

Link response to Permitted Development Rights consultation

About Wildlife and Countryside Link:

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 80 organisations to use their strong joint voice for the protection of nature.

The following members have signed onto this response: Amphibian and Reptile Conservation, Bat Conservation Trust, Buglife, Campaign for National Parks, CPRE – The countryside charity, FOUR PAWS UK, Friends of the Earth, Open Spaces Society, Plantlife, RSPB, The Wildlife Trusts, The Rivers Trust, and Woodland Trust.

For more information about this response, please contact Eleanor Ward, Hannah Blitzer, or Emma Clarke at Link (eleanor@wcl.org.uk, Hannah.blitzer@wcl.org.uk, emma.clarke@wcl.org.uk).

Covering letter:

Permitted development rights risk harm to habitats and species, animal and human health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places.

At present, planning applications are assessed against the policies set out in the Local Plan, prepared by the local planning authority with broad and extensive stakeholder and local community consultation. A properly-resourced Local Plan-led approach to planning enables local democratic oversight, strategic planning in the local area, and the assessment of any potential acute or cumulative environmental impacts.

Permitted development rights (or PDRs) allows for certain types of development without the need for a full planning application through a simplified planning process known as Prior Approval. PDRs remove the ability for local planning authorities to ensure the general sustainability of the location and design of development and to ensure local environmental limits are not breached, with potential impacts on nature, climate and communities. Local green spaces may be put under increased pressure, with potential negative consequences for nature in those areas, by increased footfall from more residents in a local area due to change of use PDRs. PDRs are also exempt from biodiversity net gain, the requirement to leave habitat in a better state, and they are exempt from developer contributions, often used to secure green and other infrastructure needed to ensure communities are viable and beautiful. PDRs can also cause harm to species and habitats. Even seemingly small developments can cause acute harm to species or habitats, for example if a species is present but not identified or species protection legislation is not properly applied in the Prior Approval process (as is often the case). Many individual impacts on species and habitats through individual PDRs or their implications (e.g., increased residents in a local area) can have cumulative impacts on species and habitats, which go unassessed and unaddressed due to the use of PDRs rather than a full planning application. Depending on the kind of development, applications for new or existing structures that house livestock can directly impact wild animals and human health through the associated risk of infectious zoonotic disease. The highly pathogenic avian influenza (HPAI) outbreak across the UK is

key example of this, and something that has had devastating impact on livestock and wild bird populations alike. Finally, robust local plan policy measures to ensure climate resilience and mitigation can and will continue to be bypassed by the prior approval process. By proposing to further side-step much needed climate policy measures at the local level, these national proposals are purposefully at odds with the Committee for Climate Change's own advice, which recommends all planning decisions are net zero compliant. Such overt policy-making discord is disruptive and will further delay the UK's ability to meet its own binding climate targets – which is disastrous for already nature depleted island.

If the Government is to pursue these proposals to further expand PDRs, they should conduct a review of existing PDRs, their benefits, and their impacts, including for nature.

We strongly reject all proposals for new or expanded PDRs in article 2(3) land. Any changes of use in these areas which are crucial for nature's recovery, for tackling the climate and biodiversity crises, and important for their historic environment and landscape value, should be subject to a normal planning application so that their impacts can be fully assessed, taken into consideration and consulted upon. Within National Parks, AONBs, and the Broads in particular, any land use planning decisions must take account of their statutory purposes and carefully manage development impacts - the only way to do this effectively is through a full planning application.

In addition, new or expanded PDRs should not apply in conservation areas, areas on or adjacent to Local Wildlife Sites, designated sites, irreplaceable habitats, brownfield sites of high environmental value, designated heritage assets (listed buildings, scheduled monuments, registered parks and gardens), buildings that host protected species, or other areas identified as covered by policies 174 to 176 of the NPPF.

In response to the call for evidence on enabling nature-based solutions, we agree that the wider legislative and policy framework and the planning legislation, policy and guidance system does not always work well to facilitate the delivery of nature-based solutions (NBS). The significant time and financial cost required to navigate the system, plus inconsistent approaches between LPAs, will place small-scale NBS projects in particular at risk of being unviable. The process can and should be further simplified and streamlined through improved resourcing of Local Planning Authorities - including expanded ecological expertise - plus stronger, clearer national policy and planning practice guidance. PDRs would represent a 'sticking plaster' response to these fundamental challenges.

If Government were to expand PDRs to NBS, this should be used for small-scale interventions only, to reduce the time and financial resource required for NBS installation, and thereby to help mainstream NBS. Any proposals for new or amended PDRs for NBS must undergo full public consultation and must align with the Local Nature Recovery Strategy.

Responses to selected questions:

DLUHC consultation:

Design codes

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?

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

Please give your reasons.

Prior approvals for design or external appearance in existing permitted development rights should not be replaced by consideration of local design codes. Instead, local design codes should be considered in addition to prior approvals for design codes.

Considering local design codes as well as prior approvals for design or external appearance would ensure legal minimum standards are considered, while also allowing local authorities to set more ambitious local standards.

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.

No Link response.

Supporting housing delivery through change of PDRs

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.

No, we do not think there should be any change for the PDR for the change of use from Class E to Class MA of Part 3.

However, if the government is to pursue amending the PDR, there should be a floorspace limit.

This proposal for expanding this PDR means that a building of significant size could be converted to residential without going through a full planning application and without considering the potentially significant indirect environmental effects of the conversion to residential, for example through increased pressure on existing greenspaces.

A size limit is also necessary to mitigate the cumulative impacts of multiple PDR developments in any one locality.

Permitted development rights risk harm to habitats and species, animal and human health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places.

At present, planning applications are assessed against the policies set out in the Local Plan, prepared by the local planning authority with broad and extensive stakeholder and local community consultation. A properly-resourced Local Plan-led approach to planning enables local democratic oversight, strategic planning in the local area, and the assessment of any potential acute or cumulative environmental impacts.

Permitted development rights (or PDRs) allows for certain types of development without the need for a full planning application through a simplified planning process known as Prior Approval. PDRs remove the ability for local planning authorities to ensure the general sustainability of the location and design of development and to ensure local environmental limits are not breached, with potential impacts on nature, climate, and communities. Local green spaces may be put under increased pressure, with potential negative consequences for nature in those areas, by increased footfall from more residents in a local area due to change of use PDRs. PDRs are also exempt from biodiversity net gain, the requirement to leave habitat in a better state, and they are exempt from developer contributions, often used to secure green and other infrastructure needed to ensure communities are viable and beautiful. PDRs can also cause harm to species and habitats. Even seemingly small developments can cause acute harm to species or habitats, for example if a species is present but not identified or species protection legislation is not properly applied in the Prior Approval process (as is often the case). Many individual impacts on species and habitats through individual PDRs or their implications (e.g., increased residents in a local area) can have cumulative impacts on species and habitats, which go unassessed and unaddressed due to the use of PDRs rather than a full planning application. Depending on the kind of development, applications for new or existing structures that house livestock can directly impact wild animals and human health through the associated risk of infectious zoonotic disease. The highly pathogenic avian influenza (HPAI) outbreak across the UK is key example of this, and something that has had devastating impact on livestock and wild bird populations alike. Finally, robust local plan policy measures to ensure climate resilience and mitigation can and will continue to be bypassed by the prior approval process. By proposing to further side-step much needed climate policy measures at the local level, these national proposals are purposefully at odds with the Committee for Climate Change's own advice, which recommends all planning decisions are net zero compliant. Such overt policy-making discord is disruptive and will further delay the UK's ability to meet its own binding climate targets – which is disastrous for already nature depleted island.

