

Response ID ANON-DEZB-M3EJ-M

Submitted to Permitted development rights 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.

Submitted on 2023-09-25 15:57:26

Scope of the consultation

Introduction

What is your name?

Name:

Peter Eversden

What is your email address?

Email:

chair@londonforum.org.uk

What is the type of organisation that you work for?

Charity or voluntary organisation

If applicable, what is the name of your organisation?

Organisation:

London Forum of Amenity and Civic Societies

What is your position in the organisation?

Position in the organisation:

Chairman

Privacy notice

Design codes

Do you want to complete this section?

Yes

Design codes

Q.1 Do you agree that prior approvals for design or external appearance in existing permitted development rights should be replaced by consideration of design codes where they are in place locally?

No

Please give your reasons :

Too few local authorities have a Local Plan that contains design codes for allocated sites and potential development areas that have been compiled with community input recently enough to be consistent with the principles set out in the National Design Guide (NDG) and National Model Design Code and which reflect local character and design preferences, as in Paragraph 11 of the Government's consultation.

Our other reasons are that Local Plans prepared before the NDG was published probably do not have well defined design codes, even if there is an indication of the development types expected in Site Allocations. The application of prior approval has proved to be effective in those situations.

Prior approval should not be replaced as it covers more than local design codes such as right to light, views, context and the setting of historic assets. Design codes are still very much in their infancy, with very few as yet in place, certainly at LPA-wide level. It would be premature to put too much weight on them in decision-making in the near future.

Communities must have a defined process for their involvement in the preparation of Design Codes, and what these codes are meant to cover. The consultation fails to set out how design codes will be enforced and by whom nor their weight in planning decisions.

Design codes - impact assessment

Q.2 Do you think that any of the proposed changes to permitted development rights in relation to design codes could impact on: a) businesses b) local planning authorities c) communities?

Yes

Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.:

b) Local planning authorities who do not yet have a Local Plan approved since the National Design Code and NMDCs were published could be prevented by permitted development from conducting effective town centre management and deciding what will be built in the way of new homes, their type and location. Additional homes require more social infrastructure and facilities and permitted development does not guarantee any contributions for those.

c) Communities could be adversely affected by permitted developments that suit the business objectives of land owners but do not deliver the type and affordability of additional homes that are required locally. Public realm could be harmed by building extensions. There could be an adverse impact on the ability of local authorities to deliver the social infrastructure and facilities that people require. If local people object to changes that their Council has to approve due to permitted development, it will affect their belief in local democracy and harm their relationship with their Councillors and LPA officers. Until we have much more experience of design codes, it is almost impossible to know what their impact will be.

Supporting housing delivery through change of use permitted development rights

Do you want to complete this section?

Not Answered

Supporting housing delivery through change of use permitted development rights

Commercial Business and Service uses to dwellinghouses (Class MA of Part 3)

Floorspace limits

Q.3 Do you agree that the permitted development right for the change of use from the Commercial, Business and Service use class (Use Class E) to residential (Class MA of Part 3), should be amended to either:

No change

Please give your reasons :

Several office conversions to residential have resulted in single aspect flats with ventilation problems due to the large floorplans of department store, commercial, business and service use buildings. The quantity of additional homes achieved by conversion should not be a priority over the housing standards and quality of life of people living in them. Some large properties in those uses should be demolished and replaced with well designed blocks of flats with communal facilities.

Too much office space has been lost in London to permitted development, increasing the unaffordability of office space, forcing businesses to move and harming the mix of facilities in town centres.

There is as yet too little experience of the impact of the changes introduced in 2021. Doubling the floorspace that can change could have a drastic effect on LPAs' ability to plan and regenerate their high streets and town centres by allowing the conversion of large department stores and hotels and have a deadening effect on local economies.

The General Permitted Development Order has become far too complicated for ease of use, development proposals and decision making. It has been interpreted by various organisations but their publications should not be necessary if the Government was clearer in its legislation. The complexity is demonstrated by the need for a Government GPDO explanation and a UCO Quick Reference Guide produced by Planning Jungle Limited in which the flow charts on pages seven and eight are useful.

