

**Inquiry: Permitted development rights**

I am responding as Chairman of the Guildford on behalf of the Society.

The Guildford Society has been an active voice, speaking up for the town and its surrounding countryside and villages, since 1896. As a Civic Society, we act as a focus for all who care about Guildford's heritage and environment. While mindful of the past, we look firmly to the future.

We recognise that development must, and will, take place. However, we do not believe this should be at the expense of Guildford's historic character and beauty, nor of the unspoilt countryside that surrounds it.

**1. What role should permitted development rights (PDR) play in the planning system?**

The society is not against PDRs as a component of an integrated Planning System and they play a valuable role in allowing small scale changes to the built environment and their use in a speedy manner. The changes to PDRs also need to be considered alongside the changes to Use being allowed particularly the new Class E.

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

PDR's up to now have had little impact on the quality and quantity of housing. The changes now coming into force, judging by prior notifications, being submitted to the Guildford LPA show many examples of poor-quality development including:

- Dwellings proposed in unsuitable locations
- Overbuilding of dwellings to minimum standards
- Conversions with inadequate Natural Light, and access to outside space.
- Change of character of area with local facilities being replaced by dwellings or densification of areas in an unplanned manner
- We are also concerned that Social Housing will to a minimum standard.

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

The PDR as now proposed will in our view:

- Cause Local Planning Authorities (LPAs) to lose powers to manage spatial policy and contribute to placemaking.
- Cause LPAs to have difficulty to implement Design Standards, Local Plans and Masterplans as it appears the hierarchy and interrelationship of legislation is not defined. In our view Permitted Development Rights should always be exercised in the context of overall planning objectives as laid out in local plans etc.
- The addition of dwellings in a unconstrained manner will pose issued in supporting new dwellings with hard Infrastructure (Electricity, Water etc) and Social Infrastructure (Medical Facilities, Education etc). Locally we have Infrastructure both hard and social which is already struggling to cope, the use of PDR's will see

potentially significant developments such as offices converted to 50 plus dwellings which will cause problems.

#### **4. Is the government's approach to PDR consistent with its vision in the Planning White Paper?**

No. The government in the form of the MHCLG is adopting a number of badly integrated policies. The Society thought the Planning White Paper presented a useful approach for the future, although we have concerns with some aspects. The focus on Design and Placemaking and Quality was very welcome.

The changes to PDR's (and Use Classes) seem to be totally contrary to the ethos of the Planning White Paper and will make it impossible for LPAs to manage planning in a manner proposed by the Planning White Paper.

#### **5. What is the impact of PDR on the ability of local authorities to plan development and shape their local communities?**

Severe, makes it more difficult as outlined to our questions to 3 and 4 above. The MHCLG appears to be trying to undermine the local element in planning via the changes to PDR system, and some of the proposals in Planning for the Future.

Ironically, it can be foreseen that the proposed system may provoke a situation where court cases become even more prevalent as LPA's seek to protect local plans.

#### **6. Is the government right to argue that PDR supports business and economic growth?**

To a degree, but locally we are not aware of well-considered applications for change of use being an issue. It is noticeable that the government has backed its proposals with little factual evidence.

The Society accepts that areas will change e.g., it is likely the retail element of Guildford High Street will contract, but this must be done in a way that preserves Heritage and creates a sense of place. Under the current proposals it looks as if all retail could be converted to dwellings in our high street with little or no control!

#### **7. What is the impact of PDR on the involvement of local communities in the planning process?**

Local Communities are already struggling to feel engaged with all levels of government. PDR's as proposed will make this disconnect worse and may prompt strife within neighbourhoods due to overdevelopment, shading between properties etc.

#### **8. Should the government reform PDR? If so, how?**

The Society as we stated in answer to Question 1 PDR's do have place in the planning system. PDRs do need to be seen in the context of the total planning system which the government is proposing to reform.

The Planning White Paper is currently being revised. This vision should include integrating the PDR system to define how PDRs relate to overall policies as produced in Local Plans etc.

The PDR system should be defined by the Planning White Paper not seen as an add on to the planning system, which may undermine the whole planning system.

## **Conclusion**

The PDR changes are poorly thought out and illogical particularly if we want to be 'Building Better, Building Beautiful.

The MHCLG appears to lack any joined up thinking on planning and seems to undervalue the role of Local Communities and Authorities in the process.

We note The Royal Town Planning Institute (RTPI), Royal Institute of British Architects (RIBA), Chartered Institute of Building (CIOB) and Royal Institution of Chartered Surveyors (RICS) representing 175,000 professionals related to Design, Planning and Development, all have major concerns on the proposed PDR (and Use) changes.

In summary we are in danger of 'Building Slums in the 21st Century'

Alistair Smith Chair- Guildford Society

[www.guildfordsociety.org.uk](http://www.guildfordsociety.org.uk)