

**SEVENOAKS DISTRICT COUNCIL
RESPONSE TO SUPPORTING HOUSING DELIVERY AND PUBLIC SERVICE
INFRASTRUCTURE**

(Section 1 – Supporting Housing Delivery and Public Service Infrastructure)

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)?

[Agree / Disagree / Don't know] Please give your reasons

Disagree

The Council recognises that the role of town centres is changing. Recent changes in shopping behaviours and Covid-19 have no doubt had a major impact on our retail and office spaces and the Council is supportive of considering how these spaces can be used going forward, to ensure our town centres remain economically vibrant, viable and continue to support local communities.

An example of this approach can be found in Policy EMP2 (Town and Local Centres) of the emerging Sevenoaks District Local Plan. This policy addresses the issue by providing flexibility to support a varied mix of town centre uses (including a broad range of leisure and recreational uses), which better meet the needs of the town centre and therefore minimise the proportion of vacant units. It encourages the reuse of existing retail units and is supportive of mixed-use developments where the residential element is not at ground floor level. It is essential that the District's town centres and other retail-based centres remain economically strong and fit for purpose.

The proposed new permitted development right to change use from commercial, business and service (Class E) to residential (C3) will have a detrimental and irreversible impact on the vitality and viability of town centres. Sevenoaks District has vibrant town centres with many independent shops, a good retail offering and a range of other town centre uses. Further, areas outside towns are served by local facilities within villages that now fall within Class E. These services are of great value to local communities and contribute to the District's rural economy.

The Government's proposals will have a devastating impact on our High Streets and rural economy, where retail and commercial uses will be lost forever and will put our towns at risk of becoming dormitory commuter settlements, as the changes impact on the competitiveness of employment space. Given the proximity of Sevenoaks District to London, its strategic transport network and the highly constrained nature of the area (93% Green Belt and 60% AONB), town centre locations are already under significant pressure for new housing. Residential is therefore likely to out-compete other uses, resulting in the loss of retail and office space which provides economic vibrancy in town centre locations. Due to the high price of domestic properties in our District, the opportunity to convert such properties back to retail or commercial use should current trends reverse over time, would be totally unviable.

Current local policies protect the commercial uses that we have, but the proposed new permitted development right will have an irreversible impact. Further, the removal of local control will not allow individual circumstances to be taken into account, risking

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the loss of the distinctive character that makes Sevenoaks District an attractive and competitive place to live and work.

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 / Disagree / Don't know] Please give your reasons

Agree

60% of Sevenoaks District lies within an Area of Outstanding Natural Beauty (AONB), including many settlements with commercial and retail uses at the heart of a town or village centre. The Council agrees that proposals for new development in AONBs, should be fully scrutinised to protect their outstanding and specific high quality character.

The Council would also go further to insist that areas designated as Green Belt should be included in this exemption, to prevent inappropriate development in protected areas.

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

[Agree / Disagree / Don't know] Please give your reasons

Disagree

At present, first floor and above accommodation is permitted to be converted under prior approvals within conservation areas. The Council requires that the ground floor changes should not be included as part of this process, as it could have a significant adverse impact on conservation areas and this impact cannot be assessed or controlled.

In Sevenoaks District, conservation areas overlap with 11 out of 23 town and local centres. The conservation areas here provide a degree of protection from unsuitable development which would be lost should these proposals go ahead. The Council asks that development in these sensitive areas remains part of the planning process, allowing a proper assessment to be made.

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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?

[Agree / Disagree / Don't know] Please give your reasons

Disagree

The National Planning Policy Framework (NPPF) directs local authorities to identify the significance of a designated heritage asset and to assess the impact of proposals on its significance. The Council considers that the proposal to introduce a prior approval process would prevent this assessment from taking place. This could potentially have a negative impact on these areas of special interest and significance. Retaining planning controls within a conservation area, does not mean that a change of use would be unacceptable, it just allows a proper assessment to be made.