Vacancy requirement

Q.4 Do you agree that the permitted development right (Class MA of Part 3) should be amended to remove the requirement that the premises must be vacant for at least three continuous months immediately prior to the date of the application for prior approval?

No

Please give your reasons :

Landlords should be seeking new tenants to continue the use of a building if it is viable. A reasonable time should be allowed to explore the possibility of alternatives. Commercial uses should continue where there is demand for them, particularly as they result in extra footfall for the benefit of other businesses in town centres. A balance must be maintained by local authority through planning and decisions between additional residential space in high streets (which could be behind the main 'shop fronts') and the space needed by retailers and other uses that deliver a suitable mix of facilities for vibrancy and community satisfaction. Achievement of the 15 minute walkable neighbourhood must be a priority.

The suggestion in this question does not seem to relate well to High Street Rental Auctions which the Government proposed.

Article 2(3) land

Q.5 Do you think that the permitted development right (Class MA of Part 3) should apply in other excluded article 2(3) land?

No

Please give your reasons :

Article 2(3) designation of land has been applied for protection of its characteristics and from unplanned and unrestricted development and that must continue. All the objectives in paragraph 25 of this consultation could be achieved by local authorities in a planned way.

Prior approval – conservation areas

Q.6 Do you think the prior approval that allows for the local consideration of the impacts of the change of use of the ground floor in conservation areas on the character or sustainability of the conservation is working well in practice?

Yes

Please give your reasons. If no, please explain why you don't think the prior approval works in practice?:

It is too early to be sure but our answer is 'Yes'. Our reasons are that there are District Centres in conservation areas and continuation of the uses within them needs to be protected by Local Authority consideration of any proposed change. The design of buildings in conservation areas is an aspect of their designation and existing ground floor non-residential uses have appropriate facades. Many would not be suitable for the front of a home and too often there would be inadequate natural light into the dwelling.

Hotels, boarding houses and guest houses (Use Class C1) to dwellinghouses

Q.7 Do you agree that permitted development rights should support the change of use of hotels, boarding houses or guest houses (Use Class C1) to dwellinghouses?

No

Please give your reasons :

These proposals are extremely sketchy and, on the basis of no evidence and pure assertion, a one-size-fits-all proposal is being made. This is an "all-or-nothing" proposal which might be totally inappropriate in certain areas, yet there is no scope for providing a more discriminating or targeted approach.

This proposal would be inappropriate in areas which have both high demand for tourist accommodation and high housing need, which will divert pressures into short-let housing and cause large-scale losses of housing. This has the strong potential to have considerable unintended and uncontrollable consequences – not just in seaside resorts but especially in London.

There are potentially much wider implications, especially in areas of high tourist demand that a reduction in authorised tourist accommodation is diverted into increasing numbers a short-let "housing" which is displacing – reducing – permanent housing in London and other areas with high demand for tourist accommodation. These "losses" of housing have not been addressed, but in some places these may even exceed the area's annual housing target, resulting in no net additional for some years. The issue of short-let housing/tourist accommodation has proved to be highly destabilising within local communities and severely undermines the achievement of annual housing targets, although these substantial "losses" have not yet been factored into evidence of housing delivery. No one has any control over this phenomenon, which is now being transformed onto an industrial scale.

The need for tourist accommodation is a local matter – the Government has no specific policy for meeting the objectively-assessed need for tourist accommodation. However, in London, the London Plan Policy E10 does this, providing policy for the scale of need for and location of new tourist accommodation, which is then translated into local plan policies by the London boroughs.

These changes could bring about harm in locations where tourism supports local jobs and secondary spend.

This issue needs a complete rethink – since there can be no one-size-fits-all approach, this proposal should be dropped.

Hotels, boarding houses and guest houses (Use Class C1) to dwellinghouses

Q.8 Are there any safeguards or specific matters that should be considered if the change of use of hotels, boarding houses or guest houses (Use Class C1) to dwellinghouses was supported through permitted development rights?

Yes

Please give your reasons. If yes, please specify. :

Consideration of the impact on all aspects of the economy and local residents should be required in all PDR cases. It is not clear why conversion from a boarding house to an HMO should not be allowed. Local Authorities will need to be allowed to impose Article 4 Directions where necessary and apply prior approval for impact on local services and facilities.

