

25 September 2023

Sent by email to PDRconsultationsummer2023@levellingup.gov.uk

Society of Local Council Clerks – Response to 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.

Dear Sir/Madam,

Thank you for giving the Society of Local Council Clerks the opportunity to comment on this important consultation document.

The Society of Local Council Clerks is the professional body representing town and parish council clerks in England and Wales. More than 4,000 local council clerks are in membership serving over 6,000 town and parish councils throughout England and Wales. Influencing, shaping and guiding the planning system is a high priority for many of our members. This issue is, therefore, of special significance and importance to the Society and its members.

In formulating this response, we have consulted with our members. We have also asked them to respond individually to it.

We have concentrated on those questions that are of the greatest relevance and significance to the sector.

Can we say at the outset that we continue to have serious concerns about the continued expansion in, and the Government's overall favourable approach to, permitted development rights as proposed in this consultation document and more generally. A view shared by many others.

Permitted development rights can erode local decision making, democratic and consultation processes as they take development out of the planning application process. This means that the potential impacts and outcomes of such proposals are not robustly assessed or considered. In addition, communities, including local councils, affected by the proposal do not have the opportunity to comment and be involved in the decision-making process.

Often it results in poor quality and unsustainable development.

While we have some sympathy with the intention behind some of the proposed changes, we consider that there are better tools available within the planning system to deal with any issues and any changes should not be at the expense of the ability of communities to control and influence the quality and nature of development.

Turning to the questions in more details.

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. While we support and welcome in broad terms the application of Design Codes to certain specified rights, this should form an integral part of the Prior Approval Process not instead of it.

It should also be noted that we have serious concerns about the Prior Approval Process.

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?

- a) Yes
- b) No
- c) Don't know

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.

Yes. We have serious objections to the proposed changes to permitted development, which will have an adverse impact on businesses, local planning authorities and communities both individually and cumulatively and for the reasons stated in our introduction.

Combination. However, our response primarily relates to the negative impact it would have on communities.

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: a) Double the floorspace that can change use to 3,000 square metres b) Remove the limit on the amount of floorspace that can change use c) No change d) Don't know Please give your reasons.

We do not consider that this change is required, fully justified or helpful. We are particularly concerned that the proposal would result in the further undesirable loss of employment and some recreational uses to housing.

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

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least three continuous months immediately prior to the date of the application for prior approval?

- a) Yes
- b) No
- c) Don't know

Don't Know. We have no strong views on this question.

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

- Yes
- b) No
- c) Don't know

No. We do not agree that the permitted development right should be extended to National Parks, World Heritage sites and other protected areas. It is not desirable, nor would it contribute to sustainable development. It is contrary to the aim of the designation of such areas, which is to conserve and enhance their special qualities.

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? a) Yes b) No c) Don't know Please give your reasons. If no, please explain why you don't think the prior approval works in practice.

Don't Know. We have no strong views on this question.

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? a) Yes b) No c) Don't know Please give your reasons

No. For the reasons stated previously we do not support the proposed use of permitted development rights to the change of use of hotels, boarding houses or guest houses (Use Class C1) to dwelling houses without the need for planning approval.

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? a) Yes b) No c) Don't know Please give your reasons. If yes, please specify

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No. This would be most effectively safeguarded by ensuring their consideration through a planning application. It could be strongly argued that, as this consultation question is seeking views on safeguards, it is recognised that this issue cannot be satisfactorily assessed and controlled through a permitted development right.

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? a) Yes b) No c) Don't know 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

Yes.

Combination. However, our response primarily relates to the negative impact it would have on communities. As stated previously, we are especially concerned that the proposal would result in the further loss of employment and some recreational uses to housing.

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? a) Yes b) No c) Don't know If so, please give your reasons.

Don't Know. We have no strong views on this question.

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: a) Double the floorspace that can change use to 300 square metres b) Remove the limit on the amount of floorspace that can change use c) No change d) Don't know Please give your reasons

No. We do not consider that this change is desirable nor justified.

Q.12 Do you agree that the existing right (Class M of Part 3) is amended to no longer apply to launderettes? a) Yes b) No c) Don't know Please give your reasons

No. We do not consider that this change is desirable nor justified. Furthermore, in many area laundrettes are an important community asset and facility that should be protected through the planning system.