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

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

Please give your reasons.

No Link response.

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

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

Please give your reasons.

No, we strongly reject this proposal for this PDR to apply in other excluded article 2(3) land. Any changes of use in these areas which are crucial for nature's recovery, for tackling the climate and biodiversity crises, and important for their historic environment and landscape value, should be subject to a full planning application so that their impacts can be fully assessed, taken into consideration and consulted upon. Within National Parks, AONBs, and the Broads in particular, any land use planning decisions must take account of their statutory purposes and carefully manage development impacts - the only way to do this effectively is through a full planning application.

In addition, the proposed PDR should not apply in conservation areas, areas on or adjacent to Local Wildlife Sites, designated sites, irreplaceable habitats, brownfield sites of high environmental value, designated heritage assets (listed buildings, scheduled monuments, registered parks and gardens), buildings that host protected species, or other areas identified as covered by policies 174 to 176 of the NPPF.

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?

It should be noted that Wildlife and Countryside Link objects to the use of prior approval as an alternative to a normal planning application and objects to the existence of PDRs in conservation areas.

However, if the Government is to retain PDRs in conservation areas, the prior approval process which allows for the local consideration of the impacts of the change of use of the ground floor on the character or sustainability of the conservation area is essential.

The prior approval process should be better implemented, supported by sufficiently well-resourced and expert local planning authorities. For example, a [recent ALGE/ADEPT survey](#) found that 26% of local planning authorities do not have access to any ecological resource and a Bat Conservation study from 2014 which fed into a [CIEEM and ALGE Advice Note on PDRs and European Protected Species \(EPS\)](#) found that approximately half of local planning authorities did not know that European Protected Species (EPS) legislation had to be taken into account as part of the PDR process.

The list of considerations for the prior approval process should be expanded to also include: the general sustainability and ecological impact of the location of housing, statutory protected species (or the excluded types of developments should include buildings that hosted protected species), heritage assets and the historic environment, the potential impact of increased pressure on green infrastructure and green space, the delivery of Biodiversity Net Gain, the implementation of National and locally-established Design Codes, and developer contributions ensure these places have the required infrastructure and green infrastructure to be viable places to live.

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 Link response.

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.

No Link response.

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, these proposed extensions of permitted development rights will impact businesses, communities, and local planning authorities.

These proposals could put nature at risk and peoples' access to nature at risk because statutory protected species are often not properly taken into account in prior approval, the general sustainability and ecological impact of housing is not considered, and PDR developments are currently exempt from biodiversity net gain and developer contributions. The impact on communities is also high: there will be increased pressure on green infrastructure and green space, developer contributions are not required under PDRs to secure the required infrastructure and green infrastructure to make these places viable and beautiful places.

Local planning authorities are also undermined by a centralisation of certain aspects of planning policy, a loss of control of development in their areas, a lack of developer contributions to improve green and societal infrastructures mentioned above (CIL notwithstanding in certain cases), all the while their usual ability to reach legal agreements on key issues is also severely limited.

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.

No Link response.

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 think there should be any change to this PDR.

However, if the government is to pursue amending the PDR, there should be a floorspace limit.

This proposal for expanding this PDR means that a building of significant size could be converted to residential without going through a full planning application and without considering the potentially significant indirect environmental effects of the conversion to residential, for example through increased pressure on existing greenspaces.

A size limit is also necessary to mitigate the cumulative impacts of multiple PDR developments in any one locality.

Permitted development rights risk harm to habitats and species, human and animal health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places.

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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 Link response.

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, we do not think there should be any change to this PDR.

However, if the government is to pursue amending the PDR, there should be a floorspace limit.

This proposal for expanding this PDR means that a building of significant size could be converted to residential without going through a full planning application and without considering the potentially significant indirect environmental effects of the conversion to residential, for example through increased pressure on existing greenspaces.

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mitigation can and will continue to be bypassed by the prior approval process. By proposing to further side-step much needed climate policy measures at the local level, these national proposals are purposefully at odds with the Committee for Climate Change's own advice, which recommends all planning decisions are net zero compliant. Such overt policy-making discord is disruptive and will further delay the UK's ability to meet its own binding climate targets – which is disastrous for already nature depleted island.

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.

No Link response.

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.

No Link response.

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 strongly reject this proposal for this PDR to apply in other article 2(3) land. Any changes of use in these areas which are crucial for nature's recovery, for tackling the climate and biodiversity crises, and important for their historic environment and landscape value, should be subject to a normal planning application so that their impacts can be fully assessed, taken into consideration and consulted upon. Within National Parks, AONBs, and the Broads in particular, any land use planning decisions must take account of their statutory purposes and carefully manage development impacts - the only way to do this effectively is through a full planning application.

In addition, the proposed PDR should not apply in conservation areas, areas on or adjacent to Local Wildlife Sites, designated sites, irreplaceable habitats, brownfield sites of high environmental value, designated heritage assets (listed buildings, scheduled monuments, registered parks and gardens), buildings that host protected species, or other areas identified as covered by policies 174 to 176 of the NPPF.

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.

No, we strongly reject this proposal for this PDR to apply in other article 2(3) land. Any changes of use in these areas which are crucial for nature's recovery, for tackling the climate and biodiversity crises, and important for their historic environment and landscape value, should be subject to a normal planning application so that their impacts can be fully assessed, taken into consideration and consulted upon. Within National Parks, AONBs, and the Broads in particular, any land use planning decisions must take account of their statutory purposes and carefully manage development impacts - the only way to do this effectively is through a full planning application.

In addition, the proposed PDR should not apply in conservation areas, areas on or adjacent to Local Wildlife Sites, designated sites, irreplaceable habitats, brownfield sites of high environmental value, designated heritage assets (listed buildings, scheduled monuments, registered parks and gardens), buildings that host protected species, or other areas identified as covered by policies 174 to 176 of the NPPF.

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, these proposed extensions of permitted development rights will impact businesses, communities, and local planning authorities.

These proposals could put nature at risk and peoples' access to nature at risk because statutory protected species are often not properly taken into account in prior approval, the general sustainability and ecological impact of housing is not considered, and PDR developments are currently exempt from biodiversity net gain and developer contributions. The impact on communities is also high: there will be increased pressure on green infrastructure and green space, developer contributions are not required under PDRs to secure the required infrastructure and green infrastructure to make these places viable and beautiful places.

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.

No Link response.

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.

No Link response.

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, we do not think there should be any expansion to this PDR.

This proposal for expanding this PDR means that a building of significant size could be converted to residential without going through a full planning application and without considering the potentially significant indirect environmental effects of the conversion to residential, for example through increased pressure on existing greenspaces.

A size limit is also necessary to mitigate the cumulative impacts of multiple PDR developments in any one locality.

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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.

No, we do not think there should be any expansion to this PDR.

This proposal for expanding this PDR means that a building of significant size could be converted to residential without going through a full planning application and without considering the potentially significant indirect environmental effects of the conversion to residential, for example through increased pressure on existing greenspaces.

A size limit is also necessary to mitigate the cumulative impacts of multiple PDR developments in any one locality.

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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, these proposed extensions of permitted development rights will impact businesses, communities, and local planning authorities.

