

Supporting Housing Delivery & Public Service Infrastructure

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	<input checked="" type="checkbox"/>
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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 you 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	✓
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Respondent Details

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

First name *

Kim

Last name *

Tagliarini

Email address

ktagliarini@elmbridge.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)

Elmbridge Borough Council

Position in organisation (if applicable)

Head of Planning Services

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"/> Officer Response
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	
Private individual	
Other (please specify):	

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

Education section	
Health sector	
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

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	✓
Don't know	

Please give your reasons:

It is a concern that the extension of permitted development rights to change use from Commercial, Business and Service (Class E) to residential (C3) is being considered, let alone whether a size limit should be applied. Under these proposals substantial retail and / or employment floorspace could be converted to residential either as part of a single scheme (unless a limited is introduced) or incrementally, through several schemes falling under any limited introduced, having a significant impact on town centres and employment areas.

Loss of premises for non-residential uses within town centres will impact upon the vitality and viability of the centre and its ability to change and adapt to the changes in online shopping and the role of town centres as multi use visitor centres. In addition, the loss of creches, gyms and indoor sports venues has the potential to impact upon the health and well-being of existing and future residents.

Changes of use within existing industrial areas could lead to residential development in unsustainable locations, far from essential local facilities and public transport leading to increased dependence on private motor vehicles. Lack of control over size of unit to which permitted change would apply could undermine the ability to plan and maintain a balance between employment and housing. Control needs to be maintained in order to safeguard economic floorspace in the interests of sustaining and enhancing the local economy. Particular concern is expressed about the impact on smaller, lower value units (in Class E(g)(i), (ii) and (iii)) that help provide a range of jobs and accommodation for a variety of users although it is recognised that this is currently possible under Class O, Part 3 rights.

Instead of a size limit LPA's need the ability to designate core areas within town centres where the use class will not apply at ground floor level.

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	✓
Disagree	
Don't know	

Please give your reasons:

These are particularly sensitive areas where the impact of any development should be fully considered within the context of a planning application and the ability to consult other stakeholders. In addition, the rights should not apply to listed buildings, including locally listed.

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

Agree	
Disagree	✓
Don't know	

Please give your reasons:

No details have been provided as to the information required by, or the precise nature of, the proposed Prior Approval process although it would appear that this would allow consideration only of the heritage impact of the conversion of a ground floor unit. Character is not however, distinguished only by the appearance of buildings at ground floor and any significant residential development in a Conservation Area which is likely to bring with it increased car parking, bin storage, domestic paraphernalia and pressure to alter the existing windows and openings to suit residential uses would also be equally harmful to the character and appearance of Conservation Areas.

The change of use of a building within a Conservation Area, has the potential to impact on the significance of the area as a designated heritage asset and the grant of a deemed permission for such works is potentially contrary to the statutory duty set out in s.73 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and paras. 193 - 196 of the NPPF.

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	
Disagree	✓
Don't know	

Please give your reasons:

For the reasons stated in response to Q.2.2, a process which only requires prior approval in respect of a ground floor unit within a Conservation Area is not considered to provide sufficient control over development which has the potential to harm the significance of a designated heritage asset.

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	✓
Don't know	

Please give your reasons:

Whilst reference is made to the consideration of noise from existing commercial premises and ensuring that new homes are in suitable locations considering the impact on the intended occupiers from heavy industry and waste management, it is considered that this should be expanded, and explicitly state that smell / odour, vibration and air pollution are also assessed.

It is also considered that rather than just referring to 'transport, particularly to ensure safe site access', that this should require the promotion of sustainable modes of transport and ensure the provision of cycling parking and electric car charging points for new homes. This would fit with the Government's emphasis on sustainable development and commitment to reduce carbon emissions. In addition, if it is determined that the right should apply to large scale buildings, it is suggested that issues of parking and traffic generation should also be subject of prior approval procedures as both issues have the potential to impact significantly on local amenity.

The introduction of the consideration of fire safety measures is welcomed but must clearly be explained as it is important to understand the extent to which this is a planning consideration rather than a matter for building regulations.

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

Yes	✓
No	
Don't know	

Please specify:

Existing Part M rights allow for consideration of the impact of the development on the provision of services and the sustainability of the shopping area and it is considered that this element of the prior approval process should be included within any new right.

