-based and consultative way taking into account local needs and local circumstances. In Brighton & Hove we seek to plan positively for a city where people can live *and* work to avoid becoming a commuter dormitory town in London's orbit. To do this, the ability to support and maintain sustainable local communities by protecting business premises, shops and leisure facilities through evidence-based planning policies is crucial.
- The proposals for expanding PDR risk undermining the purpose of the new 'E' class which allows for more flexibility regarding changes of use between various commercial uses to ensure town centre vibrancy and resilience. It facilitates premature and unmanaged loss to residential of a much wider range of uses than are covered by existing PDRs;
- It risks the loss of designated local parades which are important for the sustainability of local communities, in particular those on the periphery of the city, as accessibility to local services could be reduced. This could lead to undesirable increases in traffic movements and congestion, and negative effects on air quality and would be inconsistent with national and local carbon reduction targets.
- In Brighton & Hove the tourism sector is a key driver of the local economy with the character of the city centre and its associated retail and leisure industries being an important facet of the city's tourism offer. The potential loss of these premises and hollowing out of areas where they are currently located with residential properties through the PDR risks undermining their unique character and vibrancy.
- We are concerned that significant, unplanned losses in capacity of medical and childcare services in Brighton & Hove could occur due to the proposed PDR as they are often small-scale and located in converted residential premises.
- .

Q1 Do you agree that there should be no size limit on the buildings that could benefit from the new permitted development right to change use from Commercial, Business and Service (Class E) to residential (C3)?

Agree	
Disagree	x
Don't know	

Please give your reasons:

No. As stated in our general introduction, we do not support the proposals for a new national permitted development right for the change of use from E class to residential. The lack of a size limit could allow undesirable changes of use of large business premises to residential. The loss

of larger shops in this way could have a significant negative effect on the vitality and vibrancy of town and city centres.

The character and purpose of established urban and local centres is currently in a state of flux with covid-19 hastening a move away from a broadly retail focus towards a wider range of leisure and business uses, as reflected by the introduction of the 'E' use class. The government's stated intention for the E use class is for it to allow high streets and town centres the best chance of adapting and thriving¹. We are very concerned that the proposed Permitted Development Right could undermine this by facilitating premature and unmanaged loss of a range of commercial uses which bring footfall and clustered activities to these areas. This is a strong concern for Brighton & Hove given the city's unique character and the diversity of uses that cluster in the city centre to support not only the local community, but the large number of visitors to the city (this is discussed further below).

This much wider-ranging PDR, particularly without a size limit, could result in large scale changes from recently vacated retail units to residential, without allowing time for a more natural evolution and repurposing of sites to other uses within class 'E' shaped by planning policy. The lack of a size limit will mean there is a risk of the very largest business premises in urban centres converting to residential. Buildings converted to residential are highly unlikely to revert back to class 'E' the end result could be pepper-potting of large residential sites within areas traditional associated with business, leisure and retail, and a hollowing out of urban centres. Re-instatement of a size limit would at the minimum allow proactive management of the evolving nature of urban centres through appropriate and justified planning policies.

We recommend retaining size limits of 150sqm for retail (use class E(a)), and 500sqm for use class E(g).

Q2.1 Do you agree that the right should not apply in areas of outstanding natural beauty, the Broads, National Parks, areas specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981, and World Heritage Sites?

Agree	x
Disagree	
Don't know	

Please give your reasons:

The special characteristics of these protected areas mean a full planning application is appropriate in order to full consider the effect of the proposed development. As discussed further below, the PDR should also not apply in Conservation Areas.

Q2.2 Do you agree that the right should apply in conservation areas?

Agree	
Disagree	x
Don't know	

¹ www.gov.uk/government/publications/permitted-development-rights-and-changes-to-the-use-classes-order/flexible-use-on-the-high-street-key-facts-brief

Please give your reasons:

No. Many Conservation Areas are very much characterised by their wide and vibrant mix of uses and this is part of their special interest and character. This can relate to the way an area was historically developed with commercial streets alongside residential streets but also office and residential buildings co-existing in neighbouring buildings or with residential accommodation above historic shops. This is very much true of many urban and town centre conservation areas, where commercial uses attract footfall and residential uses provide natural surveillance. The proposed right would inevitably lead to the balance of uses in these areas being tipped firmly towards residential use, which would harm the special historic character that we are seeking to preserve or enhance and so would conflict with our statutory duty under s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Such harm would be irreversible. The consultation does not reflect this legal duty and this is a very strong concern for us.