These proposals could put nature at risk and peoples' access to nature at risk because statutory protected species are often not properly taken into account in prior approval, the general sustainability and ecological impact of housing is not considered, and PDR developments are currently exempt from biodiversity net gain and developer contributions. The impact on communities is also high: there will be increased pressure on green infrastructure and green space,

developer contributions are not required under PDRs to secure the required infrastructure and green infrastructure to make these places viable and beautiful places.

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.

No Link response.

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

We do not support further changes to enable more agricultural buildings to be converted to dwellinghouses. These changes may enable an increase of people living in the countryside, and on agricultural land, meaning equivalent increases in infrastructure beyond what is already there, such as roads, offices, shops etc. These increases not only pose a risk to the natural environment and climate but also equate to increases in pollution and emissions and declining tranquillity, environmental wellbeing and access to nature. Agricultural buildings also often support protected species such as bats and birds. Therefore, agricultural to residential development should primarily go through the full planning permission route.

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.

It should be noted that Wildlife and Countryside Link objects to the use of prior approval as an alternative to a normal planning application. Please see the response in Q25 which sets out this reasoning in relation to a conversion of agricultural buildings to dwellinghouses right.

Permitted development rights risk harm to habitats and species, human and animal health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places.

At present, planning applications are assessed against the policies set out in the Local Plan, prepared by the local planning authority with broad and extensive stakeholder and local community consultation. A properly-resourced Local Plan-led approach to planning enables local democratic oversight, strategic planning in the local area, and the assessment of any potential acute or cumulative environmental impacts.

Permitted development rights (or PDRs) allows for certain types of development without the need for a full planning application through a simplified planning process known as Prior Approval. PDRs remove the ability for local planning authorities to ensure the general sustainability of the location and design of development and to ensure local environmental limits are not breached, with potential impacts on nature, climate, and communities. Local green spaces may be put under increased pressure, with potential negative consequences for nature in those areas, by increased footfall from more residents in a local area due to change of use PDRs. PDRs are also exempt from biodiversity net gain, the requirement to leave habitat in a better state, and they are exempt from developer contributions, often used to secure green and other infrastructure needed to ensure communities are viable and beautiful. PDRs can also cause harm to species and habitats. Even seemingly small developments can cause acute harm to species or habitats, for example if a species is present but not identified or species protection legislation is not properly applied in the Prior Approval process (as is often the case). Many individual impacts on species and habitats through individual PDRs or their implications (e.g., increased residents in a local area) can have cumulative impacts on species and habitats, which go unassessed and unaddressed due to the use of PDRs rather than a full planning application. Finally, robust local plan policy measures to ensure climate resilience and mitigation can and will continue to be bypassed by the prior approval process. By proposing to further side-step much needed climate policy measures at the local level, these national proposals are purposefully at odds with the Committee for Climate Change's own advice, which recommends all planning decisions are net zero compliant. Such overt policy-making discord is disruptive and will further delay the UK's ability to meet its own binding climate targets – which is disastrous for already nature depleted island.

In particular, agricultural buildings can support wildlife including bats and birds species and on the fringes of agriculturally influenced ecosystems.

However, if the Government is to retain this PDR, we agree that a reasonable size limit is useful to help mitigate the cumulative impacts of multiple PDR developments in any one locality. It is unlikely that 1,000 square metres is reasonable given this limit may enable a substantial number of dwellinghouses to be established (using one of the suggested limits in the last question as an example, this limit could mean having up to 10 houses put in under the right. The maximum limit needs to be reduced to avoid harm to people and nature. Any PDR rights in this case should be subject to rigorous enforcement of Wildlife & Countryside Act licencing rules, and the Government should set out how this will be achieved in practice.

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, we disagree with this proposal for an expansion of this PDR.

This proposal for expanding this PDR means that a building of significant size could be converted to residential without going through a full planning application and without considering the potentially significant indirect environmental effects of the conversion to residential, for example through increased pressure on existing greenspaces or removal of existing resting areas for protected species within the building.

Permitted development rights risk harm to habitats and species, human and animal health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places.

At present, planning applications are assessed against the policies set out in the Local Plan, prepared by the local planning authority with broad and extensive stakeholder and local community consultation. A properly-resourced Local Plan-led approach to planning enables local democratic oversight, strategic planning in the local area, and the assessment of any potential acute or cumulative environmental impacts.

Permitted development rights (or PDRs) allows for certain types of development without the need for a full planning application through a simplified planning process known as Prior Approval. PDRs remove the ability for local planning authorities to ensure the general sustainability of the location and design of development and to ensure local environmental limits are not breached, with potential impacts on nature, climate, and communities. Local green spaces may be put under increased pressure, with potential negative consequences for nature in those areas, by increased footfall from more residents in a local area due to change of use PDRs. PDRs are also exempt from biodiversity net gain, the requirement to leave habitat in a better state, and they are exempt from developer contributions, often used to secure green and other infrastructure needed to ensure communities are viable and beautiful. PDRs can also cause harm to species and habitats. Even seemingly small developments can cause acute harm to species or habitats, for example if a species is present but not identified or species protection legislation is not properly applied in the Prior Approval process (as is often the case). Many individual impacts on species and habitats through individual PDRs or their implications (e.g., increased residents in a local area) can have cumulative impacts on species and habitats, which go unassessed and unaddressed due to the use of PDRs rather than a full planning application. Finally, robust local plan policy measures to ensure climate resilience and mitigation can and will continue to be bypassed by the prior approval process. By proposing to further side-step much needed climate policy measures at the local level, these national proposals are purposefully at odds with the Committee for Climate Change's own advice, which recommends all planning decisions are net zero compliant. Such overt policy-making discord is disruptive and will further delay the UK's ability to meet its own binding climate targets – which is disastrous for already nature depleted island.

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, we disagree with this proposal for an expansion of this PDR.

This proposal for expanding this PDR means that a building of significant size could be converted to residential without going through a full planning application and without considering the potentially significant indirect environmental effects of the conversion to residential, for example through increased pressure on existing greenspaces. Previously developed land can additionally have high biodiversity value so it does not make sense to treat it any differently to greenfield land in this situation.

Permitted development rights risk harm to habitats and species, human and animal health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places.

At present, planning applications are assessed against the policies set out in the Local Plan, prepared by the local planning authority with broad and extensive stakeholder and local community consultation. A properly-resourced Local Plan-led approach to planning enables local democratic oversight, strategic planning in the local area, and the assessment of any potential acute or cumulative environmental impacts.

Permitted development rights (or PDRs) allows for certain types of development without the need for a full planning application through a simplified planning process known as Prior Approval. PDRs remove the ability for local planning authorities to ensure the general sustainability of the location and design of development and to ensure local environmental limits are not breached, with potential impacts on nature, climate, and communities. Local green spaces may be put under increased pressure, with potential negative consequences for nature in those areas, by increased footfall from more residents in a local area due to change of use PDRs. PDRs are also exempt from biodiversity net gain, the requirement to leave habitat in a better state, and they are exempt from developer contributions, often used to secure green and other infrastructure needed to ensure communities are viable and beautiful. PDRs can also cause harm to species and habitats. Even seemingly small developments can cause acute harm to species or habitats, for example if a species is present but not identified or species protection legislation is not properly applied in the Prior Approval process (as is often the case). Many individual impacts on species and habitats through individual PDRs or their implications (e.g., increased residents in a local area) can have cumulative impacts on species and habitats, which go unassessed and unaddressed due to the use of PDRs rather than a full planning application. Finally, robust local plan policy measures to ensure climate resilience and mitigation can and will continue to be bypassed by the prior approval process. By proposing to further side-step much needed climate policy measures at the local level, these national proposals are purposefully at odds with the Committee for Climate Change's own advice, which recommends all planning decisions are net zero compliant. Such overt policy-making discord is disruptive and will further delay the UK's ability to meet its own binding climate targets – which is disastrous for already nature depleted island.

