



## National Trust

Clive Betts MP  
Houses of Parliament  
London  
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Dear Mr Betts,

I'm writing to you in your capacity as Chair of the Housing, Communities and Local Government Committee. I gave evidence to your committee in November 2021 as part of your inquiry into the future of the planning system. Since then, the Government has proposed significant changes to the existing planning system through their recent consultation into supporting housing delivery and public service infrastructure. The National Trust feels that this consultation has profound implications for the future of planning in England, which we hoped to highlight to you and the Committee.

The Government's proposal to introduce Permitted Development (PD) Rights for Class E to change use to residential has the potential to raise serious conflicts with their prospective new system which seeks to identify and plan growth, renewal and protected areas. We are particularly concerned that it would be directly in opposition to the Planning White Paper's welcome focus on design, placemaking and the plan-led system.

It is unclear to us, for example, how the approach to permitted development set out in the recent consultation could be reconciled with "Pillar One – Planning for development" in the White Paper, where the approach and focus in each zone could be undermined through such wide-ranging PD rights. Under these proposals, we are concerned that large numbers of units could change to residential use without what we would see as appropriate consideration, preventing communities from shaping the future of their areas. Fundamentally, these changes will make it impossible for Local Authorities to plan effectively by undermining the primacy of Local Plans, as expressed in the White Paper, as changes to the high street, town centres, edge of towns and rural locations will be outside of any planning controls.

They risk creating unsustainable communities, that lack sufficient transport links, thereby increasing reliance on private vehicles, while offering only minimal access to green spaces, of which there are no requirements for provision. And they are also at odds with the White Paper's aspiration for beauty and improving the quality of design, where reusing shop fronts for residential purposes may create properties of poor appearance and quality. The Government's own research<sup>1</sup> has confirmed that housing delivered through existing PD rights, particularly the change of use from office to residential (Class O of the GDPO), are of lower quality than those that are permitted via the grant of planning permission. What makes good housing is much more than simply setting internal space standards

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<sup>1</sup> MHCLG commissioned research into the quality standard of homes delivered through change of use permitted development rights 2020. [Research into the quality standard of homes delivered through change of use permitted development rights \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

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and adequate light. It is about community, access to goods and services, green space and wider connections – it is these joined up considerations that planning, and planners deliver – truly sustainable and liveable communities, which this threatens to undermine.

In our view these changes would also create a barrier to achieving the Government's objectives of levelling up the economic prospects of towns and cities and helping to share prosperity across the country, by taking away the diversity of uses and the social and commercial focus on which they rely. We feel they ignore the potential economic, environmental and social consequences of the loss of local shops, employment and services – such as banks and post offices, which these changes can only encourage and accelerate. We believe these effects would be especially pronounced in rural areas, where the effect on the availability of premises for employment uses may be particularly acute and residential rents are much higher than non-residential rents. And finally, we think they risk devaluing the Government's own investment in high streets via the Future High Street Funds, as well as eroding key areas of policy within the National Planning Policy Framework.

We are fully aware of the long history of PD rights for change of use to residential and their contribution to housing delivery. Existing PD rights however have restrictions in place in terms of locations, uses and size threshold which were sufficient to mitigate against significant detrimental wider impacts. We are concerned that these restrictions would be lost under the changes the Government currently proposes, and experience of previous planning reforms have shown very clearly that new PD rights for change of use to residential are likely to have a high take up level, as was seen when the rights for office conversions to residential were brought in. This new proposed extension of permitted development for residential purposes could therefore have even further reaching consequences than we've seen with previous changes.

None of this is to say that permitted development has no role to play in our planning system. We would argue that there is a need for a far more comprehensive review of PD rights as part of the reforms proposed in the Planning White Paper, with the introduction of growth, renewal and protected areas. However, as it stands, these significant expansions of the use of permitted development within the existing planning system are being implemented through secondary powers and subject to limited scrutiny and opportunity for engagement with key stakeholders. They appear to us to be at odds with the ambition articulated in the Government's proposals for longer term reform, and therefore we are concerned about the precedent set and the impact these changes will have in advance of that wider ranging debate and discussion about our planning system and how it can deliver the most benefit to the public. As such we would encourage the committee to look into the proposals in detail, to ensure that these changes are not introduced without the full and proper scrutiny required.

I would welcome the opportunity to discuss this issue and others relevant to your work, including the Trust's further progress in our exciting and innovative work on urban parks and green spaces. I would be happy to arrange a call at your convenience.

Yours Sincerely,

Ingrid Samuel

Placemaking and Heritage Director