

21 September 2023

Planning Development Management  
Department for Levelling Up, Housing and Communities  
By email only to [PDRconsultationsummer2023@levellingup.gov.uk](mailto:PDRconsultationsummer2023@levellingup.gov.uk)

Dear Sir / Madam

**Subject: Consultation on changes to permitted development rights; and a call for evidence on nature-based solutions, farm efficiency projects and diversification.**

The South Downs National Park Authority (SDNPA) welcomes the opportunity to comment on this consultation. Our responses to the 88 questions in the consultation are appended to this letter. We do, however, make some important overarching points in this letter as set out below. We are also signatories to the response by National Parks England, which we support.

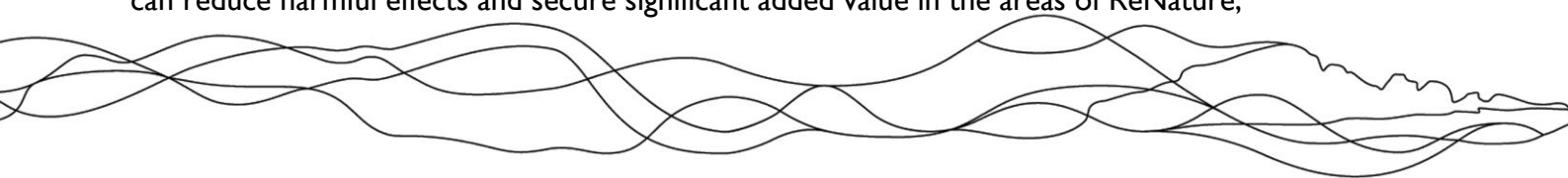
We support our collective ambition for the planning system to be efficient, proportionate, and effective, to deliver beautiful and well-designed development. We absolutely recognise increased flexibilities may have a role to play in achieving these principles. We will come back to those proposed changes which we think could work to deliver efficiency without degrading the countryside and undermining the principles of sustainable and well-designed context led proposals.

Notwithstanding we do raise very serious concerns regarding proposals for applying certain permitted development rights in National Parks that are currently exempt. We strongly consider that the exemption for National Parks should remain, and these permitted development rights should not apply in National Parks. Our concerns particularly relate to the following new PD rights proposed:

- Agricultural buildings to dwellinghouses, including agricultural building not part of an agricultural unit – Q.31 and associated questions.
- Other rural buildings to dwellinghouses – Q.32 and associated questions.
- Commercial to dwellinghouses – Q.5 and associated questions.
- Hotels, boarding houses, or guest houses (in the CI Hotels Use Class) to dwellinghouses – Q.7 and associated questions.

In 2014 the Government excluded nationally protected landscapes when they introduced new national PD rights to allow agricultural buildings to be converted to housing without the need for planning permission. This was in recognition of the fact that nationally protected landscapes warranted a different approach. It is unclear what has changed in the last decade to justify such a reversal of policy, particularly as we have been delivering the right homes in the right place rather than sporadic development all over the countryside through our award winning adopted Local Plan. The rationale for the current position still stands with no evidence that the changes are necessary or desirable that we have seen.

By bringing these types of developments through the planning system in National Parks we can reduce harmful effects and secure significant added value in the areas of ReNature,



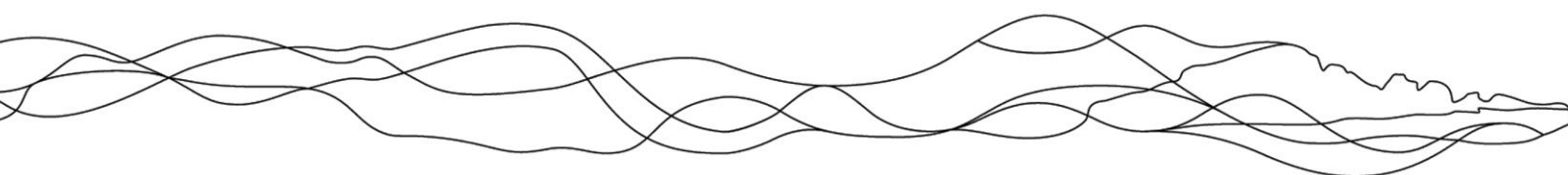
Climate Action and Park for All, supporting delivery of a design quality that contributes to conserving and enhancing the National Park that communities, businesses, and visitors value.