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, we agree that a prior approval as set out above should be introduced in order to assess the impacts of extension on light for neighbouring premises, including insects, bats, and birds that may reside or forage nearby and be susceptible to impacts from light pollution. This prior approval should also consider the potential loss of access to greenspace and trees for neighbouring premises. Other considerations linked to climate change, especially resilience, should also be considered where appropriate.

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.

No Link response.

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, we strongly reject this proposal for this PDR to apply in other article 2(3) land. Any changes of use in these areas which are crucial for nature's recovery, for tackling the climate and biodiversity crises, and important for their historic environment and landscape value, should be subject to a normal planning application so that their impacts can be fully assessed, taken into consideration and consulted upon. Within National Parks, AONBs, and the Broads in particular, any land use planning decisions must take account of their statutory purposes and carefully manage development impacts - the only way to do this effectively is through a full planning application.

In addition, the proposed PDR should not apply in conservation areas, areas on or adjacent to Local Wildlife Sites, designated sites, irreplaceable habitats, brownfield sites of high environmental value, designated heritage assets (listed buildings, scheduled monuments, registered parks and gardens), buildings that host protected species, or other areas identified as covered by policies 174 to 176 of the NPPF.

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.

Buildings on agricultural units can support numerous species of wildlife including bat and bird species, whether or not their primary purpose was agricultural (see responses in Q25-27 for further reasoning). Therefore, the full planning permission process is the most appropriate avenue for this type of development in order to safeguard the environment and appropriately consider the needs of protected species, including avoidance or mitigation of any impacts.

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 Link response.

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 Link response.

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.

For the reasons outlined in the above responses (see responses to Q.25-27 and Q32) the right should not apply to agricultural buildings that are no longer part of an agricultural unit. Agricultural buildings are not only important for numerous species of wildlife, but also change of use can introduce unintended consequences that cumulatively impact species, habitats, access to nature, local communities, our climate, and heritage. Therefore, we object to amending the right and reiterate that these decisions should be subject to full planning applications.

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, any existing building must already have existing suitable access to a public highway to benefit from the right, to avoid the environmental impacts such as land take, fragmentation of habitats, and pollution, from additional public highway access.

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.

No Link response.

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.

No Link response.

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.

Wildlife and Countryside Link objects to the use of PDRs and prior approval as an alternative to a normal planning application.

Permitted development rights risk harm to habitats and species, human and animal health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places.

At present, planning applications are assessed against the policies set out in the Local Plan, prepared by the local planning authority with broad and extensive stakeholder and local community consultation. A properly-resourced Local Plan-led approach to planning enables local democratic oversight, strategic planning in the local area, and the assessment of any potential acute or cumulative environmental impacts.

Permitted development rights (or PDRs) allows for certain types of development without the need for a full planning application through a simplified planning process known as Prior Approval. PDRs remove the ability for local planning authorities to ensure the general sustainability of the location and design of development and to ensure local environmental limits are not breached, with potential impacts on nature and communities. Local green spaces may be put under increased pressure, with potential negative consequences for nature in those areas, by increased footfall from more residents in a local area due to change of use PDRs. PDRs are also exempt from biodiversity net gain, the requirement to leave habitat in a better state, and they are exempt from developer contributions, often used to secure green and other infrastructure needed to ensure communities are viable and beautiful. PDRs can also cause harm to species and habitats. Even seemingly small developments can cause acute harm to species or habitats, for example if a species is present but not identified or species protection legislation is not properly applied in the Prior Approval process (as is often the case). Many individual impacts on species and habitats through individual PDRs or their implications (e.g., increased residents in a local area) can have cumulative impacts on species and habitats, which go unassessed and unaddressed due to the use of PDRs rather than a full planning application. Depending on the kind of development, applications for new or existing structures that house livestock can directly impact wild animals and human health through the associated risk of infectious zoonotic disease. The highly pathogenic avian influenza (HPAI) outbreak across the UK is key example of this, and something that has had devastating impact on livestock and wild bird populations alike. Finally, robust local plan policy measures to ensure climate resilience and mitigation can and will continue to be bypassed by the prior approval process. By proposing to further side-step much needed climate policy measures at the local level, these national proposals are purposefully at odds with the Committee for Climate Change's own advice, which recommends all planning decisions are net zero compliant. Such overt policy-making discord is disruptive and will further delay the UK's ability to meet its own binding climate targets – which is disastrous for already nature depleted island.

If the Government is to pursue these proposals to further expand PDRs, they should conduct a review of existing PDRs, their benefits, and their impacts, including for nature.

PDRs or expanded PDRs should not apply in other article 2(3) land. Any changes of use in these areas which are crucial for nature's recovery, for tackling the climate and biodiversity crises, and important for their historic environment and landscape value, should be subject to a normal planning application so that their impacts can be fully assessed, taken into consideration and consulted upon. Within National Parks, AONBs, and the Broads in particular, any land use planning decisions must take account of their statutory purposes and carefully manage development impacts - the only way to do this effectively is through a full planning application.

In addition, the proposed PDR should not apply in conservation areas, areas on or adjacent to Local Wildlife Sites, designated sites, irreplaceable habitats, brownfield sites of high environmental value, designated heritage assets (listed buildings, scheduled monuments, registered parks and gardens), buildings that host protected species, or other areas identified as covered by policies 174 to 176 of the NPPF.

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.

It should be noted that Wildlife and Countryside Link objects to the use of prior approval as an alternative to a normal planning application and objects to the existence of PDRs in conservation areas.

However, if the Government is to retain PDRs in conservation areas, the prior approval process which allows for the local consideration of the impacts of the change of use of the ground floor on the character or sustainability of the conservation area is essential.

The prior approval process should be better implemented, supported by sufficiently well-resourced and expert local planning authorities. For example, a [recent ALGE/ADEPT survey](#) found that 26% of local planning authorities do not have access to any ecological resource and a Bat Conservation study from 2014 which fed into a [CIEEM and ALGE Advice Note on PDRs and European Protected Species \(EPS\)](#) found that approximately half of local planning authorities did not know that European Protected Species (EPS) legislation had to be taken into account as part of the PDR process.

The list of considerations for the prior approval process should be expanded to also include: the general sustainability and ecological impact of the location of housing, statutory protected species (or the excluded types of developments should include buildings that hosted protected species), heritage assets and the historic environment, the potential impact of increased pressure on green infrastructure and green space, the delivery of Biodiversity Net Gain, the implementation of National and locally-established Design Codes, and developer contributions ensure these places have the required infrastructure and green infrastructure to be viable places to live.

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, these proposed extensions of permitted development rights will impact businesses, communities, and local planning authorities.

These proposals could put nature at risk and peoples' access to nature at risk because statutory protected species are often not properly taken into account in prior approval, the general sustainability and ecological impact of housing is not considered, and PDR developments are currently exempt from biodiversity net gain and developer contributions. The impact on communities is also high: there will be increased pressure on green infrastructure and green space,

developer contributions are not required under PDRs to secure the required infrastructure and green infrastructure to make these places viable and beautiful places.

