

Submitted by email to: [PDRconsultationsummer2023@levellingup.gov.uk](mailto:PDRconsultationsummer2023@levellingup.gov.uk)

**Response to consultation on additional flexibilities to support housing delivery, the agricultural sector, businesses, high streets and open prisons (25 September 2023)**

Campaign for National Parks is the only independent charity dedicated to securing the future of National Parks in England and Wales. We want a world where nature and people are thriving in our National Parks and where wildlife is wild and natural beauty is protected for generations to come. We want National Parks to be places which everyone, no matter their age or background, can access and feel inspired by.

National Parks are our finest landscapes with the highest level of protection. Their statutory purposes are to conserve and enhance wildlife, cultural heritage and natural beauty, and to promote opportunities for public enjoyment and understanding of their special qualities. National Parks contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for recreation. They also play a vital role in sustainable development through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses.

This document highlights some of the key points we have made in response to selected questions in the online survey, particularly our strong objections to introducing new permitted development rights (PDRs) in National Parks and AONBs. We are particularly concerned about the proposals to extend PDRs for change of use of agricultural and other rural buildings to residential dwellings but we also object to many of the other proposals.

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 National Parks and AONBs, where decisions also need to take account of the statutory purposes. In addition, National Parks contain a high number of the buildings which could potentially be affected by these proposals, for example, there are around 4500 field barns in the Yorkshire Dales National Park many of which are in locations which would be completely inappropriate for residential use.

There is a long-established principle of certain PDRs not applying in National Parks and AONBs because of the need to ensure that these areas are protected against damaging development. In line with this principle, the need to exclude National Parks and AONBs was recognised and supported when the PDRs for barn conversions were first introduced in 2014 and the reasons which applied then are all still just as relevant today.

We welcome the Government's intention to support housing delivery and the rural economy but we strongly object to most of the proposals in the consultation for the following reasons:

- The conflict with national planning policy: The National Planning Policy Framework (NPPF) emphasises the special status that National Parks and AONBs should be afforded in planning policies and decisions and makes it clear that they have the highest status of protection. For example, paragraph 176 of the NPPF requires that “Great weight should be given to conserving and enhancing landscape and scenic beauty..” in these areas. This will not happen if development is allowed to take place without a planning application.
- The development of new, isolated residential units in unsustainable locations would have a detrimental impact on the statutory purposes and special qualities of these areas.
- These changes would not deliver new homes for those who most need them as many of the new dwellings are likely to become second homes or holiday lets. The new PDRs would undermine the existing policies National Park Authorities (NPAs) have in place to support affordable housing and ensure new residential development takes place in appropriate locations and is restricted to housing that will be used as a permanent and principal residence. This would directly conflict with the Government’s aim of preventing further loss of permanent homes as set out in the recent consultation on creation of a new permitted development right for holiday lets and the increases in council tax on second homes.
- There would be a significant incentive to convert buildings to residential use as the value of residential dwellings is significantly higher than that of buildings used for agricultural or commercial purposes. This could have unintended consequences for these sectors, threatening the contribution they make to the statutory purposes and special qualities of National Parks. For example, if it results in the rapid and unmanaged conversion of shops and other services which are vital to the sustainability of small communities and rural tourism.
- There would be negative impacts on the landscape as a result of allowing inappropriate modern buildings to continue in use for much longer than would otherwise be the case if they are no longer required for agricultural or rural purposes and through the introduction of driveways, formal gardens and the supporting infrastructure associated with conversion to residential use.
- Introducing new PDRs would remove the ability of local planning authorities to manage and monitor important aspects of development such as requirements for new infrastructure and the impact on wildlife.
- The requirement for prior approval would be unlikely to lead to reduced bureaucracy or a much speedier decision, particularly if the reduced fees for local planning authorities restrict the resources they are able to devote to this.
- There is no evidence that the current system is preventing change of use where it is appropriate for it to happen. Requiring a planning application does not prevent development taking place, it just ensures that development is only allowed in appropriate locations and in such a way that any negative impacts can be properly mitigated. The Government’s own planning application (PS2) statistics show that since 2014 when a permitted development right for agricultural to residential use was previously proposed in National Parks, the ten

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English National Park Authorities approved 90% of all planning applications and 87% of all change of use applications.

- Introducing further PDRs will undermine the existing plan-led system and disenfranchise local people who will have no opportunity to influence development that could have a significant impact on their community and the local area.

For further information about any of the points we have made in this response, please contact Ruth Bradshaw, Policy and Research Manager, Campaign for National Parks (email: [ruthb@cnp.org.uk](mailto:ruthb@cnp.org.uk))