Since each local area which might be affected by such a PDR will be different, a one-size-fits-all, top-down policy change is totally inappropriate.

The very places which are identified as candidates for this proposed PDR – areas of high housing need – may be places where the demand for tourist accommodation is also high. If hotels are turned into housing this could have severe consequences for:

- the tourist industry – sufficient tourist accommodation; and
- the expansion of short-let housing, which is impossible for local planning authorities to manage; and
- the loss of permanent housing to short-lets, which adversely affects both the supply and price of housing, which exacerbates local housing problems and undermines the local community. This is not just a coastal resort issue but also an issue in London.
- overall, this could have a major destabilising impact on tourism, the management of development pressures and create considerable pressures within local communities.

Impact Assessments

Q.9 Do you think that any of the proposed changes in relation to the Class MA permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Yes

Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.:

It could impact on all three of a), b), c) because control would be taken away from those who have to ensure there are adequate services and facilities in town centres, Councils who have to plan for their future and mix of services and people who live in them and expect to be involved in decision making on changes.

The conversion of any shop or small café to residential is unlikely to deliver a satisfactory home but the impact of their conversion is to harm the high street frontages, reduce footfall as people find it unattractive to visit and to drive away other businesses and services.

Viable small businesses could be driven out and a lack of local facilities would increase car use by requiring people to travel further from their homes for local services, contrary to climate change objectives and the need for improved quality of the air we breathe.

Q.10 Do you think that changes to Class MA will lead to the delivery of new homes that would not have been brought forward under a planning application?

No

Please give your reasons :

They could be of inferior quality and unsuitable tenure. No evidence over the past two years suggests that they will have more than a very marginal impact. It is difficult to know what the take-up would be, but no guarantee that the outcome is likely to be positive.

Betting offices and pay day loan shops etc. to dwellinghouses (Class M of Part 3) and arcades etc. to dwellinghouses (Class N of Part 3)

Floorspace limits

Q.11 Do you agree that the right for the change of use from hot food takeaways, betting offices, pay day loan shops and launderettes (Class M of Part 3) is amended to:

No change

Please give your reasons :

Betting offices of 300 sq m may not be suitable for residential use.

It is not clear why buildings that happen to have become food takeaways, betting shops or payday loan shops should be singled out for special protection.

Q.12 Do you agree that the existing right (Class M of Part 3) is amended to no longer apply to launderettes?

Yes

Please give your reasons :

Launderettes are particularly valuable as a community facility, especially in London where they are still quite common, in areas with a high proportion of rented housing (public, RSL and privately rented) and where the cost of housing is high and space is at a premium.

Launderettes are vital indicators of social exclusion for communities where ownership levels of washing machines, whether in the basis of incomes or lack of space.

The NPPF para 93 emphasises the need for local planning policies and decisions to “guard against the unnecessary loss of valued community facilities and services where this would reduce the community's ability to meet its day-to-day needs.

Local Plan policies and Article 4 Directions in several Inner London boroughs specifically protect launderettes and exemptions for Article 2(3) land – conservation areas – have helped to avoid losses.

London Forum strongly support the proposal that the existing right should no longer apply to launderettes.

Q.13 Do you agree that the right for the change of use from amusement arcades and centres, and casinos (Class N of Part 3) is amended to:

No change

Please give your reasons :

Amusement arcades and centres seldom are as large as 150 square metres - the equivalent of two shop units – and are typically shopfront uses in town centres. The proposal to increase the limit to 300 square metres or the equivalent of four shops, would create large blank frontages and would undermine the declared purpose of supporting the vitality and viability of town centres.

No change also for town centre casinos. They are a main town centre use (NPPF Glossary) which adds to the vitality of the town centre evening and night-time economy. Their conversion to housing would, by definition, reduce the vitality and viability of the evening and night-time economy. Raising the threshold for conversion to housing to 300 square metres would significantly increase the impact on the evening and night-time economy of the town

centre.