There is concern that whilst in some areas the loss of uses following within Class E may be acceptable in principle, here are circumstances where it may not be. For example; the loss of a shop in a village which may be key to supporting a sustainable community, the loss of sports and recreation buildings in an area where provision is limited and such loss would affect the health and well-being of a community, or the loss of a key retail site(s) on a high street which may then lead to other retail uses being segregated from the retail core which may affect their viability and longevity.

If building operations necessary to convert a building are included within the permitted development right, as part the current GDPO, it is essential that the impact upon the design and external appearance of the building is included as a matter for consideration.

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	✓
Disagree	
Don't know	

Please give your reasons:

Any change of use will provide significant value to the developer and the costs of processing and assessing any application to facilitate the development should be borne by the developer

and not the Council. The application fee must cover the cost of assessing the application within statutory timeframes. Whilst the principle of linking cost to the complexity of a development, it is important not to underestimate the amount of work undertaken to assess a single dwelling, the base fee for a single dwelling must be sufficient to cover all of the work undertaken.

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

Yes	
No	✓
Don't know	

Please give your reasons:

It is recognised that this reflects existing fees however, it does cover the cost of processing such applications by Planning Services.

The permitted development rules are complex and there are a range of matters to be considered in the same way they would be for a planning application. During the course of a planning application the principle of development is a key consideration; and this remains the case for permitted development to ensure that the proposal meets all the limitations and conditions set out by Government. Whilst the considerations may in some cases be less than a planning application, experience with the existing permitted development rights have demonstrated that it takes no less time and resources to consider an application for prior approval. Therefore, it is a significant concern there would be no reduction in work for the Service and that the fee of £96 is not sufficient for the resources involved in the consideration of prior approval applications for new housing.

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	✓
No	

Please specify:

It is recognised that the change of use of buildings would help contribute to meeting housing needs. However, it is considered that the benefits would not outweigh the potential harm that would arise from the proposed permitted development rights.

The proposal takes no account of the suitability of locations for housing or of the need to provide funding for infrastructure and services to support the increased population. It is also a concern that the consultation is silent on the type, size and tenure of housing to be provided. It is also unclear how good design and placemaking will be promoted through permitted development.

It is essential that the right mix of housing to meet the needs of the local community is provided, including affordable housing, and allows for Local Authorities to deliver on the aspirations of the Local Plans. In regard to the provision of affordable housing, Proposal 20 of the Government's White Paper: Planning for the Future (August 2020) stated that the proposed combined Levy would be extended to capture changes of use through permitted development rights. It is suggested that in advance of the outcomes of the consultation / the

combined Levy, this would be an opportunity for the Government to start to introduce such measures.

On the point of infrastructure, and also in advance of any combined Levy, it is considered imperative that the Community Infrastructure Levy (CIL) Regulations are amended to ensure that proposals for changes of use permitted under the GDPO are at least CIL liable. To provide additional housing without the necessary infrastructure would create unsustainable developments / communities and would not meet the needs of future occupiers or existing communities.

The aim of the proposals is to have thriving, vibrant town centres however, there is no requirement for buildings to be vacant (nor vacant for a set period of time) to benefit from the proposed permitted development rights. This could lead to the loss of existing less profitable uses, fragmenting the retail / leisure offer and impacting on the diversity and vitality of the local centre. As a result, both consumers and workers will need to travel further afield to access services / employment. This is not promoting sustainable development and will exacerbate any existing issues of congestion and air pollution if alternative modes of public transport are not easily accessible. In terms of accessing services and employment opportunities, this is also likely to disproportionately impact on older generations and those on lower incomes.

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	✓
No	
Don't know	

If so, please give your reasons:

It is a concern that the proposals would have a considerable adverse impact on communities as a result of the loss of important services and facilities and that the resultant homes and living environment would not be of a level whereby the adverse impacts would be outweighed by the proposed permitted development rights.

The proposed changes are likely to result in residential development in commercial areas being located away from essential facilities for residential areas such as shops, schools, open spaces etc. The consultation does not provide any information on how funding would be secured for infrastructure to mitigate the impact of the increased residential population nor does it promote the use of / the need to ensure that sustainable modes of transport can be utilised. This appears to be an acceptable consequence to the Government.

