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**Chairman: Keith Leaman**



28<sup>th</sup> January 2021

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

Dear Sir or Madam

**The City of Winchester Trust response to the government consultation on Supporting housing delivery and public service infrastructure (through permitted development (December 2020))**

The City of Winchester Trust (CWT) was founded in 1957 (then called the Winchester Preservation Trust) to protect the character of the City of Winchester. We do not resist change (hence the subsequent alteration of our name), because we believe continuing change to be an essential part of the City's character, but believe that change should be carefully managed to ensure that it enhances rather than detracts from the character. Currently we have some 500 members.

**Response to the current proposal to extend permitted development rights**

The CWT strongly shares and supports Civic Voice in its very well expressed responses (to which we have contributed); consequently it would be pointless to reword the consultation responses by Civic Voice, so we append them verbatim as our response. We do, however, have two additional overall comments based on our experience of the system as it has been applied in Winchester.

Ever since PD rights first appeared as a means of reducing the procedural burdens of the planning process on owners and local planning authorities alike, there have been two fundamental flaws in the system, about which we have repeatedly complained. Planning officers have invariably explained that there is nothing they can do about it. The flaws are twofold:

1. Although the PDRs were generally made subject to conditions and limitations to protect amenity, these have not always been sufficiently expert and comprehensive to serve as intended.
2. What amount to government planning permissions are not adequately monitored either by the government or by the local authority. Regulations that are not reviewed and amended can become

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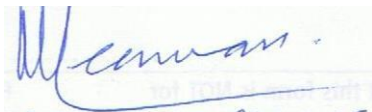
open to abuse, either by ignorant or careless owners, or more seriously by unscrupulous developers/landowners exploiting loopholes and omissions. Although not connected with PDRs, problems associated with the catastrophic application of unsuitable cladding for multi-storey buildings is an extreme and cautionary example.

With the commendable objective of increasing the number of urgently needed affordable homes, recently introduced rights permitting change of use from offices etc to residential use without the need for planning applications, have been widely criticised for facilitating the introduction of substandard accommodation. In this case, government has acknowledged the problem and now requires that proper residential standards must be met when exercising this right.

Equally well-intentioned past PDRs covering what were regarded as minor domestic works, have on many occasions spoilt the quality and consistency of housing areas by failing to prevent inappropriate additions, changes of window design and materials, etc. This is due to the writers of the 'conditions and limitations' not being sufficiently familiar with all the circumstances in which the rights will be exercised. For example, new dormer windows are now consistently greatly oversized (we call them sheds on the roof) or in positions where they spoil the appearance particularly of traditional housing.

Although CWT understands the advantages of introducing *de minimis* thresholds in the planning process, we urge that periodic review and amendment should become a regular part of the system (in consultation with local authorities) to avoid weakening the government's other objectives - exemplified by Building Better Building Beautiful - which imply the need for both high standards and improved appearance.

Yours faithfully,



Keith Leaman  
Chairman