Date the building was in use in order to benefit from the right

Q.14 Do you agree that the right (Class M of Part 3) should be amended to replace the existing date on which the building must have been in use as a hot food takeaway, betting office, pay day loan shop or launderette instead to a two-year rolling requirement?

No

Please give your reasons :

Launderette should be deleted

Q.15 Do you agree that the right (Class N of Part 3) should be amended to replace the existing date on which the building must have been in use as an amusement arcade or centre, or casino instead to two-year rolling requirement?

No

Please give your reasons :

There is no rational reason for the arbitrary dates in use at present. But see answer to Q11.

Article 2(3) land

Q.16 Do you think that the permitted development right for the change of use from hot food takeaways, betting offices, pay day loan shops and launderette (Class M of Part 3) should apply in other article 2(3) land?

No

Please give your reasons :

It should be unthinkable that developments in Article 2(3) land should be allowed without full planning consent. But see answer to Q11.

Q.17 Do you think that the permitted development right for the change of use of amusement arcade or centre, or casino (Class N of Part 3) should apply in other excluded article 2(3) land?

No

Please give your reasons :

See answer to Q16

Impact Assessments

Q.18 Do you think that any of the proposed changes in relation to the Class M and N permitted development rights could impact on: a) businesses b) local planning authorities c) communities?

Yes

Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.:

Communities could lose facilities that are essential parts of the local social infrastructure and service availability. That would increase travel costs and journeys to other locations. Applying these rights to launderettes should be deleted because of their impact on local communities, especially areas where because lack of space and/or low incomes, launderettes are a vital community facility. Their change of use would significantly increase social exclusion, for very little housing gain.

Q.19 Do you think that changes to Class M and N will lead to the delivery of new homes that would not have been brought forward under a planning application?

Yes

Please give your reasons :

Some of these proposals would produce very little/few gains, but would reduce the vitality of our town and neighbourhood centres.

Commercial, Business and Service, betting office or pay day loan shop to mixed use residential (Class G of Part 3)

Uses the right applies to

Q.20 Do you agree that the right (Class G of Part 3) is expanded to allow for mixed use residential above other existing uses?

No

Please give your reasons. If yes, please say which uses the right might apply to and give your reasons.:

The uses to be replaced could be delivering important services and facilities. Changing upper-floor uses above Class E ground floor uses, such as shops and restaurants, from other Class E uses (such as offices) to housing may reduce the economic activity of the town centre/high street by more than any potential gain in activity or expenditure.

The addition of a few individual flats may result in a significantly greater loss in economic activity, footfall and expenditure, which would not support "thriving and vibrant town centres and high streets".

Number of flats that can be delivered

Q.21 Do you agree that the number of flats that may be delivered under the right (Class G of Part 3) is doubled from two to four?

No

Please give your reasons :

The reference to "underused or empty storage space" is disingenuous! The right would apply equally to space in other, usually E Use Class uses, and would double the "entitlement" to change use to housing.

Upper floor E Use Class uses are a vital part of the supply of premises, especially for small businesses and their loss could have a significant impact on the critical mass of these uses and the vitality of the town centre.

Changes to permitted development rights on an increased scale across the board, is not just for "underused or empty storage space" but applies to all economic activities. This could strip out small businesses from town centres and would work against the Government's commitment to "supporting vibrant and thriving town centres and high streets." These proposals have lost sight of this. The words "there may be cases" in the consultation text is the weakest possible reason for making any such change.

Consequential changes to the permitted development right that allows the change of use from a mixed use to Commercial Business and Service use or betting office or pay day loan shop right (Class H of Part 3)

Q.22 Do you agree that the permitted development right (Class H of Part 3) is amended to align with any changes made to the uses to which Class G of Part 3 applies?

No

Please give your reasons :

This is extremely unclear – it seems to be all smoke and mirrors. The only thing that is clear is that this most likely to be a one-way trip – what is unclear is whether it would be beneficial for the local economy, businesses or the local community.

Impact Assessments

Q.23 Do you think that any of the proposed changes in relation to the Class G and H permitted development rights could impact on: a) businesses b) local planning authorities c) communities?