Q2.3 Do you agree that, in conservation areas only, the right should allow for prior approval of the impact of the loss of ground floor use to residential?

Agree	x
Disagree	
Don't know	

Please give your reasons:

See answer to Q2.2. If the right is applied in conservation areas, then allowance for prior approval of the impact of the loss of ground floor use to residential is an absolutely necessary step to allow for some mitigation of the potential harmful impacts highlighted in the answer to Q2.2. In conservation areas the loss of historic and/or traditional shop fronts would be an additional, particular concern. There are also historic commercial buildings – and indeed groups or terraces of buildings - that may have been designed specifically for commercial or part-commercial use and their conversion to residential could adversely impact on those distinctive features that allow them to contribute so positively to conservation areas.

However negative impacts arising from a loss of ground floor use to residential can occur in areas outside conservation areas, for example the loss of business premises in important local parades that support more isolated communities or the loss of active frontages affecting the vibrancy of urban centres. We would therefore support an extension of this prior approval requirement to all areas with clear guidance that the prior approval of the impact of the loss of the ground floor use to residential can include consideration of the effect on the sustainability of the area as a focus for E class use..

Q3.1 Do you agree that in managing the impact of the proposal, the matters set out in paragraph 21 of the consultation document should be considered in a prior approval?

Agree	
Disagree	X
Don't know	

Please give your reasons:

We do not oppose the prior approval measures listed, but as set out in the answer to Q.2 above we would want to see an additional prior approval requirement relating to the impact of the loss of the ground floor use to residential should also apply to all areas, as well as consideration of further issues as set out in Q3.2 below.

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Q3.2 Are there any other planning matters that should be considered?

Yes	x
No	
Don't know	

Please specify:

Further consideration should be given to the effect of the PDR on designated Important Local Parades so that sustainable local neighbourhoods can be protected. These often serve more isolated residential areas in towns and cities and provide important local services such as local food shopping, post office services, hairdressers and so on. The PDR will facilitate the gradual erosion of business premises in these areas and particularly in areas of high residential land values. Such parades are often outside of conservation areas; therefore without further provision as requested in Q.2.3, there will often be no ability to consider the loss of the ground floor to residential through prior approval.

The importance of such facilities being available locally has been very apparent during the period of covid-19 restrictions. If these premises are lost, there will be associated negative effects such as increasing the need for residents to travel to access local services. This could lead to undesirable increases in traffic movements and congestion, and negative effects on air quality and would be inconsistent with national and local carbon reduction targets.

A broad brush national approach to this issue does not allow for the planning process to respond to particular local circumstances. In Brighton & Hove the tourism sector is a key driver of the local economy. The character of the city centre and its associated retail and leisure industries is an important facet of the city's tourism offer. For example, the independent shops in the Lanes and the North Laine areas are respectively the #2 and #5 rated best 'things to do' in Brighton on TripAdvisor² and attract large numbers of tourists to the city every year. The potential loss of these retail premises and hollowing out of these areas with residential properties through the PDR risks undermining their unique character and vibrancy. This could have a consequential negative effect on the city's economy through diminished appeal to tourists.

In Brighton & Hove, a significant proportion of local medical and childcare facilities are small-scale and located in converted residential premises. Such properties are easily converted back to residential and are therefore at risk through the proposed PDR as they now fall within the 'E' use class. Adopted planning policies in Brighton & Hove protect such facilities unless it can be demonstrated that they are not needed, or alternative capacity can be provided elsewhere. We are concerned that significant, unplanned losses in capacity of these services could occur due to the proposed PDR.

Q4.1 Do you agree that the proposed new permitted development right to change use from Commercial, Business and Service (Class E) to residential (C3) should attract a fee per dwellinghouse?

Agree	x
Disagree	
Don't know	

² www.tripadvisor.co.uk/Attractions-g186273-Activities-Brighton_East_Sussex_England.html

Please give your reasons:

Yes, the consideration of the prior approval application will require significant officer time, both from planning officers and other internal consultees whose input is required to assess issues such as transport impacts.

Furthermore, developments brought forward through the proposed PDR are, cumulatively, likely to result in significant additional infrastructure requirements. Considerable numbers of new residential units could potentially be delivered, leading to requirements for sustainable transport improvements; additional educational capacity; improvements to existing open space, affordable housing and so on. In order for such requirements to be identified and funded and delivered in a timely fashion, CIL contributions and S106 agreements where necessary should apply.