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.

No Link response.

Supporting the agricultural sector through additional flexibilities

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.

An increase in commercial use presents a risk to nature and an interference with the tranquillity of the countryside. Commercial activity, including flexible commercial use, should be subject to the usual planning system (i.e., planning applications) and directly towards peri-urban and urban areas.

The proposed changes to certain permitted development rights pose a cumulative risk to local environments and communities. Allowing property owners the opportunity to circumvent the scrutiny offered by a Local Plan approach through permitted development rights (i.e. without the need for a full planning application) and convert rural land for rapid "low impact" development threatens wildlife such as flora, fauna and fungi that live within agricultural and rural environments. Although imperfect, the planning system establishes an important layer of protection for agricultural landscapes, ensuring that any new developments are subject to appropriate checks and balances, as well as expert guidance.

Increasing development that avoids the usual planning process risks exposing agricultural land to unsustainable and inappropriate development. If Wildlife & Countryside Act rules are not enforced, there is a substantial environmental risk of harm or destruction of habitats and protected species, soil degradation, impacts on farm productivity and crop resilience and agricultural pollution. There is also an environmental risk to species and habitats that are not identified in legislation or appropriately protected in the Prior Approval process for permitted development rights. The use of buildings in rural landscapes are also often occupied by protected species, so require an Ecological Impact Assessment (EiA).

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.

The right should not be amended to allow for buildings on agricultural land and the agricultural landscape to be used for these purposes given the risk of increased intensity of use and the need for additional infrastructure. Some land areas within the curtilage of a building may be vast and there is no threshold set for impact of activities such as paintballing and sports on the land. This presents a high environmental risk, particularly if it is a Local Wildlife Site (LWS) or area of high biodiversity value. Essential wild plants and other species may be removed for such buildings and land, e.g., trees, which would not only cause disturbance but would also cause acute and cumulative harm to nature.

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.

In principle, we are supportive of farm diversification changes where they reduce road use and traffic if goods can be processed on site rather than requiring to be driven to a third party. Furthermore, if it extends to abattoirs it will reduce livestock movement and support smaller farm businesses,

However, requiring a planning application does not mean farm diversification changes such as those outlined above cannot take place, only that the development would be more carefully managed through the full planning process to mitigate negative impacts to nature and people. Any change of use should be undertaken only with the appropriate input and guidance from accredited site surveys, ecologists, hydrologists, etc., to ensure the change in use will not have an unintended, adverse wider environmental impact.

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.

For the reasons set out above, the existing planning system should be improved for farmers and agricultural communities by increasing the resources for planning authorities as opposed to

establishing new rights for flexible commercial uses that circumvent requirements to undertake a planning application and the Local Plan led approach.

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.

As Q45-46 indicate, although we support farm diversification, any relaxation of permitted development rules to allow a mix of permitted uses on agricultural land (as well as any other uses outlined in this consultation related to agricultural land) should be limited to temporary, small-scale modifications for small farms or horticultural purposes and account for number and type of livestock housed and on the surrounding land. Relaxation of the rules needs to be balanced out by a continuing central focus on full planning applications and the Local Plans and must be accompanied by clear national guidance on planning applications related to agriculture.

Regardless of any amendments to permitted development rights, farm developments must be subject to high standards to be granted planning permission (e.g., farm-level nutrient budgets) and required to provide climate and biodiversity impact and waste management plans. Permitting and spatial systems also need to be strengthened to ensure compliance with relevant legislation and regulations, as well as local development plans.

Planning permission should always be required for any new buildings or expansions of buildings to house livestock or for change of use of buildings to house livestock.

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.

Erecting new buildings of substantial size (e.g., including those over 1,000 sq metres as referenced in the consultation) contributes to the reduction in land, thereby interfering with environmental wellbeing, tranquillity and the farming and rural landscapes. It also increases the risk of adverse impacts to nature substantially.

Change from agricultural and rural land purposes to flexible commercial use also risks jeopardizing already limited amenity access rights to nature. Large conversions of agricultural land by way of permitted development rights risk an increase in badly managed and poor quality development in the countryside.

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.

No Link response.

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.

The proposed changes will have an impact on all of the groups outlined above. Businesses face unintended economic, social and environmental costs (particularly in absence of expert advice and site-specific guidance that would otherwise be delivered through undertaking a full planning application) should be guided by the Local Plan approach.

Local authorities will face a risk of needing to contribute financial and capacity resources to addressing unintended impacts on local communities and environments.

Communities also are at risk of impact. As mentioned above, tranquillity, access to nature, healthy agri-environments and environmental wellbeing are placed at risk.

The impact on nature and wildlife also need to be considered here. There are many individual impacts on species and habitats on agricultural land and in buildings through individual permitted development rights or their implications (e.g., increased commercial footfall/disturbance in the area), which can have cumulative impacts on species and habitats that go unassessed and unaddressed due to the use of PDRs rather than a full planning application.

The best way to safeguard nature and climate is to adopt a precautionary approach through developing a properly resourced, Local Plan led system and improving the quality of advice and support to farmers, rather than extending permitted development rights on rural and agricultural land, including farms. Poor, or absent, planning is worse than no development at all – the widening of permitted development and a self-assessment approach increases this risk.

At present, the main factor in deciding planning applications are Local Plans. Prepared by Local Planning Authorities, Local Plans represent local democratic oversight and broad stakeholder consultation, including farmers, to ensure the participation of community and agricultural interests in rural land. Changing agricultural buildings to flexible uses such as shops and restaurants may seriously jeopardise these interests and creates additional economic and environmental risk to all of the groups outlined above.

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.

We oppose all area threshold extensions. These area thresholds were already changed within the last few years and it is far too soon to assess the impact of these changes. The most economical option, and the best option to safeguard nature and local communities, is to wait until this impact becomes visible before enacting further changes to the limits.

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.

We agree with this as there should not be PDRs for Scheduled Ancient Monuments (SAMs).

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.

See response to Q51. We oppose all area threshold extensions. These area thresholds were already changed within the last few years and it is far too soon to assess the impact of these changes. The most economical option, and the best option to safeguard nature and local communities, is to wait until this impact becomes visible before enacting further changes to the limits.

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.

See response to Q51. We oppose all area threshold extensions. These area thresholds were already changed within the last few years and it is far too soon to assess the impact of these changes. The

most economical option, and the best option to safeguard nature and local communities, is to wait until this impact becomes visible before enacting further changes to the limits.

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.

See response to Q52.

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.

No Link response.

Supporting business and high streets through greater flexibilities

Q.57 Do you agree that the maximum floorspace limit for the extension or alteration to a Commercial, Business and Service establishment on non-protected 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 think there should be any extension to this PDR.

This proposal for expanding this PDR means that a building could be extended or altered without going through a full planning application and without considering the potentially significant indirect environmental effects of the extension or alteration.

Permitted development rights risk harm to habitats and species, human and animal health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places.

At present, planning applications are assessed against the policies set out in the Local Plan, prepared by the local planning authority with broad and extensive stakeholder and local community

consultation. A properly-resourced Local Plan-led approach to planning enables local democratic oversight, strategic planning in the local area, and the assessment of any potential acute or cumulative environmental impacts.