Yes

Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.:

There would appear to be potential loss of economic activity, which would impact both businesses and communities in terms of the critical mass of economic activity and job opportunities and, therefore, on the viability and vitality of our town centres.

Q.24 Do you think that changes to Class G will lead to the delivery of new homes that would not have been brought forward under a planning application?

Don't know

Please give your reasons :

There must be some uncertainty about take-up and any impact on housing delivery would be tiny, although the likely impact will depend on the individual centre – a good reason for not undertaking a top-down, across the board change in permitted development rights.

Agricultural buildings to dwellinghouses (Class Q of Part 3)

Size limits and maximum numbers of homes delivered

Q.25 Do you agree that the smaller and larger home size limits within the agricultural buildings to dwellinghouses right (Class Q of Part 3) should be replaced with a single maximum floorspace limit of either:

Not Answered

Please give your reasons :

Q.26 Do you agree that an overall limit on the amount of floorspace that can change use, set at 1,000 square metres, should be introduced for the agricultural buildings to dwellinghouses right (Class Q of Part 3)?

Not Answered

Please give your reasons :

Q.27 Do you agree that the 5 home limit within the agricultural buildings to dwellinghouses right (Class Q of Part 3) should be increased to allow up to a total of 10 homes to be delivered within an agricultural unit?

Not Answered

Please give your reasons :

Rear extensions

Q.28 Do you agree that the permitted development right for the change of use from agricultural buildings to residential use (Class Q of Part 3) should be amended to allow for an extension to be erected as part of the change of use on previously developed land?

Not Answered

Please give your reasons :

Q.29 Do you agree that a prior approval be introduced, allowing for the consideration of the impacts of an extension on the amenity of neighbouring premises, including overlooking, privacy and light?

Not Answered

Please give your reasons :

Minimum building size

Q.30 Do you agree that buildings should have an existing floorspace of at least 37 square metres to benefit from the right?

Not Answered

Please give your reasons :

Article 2(3) land

Q.31 Do you think that the permitted development right for the change of use from agricultural buildings to residential use (Part 3 Class Q) should be amended to apply in other article 2(3) land?

Not Answered

Please give your reasons :

Agricultural buildings not solely in agricultural use

Q.32 Do you agree that the right be amended to apply to other buildings on agricultural units that may not have been solely used for agricultural purposes?

Not Answered

Please give your reasons :

Q.33 Are there any specific uses that you think should benefit from the right?

Not Answered

If yes, please give examples of the types of uses that the right should apply to.:

Q.34 Are there any specific uses that you think should not benefit from the right?

Not Answered

If yes, please give examples of the types of uses that the right should not apply to.:

Former agricultural buildings no longer on an agricultural unit

Q.35 Do you agree that the right be amended to apply to agricultural buildings that are no longer part of an agricultural unit?

Not Answered

Please give your reasons :

Highways access

Q.36 Do you agree that any existing building must already have an existing suitable access to a public highway to benefit from the right?

Not Answered

Please give your reasons :

Works permitted

Q.37 Do you have a view on whether any changes are required to the scope of the building operations permitted by the right?

Not Answered

Please give your reasons. If yes, please provide details. :

Q.38 Do you have a view on whether the current planning practice guidance in respect of the change of use of agricultural buildings to residential use should be amended?

Not Answered

Please give your reasons. If yes, please provide details of suggested changes. :

Enabling the change of use of other rural buildings to residential

Q.39 Do you agree that permitted development rights should support the change of use of buildings in other predominantly rural uses to residential?

Not Answered

Please give your reasons. If yes, please specify which uses.:

Q.40 Are there any safeguards or specific matters that should be considered if the right is extended to apply to buildings in other predominantly rural uses?

Not Answered

Please give your reasons If yes, please specify. :

Impact Assessments

Q.41 Do you think that any of the proposed changes in relation to the Class Q permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Not Answered

Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.:

Q.42 Do you think that changes to Class Q will lead to the delivery of new homes that would not have been brought forward under a planning application?

Not Answered

Please give your reasons :

Supporting the agricultural sector through additional flexibilities

Do you want to complete this section?

No

Supporting businesses and high streets through greater flexibilities

Do you want to complete this section?