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 / Disagree / Don't know] Please give your reasons

Agree

The criteria laid out in paragraph 21 include the necessary safeguards.

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

[Agree / Disagree / Don't know] Please specify

Agree

The Council suggests that noise protection for future residential units within commercial, business and service areas should be considered, as town centres are busy and can, at times, be noisy places. Town centres can also be subject to poor air quality, being within an Air Quality Management Area, so for future residents, the Council asks that appropriate mitigation measures exist to provide new properties with clean air. We would also require that adequate refuse storage and bin collection facilities are included, as this often arises as a post development problem for residential development in town centres. Further, all new homes should be delivered in line with nationally prescribed space standards and meet M4(2) of the Building Regulations for accessible and adaptable dwellings, to raise accessibility standards for new homes in line with the Government's intention and recent consultation on the matter.

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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 / Disagree / Don't know] Please give your reasons

Agree

Whilst the Council agrees with the phraseology of the question, it fundamentally disagrees with the proposal. Should the changes set out in the consultation document be implemented, the Council is of the view that a 'fee per dwelling house' approach should be followed.

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

[Yes / No / Don't know] Please give your reasons

No

The Council agrees with the principle of charging a fee. It does, however, not agree with the £96 proposed. The fee should be increased to £206, to match the fee for all other change of use prior approvals, in particular, due to the additional assessments that are proposed to be carried out by a local planning authority. Then, a multiplier per dwelling house should be applied.

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 / No] Please specify

Yes

As set out in the response to Q1, we fundamentally disagree with the Government proposals, which will:

1. Adversely impact on the vibrancy and vitality of town centres.
2. Be irreversible and result in higher land values that will out-compete other land uses and will therefore not deliver affordable housing.
3. Result in a reduction in housing quality and a loss of business rate income.
4. Encourage the development of dormitory settlements, which in turn impact on sustainability by increasing travel patterns.
5. Impact on public transport in that catchment areas will be significantly affected, resulting in increased transport costs and loss of viability for certain public transport modes.

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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 / No / Don't know] If so, please give your reasons

Yes

The proposals will impact on all three areas, as set out below. The Council considers that the proposals are very short-sighted and will have significant and detrimental long-term impacts on our town centres and high streets. Fundamentally, the proposed measures will result in a reduction in the quality of the built environment, which is at odds with many of the principles set out in the Planning White Paper, particularly those related to Planning for Beautiful Places.

Impacts on businesses:

The Council is concerned that the proposals will result in commercial floorspace being lost forever. There is uncertainty over re-provision and where displaced businesses will relocate to, given the constraints on land-use in the District. A further concern is that SMEs will be forced out of business, as they will be unable to compete with high residential land values. Covid-19 has demonstrated that SMEs are far more resilient than larger firms and in this respect are highly beneficial to local economies. However, these proposals will erode economic resilience when and where it is needed most.

Impacts on communities

Looking at the impact of these proposals on the community, the Council considers there could be a number of benefits, which include the provision of housing, the use of brownfield land and the reduction in the number of vacant units in town centres.

The Council is, however, concerned that the proposals will encourage the development of housing to minimal standards. In a District with a rising ageing population, this will not meet identified needs. Evidence also suggests that in many instances, these retrofitted homes are not energy efficient and incur higher maintenance costs. The Council is also concerned that housing will not be affordable and it would result in a loss of services that are of value to local communities.

Furthermore, these proposals will result in increased isolation for communities in smaller villages where local facilities are lost to residential use, reducing overall community cohesiveness and resilience.

The Council predicts that the proposals will result in a loss of income from CIL and business rates. It also considers that the proposals will disempower communities in planning decisions and in the shaping of their environments, as there is no public consultation associated with permitted development processes.

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Impacts on local planning authorities

Regardless of available evidence, local authorities will have limited scope to determine the right mix of uses for town centres. The proposed changes undermine the vision, strategy and effectiveness of Local Plans, particularly in terms of meeting specific housing needs and ensuring high quality design.