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: a) Double the floorspace that can change use to 300 square metres b) Remove the limit on the amount of floorspace that can change use c) No change d) Don't know Please give your reasons.

No. Again, we do not consider that is desirable nor justified. Especially in view of the often contentious nature of amusement arcades and centres and their potential impact on local communities. It is critical that the impacts of a proposals are fully assessed and considered through a planning application.

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? a) Yes b) No c) Don't know Please give your reasons.

Don't Know. We have no strong views on this question.

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? a) Yes b) No c) Don't know Please give your reasons.

Don't Know. We have no strong views on this question.

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? a) Yes b) No c) Don't know Please give your reasons.

No. We do not agree with principle of this permitted development right. More specifically we do not consider it desirable or see any justification that the right if approved should include land that has a special environmental or historical value.

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? a) Yes b) No c) Don't know Please give your reasons.

As our response to question 16, we do not agree with principle of this permitted development right. More specifically we do not consider it desirable or see any justification that the right, if approved, should include land that has a special environmental or historical value.

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? a) Yes b) No c) Don't know 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.

Yes.

Combination. However, our response primarily relates to the negative impact it would have on communities.

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? a) Yes b) No c) Don't know If so, please give your reasons.

Don't Know. We have no strong views on this question.

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? a) Yes b) No c) Don't know Please give your reasons. If yes, please say which uses the right might apply to and give your reasons

Don't Know. We have no strong views on this question.

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? a) Yes b) No c) Don't know Please give your reasons.

No. It would result in poor quality housing with inadequate space and other amenities, which is generally of poorer quality than built with planning permission. The poor quality of some housing produced under permitted development continues to be a serious concern and a criticism of some of the recent changes to permitted development rights.

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? a) Yes b) No c) Don't know Please give your reasons

Don't Know. We have no strong views on this question.

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? a) Yes b) No c) Don't know 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.

Yes.

Combination. However, our response primarily relates to the negative impact it would have on communities.

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? a) Yes b) No c) Don't know If so, please give your reasons.

Don't Know. We have no strong views on this question.

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: a) 100 square metres per dwellinghouse b) 150 square metres per dwellinghouse c) No change d) Don't know

Don't Know. We have no strong views on this question.

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)? a) Yes b) No c) Don't know Please give your reasons.

No. In particular, as it would result in an increase in the number of dwellings that could be developed without planning permission and associated controls and scrutiny, many of the resulting dwellings will be of poor quality and in unsustainable locations.

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? a) Yes b) No c) Don't know Please give your reasons.

No. Again as it would result in an increase in the number of dwellings that could be developed without planning permission and associated controls and scrutiny, many of the resulting dwellings will be of poor quality and in unsustainable locations. Furthermore, it would also mean that some of the resulting developments will be exempt from having to provide affordable housing or developer contributions and other public benefits, which is not desirable.

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? a) Yes b) No c) Don't know Please give your reasons

No. It is important that such extensions are assessed and scrutinised through the planning system. It is also at odds with the latest revision of the NPPF with its emphasis on ensuring high quality and sustainable design as there will be no formal requirement for such extensions to fulfil this.

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? a) Yes b) No c) Don't know Please give your reasons.

Yes. While we disagree that this type of development proposals should be dealt through the Prior Approval process, should this permitted development right be approved it is important that these impacts are considered.

Q.30 Do you agree that buildings should have an existing floorspace of at least 37 square metres to benefit from the right? a) Yes b) No c) Don't know Please give your reasons

Don't Know. We have no strong views on this question.

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? a) Yes b) No c) Don't know Please give your reasons.

No. This would be contrary to the purpose of their designation as such, which includes, amongst other things, to preserve and protect sensitive and exceptional landscapes and protect the special architectural and historic interest of areas.

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? a) Yes b) No c) Don't know Please give your reasons.

No. It will result in poor quality and unsustainable development (primarily housing) that has not been properly assessed via a planning application.

Q.33 Are there any specific uses that you think should benefit from the right? a) Yes b) No c) Don't know If yes, please give examples of the types of uses that the right should apply to.

No.

Q.34 Are there any specific uses that you think should not benefit from the right? a) Yes b) No c) Don't know If yes, please give examples of the types of uses that the right should not apply to

No.

Q.35 Do you agree that the right be amended to apply to agricultural buildings that are no longer part of an agricultural unit? a) Yes b) No c) Don't know Please give your reasons.

