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West Yorkshire Combined Authority Response: Planning reform: Supporting the high street and increasing the delivery of new homes

Thank you for the opportunity to comment on the 'Planning reform: Supporting the high street and increasing the delivery of new homes' consultation. We welcome the Government's commitment in the consultation to ensure that the planning system supports the creation of new businesses and homes. We are particularly interested in Part 1 of the consultation that deals with permitted development rights and use classes.

The West Yorkshire Combined Authority is not a strategic or local planning authority. It therefore has no statutory responsibilities relating to planning. However, the Leeds City Region Local Planning Authorities, some will be making individual responses to the consultation, are committed to partnership working to ensure a joined-up approach to spatial planning including tackling cross-boundary issues and agreeing strategic priorities set out in our Strategic Economic Plan (SEP).

The SEP has ambitious growth aspirations to develop and regenerate integrated Spatial Priority Areas (SPA), support employment, quality environments and the building of 10,000-13,000 new homes per year. Whilst the delivery of homes remains a priority, this should not be at the expense of developing high quality, well balanced environments that create a good place to live and work.

With respect to the consultation, part 1 deals with the permitted development changes. These include:

- The extension of changes between typical high street uses for existing premises for three years to include more leisure / community uses - gyms, libraries, health centre to continue enabling business start-ups and prevent empty premises.
- Changes from high street uses to office (B1) use and hot food takeaways to residential (C3) use.
- Upwards extension to a maximum building height of five storeys for certain existing buildings to provide "additional well-designed homes to meet local housing need."

- The potential for further storeys on free standing purpose built blocks of flats.
- Continued use of prior approval for changes to residential use to assess flooding / contamination risks; transport and highways and the impact of additional new homes on existing occupiers and businesses.
- Permanence of existing time limited PD rights for a change of use for buildings (up to 500sqm) from storage / distribution (B8) to residential (C3) use. Prior approval remains for transport and highways, contamination, air quality, noise and flooding, along with consideration of the impact residential use might have on nearby B8 or light industrial (B1(c)) uses.
- A new PD right for demolition of commercial buildings and redevelopment as residential, excluding development subject to Environmental Impact Assessment.

We share the concerns highlighted by the Local Government Association¹ (LGA) which identifies that the increase of permitted development rights reduces the ability of organisations, including the Combined Authority, to contribute in any meaningful way to the development process. It also reduces the possibility of generating added value either through the ability of a Local Planning Authority to negotiate reasonable amendments to make a scheme acceptable or through the ability to attract planning gain.

There is a risk that enhanced permitted development rights circumvent policies of the local authority local plans, compromise the objectives of locally developed masterplans and prevent the properly managed development of a place, thereby compromising the aims of the local authority local plans and the SEP. This may include the development of low quality, small residential units in town centres or larger change of use development in out of town sites with little regard to the suitability of the location and the long term implications for the regeneration of our town and city centres.

Appendix A contains responses to those questions of strategic relevance to the Leeds City Region. Should you require any further clarification on the issues raised please do not hesitate to contact me.

Yours sincerely,



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¹ LGA permitted development order survey 2018

(https://www.local.gov.uk/sites/default/files/documents/Permitted%20development%20survey%20018%20-%20report%20FINAL_1.pdf)