



Response form

New opportunities for sustainable development and growth through the reuse of existing buildings: Consultation

We are seeking your views to the following questions on the proposals to support sustainable development and growth through encouraging the reuse of empty and redundant existing buildings where the original use was no longer required or appropriate.

How to respond:

The closing date for responses is 11 September 2012.

This response form is saved separately on the DCLG website.

Responses should be sent preferably by email:

Email responses to: Deregulate.planning@communities.gsi.gov.uk

Written responses to:

Saima Williams
Consultation Team (Wider change of use)
Planning Development Management Division
Department for Communities and Local Government
1/J3, Eland House
Bressenden Place
London SW1E 5DU

About you

i) Your details:

Name:	Ruth Bradshaw
Position:	Policy and Research Manager
Name of organisation (if applicable):	Campaign for National Parks
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ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

- Organisational response
- Personal views

iii) Please tick the box which best describes you or your organisation:

- District Council
- Metropolitan district council
- London borough council
- Unitary authority/county council/county borough council
- Parish council
- Community council
- Non-Departmental Public Body (NDPB)
- Planner
- Professional trade association
- Land owner

- Private developer/house builder
- Developer association
- Voluntary sector/charity
- Other

(please comment):	
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**iv) What is your main area of expertise or interest in this work
(please tick one box)?**

- Chief Executive
- Planner
- Developer
- Surveyor
- Member of professional or trade association
- Councillor
- Planning policy/implementation
- Environmental protection
- Other

(please comment):	
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Would you be happy for us to contact you again in relation to this questionnaire?

Yes No

ii) Questions

Please refer to the relevant parts of the consultation document for narrative relating to each question.

Question 1: Do you think there should be permitted development rights for buildings used for agricultural purposes to change use to:

- **Class A1 (shops), A2 (financial and professional services), and A3 (restaurants and cafes),**
- **Class B1 (Business) and B8 (storage and distribution),**
- **Class C1 (Hotels)**
- **Class D2 (Assembly and Leisure)**

Yes No

Comments

Whilst the Campaign for National Parks acknowledges the Government's intention to reduce bureaucracy by extending permitted development rights, we have serious concerns about the unintended consequences of removing the need for planning permission for the change of use of agricultural buildings. Existing planning procedures do not necessarily prevent the reuse of redundant agricultural buildings but they do ensure that where the proposed new use may be inappropriate there is a means of identifying, reducing and, if necessary, mitigating for, any negative impacts.

Any change of use will have a range of impacts in areas such as access, parking, lighting, landscape, noise, highways and environmental issues which need to be taken into consideration as part of the process of determining whether the new use is appropriate for the location. Such factors need to be given even greater consideration in isolated locations and in National Parks, where decisions also need to take account of the statutory National Park purpose to conserve and protect the special qualities of the area. In addition, National Parks contain a high number of the buildings which could potentially be affected by this proposed extension to permitted development rights, for example, there are around 4000 field barns in the Yorkshire Dales National Park many of which are in locations which would be completely inappropriate for certain of the proposed changes of use.

Appropriate change of use should be encouraged, particularly where this helps to ensure the future upkeep of traditional buildings, however such changes of use need to be carefully managed and monitored to ensure that the potential impacts of any proposed new use are properly considered and that due account is also taken of the cumulative impacts within an area. This is what the existing planning process is designed to do and many National Park Authorities (NPAs) have specific policies relating to change of use of agricultural buildings which allow them to support farm diversification proposals where the location, scale and character is appropriate and there are no adverse impacts on neighbouring properties. If NPAs lose this kind of policy control, they will effectively lose their ability to deliver one of the statutory purposes of National Parks.

The introduction of these permitted development rights could lead to a significant increase in completely inappropriate uses for potentially redundant agricultural buildings. There are already examples in National Parks of former agricultural buildings being used as scrap yards, vehicle storage and distribution centres as well as being illegally converted to domestic use.

We do not believe that all of the proposed changes of use are 'relatively low impact business uses' as set out in the consultation document. Some of the proposed use classes for which planning permission would no longer be required seem particularly inappropriate in a National Park setting, for example, Class B8, storage and distribution. There could be significant landscape impacts from the storage and parking of vehicles on former agricultural sites. Cafes, leisure facilities and food processing would all also have significant impacts in the form of traffic generation and/or noise and light pollution. Even a change of use to offices or workshops could generate significant additional vehicle movements as a result of staff, visitors and suppliers needing to access the premises.

Question 2: Should thresholds and limitations be applied to reduce the potential impact of any permitted change of use?

Yes No

Comments

We do not believe that such change of use should become permitted development. However, were it to do so, then thresholds or limitations should be applied to avoid the conversion of several buildings within a single farm complex and the subsequent cumulative impacts. If permitted development rights are introduced they should be limited to one building in any farm complex. It would also be appropriate to restrict permitted development rights to traditional buildings greater than a certain age as many modern agricultural buildings are less appropriate for conversion to other uses in any case.

Question 3: Are there circumstances that would justify a prior approval process to allow the local planning authority to consider potential impacts?

Yes No

Comments

We do not support these permitted development rights but if they are introduced, then they should be accompanied by a prior approval process for National Parks and other Article 1(5) land as defined in the Town and Country Planning (General Permitted Development) Order 1995, given the additional importance of considering the wider impacts of change of use in these sensitive locations. However, the scope for control through a prior approval process is limited so it would be far more appropriate not to introduce these rights and to continue to allow the full impacts of change of use to be assessed through the planning process. This would mean that where planning permission is granted, it can be accompanied by conditions to reduce or mitigate any disbenefits arising from the change of use.

Question 4: Do you agree that the size thresholds for change of use should be increased?

Yes No

Comments

We do not wish to respond to this question.

Question 5: If so, is 470m² the correct threshold, or should the increase in the limit be larger or more modest?

Yes No

Comments

We do not wish to respond to this question.

Question 6: Do you think there should be permitted development rights to allow for the temporary use of buildings currently within the A, B1 and D1 and D2 use classes for a range of other specified uses

for two years?

Yes No

Comments

We do not wish to respond to this question.

Question 7: If you agree with the proposal what uses do you think should be allowed on a temporary basis?

Comments

We do not wish to respond to this question.

Question 8: Do you think there should be permitted development rights to allow hotels to change to residential use without the need for a planning permission?

Yes No

Comments

We do not believe that this proposal would support rural growth or sustainable development. In fact, it could have a detrimental effect on the local economy and would reduce the opportunities to save such assets for the local or wider community. Such changes of use must continue to be carefully examined through the planning system and, as with shops and pubs, there must be evidence that the business is no longer viable before a change of use is permitted.

We are particularly concerned that any such change of use should not be extended to rural pubs which include overnight accommodation.

Question 9: Should thresholds and limitations be applied to reduce the potential impact of any permitted change of use?

Yes No

Comments

We do not believe that such change of use should be permitted.

Question 10: Are there circumstances that would justify a prior approval process to allow the local authority to consider potential impacts?

Yes No

Comments

We do not wish to respond to this question.

Question 11: Are you aware of any updates or amendments needed to the descriptions currently included for the existing Use Classes?

Yes No

Comments

Not applicable.

Question 12: If yes, what is the amendment, and what is the justification?

Comments

Not applicable.

Question: Impact Assessment

Do you have any comments on the assumptions and analysis set out in the consultation stage Impact Assessment? (See Annex 1)

See also the further specific questions within that Impact Assessment

Yes No

Comments

Not applicable.

Thank you for your comments.