No. Mainly for the reasons provided above. It will result in poor quality development in unsustainable locations some of which may not have to contribute to affordable provision or developer contributions.

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? a) Yes b) No c) Don't know Please give your reasons.

Yes – otherwise it may result in development without adequate highway access with the associated issues.

Q.37 Do you have a view on whether any changes are required to the scope of the building operations permitted by the right? a) Yes b) No c) Don't know Please give your reasons. If yes, please provide details.

We have no strong views on this question.

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? a) Yes b) No c) Don't know Please give your reasons. If yes, please provide details of suggested changes.

Don't know. We have no strong views on this question.

Q.39 Do you agree that permitted development rights should support the change of use of buildings in other predominantly rural uses to residential? a) Yes b) No c) Don't know Please give your reasons. If yes, please specify which uses.

No. We would strongly disagree with this. Our experience is that the current Class Q permitted development right often results in poor quality development in unsustainable locations; extending it to allow for other rural uses to change use to residential will only exacerbate this.

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? a) Yes b) No c) Don't know Please give your reasons If yes, please specify

Don't know. We do not have strong views on this question.

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? a) Yes b) No c) Don't know 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

Yes.

Combination. However, our response primarily relates to the negative impact it would have on communities.

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? a) Yes b) No c) Don't know Please give your reasons

Don't know. We do not have strong views on this question.

Q.43 Do you agree that permitted development rights should support the change of use of other buildings in a predominantly rural land use to a flexible commercial use? a) Yes b) No c) Don't know Please give your reasons. If yes, please specify which uses.

No. This type of development should be assessed and considered through a planning application. We do not consider it appropriate, justified or beneficial to have a permitted development right to cover this.

Q.44 Do you agree that the right be amended to allow for buildings and land within its curtilage to be used for outdoor sports, recreation or fitness? a) Yes b) No c) Don't know Please give your reasons.

No. This type of development should be assessed and considered through a planning application. We do not consider it appropriate, justified or beneficial to have a permitted development right to cover this. It would also result in development in unsustainable locations.

Q.45 Do you agree that the right be amended to allow buildings to change use to general industrial, limited to only allow the processing of raw goods produced on the site and which are to be sold on the site, excluding livestock? a) Yes b) No c) Don't know Please give your reasons.

Don't know. We do not have strong views on this question.

Q.46 Should the right allow for the change of uses to any other flexible commercial uses? a) Yes b) No c) Don't know Please give your reasons. If yes, please specify which uses

No. We do not consider that allowing other flexible commercial uses to be sensible, justified or beneficial or in the interests of the proper planning of the area. This type of development should be assessed and considered through a planning application.

Q.47 Do you agree that the right be amended to allow for a mix of the permitted uses? a) Yes b) No c) Don't know Please give your reasons.

No. We do not consider the amendment to be sensible, justified or beneficial or in the interests of the proper planning of the area. This type of development should be assessed and considered through a planning application.

Q.48 Do you agree that the right be amended to increase the total amount of floorspace that can change use to 1,000 square metres? a) Yes b) No c) Don't know Please give your reasons.

No. We do not consider the amendment to be sensible, justified or beneficial or in the interests of the proper planning of the area. This type of development should be assessed and considered through a planning application.

Q.49 Is the trigger as to whether prior approval is for required set at the right level (150 square metres)? a) Yes b) No c) Don't know Please give your reasons. If not, please say what it should be, and give your reasons.

Don't know. We do not have strong views on this question.

Q.50 Do you think that any of the proposed changes in relation to the Class R permitted development right could impact on: a) businesses b) local planning authorities c) communities? a) Yes b) No c) Don't know 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

Yes.

Combination. However, our response primarily relates to the negative impact it would have on communities.

Q.51 Do you agree that the ground area limit of new buildings or extensions erected under the right be increased from 1,000 to 1,500 square metres? a) Yes b) No c) Don't know Please give your reasons.

No. We do not consider that the proposed increase to be sensible or beneficial or in the interests of the proper planning of the area. This type of development should be assessed and considered through a planning application.

Furthermore, the 1500 square metre thresholds strike us as arbitrary and not properly justified nor robust.