In addition, the proposals will also result in a loss of the planning fee income and CIL funding, with no mechanism to charge and a loss in business rates. The Council is concerned that the cumulative long-term effects on town centres cannot be assessed in the short-term and requires a broader consideration.

The proposals suggest the creation of two parallel planning systems, the majority of which could be outside of local authority control. This effectively excludes local authorities, councillors and those that they represent from the planning process.

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 / No / Don't know] If so, please give your reasons

Yes

The proposals will result in reduced footfall and community surveillance, affecting public safety and security. Specific groups may therefore feel more isolated and due to fewer people being around, could be more easily targeted and victimised.

Further, the proposals do not include a mechanism for the delivery of affordable housing and therefore those in housing need will be unable to access new homes.

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Section 2 – Supporting Housing Delivery and Public Service Infrastructure

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?

[Agree / Disagree / Don't know] Please give your reasons

Disagree

The NPPF encourages local authorities to guard against the unnecessary loss of valued community infrastructure and it is agreed that new procedures for extensions to schools, hospitals and other local services will enable providers to adapt to changing needs in a timely manner. However, the Council must also have the ability to control adverse social, economic and environmental impacts of new infrastructure development.

The Council understands that these proposals would not apply in conservation areas and AONBs. To preserve the openness of land, it is also suggested that they should not be permitted to extend into the Green Belt.

The Council supports the proposal to not permit extensions within 10 metres of a boundary. This will allow the impact on adjacent properties to be properly assessed.

Further clarification is required on whether the proposals relate to both public sector and private sector schools. In addition, it is unclear how and when the 25% increase could be used - for example, a one-off increase on the current or original footprint, or whether the school would be allowed to apply for a 25% increase every year. The Council suggests that a 'one off' approach is most appropriate.

The Council would also highlight that current overdevelopment of sites has resulted in new development on school car parks. This displaces staff and visitor cars to nearby roads, often causing hazards. An automatic right for extension will only exacerbate this issue.

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

[Yes / No / Don't know] If so, please give your reasons

No, except in non-sensitive areas

The Council supports the proposal to allow schools to be flexible and respond quickly to changing needs. However, permitting larger and taller buildings would have a greater impact on conservation areas, AONBs and Green Belt locations. The Council does not, therefore, support height increases in these sensitive locations.

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

[Yes / No / Don't know] If so, please give your reasons

No

There is no evidence to support this proposal.

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

There are no prisons in Sevenoaks District. The Council has no specific comment in response to this question.

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

[Yes / No / Don't know] If so, please give your reasons

Yes

The Prior Approval process should provide scope to consider design, access and highways matters such as transport and pedestrian safety. In addition, scope should be provided to consider the impact on the significance of heritage assets.

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 / No / Don't know] If so, please give your reasons

Yes

An increase in the size and scale of these facilities could have a negative impact in terms of traffic generation, pedestrian safety and visual amenity. The impact of height increases will be particularly severe where extensions take place above the height of existing surrounding buildings. The lack of public engagement associated with prior approval applications and the potential impact of these proposals is likely to increase the number of complaints received by local planning authorities, placing additional strain on the resources of planning teams.

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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 / No / Don't know] If so, please give your reasons

No

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?

There are no prisons in Sevenoaks District. The Council has no specific comment in response to this question.

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 / No / Don't know] If so, please give your reasons

No

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)?

[Yes / No / Don't know] If so, please give your reasons

No

Given the inevitable sensitivities and stakeholder interests, major development of this nature requires careful consideration. The focus should be on getting to the right decision, rather than the time taken to reach a decision. It is also important to ensure that all stakeholder views are fully recognised, considered and incorporated.

The proposed new prioritisation for proposals of this nature could also result in delays for other applications. Therefore, if the Government is to impose these changes, the Council suggests that additional resources are provided to assist local authorities in meeting these shorter deadlines.

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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?