Yes

Commercial Business and Service use extensions (Class A of Part 7)

Q.57 Do you agree that the maximum floorspace limit for the extension or alteration to a Commercial, Business and Service establishment on non-protected land is increased to either 200 square metres or a 100% increase over the original building, whichever is lesser?

No

Please give your reasons :

Without any examples or an assessment of the size of most of the properties and how these vary by location it is difficult to understand what the implications would be.

Significant degradation to town centres could be caused as the extension could dominate the existing building and significantly alter its character so there must be planning scrutiny and engagement of local stakeholders and communities. PDRs need to be subject to prior approval in order to consider design and appearance. A 100% increase is substantial and could have a significant impact on the wider environment.

Industrial and warehousing extensions (Class H of Part 7)

Q.58 Do you agree that the maximum floorspace of a new industrial and/or warehousing building on non-protected land permitted under the Part 7 Class H permitted development right be amended to 400 square metres?

Yes

Please give your reasons :

Industrial and warehousing extensions (Class H of Part 7)

Q.59 Do you agree that the maximum floorspace of a new industrial and/or warehousing extension on non-protected land be increased to either 1,500 square metres or a 75% increase over the original building, whichever is lesser.

Yes

Please give your reasons :

Impact Assessments

Q.60 Do you think that any of the proposed changes in relation to the Part 7 permitted development rights could impact on: a) businesses b) local planning authorities c) communities?

Yes

Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.:

These proposals could have a significant adverse impact on placemaking and communities.

Markets - temporary use of land (Class B of Part 4)

Q.61 Do you agree that the permitted development right for the temporary use of land should be amended so that markets can operate either:

28 days per calendar year (in line with other uses permitted under the right)

Please give your reasons. If you have chosen a different number of days per calendar year, please specify what number of days the right should provide for?:

The number of days permitted for temporary uses will need to be varied dependent upon the activity, location and nature of the land. For activities for longer periods, larger sites and the need for recovery periods for grass surfaces (such as parks), a full planning consent will be needed rather than the use of permitted development rights.

Not all uses will need 28 days, whilst some events like weekly farmers' markets clearly operate for more than 28 days per year – is this classed as a

temporary market?

Impact Assessments

Q.62 Do you think that any of the proposed changes in relation to the Part 4 permitted development rights could impact on: a) businesses b) local planning authorities c) communities?

Not Answered

Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.:

Ensuring the sufficient capacity of open prisons

Do you want to complete this section?

No

Public Sector Equality Duty

Q.66 Do you think that the changes proposed in this consultation could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

Yes

Please give your reasons :

The Government's proposals could reduce the required mix of uses, social infrastructure and services on all people in the area where they are applied for the reasons given to the earlier questions

Call for evidence - nature-based solutions, farm efficiency projects, and diversification.

Do you want to complete this section?

Yes

Call for evidence - nature-based solutions, farm efficiency projects, and diversification.

Nature-based solutions

Q.67 What guidance, policy, or legislative changes could help to provide a more supportive framework for planning authorities to determine planning applications within?

Q.67 What guidance, policy, or legislative changes could help to provide a more supportive framework for planning authorities to determine planning applications within? :

This has limited interest for London unless wetlands are to be affected.

Meeting nutrient standards has been controversial and Michael Gove appears to wish to relax the rules recently. So, Q69 may not be relevant to London but the situation on nutrient neutrality and biodiversity net gain is confused.

Q.68 What new permitted development rights, or amendments to existing permitted development rights, would streamline and simplify the process? If referring to an existing permitted development right, please be as specific as possible.

Q.68 What new permitted development rights, or amendments to existing permitted development rights, would streamline and simplify the process? If referring to an existing permitted development right, please be as specific as possible. :

No suggestions.

Q.69 Would a specific and focused permitted development right expedite or resolve a specific delivery challenge for nutrient mitigation schemes?

Q.69 Would a specific and focused permitted development right expedite or resolve a specific delivery challenge for nutrient mitigation schemes?:

No suggestions.

Q.70 Please provide specific case studies (including planning reference numbers where available) which can help us understand what issues farmers and land managers are facing in relation to nature-based solutions.