Permitted development rights (or PDRs) allows for certain types of development without the need for a full planning application through a simplified planning process known as Prior Approval. PDRs remove the ability for local planning authorities to ensure the general sustainability of the location and design of development and to ensure local environmental limits are not breached, with potential impacts on nature, climate, and communities. Local green spaces may be put under increased pressure, with potential negative consequences for nature in those areas, by increased footfall from more residents in a local area due to change of use PDRs. PDRs are also exempt from biodiversity net gain, the requirement to leave habitat in a better state, and they are exempt from developer contributions, often used to secure green and other infrastructure needed to ensure communities are viable and beautiful. PDRs can also cause harm to species and habitats. Even seemingly small developments can cause acute harm to species or habitats, for example if a species is present but not identified or species protection legislation is not properly applied in the Prior Approval process (as is often the case). Many individual impacts on species and habitats through individual PDRs or their implications (e.g., increased residents in a local area) can have cumulative impacts on species and habitats, which go unassessed and unaddressed due to the use of PDRs rather than a full planning application. Finally, robust local plan policy measures to ensure climate resilience and mitigation can and will continue to be bypassed by the prior approval process. By proposing to further side-step much needed climate policy measures at the local level, these national proposals are purposefully at odds with the Committee for Climate Change's own advice, which recommends all planning decisions are net zero compliant. Such overt policy-making discord is disruptive and will further delay the UK's ability to meet its own binding climate targets – which is disastrous for already nature depleted island.

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 think there should be any extension to this PDR.

This proposal for expanding this PDR means that a building could be extended or altered without going through a full planning application and without considering the potentially significant indirect environmental effects of the extension or alteration.

Permitted development rights risk harm to habitats and species, animal and human health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places.

At present, planning applications are assessed against the policies set out in the Local Plan, prepared by the local planning authority with broad and extensive stakeholder and local community consultation. A properly-resourced Local Plan-led approach to planning enables local democratic

oversight, strategic planning in the local area, and the assessment of any potential acute or cumulative environmental impacts.

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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 think there should be any extension to this PDR.

This proposal for expanding this PDR means that a building could be extended or altered without going through a full planning application and without considering the potentially significant indirect environmental effects of the extension or alteration.

Permitted development rights risk harm to habitats and species, human and animal health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places.

At present, planning applications are assessed against the policies set out in the Local Plan, prepared by the local planning authority with broad and extensive stakeholder and local community consultation. A properly-resourced Local Plan-led approach to planning enables local democratic

oversight, strategic planning in the local area, and the assessment of any potential acute or cumulative environmental impacts.

Permitted development rights (or PDRs) allows for certain types of development without the need for a full planning application through a simplified planning process known as Prior Approval. PDRs remove the ability for local planning authorities to ensure the general sustainability of the location and design of development and to ensure local environmental limits are not breached, with potential impacts on nature, climate, and communities. Local green spaces may be put under increased pressure, with potential negative consequences for nature in those areas, by increased footfall from more residents in a local area due to change of use PDRs. PDRs are also exempt from biodiversity net gain, the requirement to leave habitat in a better state, and they are exempt from developer contributions, often used to secure green and other infrastructure needed to ensure communities are viable and beautiful. PDRs can also cause harm to species and habitats. Even seemingly small developments can cause acute harm to species or habitats, for example if a species is present but not identified or species protection legislation is not properly applied in the Prior Approval process (as is often the case). Many individual impacts on species and habitats through individual PDRs or their implications (e.g., increased residents in a local area) can have cumulative impacts on species and habitats, which go unassessed and unaddressed due to the use of PDRs rather than a full planning application. Finally, robust local plan policy measures to ensure climate resilience and mitigation can and will continue to be bypassed by the prior approval process. By proposing to further side-step much needed climate policy measures at the local level, these national proposals are purposefully at odds with the Committee for Climate Change's own advice, which recommends all planning decisions are net zero compliant. Such overt policy-making discord is disruptive and will further delay the UK's ability to meet its own binding climate targets – which is disastrous for already nature depleted island.

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

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, these proposed extensions of permitted development rights will impact businesses, communities, and local planning authorities.

These proposals could put nature at risk and peoples' access to nature at risk because statutory protected species are often not properly taken into account in prior approval, the general sustainability and ecological impact of housing is not considered, and PDR developments are currently exempt from biodiversity net gain and developer contributions. The impact on communities is also high: there will be increased pressure on green infrastructure and green space, developer contributions are not required under PDRs to secure the required infrastructure and green infrastructure to make these places viable and beautiful places.

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?

We do not support an extension of this right and there need to be clear exemptions for conservation areas for this right, as there are potential impacts on the environment. For example, Dorset Wildlife Trust has reported that an existing PDR is being used to hold a carboot sale on a Local Wildlife Site in Portland.

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.

No Link response.

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, this PDR should not be expanded to apply to open prisons.

Expansions or additions of prisons should require a planning application. Extending permitted development could undermine existing development mitigation (whether mitigation measures for the original development were voluntary or required for planning consent) and without proper assessment, permitted development would have a negative impact. By continuing to go through the normal planning application process, we can ensure that these developments: properly consider statutory protected species, heritage assets and the historic environment and the potential impact of increased pressure on infrastructure and green infrastructure; effectively implement Design Codes; are subject to Biodiversity Net Gain; require developer contributions to ensure the required infrastructure and green infrastructure; and are subject to democratic consultation with local communities.

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.

No Link response.

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, these proposed extensions of permitted development rights will impact businesses, communities, and local planning authorities.

These proposals could put nature at risk and peoples' access to nature at risk because statutory protected species are often not properly taken into account in prior approval, the general sustainability and ecological impact of housing is not considered, and PDR developments are currently exempt from biodiversity net gain and developer contributions. The impact on communities is also high: there will be increased pressure on green infrastructure and green space, developer contributions are not required under PDRs to secure the required infrastructure and green infrastructure to make these places viable and beautiful places.

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.

No Link response.

Defra call for evidence:

Nature-based solutions

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

The wider legislative and policy framework and the planning legislation, policy and guidance do not always work well to facilitate the delivery of nature-based solutions (NBS). The planning system is often complex, time-consuming and costly to navigate, particularly for small-scale projects, where large upfront costs associated with seeking planning permission that cannot be recovered will make these projects unviable.

Barriers within the planning system to consenting and delivery of NBS include a lack of ecological expertise and capacity within Local Planning Authorities (LPAs), and a lack of clear national planning policy steer on nature-based solutions – both concerning how NBS work, and the multiple benefits that these approaches can deliver for both nature and people. This lack of clear guidance means that there is not a consistent approach to NBS within the planning system. Policies and approaches can vary between LPAs, adding further complexity to an already challenging process. Currently, [26% of LPAs do not have any access](#) to ecological expertise.

The following changes would help provide a more supportive framework for planning authorities to consider nature-based solutions within the planning system. We discuss these further throughout our response to questions 67-74.

- Increased capacity, resources, and ecological expertise within Local Planning Authorities – to ensure that a consistent approach to NBS is taken through the planning system, and to ensure that NBS projects can be reviewed on a case-by-case basis and consented with greater efficiency and efficacy. An improved understanding of what NBS are and how they work would help to smooth this process.
- Clearer national policy and planning practice guidance on NBS – to give clearer steer and advice as to the need for NBS, the benefits they can bring, and the location and design factors that should be taken into account. This steer should also clarify that there should be strong presumption in favour of works that are environmentally beneficial – for example, those identified through LNRS or ELMS contracts, or where NBS projects will contribute towards achievement of the Environmental Improvement Plan. A clear presumption in favour of NBS should be expressed within the National Planning Policy Framework, to give strong preference to swift approval unless there are strong and explicit reasons to the contrary.