[Yes / No / Don't know] If so, please give your reasons

No

The Council is concerned that this modified process would affect the quality of planning decisions. It is also unclear how the proposed new procedures would work alongside existing processes and whether the determination of 'normal' planning applications will suffer as a result. In addition, major applications for these facilities must include a comprehensive mechanism for public engagement. It is currently unclear how this aspect will be incorporated.

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

[Agree / Disagree / Don't know] Please give your reasons

Disagree

The Council does not support a proposed reduction in the determination period. This is not considered sufficient to consider the significant amount of information provided with proposals of this nature or incorporate the views of statutory consultees. The benefit of 'saving' time on the determination period is also unclear. Overall, the proposal will result in poorer decisions and will be detrimental to the overall quality of development.

Should the Government decide to proceed with this proposal, more emphasis must be placed on the pre-application consultation process. It should become compulsory for developers to engage in meaningful discussions with the Council and statutory consultees. The Council also asks that, for these forms of application, the validation checklists for planning applications are amended to ensure public consultation and pre application meetings take place.

The Council questions whether reducing the determination period for applications would lead to faster delivery of development on the ground. Given the reduced time for community engagement, it is considered that this would have a negligible contribution to reducing the lead-time for delivery.

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

[Yes / No / Don't know] If so, please give your reasons

No

The Council is concerned that reducing the consultation timescale will disempower local residents and other statutory bodies, resulting in less informed and balanced comments on development proposals. Ultimately, this measure will erode the democratic right of individuals to participate in the planning process.

The Council is also concerned that it will not receive responses within the proposed new timescales and officer decisions will, in many cases, be made without the benefit of input from statutory consultees and Parish and Town Councils. Overall, the benefits of trimming the consultation response time does not outweigh the challenges associated with the proposal.

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.)

[Yes / No / Don't know] If so, please give your reasons

No

The Council does not consider further centralisation of the planning process to be beneficial. The proposed addition to the process will be time consuming and costly. We also question why this proposal would be of benefit and to whom.

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 / No / Don't know] If so, please give your reasons

No

The Council supports the emphasis in addressing key planning issues at the pre application stage and proactively seeking to resolve these matters outside of the planning application process. There is little doubt that early engagement helps applications through the process and an up to date Local Plan has a considerable role to play in this. However, whilst local authorities will continue to do all they can, the applicant has ultimate ownership of the proposal and must take the lead in initiating

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and leading the process. The extent to which local authorities are able to assist depends on the nature of the issue and the proposal. A 'catch all' provision in the NPPF, that does not reflect the nuances of infrastructure proposals or the planning process, is not supported.

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?

An increase in planning fees will be required to cover the cost of additional resources needed to respond to the suggestions in this document.

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

[Yes / No / Don't know] If so, please give your reasons

Yes

If public service infrastructure projects were to be prioritised, the Council would expect the Government to deliver:

- Clearer guidelines for developers and Local Planning Authorities submitting bids, to explain their roles and what is compulsory.
- Clearer guidelines on the role and expectations of the statutory bodies, such as Highways England, The Environment Agency and heritage organisations.
- Compulsory pre-application procedures, including an assessment of the scheme and consultations with all interested parties.
- Clearer validation procedures, especially for proposals in sensitive locations such as an AONB, conservation areas and the Green Belt.
- Further resources should be made available to Local Planning Authorities, including funding. It is not possible to do this extra work, quicker, faster and with good quality decision making without additional resources.

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?

Certain groups may require more time to respond to proposals for public service infrastructure. Sufficient flexibility should be provided in regulations to allow for this.

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Consolidation and simplification of existing permitted development rights

(Section 3 – Supporting Housing Delivery and Public Service Infrastructure)

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?

Agree / Disagree / Don't know] Please give your reasons.