Q.70 Please provide specific case studies (including planning reference numbers where available) which can help us understand what issues farmers and land managers are facing in relation to nature-based solutions.:

No case studies.

Q.71 Would these issues be resolved by amending planning practice guidance or permitted development rights, or any other solutions?

Q.71 Would these issues be resolved by amending planning practice guidance or permitted development rights, or any other solutions?:

No suggestions.

Q.72 Are there any success stories that we can learn from on individual cases, or in certain local planning authorities?

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No success stories to offer.

Q.73 Would you propose different solutions for different sized agricultural units?

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No suggestions

Q.74 Do you foresee any unintended negative consequences that may result from more nature-based solutions coming forward (e.g., impacts to other species, flood risk, wildfire risk, risk to public safety, releasing contaminants from contaminated land or hydrology etc.)? How could these be avoided?

Q.74 Do you foresee any unintended negative consequences that may result from more nature-based solutions coming forward (e.g., impacts to other species, flood risk, wildfire risk, risk to public safety, releasing contaminants from contaminated land or hydrology etc.)? How could these be avoided?:

The Government could avoid unintended consequences by making planning legislation subject to consultation and review. The attempt to alter nutrient neutrality by a very late addition to the Levelling-up and Regeneration Bill was unwise, confusing and controversial. The guidance to local authorities on mitigation published subsequently did not clarify the situation.

Farm efficiency projects

Q.75 What guidance, policy, or legislative changes could help to provide a more supportive framework for planning authorities to determine planning applications within?

Q.75 What guidance, policy, or legislative changes could help to provide a more supportive framework for planning authorities to determine planning applications within? :

No suggestions, as this is not relevant to London.

Q.76 What new permitted development rights, or amendments to existing permitted development rights, would streamline and simplify the process? If referring to an existing permitted development right, please be as specific as possible.

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No suggestions, as this is not relevant to London.

Q.77 Please provide specific case studies (including planning reference numbers where available) which can help us understand what issues farmers and land managers are facing in relation to slurry stores or lagoons and small-scale reservoirs.

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No suggestions, as this is not relevant to London.

Q.78 Would these issues be resolved by amending planning practice guidance or permitted development rights, or any other solutions?

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No suggestions, as this is not relevant to London.

Q.79 Are there any success stories that we can learn from on individual cases, or in certain local planning authorities?

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No suggestions, as this is not relevant to London.

Q.80 Would you propose different solutions for different sized agricultural units?

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No suggestions, as this is not relevant to London.

Q.81 Do you foresee any unintended negative consequences that may result from more farm efficiency projects coming forward (e.g., impacts on nutrient pollution, protected sites or hydrology)? How can these be mitigated?

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No suggestions, as this is not relevant to London.

Diversification of farm incomes

Q.82 What guidance, policy, or legislative changes could help to provide a more supportive framework for planning authorities to determine planning applications within?

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No suggestions, as this is not relevant to London.

Q.83 What new permitted development rights, or amendments to existing permitted development rights, would streamline and simplify the process? If referring to an existing permitted development right, please be as specific as possible.

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No suggestions, as this is not relevant to London.

Q.84 Are there any other diversification projects which have not been covered in this call for evidence or the wider consultation, that you wish to provide evidence for? If so, please provide specific case studies (including planning reference numbers where available) which can help us understand what issues farmers and land managers are facing.

Q.84 Are there any other diversification projects which have not been covered in this call for evidence or the wider consultation, that you wish to provide evidence for? If so, please provide specific case studies (including planning reference numbers where available) which can help us understand what issues farmers and land managers are facing.:

No suggestions, as this is not relevant to London.

Q.85 Would these issues be resolved by amending existing permitted development rights, or any other solutions?

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No suggestions, as this is not relevant to London.

Q.86 Are there any success stories that we can learn from on individual cases, or in certain local planning authorities?

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No suggestions, as this is not relevant to London.

Q.87 Would you propose different solutions for different sized agricultural units?

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No suggestions, as this is not relevant to London.

Q.88 Do you foresee any unintended negative consequences that may result from more farm diversification projects coming forward? How can these be mitigated?

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No suggestions, as this is not relevant to London.