

Public Service and Permitted Development Consultation
Ministry of Housing, Communities and Local Government
Planning Directorate
3rd Floor, North East
Fry Building, 2 Marsham Street
London SW1P 4DF

28 January 2021

Dear Sirs

SUPPORTING HOUSING DELIVERY AND PUBLIC SERVICE INFRASTRUCTURE (through Permitted Development)

Oxford Civic Society strongly object to the proposal in principle because of the harm that it could do to our high streets, town and city centres; the creation of poor-quality homes; and the loss of historic character of our conservation areas.

Covid-19 has had a serious impact on the economy and we have all seen businesses close, many unlikely to reopen their doors again. We don't want empty high streets and the change of use from any use or mix of uses within Class E (Commercial, Business and Service users) to Residential use (C3) could perhaps provide affordable accommodation for the numerous individuals working in Oxford. Such conversions could bring life back into the City centre with a larger number of people on the streets in the evenings, shopping locally, frequenting restaurants and public houses, attending theatre and cinema. The greater number of people who live in the centre would not need cars: this would have a knock-on effect on the use of private and public transport. A reduction in vehicles would improve the quality of the air we breathe.

That said, it is **essential** that any, indeed, all developments are undertaken sympathetically, taking account of location and the potential impact on the area and its neighbours. It must not be random and market driven.

The basic premise that there should be new permitted development is not entirely objectionable, change is good if it improves. However, the main elements that raise objection are:

Deregulation can lead to unscrupulous developments and exploitation of loopholes in legislation leading to poor quality accommodation and a change to the size and shape of an area. Change must be done in a planned and curated way by local communities through their

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local planning policies; the paper fails to explain satisfactorily why the new public service application process (para 43, 44) is given priority for public over private development This must be clarified

- **Changes to the consultation period** that exclude effective engagement with the local community is unacceptable;
Reducing scrutiny and public consultation and giving the final decision to a remote unitary council (if the Devolution White Paper is successful) or a Secretary of State who has no connection to place, might lead to unscrupulous development, poor quality of accommodation and a loss of character in areas of conservation.
A recent study by *Civic Voice* has identified the types of use that under the new PD rights would be able to change to housing. The categories that currently cannot change without recourse to planning regulation that would change from No to Yes are numerous¹; those that will continue to require permitted development permission under the new legislation are Community Centre/Halls; Public Houses, Takeaway (Hot Food); Libraries; Beauty Salons; Hotels; Cinemas.
- **Broadening of PDR for land and properties within conservation areas** can destroy or blight such areas and effectively see the loss of heritage assets which many towns and cities rely on for economic reasons, such as tourism. We cannot support this policy and believe the 'protected status' that is being offered to conservation areas in the Paper is meaningless, if the proposals are adopted.

In our view this is another ill-conceived proposal that will meet with significant opposition from all those that respond from the community, the councils, *Civic Voice* and local civic societies across the country. We urge the Government to look at these proposals again, clarify those aspects which are unclear, and come forward with a revised Paper that answers the concerns of all stakeholders.

Yours faithfully,



Gillian Coates
Oxford Civic Society Vice-Chair and Planning Group Co-ordinator.

¹ Restaurants; Cafes; Gyms; Creche/nurseries; Day Centres; GP surgeries/Health Centres; Dentists; Coffee Shops

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