

Supporting Housing Delivery & Public Service Infrastructure

About this Consultation

Q1. Please confirm you have read this page.

Yes

Privacy notice

Q2. Please confirm you have read this page.

Yes

Respondent Details

Q3. First name

Marj

Q4. Last name

Powner

Q5. Email address

friendsofcarringtonmoss@gmail.com

Q6. Are you responding on behalf of an organisation or as an individual?

Organisation

Q7. Organisation (if applicable)

Friends of Carrington Moss

Q8. Position in organisation (if applicable)

Chair

Q9. Please indicate whether you are replying to this consultation as a:

Community group, including residents' associations

Q10. Please indicate which sectors you work in / with (tick all that apply):

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

Q11. 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)?

Disagree

Please give your reasons:

We disagree totally with the principle of Permitted Development Rights - developers already have too much power and influence on developments in local communities. The fact that you have had to demand that developers meet national design standards because they have previously built homes without windows, etc, demonstrates that the power of these organisations needs to be curbed, not extended. We do not disagree that there should be easy processes to support change of use but this should be done with the full knowledge, involvement and engagement of local communities.

Q12. 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

Please give your reasons:

There should be a boundary of at least 1000 metres around all such areas, including sites of biological importance and sites of special scientific interest preventing any development. It is a pity that so much effort is being made to give more power and influence to developers and yet is not balanced with additional protections for our natural environment, for example, given the Government's declaration of the climate emergency, an absolute moratorium on builds on peatland.

Q13. Q2.2 Do you agree that the right should apply in conservation areas?

Disagree

Please give your reasons:

Would this significantly increase footfall in conservation areas? Why would that be desirable? Any such plans should go through a rigorous planning process with the full knowledge, involvement and engagement of local communities.

Q14. 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?

Disagree

Please give your reasons:

There should be prior approval of the impact of all aspects of the development on the conservation area.

Q15. 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

Q16. Q3.2 Are there any other planning matters that should be considered?

Yes

Please specify:

Sustainability - access to public transport, to schools, GPs, etc. Potential increases in air and noise pollution in the area. Potential impact on the environment.

Consultation - there should be full consultation of at least 6 weeks with local residents.

Q17. 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

Please give your reasons:

If you are giving developers more power and influence, they should pay for it! Why would you cap it at the fee for 50 homes?

Q18. Q4.2 If you agree there should be a fee per dwelling house, should this be set at £96 per dwellinghouse?

No

Please give your reasons:

The fee is too low. You expect there to be high take-up and this approach will result in significant productivity benefits for developers and, therefore, significantly reduced costs. With that in mind, it should attract at least double that fee per dwelling, with no cap.

Q19. 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

Please specify:

All change of use applications should be fully discussed and agreed with the community. This approach is leading to areas being designed by developers and not by the residents who live in them. The impact on existing residents will be significant, access to school places being just one specific issue that will impact local communities.

Q20. 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

If so, please give your reasons:

Yes a significant impact if the local communities are not fully consulted on the plans. As mentioned above, the impact on local school places is just one issue. For local businesses, the change of use could lead to specific issues (for example if there are HGVs travelling 24x7, the new community may complain about noise and air pollution). For local planning authorities, the developments may not be aligned with the LPAs designation for the area (ie there may be a greater need in some areas for more jobs than homes).

Q21. 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

If so, please give your reasons:

There is no requirement or target for the build of social housing, so many of the most vulnerable in our society, who will have no say about whether these homes are built or not, will have no access to the resulting homes. The beneficiaries are the landowners and developers! More effort should be being made to involve citizens (including those who share a protected characteristic) in the planning process, not remove them from it!

Supporting public service infrastructure through the planning system

Q22. 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?

Disagree

Please give your reasons:

Again, why do you need to do this in such a way that local communities are not fully involved and engaged? Such extensions can be detrimental to local communities, resulting in increased traffic and pollution.

Q23. Q7.2 Do you agree that the right be amended to allow the height limit to be raised from 5 metres to 6?

Disagree

Please give your reasons:

This should be subject to local conditions, and agreed with the local community.

Q24. Q7.3 Is there any evidence to support an increase above 6 metres?

No

Please specify:

This should be subject to local conditions, and agreed with the local community.

Q25. Q7.4 Do you agree that prisons should benefit from the same right to expand or add additional buildings?

