



Please ask for: **Kate O'Driscoll**
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GREATER LONDON AUTHORITY

Via email: kit.malthouse@communities.gsi.gov.uk

Kit Malthouse MP
Minister of State for Housing
Ministry of Housing, Communities and Local Government
4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

7 March 2019

Dear Minister,

Planning Reform: Supporting the high street and increasing the delivery of new homes

We, the Wider South East (WSE) Political Steering Group, are an all-tier executive partnership with geographical and cross party-political representation from across the WSE, which was established in 2015. The WSE partnership harnesses the collective strength of the three biggest economies in England to tackle the most important economic challenges facing local authorities across the country.

The Mayor of London and council leaders from across the East, London and South East are committed to supporting initiatives that maximise the ability of councils to promote local housing and sustainable growth in their areas, including successful high streets. Our three regions are central to the nation's success, together delivering 47% of England's economic output - £840 billion GVA in 2017.

The WSE Political Steering Group fully supports the government's ambition to drive forward the delivery of much-needed housing, and we appreciate MHCLG data shows 13,526 of England's total 222,190 net additional homes were delivered nationally through PDR in 2017-18. However, we have serious concerns that the recent proposals to further extend the Permitted Development Rights (PDR) regime could have unintended consequences for local economies and environments across the WSE area. Development has to be acceptable to local communities and secure their support.

Each of our areas responded to MHCLG's recent consultation, but we wanted to personally write to you to emphasise the significance of our shared concerns.

We are concerned that if MHCLG's proposals go ahead as suggested, they risk:

- Encouraging residential development that is below acceptable space and design standards, and that does not meet the aims of the Building Better, Building Beautiful Commission;
- Further PDR sites coming forward without contributing to addressing the need for genuinely affordable housing, given PDR exemptions from these contributions;
- Undermining councils' ability to ensure that a suitable mix of uses is provided, helping to make town centres vibrant places;
- Worsening the Wider South East's existing infrastructure deficit through lack of financial contributions from PDR sites; and

- Undermining councils' role in supporting and developing key sectors of the local economy. We are committed to a positive plan-led approach and PDR can bypass this and potentially result in loss of employment spaces and sites.

We would urge you to rethink in particular the PDR proposals with regard to:

- Making permanent the current time-limited PDR for change of use from storage and distribution to residential;
- Allowing the demolition of commercial buildings for redevelopment as residential; and
- Allowing upwards extension of homes (additional storeys) on residential buildings, without necessary planning control on space and design standards.

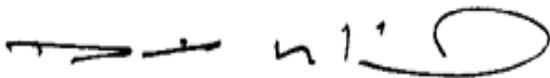
The WSE Political Steering Group is concerned that all the factors above could weaken councils' place-shaping ability, undermining our local plan-led approach for employment and economic development and weakening our ability to support and enhance sustainable communities where people want to live and work. We appreciate councils can make 'Article 4' exemptions to PDR, but the National Planning Policy Framework emphasises that this should only be used in limited situations. To avoid the serious risks to the planning system set out above, we would urge you not to implement the proposed extension of the PDR regime, allowing us to use the locally-led planning system to bring forward homes, support sustainable economic growth and help deliver the infrastructure our communities need.

We would welcome an opportunity to meet to explore this issue, and more broadly, how we can work with government on initiatives to increase housing delivery further.

Yours sincerely



Jules Pipe Deputy Mayor of London for Planning, Regeneration and Skills, Greater London Authority



Cllr David Finch Chairman, East of England LGA/ Leader of Essex County Council



Cllr Ralph Bagge Deputy Chairman, South East England Councils / South Bucks District Council



Cllr Darren Rodwell London Councils Portfolio Holder for City Development/ Leader of London Borough of Barking and Dagenham