Q4.2 If you agree there should be a fee per dwelling house, should this be set at £96 per dwellinghouse?

Yes	
No	x
Don't know	

Please give your reasons:

The fee should be set at a higher level, more in line with that applied to planning applications to reflect the considerable work involved in determining the prior approval application, and the reduction in income to planning departments through fewer full planning applications caused by the extension of permitted development rights.

Q5 Do you have any other comments on the proposed right for the change of use from Commercial, Business and Service use class to residential?

Yes	X
No	

Please specify:

See comments made above at Q.3.2

Communities are able to influence how the areas in which they live evolve through engagement in the local plan and development management processes. Similarly elected local members represent their communities in decision making on planning applications and development plans and are able to take an evidence-based approach to decision-making in these areas. The increasing scope of permitted development rights enlarges the democratic deficit in planning, as significant changes to the character and future evolution of areas will be able to occur with far less input from local residents and those who represent them.

Q6.1 Do you think that the proposed right for the change of use from the Commercial, Business and Service use class to residential could impact on businesses, communities, or local planning authorities?

Yes	x
No	
Don't know	

If so, please give your reasons:

Yes for the reasons set out above. In summary we are concerned about a reduction in democratic oversight of the planning process by LPAs and communities and that the future evolution of cities will be less evidence-based and more reactive to short term market trends without proper consideration of planning issues in the round i.e. sustainable development. LPAs will be further impacted by reductions in planning application fees .

Communities are likely to be affected by the loss of local services in accessible locations (retail, medical, leisure and childcare facilities, etc). Both businesses and communities will be affected by a negative impact on the vibrancy and vitality of urban centres; the lack of affordable work space in the face of competition from high land values for residential uses. The Brighton & Hove economy has a high proportion of SME businesses, whose premises may be especially vulnerable to changes of use through the proposed PDR as they are often smaller and more easily converted to residential use.

The council has been successfully managing change of use of offices to residential since its Article 4 Direction was introduced in 2013 for certain defined areas of the city – the need for this underpinned by specific evidence commissioned regarding employment land supply in the city. There are serious concerns about the further erosion of the council's ability to maintain a supply of needed employment land; the detrimental impact on established business/ industrial parks through the proposal and the local economy.

Monitoring figures for the period 2010/11 to 2018/19 show a net loss of 29,381m² in employment floorspace. For the five year period 2014/15 – 2018/19, the net annual development rate for employment floorspace represents an average annual net loss of 7,789m² of employment floorspace. The vast majority of loss went to residential. The city does not have a large stock of industrial sites or premises. Indeed, evidence points (Employment Land Study Review 2012 and more recently the Brighton & Hove Economic Strategy 2018-23) to a particularly tight industrial market with a perception that there is limited spare capacity. However, there is still market demand for industrial space in the city (Industrial Estates Audit December 2017 and through indications more recently from commercial agents), there is an increasing pressure on the remaining space to accommodate the City's economic activity. The approach in the Proposed Submission City Plan is to safeguard key industrial estates and premises and manage any losses through appropriate policy that considers location, quality of premises and redundancy.

Removing the LPA's ability to maintain a needed supply of industrial space is not considered to be sustainable and would risk harming activities which form an important part of the city's functioning economy. This would be contrary to aspirations for the Greater Brighton City Region where a stated priority is to create attractive employment space for businesses to grow and thrive. There would be a loss of affordable workspace which is important to support spin-off, start up and smaller businesses as well as businesses that support the city's service-based economy. Furthermore, some of the identified growth sectors the City is seeking to expand and attract (e.g.

environmental technologies) through City Deal/ City Region programmes and strategies will require industrial premises.

The proposal would remove any incentive for landowners to invest and retain light industrial/ storage and warehousing premises in an authority where the difference in land values for residential use in Brighton & Hove against those for industrial/ storage uses is so significant. There has been no industrial floorspace delivered on planned sites since 2013. The unplanned introduction of residential uses into industrial estates will compromise the operation of these industrial areas and hinder the ability of businesses to operate successfully/ expand.