Disagree

Please give your reasons:

Local communities should be fully involved and engaged in any decisions of this nature. Such extensions can be detrimental to local communities, resulting in increased traffic and pollution.

Q26. Q8 Do you have any other comments about the permitted development rights for schools, colleges, universities, hospitals and prisons?

Yes

Please specify:

Sustainability issues should be covered, public transport, air and noise pollution, etc. All permitted development should be subject to community consultation lasting no less than 6 weeks.

Q27. 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

If so, please give your reasons:

For communities there could be significant increases in traffic and air/noise pollution. For businesses close to the planned development there could be impacts on their processes (ie 24x7 transport).

Q28. 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

If so, please give your reasons:

If such residents live close to the planned development and are not given the opportunity to fully participate in an appropriately timed consultation, the impact on such residents could be underestimated and/or ignored.

Q29. 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

If so, please give your reasons:

For communities there could be significant increases in traffic and air/noise pollution. For businesses close to the planned development there could be impacts on their processes (ie 24x7 transport).

Q30. 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

If so, please give your reasons:

If such residents live close to the planned development and are not given the opportunity to fully participate in an appropriately timed consultation, the impact on such residents could be underestimated and/or ignored.

Q31. 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)?

No

Please give your reasons:

All developments, of whatever size or scope should be subject to public consultation lasting no less than 6 weeks.

Q32. 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?

No

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

All developments, of whatever size or scope should be subject to public consultation lasting no less than 6 weeks.

Q33. Q13 Do you agree the determination period for applications falling within the scope of the modified process should be reduced to 10 weeks?

No

Please give your reasons:

All developments, of whatever size or scope should be subject to public consultation lasting no less than 6 weeks. Prioritisation of planning applications should be determined locally.

Q34. Q14 Do you agree the minimum consultation / publicity period should be reduced to 14 days?

No

Please give your reasons:

All developments, of whatever size or scope should be subject to public consultation lasting no less than 6 weeks. If someone is on holiday or sick, they could miss the opportunity of participating in consultation lasting only 14 days. People who share protected characteristics are even more likely to miss the opportunity to participate because they may need help in understanding the implications of planning proposals in their area. We have no confidence that developers will fully engage with, and involve, the local community prior to the planning application being submitted. As things stand today, the community is not even considered to be a key stakeholder in developing the Masterplans for their areas, nevermind being engaged in the process!

Q35. 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.)

No

Please give your reasons:

Why is it important that the SoS is notified? You are suggesting that there will be a huge take-up of these applications, yet you are creating another layer of bureaucracy (and resource requirements) around them that is not needed. The SoS would be better occupied by reviewing the developments which have been approved and not yet started, giving developers target dates for completion and issuing penalties to those who do not comply.

Q36. 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

Q37. 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

Please specify:

Only to reiterate that citizens should be fully involved in all plans for their areas and a reasonable time period for public consultation (no less than 6 weeks) should be mandated for all developments.

Q38. Q17.2 Do you have any other suggestions on how these priority public service infrastructure projects should be prioritised within the planning system?

Yes

Please specify:

Local planning authorities should be required to involve local people in the development of Masterplans for their areas (natural sub-areas within the Local Authority area). This Masterplanning process should include public service infrastructure projects and all other potential development ideas for the local area, including ideas which are proposed by the community, who know their areas and the core needs best. Prioritisation should be determined locally.

Q39. 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

If so, please give your reasons:

If such residents live close to the planned project and are not given the opportunity to fully participate in appropriately timed consultation, the impact on such residents could be underestimated and/or ignored.

Consolidation and simplification of existing permitted development rights

Q40. 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?

Disagree

Q41. Q19.2 Are there any additional issues that we should consider?

Yes

Please specify:

The public want more involvement in local planning decisions, not less. Local residents want to design their areas, not be presented with a developer-led Masterplan to comment on!

Q42. 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?

Disagree

Q43. Q21 Do you agree the broad approach to be applied in respect of category 4 outlined in paragraph 76 of the consultation document?

Disagree

Q44. Q22 Do you have any other comments about the consolidation and simplification of existing permitted development rights?

Yes

Please specify:

All permitted development rights should be withdrawn and the public should be fully involved in how the planning process is regularly updated, including the establishment of a citizens' assembly to provide inputs from a variety of individuals, including those who share protected characteristics.

These proposed changes are being driven to generate more profit for developers and less community involvement. This does not fit with the Government's role of representing its people - it seems to only be representing business not citizens!