As set out in response to Q.5, the proposed changes would not be limited to vacant or surplus floorspace but, to all premises in the new E Use Class regardless of location or whether the retail centre is failing or succeeding; the uses / activities are essential for the vitality and viability of the retail centre; the real need is to change and diversify the retail centre, to build up the economy and support its recovery / resilience, rather than reduce economic activity.

There is concern that the proposed changes would not be targeted to meet these challenges, as the main impact seems to be to encourage the deconstruction of the economic interdependence and benefits of a concentration of both economic activities and social infrastructure in both town and local centres. Secondly, there is a misunderstanding about the benefits that the change of the existing uses to housing could have on the vitality and viability of a centre. The impact of a change of use, especially at ground-floor level, but also on upper floors, currently in economic uses, to housing is likely to;

- reduce the level of economic activity, not just in terms of employment in the displaced businesses, but also in terms of the expenditure of the business and its employees within the town centres. The scale of expenditure of new households is unlikely to replace the lost expenditure from displaced businesses;
- reduce footfall – housing itself generates very low levels of activity, so compared with commercial uses would reduce vitality;
- create blank frontages – shops, offices, services – indeed most of the main town centre uses enumerated in the NPPF and the uses in the new E Use Class generate vitality – housing as a ground-floor town centre use will reduce footfall as it makes shopping frontages less attractive to shoppers.

Thirdly, most of the E Use Class uses are essential to the success and continuing vitality of town centres and local centres. To encourage their removal in the absence of any strategy or tools to harness new investment, is likely to nullify any local strategies for revitalising town centre through positive planning let alone safeguarding against the unnecessary loss of valued facilities and services. These are two of the key policy themes in the current NPPF.

In addition, the proposals undermine the NPPF in regard to Local Plans meeting their area's needs for economic development and to plan for the future of town centres. Cumulatively, the proposals could have a significant impact on the supply of land for economic development and scale and variety of jobs available. The Local Authority is unable to plan for the unknown – this is not sound planning. There are also concerns regarding the monitoring of employment / retail land. Potentially, the Authority would have no prior warning about a development that might result in a significant loss of employment / retail floorspace.

There is concern that the impact of retail closures and the impact of the COVID lockdowns, from which recovery needs to be planned and controlled would be worsened by the Government's new proposals for any Use Class E premises to change to housing which could increase the uptake considerably, driven by individual decisions of property owners.

A recent YouGov Survey also found that the demand / need for local retail opportunities has heightened as a result of the COVID-19 and that the trend is likely to continue. The following statistic reflect this point:

- 70% of Britain's will continue to shop local after the pandemic.
- Breaking this down 46% say they will continue to purchase from local sources to some extent when lockdown ends, however almost one in four (24%) say they will actually increase their spending with local producers.
- Only 25% said they would either reduce or stop shopping for groceries locally once the lockdown fully ends.
- Britain's in general are also thinking about switching up their shopping habits when lockdown ends, with 20% of all adults strongly agreeing that they will shop from local sources where possible after the pandemic and another 32% slightly agreeing.

The switch to people using their local high street can also be seen in the footfall numbers as less people use the larger city centres and more people rediscover their local centre. For example, from March 1 to June 30 2020, footfall in smaller district centres fell by 34.5%, compared to a drop of 75.9% in larger cities over the same period (**High Street Task Force**). There is a concern that the Government's proposals will negatively impact the revival of the High Street and other retail centres.

The proposed changes would also result in a loss of ability for other stakeholders to participate in the decision-making process. This is important as the use of a property for residential purposes might conflict with the use of nearby buildings for commercial purposes, for example, night access, deliveries.

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	✓
No	
Don't know	

If so, please give your reasons:

As set out in the response to Q.5. the proposals have the potential to impact on the older population, the less mobile and those on lower incomes.

The loss of local services and facilities including employment opportunities, will mean that our communities need to travel further afield to access these. This is not promoting sustainable development and if alternative modes of public transport are not easily accessible could disproportionately impact some sections of our community.