Q.52 Do you agree that we remove the flexibility for extensions and the erection of new buildings where there is a designated scheduled monument? a) Yes b) No c) Don't know Please give your reasons

Yes. It is important that scheduled monuments are given the greatest level of protection through the planning system.

Q.53 Do you agree that the right be amended to allow extensions of up to 25% above the original building cubic content? a) Yes b) No c) Don't know Please give your reasons.

Don't know. We do not have strong views on this question.

Q.54 Do you agree that the right be amended to allow the ground area of any building extended to reach 1,250 square metres? a) Yes b) No c) Don't know Please give your reasons.

Don't know. We do not have strong views on this question.

Q.55 Do you agree that we remove the flexibility for extensions where there is a designated scheduled monument? a) Yes b) No c) Don't know Please give your reasons.

Yes. It is important that scheduled monuments are given the greatest level of protection through the planning system.

Q.56 Do you think that any of the proposed changes in relation to the Part 6 permitted development rights could impact on: a) businesses b) local planning authorities c) communities? a) Yes b) No c) Don't know 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

Yes.

Combination. However, our response primarily relates to the negative impact it would have on communities.

Q.57 Do you agree that the maximum floorspace limit for the extension or alteration to a Commercial, Business and Service establishment on nonprotected land is increased to either 200 square metres or a 100% increase over the original building, whichever is lesser? a) Yes b) No c) Don't know Please give your reasons.

No. We do not consider that the proposal to be sensible or beneficial or in the interests of the proper planning of the area. This type of development should be assessed and considered through a planning application.

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? a) Yes b) No c) Don't know Please give your reasons

No. We do not consider that the proposal to be sensible or beneficial or in the interests of the proper planning of the area. This type of development should be assessed and considered through a planning application.

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. a) Yes b) No c) Don't know Please give your reasons.

No. We do not consider that the proposal to be sensible or beneficial or in the interests of the proper planning of the area. This type of development should be assessed and considered through a planning application.

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? a) Yes b) No c) Don't know

Yes.

Combination. However, our response primarily relates to the negative impact it would have on communities.

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: a) 28 days per calendar year (in line with other uses permitted under the right) b) A different number of days per calendar year c) No change d) Don't know 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?

Don't know. We do not have strong views on this question.

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? a) Yes b) No c) Don't know 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.

Yes.

Combination. However, our response primarily relates to the negative impact it would have on communities.

Q.63 Do you agree that the existing Class M of Part 7 permitted development right is amended to additionally apply to open prisons? a) Yes b) No c) Don't know Please give your reasons

No. We do not consider that the proposal to be sensible or beneficial or in the interests of the proper planning of the area. This type of (often contentious) development should be assessed and considered through a planning application.

Q.64 Do you agree that there should be a prior notification process where the development under the Class M of Part 7 right is being used for open prisons? a) Yes b) No c) Don't know Please give your reasons

Don't know. While we have no strong views on the proposal, we would urge that there should be a requirement to notify town and parish councils (similar to that for planning applications) of such Prior Notifications.

Q.65 Do you think that the proposed changes to the Class M of Part 7 permitted development right in relation to open prisons could impact on: a) businesses b) local planning authorities c) communities? a) Yes b) No c) Don't know 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

Yes.

Combination. However, our response primarily relates to the negative impact it would have on communities.

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). a) Yes b) No c) Don't know Please give your reasons

Yes.

Combination. However, our response primarily relates to the negative impact it would have on communities.

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

Don't know. We do not have strong views on this question.

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

Don't know. We do not have strong views on this question.

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

Don't know. We do not have strong views on this question.

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.

Don't know. We do not have strong views on this question.

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

Don't know. We do not have strong views on this question.

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

Don't know. We do not have strong views on this question.

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

Don't know. We do not have strong views on this question.

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?

Don't know. We do not have strong views on this question.

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

Don't know. We do not have strong views on this question.

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.

It is highly unlikely that we would support any new or amendments to existing permitted development rights for the reasons stated previously.

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

We have no strong views on this question.

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.

It is highly unlikely that we would support any new, or amendments to existing, permitted development rights for the reasons stated previously.

Thank you again for the opportunity to comment upon this important consultation. If it would be helpful, the Society will be pleased to meet with or speak to officials to explain in more detail its points and observations over this issue.

Yours sincerely,

Rob Smith



Chief Executive

Society of Local Council Clerks