Making permanent the permitted development rights could also hinder the operation and development of waste management facilities. Many modern waste management facilities are light industrial in nature and can be appropriately located close to B1 uses, whilst retaining a 'sui generis' classification. However they may not be suitable for locations proximate to residential dwellings. Allowing more residential developments in areas previously in light industrial use may reduce the number of appropriate sites for the new waste management development that is required to increase rates of recycling and recovery of waste, as well as potentially causing problems for existing facilities through the closer proximity to residential properties – a land use more sensitive to impacts such as noise, odour, dust etc.

Q6.2 Do you think that the proposed right for the change of use from the Commercial, Business and Service use class to residential could give rise to any impacts on people who share a protected characteristic?

Yes	X
No	
Don't know	

If so, please give your reasons:

The proposed PDR will risk the loss of local shops, services, businesses and community facilities as set out above. A more centralised distribution may increase the distances that users are required to travel to access these uses. This reduced accessibility is likely to be particular issue for those who are less mobile. Transport costs could also impact adversely on some groups with a protected characteristic.

Smaller business units which are often used by younger people running starter businesses may be more likely to be suitable for changes of use to residential, thus disproportionately effecting this age group.

Supporting public service infrastructure through the planning system

Q7.1 Do you agree that the right for schools, colleges and universities, and hospitals be amended to allow for development which is not greater than 25% of the footprint, or up to 250 square metres of the current buildings on the site at the time the legislation is brought into force, whichever is the larger?

Agree	
Disagree	X
Don't know	

Please give your reasons:

No. We consider that the proposal would further erode the local democratic planning process. It would allow significantly sized buildings to fall within the scope of permitted development. Many schools and hospitals in Brighton & Hove are located in already densely developed areas with residential development in close proximity to the boundary. It is important that full consideration is given to the range of impacts of development of this scale.

Q7.2 Do you agree that the right be amended to allow the height limit to be raised from 5 metres to 6?

Agree	
Disagree	X
Don't know	

Please give your reasons:

No. See answer to Q. 7.1 above. An incremental increase from 5m to 6m, combined with the proposals to allow a larger footprint of building, the additional bulk could significantly adversely impact on neighbouring properties. There is no evidence to indicate that this proposed increase is justified.

Q7.3 Is there any evidence to support an increase above 6 metres?

Yes	
No	x
Don't know	

Please specify:

We are not aware of any evidence to support an increase above six metres and we do not support such an increase.

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Q7.4 Do you agree that prisons should benefit from the same right to expand or add additional buildings?

Agree	
Disagree	
Don't know	x

Please give your reasons:

No comment as no prisons are located within Brighton & Hove; however the concerns as set out above are likely to apply to prisons too.

Q8 Do you have any other comments about the permitted development rights for schools, colleges, universities, hospitals and prisons?

Yes	
No	X

Please specify:

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Q9.1 Do you think that the proposed amendments to the right in relation to schools, colleges and universities, and hospitals could impact on businesses, communities, or local planning authorities?

Yes	X
No	
Don't know	

If so, please give your reasons:

Yes, the proposed amendments will further diminish the ability of local communities and LPAs to provide democratic oversight of the planning process

Q9.2 Do you think that the proposed amendments to the right in relation to schools, colleges and universities, and hospitals, could give rise to any impacts on people who share a protected characteristic?

Yes	
No	
Don't know	X

If so, please give your reasons:

Q10.1 Do you think that the proposed amendment to allow prisons to benefit from the right could impact on businesses, communities, or local planning authorities?

Yes	
No	
Don't know	x

If so, please give your reasons:

No comment as no prisons are located within Brighton & Hove.

Q10.2 Do you think that the proposed amendment in respect of prisons could give rise to any impacts on people who share a protected characteristic?

Yes	
No	
Don't know	x

If so, please give your reasons:

No comment as no prisons are located within Brighton & Hove.

Q11 Do you agree that the new public service application process, as set out in paragraphs 43 and 44 of the consultation document, should only apply to major development (which are not EIA developments)?

Yes	X
No	

Please give your reasons:

If the new application process is brought in, then we support excluding developments that are subject to EIA. These developments are likely to be particularly large and extra time in the determination process is appropriate to allow for full consideration of the range of impacts that are likely to result.

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Q12 Do you agree the modified process should apply to hospitals, schools and further education colleges, and prisons, young offenders' institutions, and other criminal justice accommodation?

Yes	
No	X

If not, please give your reasons as well as any suggested alternatives:

For the reasons given in the answers to questions 7.1, 7.2 and 9.1 we do not support the modified process. The benefits of a marginally expedited process do not outweigh the negatives.