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	✓
Don't know	

Please give your reasons:

Whilst some greater flexibility is welcomed, it is noted that the traffic implications of the development are not considered. New or extended buildings could be situated on areas of existing car parking and would themselves give rise to additional parking requirements. On a limited site, this could lead to significant amenity or highway safety implications.

Within some boroughs and districts, many of these public service facilities are located in the Green Belt. Even an increase of 25% of the footprint or even 250 sqm could have a significant impact on its openness. It is therefore considered that this is best considered through a Planning Application.

Furthermore, the allowance of up to 25% of the footprint of the current buildings on site at the time the legislation is brought into force relies on the LPAs having access to accurate surveys of the site at the relevant time.

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	
Don't know	

Please give your reasons:

Subject to the proposed safeguard that this increase in height would not apply within 10m of the boundary of the site it is not considered that the change would cause a significant adverse impact upon adjoining occupiers.

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

Yes	
No	✓
Don't know	

Please specify:

In some areas any further increase above 6 metres may have a significant impact upon the visual amenity and character of any area and therefore should be resisted and considered through a Planning Application.

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

Agree	
Disagree	
Don't know	✓

Please give your reasons:

Not applicable to Elmbridge.

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

Yes	
No	✓

Please specify:

No comment.

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	✓
No	
Don't know	

If so, please give your reasons:

As stated in response to Q7.1, there are potential traffic implications that would impact on local communities and an enforceability issue for Local Authorities.

The response to Q4.2 also applies here in regard to the resources that it takes to consider such proposals and how the time spent is not reflected in the fees.

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	✓

If so, please give your reasons:

Insufficient information to form a view on this matter.

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	✓

If so, please give your reasons:

Insufficient information to form a view on this matter.

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	✓

If so, please give your reasons:

Insufficient information to form a view on this matter.

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	✓
No	

Please give your reasons:

The purpose of the process is to speed up the determination of applications. 'Minor' development is already subject to a more limited eight-week determination date such that there is no value in including such development under the new public service application process.

It is agreed that development that the amended timeframes should not apply to EIA development.

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	

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

Insufficient information to form a view on this matter.

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	✓

Please give your reasons:

A 10-week period is unlikely to be sufficient to assess and determine an application of the scale envisaged. This is primarily due to the length of time it takes for statutory consultees to respond to on applications.

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

Yes	
No	✓

Please give your reasons:

If the modified process is reduced to 10 weeks, then the consultation / publicity period should be reduced to 14 days to ensure the Local Authority adequate time to make a decision.

However, reducing the publicity period impacts on local engagement particularly when it coincides with holiday periods. When all other applications require a 21 day consultation period residents will view applications as being rushed to avoid consultation.

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	✓

Please give your reasons:

It is unclear what value this would add to the process weighed against the further processes put upon the Local Authority.

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	✓
No	

Please give your reasons:

The NPPF already encourages pre-application engagement. Whilst there is no objection to any amendment to para. 94 of the NPPF as suggested to include other public sector infrastructure projects with the existing advice relating to education provision, it is not considered that this will materially impact on the determination process.

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	

Please specify:

The Government's expectation that any post-permission consents such as reserved matters or conditions applications will be similarly prioritised is noted, as is the fact that the current fee structure will still apply. As previously stated, there is concern that the fee structure is not being amended when the reality is that the cost of determining such proposals is not reflected.

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	✓

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	
No	

If so, please give your reasons:

Insufficient information to form a view on this matter.

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	✓
Disagree	
Don't know	

Please give your reasons:

With several amendments the GPDO has become overly complicated at a time when the planning system is supposed to be made more efficient and transparent. Accordingly, proposals to simplify and consolidate the Order are welcomed.

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

Yes	
No	✓

Please specify:

No comment.

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	
Disagree	
Don't know	✓

Please give your reasons:

The borough does not have a high incidence of these uses within the town centre and accordingly no specific comment is made.

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	
Don't know	✓

Please give your reasons:

Care needs to be taken in instances where rights are merged and the decision as to whether the resultant situation provides a broader or more restricted right is made. In particular concern is raised in respect of the suggestion that the process could result in extended rights being applied to protected land such as Conservation Areas. The serious concern set out in the response to Q.2.2 on this issue is reiterated.

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

Yes	
No	✓

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.