Outside the planning system, design and delivery of NBS should be supported by effective implementation and enforcement of other legislation and policy. There should be full compliance with environmental legislation, high standards of nutrient management planning and waste management planning, and assessment and control of cumulative impacts of pollution sources within the local area.

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.

It should be noted that Wildlife and Countryside Link generally objects to the use of permitted development rights and the prior approval process as an alternative to a full planning application. PDRs risk harm to habitats and species, human and animal health, heritage and the historic environment, the climate, people's access to nature, and the strategic creation of green and beautiful places. A properly-resourced Local Plan-led approach to planning enables local democratic oversight, strategic planning in the local area, and the assessment of any potential acute or cumulative environmental impacts.

As discussed, the wider legislative and policy framework and the planning legislation, policy and guidance system does not always work well to facilitate the delivery of nature-based solutions (NBS). The significant time and financial cost required to navigate the system, plus inconsistent approaches between LPAs, will place small-scale NBS projects in particular at risk of being unviable. The process can and should be further simplified and streamlined through improved resourcing of Local Planning Authorities - including expanded ecological expertise - plus stronger, clearer national policy and planning practice guidance. PDRs would represent a 'sticking plaster' response to these fundamental challenges.

Furthermore, barriers to the uptake, use and delivery of nature-based solutions also exist beyond the planning process, ranging from knowledge gaps, to inadequate funding, to institutional and legislative barriers. These will vary according to context, across different habitat types or sectors. The primary opportunities to increase the uptake of NBS will therefore not always sit within the planning process, and would not be resolved through new or amended PDRs. A more holistic view of the policy landscape is required.

If Government were to expand PDRs to NBS, this should be used for small-scale interventions only, to reduce the time and financial resource required for NBS installation, and thereby to help mainstream NBS. Any proposals for new or amended PDRs for NBS must undergo full public consultation, and must align with the Local Nature Recovery Strategy.

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

As above, Wildlife and Countryside Link generally objects to the use of permitted development rights and the prior approval process as an alternative to a normal planning application. Delivery challenges for NBS and nutrient mitigation schemes should be addressed through improved resourcing of LPAs - including expanded ecological expertise - and stronger, clearer national policy and planning practice guidance.

If Government were to expand PDRs to NBS for nutrient mitigation schemes, this should be used for small-scale interventions only, to reduce the time and financial resource required for NBS installation, and thereby to help mainstream NBS. Any proposals for new or amended PDRs for NBS must undergo full public consultation and must align with the Local Nature Recovery Strategy.

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.

The issues that farmers and land managers are facing in relation to nature-based solutions fall both within and outside of the planning system. These challenges will also vary with context, for example across different habitat types, or different sectors. These issues include, but are not limited to:

- **A lack of resource and capacity within Local Planning Authorities** - LPAs are not sufficiently resourced to efficiently review and consent NBS projects on a case-by-case basis, resulting in costly delays and significant administrative burdens.
- **A lack of ecological expertise within Local Planning Authorities** - as discussed, [26% of Local Planning Authorities do not have access to ecological expertise](#). This means that approaches to, and understanding of, nature-based solutions are not always consistent across LPAs. This adds further complexity and cost. For example, NBS projects involving wetlands have faced challenges securing planning permission due to default refusals of developments that will flood, despite this flooding being intrinsic to the function and purpose of the wetland.
- **A lack of clear national policy and planning practice guidance regarding nature-based solutions** - guidance on the need for, benefits from, and implementation of nature-based solutions must be clearly set out in publicly accessible guidance documents, to support both LPAs and project managers. This should also clarify that there should be strong presumption in favour of works that are environmentally beneficial – for example, those identified through LNRS or ELMS contracts, or where NBS projects will contribute towards achievement of the Environmental Improvement Plan. A clear presumption in favour of NBS should be expressed within the National Planning Policy Framework, to give strong preference to swift approval unless there are strong and explicit reasons to the contrary.
- **The legislative and policy framework** - opportunities for NBS projects may be constrained by the legislative and policy framework requiring that alternative approaches are taken. For example, Clause 153 under the Levelling Up Bill would require that water companies reduce nutrient pollution entering rivers through upgrading wastewater treatment works to Technically Achievable Limits, precluding the use of wider catchment and nature-based approaches.
- **A lack of resources and capacity within statutory agencies, such as Natural England and the Environment Agency** - Natural England and the Environment Agency should be sufficiently resourced as statutory consultees in the planning system.
- **Institutional and process-based barriers within other sectors** - opportunities for farmers and land managers to participate alongside the water industry in NBS projects may be constrained by 'fair share' principles. Furthermore, opportunities to work with the water industry on NBS may be lacking, due to bias towards traditional, hard-engineering approaches at the expense of NBS in water industry processes such as the Price Review and the WINEP.

Case studies:

Don Catchment Rivers Trust - scrapes and natural flood management

Don Catchment Rivers Trust ran a project to create small scrapes on a site within two different council jurisdictions. Whilst Sheffield City Council have permission to proceed without conditions, North East Derbyshire Council requested full planning permission. The time and financial costs incurred, and the inconsistent approach between two authorities, can make small NBS schemes such as this unviable.

A further challenge arises from the lack of clarity and guidance given from the outset on what planning requirements will need to be met for a project. Don Catchment Rivers Trust undertook a natural flood management project, funded by the National Highways Scheme, that aimed to install storage ponds. Full planning permission was required. However, following the initial application, further information was requested by the council at intervals, and ultimately took 11 months for the final decision to be determined. This could be alleviated through the provision of a full checklist of the information required at the start of the process.

Action for the River Kennet - wetland creation

Action for the River Kennet (ARK) have run wetland creation projects, and have found that the planning process is set to refuse by default any project that involves flooding. Yet flooding is an integral part of the creation and function of a wetland. The process to then explain this flood risk incurs significant delays and expense, which could be avoided if there was better understanding of NBS within the planning system.

Additionally, the scale of fees incurred for NBS projects should reflect that these 'developments' deliver environmental and societal benefits, and do not generate profits. A hectare of housing, for example, is vastly different in form and function to a hectare of wetland.

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

As discussed, issues in relation to nature-based solutions that arise from the planning process should be amended through sufficiently resourcing LPAs - in terms of funding, capacity, and ecological expertise - and through the provision of stronger, clearer national policy and planning practice guidance. Increased capacity and ecological expertise within LPAs will ensure that projects can be reviewed and consented on a case-by-case basis with greater efficacy and efficiency, and will help avoid unnecessary stalls.

If Government were to expand PDRs to NBS, this should be used for small-scale interventions only, to reduce the time and financial resource required for NBS installation, and thereby to help mainstream NBS. Any proposals for new or amended PDRs for NBS must undergo full public consultation, and must align with the Local Nature Recovery Strategy.

Strengthening the National Planning Policy Framework for NBS

National planning policy should be amended to clearly set out the need for, benefits from, and implementation of nature-based solutions. These amendments must be clearly set out in publicly accessible guidance documents, to support both LPAs and project managers. This should also clarify that there should be strong presumption in favour of works that are environmentally beneficial – for

example, those identified through LNRS or ELMS contracts, or where NBS projects will contribute towards achievement of the Environmental Improvement Plan. A clear presumption in favour of NBS in the National Planning Policy Framework would give strong preference to swift approval unless there are strong and explicit reasons to the contrary.