Emerging planning reforms have given greater emphasis to the Development Plan in decision making. We support this as it gives clarity to both businesses and communities. We are concerned that the proposed changes fundamentally undermine the 'Plan-led system' in National Parks and will adversely affect engagement in Local Plan making and design codes when such significant changes can happen under permitted development, with negative impacts to businesses, communities and already struggling infrastructure.

Research from Nationwide (2022) indicates that a dwelling located within a National Park attracts a 25% premium over an otherwise identical property. The housing delivered under the proposed permitted development rights is likely to attract a significant premium and / or be for second homes / visitor accommodation. Importantly given the rationale provided it will not support the housing needs of our local communities for affordable homes and rural workers homes. The proposed changes would make any meaningful impact on housing delivery, which is not our primary focus under the objectives of the National Parks Circular and NPPF paragraph 176. Rather it would result in the delivery of scattered unrestricted open market dwellings in National Parks.

Such dramatic change of use of buildings and land can have big implications, especially for nationally designated landscapes, beyond appearance. Indeed, appearance appears to be key to the some of the ideas being acceptable (for example, paragraph 27 in the consultation materials), when in fact appearance is just one planning matter. Change of use and thus change in function, may result in significant and adverse effects on character, such as peace and tranquillity, dark night skies and transport issues, particularly cumulatively. As a working landscape, land-based economy functions, and the agricultural buildings that support these activities, have a vital role in creating, shaping and maintain the qualities for which the South Downs National Park is designated. Scattered and often isolated new homes are likely to have a negative effect on landscape due to the associated domestic features such as garden enclosures, lighting, and other works to enable conversion to a domestic building. This undermines the landscape, character, and special qualities on which protected landscapes have been designated. There are instances where such change of use is appropriate, but it is the management of detrimental effects and the added value that planning enables, such as sensitive lighting, appropriate access, landscape, and sustainable drainage, that is vital to such conversion success in designated landscapes. This requires applications to go through the planning system, not a change in permitted development rights.

Along with the wider National Park family, our Local Plan includes provision for appropriate development to meet the needs of local communities. In the South Downs National Park, Local Plan Policy SD41 allows for the conversion of agricultural buildings subject to a cascade prioritising agricultural workers dwellings and diversification schemes and visitor accommodation – so important to local rural economy and national park purposes before open market housing. This cascade supports delivery of identified local housing needs and land-based sector businesses, vital to the National Park. By allowing direct change from agricultural buildings to dwellinghouses under permitted development, this undermines our ability to support the land-based sector and delivery of the right homes in the right places.

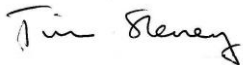


There are other proposed changes to permitted development rights that we do see value in exploring. For example, the proposal to allow change of use from agricultural dwellings to flexible commercial use (Class R of Part 3) to be expanded to include other buildings in predominantly rural land use, and the change from agricultural buildings and other rural buildings and land within their curtilage to outdoor sports, recreation, and fitness.

As evidenced above the South Downs National Park Authority supports aims for an efficient and effective planning system and support for the agricultural sector and delivery of the right homes in the right places. The SDNPA has been innovative and proactive in this area, adding value through the tools enabled by the planning system. Ultimately, we raise serious concerns regarding many of the proposed permitted development rights, especially the unrestricted conversion of agricultural and rural buildings to dwellinghouses.

If you have any questions about our response, we would be happy to discuss.

Yours



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