Disagree

The Council disagrees with the proposed changes. As noted in response to Q6.1, we believe these proposals will limit the extent to which local authorities are able to manage and protect the quality of the built environment, which is at odds with the objectives of the Planning White Paper to deliver Planning for Beautiful Places. The proposed new permitted development right to change land use from commercial, business and service (Class E) to residential (C3) will have a detrimental impact on the District's town centres. The proposal undermines the vision and strategy of the emerging Sevenoaks District Local Plan, as well as not making provision for new affordable housing to meet our local housing needs and statutory housing duty.

Should the changes set out in the consultation be implemented, there will be a need to update and simplify the existing permitted development rights.

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

[Yes / No] Please specify

No

Q20. Do you agree 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?

[Agree / Disagree / Don't know] Please give your reasons

Disagree

The Council disagrees with the proposed changes as they would remove local control and do not take account of individual circumstances or the distinctive character of the District.

The Council recognises the changing role of the town centre. Policy EMP2 (Town and Local Centres) in the emerging Sevenoaks District Local Plan provides flexibility to support a varied mix of town centre uses (including a broad range of leisure and

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recreational uses), which better meet the needs of the town centre and minimise the proportion of vacant units.

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

[Agree / Disagree / Don't know] Please give your reasons

Disagree

There are specific concerns regarding the approach to category 4. Whilst it supports clarity and ease of use, the Council does not support changes that will remove local control and will not allow local circumstances to be taken into account.

Sevenoaks District has vibrant town centres with many independent shops, a good retail offering and a range of other town centre uses. Further, smaller settlements outside of towns are served by local facilities that now fall within Class E. These services are of great value to local communities and contribute to the District's rural economy. The Government's proposals will have a devastating impact on our High Streets and rural economy, where retail and commercial uses will be lost forever, and will put our towns at risk of becoming dormitory commuter towns, as the changes impact on the competitiveness of employment space.

Given the proximity of Sevenoaks District to London, the strategic transport network and the highly constrained nature of the area (93% Green Belt and 60% AONB), land in the District is already under significant pressure for housing. Current local policies protect the commercial uses we have, but the proposals put forward would have an irreversible impact. Further, the removal of local control will not provide for individual circumstances to be taken into account and will risk the loss of the distinctive character that makes Sevenoaks District an attractive and competitive place to live and work.

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

[Yes / No] Please specify

Yes

The Council recognises that the role of town centres is changing. Recent changes in shopping behaviours and Covid-19 have no doubt had a major impact on our retail and office spaces and the Council is supportive of considering how these spaces can be used going forward to ensure our town centres remain economically vibrant, viable and continue to serve and support our local communities.

Policy EMP2 (Town and Local Centres) in the emerging Sevenoaks District Local Plan addresses this issue and provides flexibility to support a varied mix of town centre uses (including a broad range of leisure and recreational uses), which better meet the

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needs of the town centre and minimise the proportion of vacant units. It encourages the reuse of existing retail units and is supportive of mixed-use developments where the residential element is not at the ground floor. It is essential that the District's town centres and other retail-based centres remain economically strong, competitive and fit for purpose. Any changes to the permitted development rights that remove local control are not supported.

Further, the proposals do not include a mechanism for the delivery of much needed affordable housing in Sevenoaks District. This means that those in housing need will be unable to access the new homes created, prohibiting the Council from meeting its local housing needs and statutory housing duty.

The Council is of the view that development in the Green Belt should also be exempt from the permitted development rights set out in the consultation document. The proposals provide the scope to fundamentally change the nature of an existing land use, to one that has a significant impact on openness and is no longer appropriate in a Green Belt location. As noted in response to Q6.1 and Q19.1, we do not believe the proposals are consistent the principles of Planning for Beautiful Places set out in the Planning White Paper.

A further particular concern relates to the impact of the proposals on high streets. The Council is of the view that these measures are at odds with the initiatives set out in the 2011 Mary Portas Review to support healthy high streets. Retailers have been under pressure for many years now from online shopping and it is unclear how these proposals will support vitality and viability. A clearer link is needed with this aspect of the NPPF.