Amending planning practice guidance

The planning approach to NBS should be consistent and standardised, making it simpler for the LPA to review and consent the project, and making this process less cost-intensive. This consistent approach must be clearly set out in publicly accessible guidance documents, to allow project managers to anticipate and build in resources for planning requirements, and to support LPAs. This guidance must be informed by NBS expertise, and should take account of the current evidence base, and on-the-ground technical experience of practitioners. This could include a reference bank of worked examples of NBS that planning authorities can make use of.

Wider solutions

Barriers to the use of nature-based solutions exist both within and beyond the planning system, and therefore so do the opportunities to resolve them.

For example, the water industry Price Review process currently includes several barriers to the uptake of nature-based solutions, due to a lack of full natural capital accounting, and ongoing bias towards traditional, hard-engineering approaches to resolve environmental problems such as poor water quality. This is now further jeopardised by Government proposals to extend the Growth Duty to Ofwat, which would further weigh the balance too heavily toward financial cost, at the expense of environmental needs, costs, and benefits, and recent steer from the Secretary of State to the water industry that would see environmental ambition capped until the next Price Review. Ofwat must - with support from Government - remove barriers to water company use of nature-based solutions in PR24 and future price reviews.

The benefits of doing so are exemplified by the [River Petteril NBS project](#), which saw Catchment Nutrient Balancing being implemented to improve river water quality. This more flexible, innovative permitting approach - piloted with the Environment Agency - allowed water companies to work with other sectors across the catchment to address nutrient pollution, as opposed to relying on expensive wastewater treatment work upgrades. This resulted in up to 7 times more phosphorus reduction than could have been achieved through wastewater treatment work interventions, and had an additional £1.7 million in natural capital benefits compared to conventional solutions. Yet these collaborative, highly effective NBS approaches are restricted by the current regulatory and legislative framework.

In addition to increasing the ecological expertise and capacity of LPAs, Natural England and the Environment Agency should also be sufficiently resourced as statutory consultees in the planning system.

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

South East Rivers Trust

South East Rivers Trust had a positive experience when a Lead Local Flood Authority team were able to send officers out on site, and thereby were able to develop a shared understanding of the aims

behind the project and the work being delivered. This demonstrates the importance of engagement on the ground, and building up direct experience and expertise of NBS within the planning sector.

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

Wildlife & Countryside Link support proposals for temporary, small-scale modifications on smaller farms for horticulture purposes to have permitted development rights (including units for packing/storage, polytunnels etc).

The size of the unit should not be the main or only consideration, but also the use. For livestock units, the number and type of livestock housed, as well as the number and type of livestock in the surrounding land must be taken into account through a full planning application. Lots of animals in smaller units can have a bigger environmental and societal impact than one very large unit.

Any medium to large unit involving livestock should be treated differently to units that don't involve livestock.

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?

Nature-based solutions can effectively and efficiently deliver good environmental outcomes; they are often cheaper to implement than traditional, hard-engineering approaches, and deliver multiple benefits for nature and people. To ensure the full extent of this potential can be unlocked and maintained, it is essential that the ongoing monitoring and any necessary management of the solution is secured long-term.

Unintended negative consequences could arise from nature-based solutions due to:

- Potential abuse of the planning system under the guise of NBS, due to the fact that NBS is currently a very broad, under-regulated term.
- The removal or destruction of good habitat and replacement by an ill-suited NBS intervention, which then does not deliver the ecological benefits that are needed. It is important that the nature-based solution is appropriate for the environmental context - 'right NBS, right place'.
- The nature-based solution not mitigating for any wildlife or habitat disturbance caused.

The standardisation and accreditation of nature-based solutions would significantly decrease, if not avoid completely, the risks of unintended negative consequences. A properly functioning accreditation system would identify, mitigate for, and avoid the negative impacts of proposed NBS projects. Work is already happening in this area. For example, the Mainstreaming NBS Project, co-lead by The Rivers Trust and United Utilities, aims to support the development of more standardised, validated and verified NBS delivery, including a common value framework, and a framework for high integrity NBS markets.

Inappropriate application of nature-based solutions could be further regulated through the administration of the funding mechanisms. An improved inventory of existing habitats will also allow guidance and funding to steer impacts away from sensitive areas.

Farm efficiency projects

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

Defra is correct to explore all possible options to improve farm efficiency and income for farmers. However, extending permitted development on agricultural land inevitably precludes the use of such land for specific purposes. See the answers in Q45-47 for the Link position on extending PDRs for farm efficiency projects. The importance of increasing the productivity of farms along with achieving overarching environmental outcomes (public goods) is noted. Yet, this needs to be done in a way that supports biodiversity, public health and climate change mitigation and adaptation. Farmers and land managers must be supported by Defra funding, that will accompany existing planning processes, to engage accredited site surveys, ecologists and hydrologists that will be able to provide advice on the environmental impact of a specific project and mitigate threats to nature and heritage.

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.

No Link response.

Q.77 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 slurry stores or lagoons and small-scale reservoirs.

No Link response.

Q.78 Would these issues be resolved by amending planning practice guidance or permitted development rights, or any other solutions?

No Link response.

Q.79 Are there any success stories that we can learn from on individual cases, or in certain local planning authorities?

No Link response.

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

No Link response.

Q.81 Do you foresee any unintended negative consequences that may result from more farm efficiency projects coming forward (e.g., impacts on nutrient pollution, protected sites or hydrology)? How can these be mitigated?

Anaerobic digestion is being promoted as a quick fix to pollution from organic manures, as well as a renewable source of bioenergy. However, anaerobic digestates pollute the air through emitting ammonia, and have been known to pollute nearby ecosystems and water courses when mismanaged.

It is also common for farmers to start growing maize to feed to the digestors which are fuel hungry, and maize is a calorific crop. However, using land for maize production is not only an inefficient use of agricultural land, but maize requires a large amount of fertiliser to grow, which has high rates of leaching and embedded greenhouse gas emissions. Therefore, AD systems in this way can be unintendedly worse for the environment and need to be properly regulated through the planning system and licensing/environmental permitting.

Diversification of farm incomes

Q.82 What guidance, policy, or legislative changes could help to provide a more supportive framework for planning authorities to determine planning applications within?

Farm income may be diversified by going through the usual planning system (i.e. a planning application) to ensure that development is occurring in appropriate locations and is appropriately designed. There are other models for Defra to encourage diversification of income than relaxing planning rules (e.g. more advice and support to farmers, increased budget for farming to enable upskilling of the sector in particular specialisms). Certain permitted development rights may produce unintended outcomes, resulting in land managers paying more to rectify the problems.

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.

No Link response.

Q.84 Are there any other diversification projects which have not been covered in this call for evidence or the wider consultation, that you wish to provide evidence for? If so, please provide specific case studies (including planning reference numbers where available) which can help us understand what issues farmers and land managers are facing.

No Link response.

Q.85 Would these issues be resolved by amending existing permitted development rights, or any other solutions?

No Link response.

Q.86 Are there any success stories that we can learn from on individual cases, or in certain local planning authorities?

No Link response.

Q.87 Would you propose different solutions for different sized agricultural units?

No Link response.

Q.88 Do you foresee any unintended negative consequences that may result from more farm diversification projects coming forward? How can these be mitigated?

No Link response.