Q13 Do you agree the determination period for applications falling within the scope of the modified process should be reduced to 10 weeks?

Yes	
No	X

Please give your reasons:

No. This would place further pressure on planning departments and other council departments who are consulted on applications which are already under-resourced. Developments falling into this category could be of a significant size and consequently have a range of potential impacts which need careful and professional consideration in the determination process. A number of external bodies and council departments are likely to be consulted and the decision-making process is reliant on these consultation responses for which an adequate amount of time is necessary.

It should be noted that delays in the determination of applications are often caused by applicants failing to provide required information and clarifications in a timely manner.

Q14 Do you agree the minimum consultation / publicity period should be reduced to 14 days?

Yes	
No	X

Please give your reasons:

No, fourteen days is an inappropriately short period of time and is unrealistic. As stated in the consultation document it is important that local communities are able to express their views and have an opportunity to do so. The chance of interested parties being unaware of the consultation process is significantly increased by the proposed changes, for example a family may take a

two-week holiday over the period the consultation takes place and miss the opportunity to make their views known.

We recognise that it is important for decision-making to occur in a timely fashion, but the benefits of expediting the process by a single week in this way are very small and we do not consider they offset the potential negative consequences caused by an inadequate amount of time for scrutiny of proposals.

Q15 Do you agree the Secretary of State should be notified when a valid planning application is first submitted to a local planning authority and when the authority anticipates making a decision? (We propose that this notification should take place no later than 8 weeks after the application is validated by the planning authority.)

Yes	
No	X

Please give your reasons:

No. We consider that this adds a further unnecessary level of bureaucracy to the planning process. In the interests of transparency full details of key dates in the determination process for all planning applications are already made publicly available on the council's website, including the date applications are received, validated and advertised, consultation dates and the determination deadline,

Q16 Do you agree that the policy in paragraph 94 of the NPPF should be extended to require local planning authorities to engage proactively to resolve key planning issues of other public service infrastructure projects before applications are submitted?

Yes	x
No	

Please give your reasons:

Yes, we recognise the importance of constructive and effective pre-application discussions and already engage with applicants in this manner.

Q17.1 Do you have any comments on the other matters set out in the consultation document, including post-permission matters, guidance and planning fees?

Yes	
No	X

Please specify:

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Q17.2 Do you have any other suggestions on how these priority public service infrastructure projects should be prioritised within the planning system?

Yes	
No	X

Please specify:

--

Q18 Do you think that the proposed amendments to the planning applications process for public service infrastructure projects could give rise to any impacts on people who share a protected characteristic?

Yes	X
No	

If so, please give your reasons:

The opportunity to make comments is likely to be impacted alongside other parts of the community.

Consolidation and simplification of existing permitted development rights

Q19.1 Do you agree with the broad approach to be applied to the review and update of existing permitted development rights in respect of categories 1, 2 and 3 outlined in paragraph 76 of the consultation document?

Agree	x
Disagree	
Don't know	

Please give your reasons:

Yes, it makes sense to consolidate and simplify the existing permitting development rights in order to make the rights clearer and more coherent.

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Q19.2 Are there any additional issues that we should consider?

Yes	
No	x

Please specify:

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Q20 Do you agree think that uses, such as betting shops and pay day loan shops, that are currently able to change use to a use now within the Commercial, Business and Service use class should be able to change use to any use within that class?

Agree	X
Disagree	
Don't know	

Please give your reasons:

If retail shops are permitted to change to any use within class 'E' then it is logical for betting shops and payday loan shops to also benefit from this right as they are usually located within retail style premises.

Q21 Do you agree the broad approach to be applied in respect of category 4 outlined in paragraph 76 of the consultation document?

Agree	
Disagree	x
Don't know	

Please give your reasons:

We caution against increases in the size limits of PDRs solely in the name of flexibility and simplification. Full consideration should be given to the potential consequences of such alterations such as those discussed in detail above.

Q22 Do you have any other comments about the consolidation and simplification of existing permitted development rights?

Yes	
No	x

Please specify:

End of survey

You have reached the end of the consultation questions. Thank you for taking the time to complete them and for sharing your views. Please note that you will not receive an automated email to confirm that your response has been submitted.

After the consultation closes on 28 January 2021 we will consider the responses we have received and publish a response, in due course.

