



The countryside charity  
Dorset

**Dorset CPRE**

25<sup>th</sup> September 2023

**Open consultation on additional flexibilities to support housing delivery, the agricultural sector, businesses, high streets, and open prisons; and a call for evidence on nature-based solutions, farm efficiency projects and diversification.**

This response is prepared by the Dorset Branch of the Campaign to Protect Rural England (CPRE). Our mission is to promote, enhance and protect a thriving countryside.

Our response focuses on the proposals contained within

- 1) Agricultural buildings to dwellinghouses (Class Q of Part 3) (paragraphs 53 -94)
- 2) Supporting the agricultural sector through additional flexibilities (paragraphs 95 -137)
- 3) Markets – temporary use of Land (Class B of Part 4) (paragraphs 150 – 153)

### **Summary**

Dorset is a predominantly rural county, famous for its Jurassic Coast and Hardy country, a large proportion of which (approx. 50%) is designated as an Area of Outstanding Natural Beauty and was recommended in the 2019 Landscapes Review by Julian Glover as warranting National Park Status. As such the proposal to extend further extend permitted development rights already applicable to agricultural buildings under the General Permitted Development Order, Class Q and remove the exemption covering agricultural buildings in designated landscapes (Article 2(3) Land) is a subject close to our heart.

We are strongly opposed to the government's proposed amendments to the General Permitted Development Order to extend permitted development rights relating to the conversion of agricultural buildings. The UK is widely acknowledged to be one of the most nature depleted nations in the whole world, extending permitted development rights to cover agricultural buildings, particularly those in Article 2(3) Land will lead to further urbanisation of our precious rural areas which are of great natural beauty. We should be seeking opportunities to restore natural beauty where it has been lost rather than perpetuating its demise.

Due to the impact that changing the use of these buildings we believe that any applications for change of use of agricultural buildings should be fully assessed by local planning authorities who are best placed to assess the suitability of the building for conversion, the impacts of any proposed use and whether it meets local needs.

Given that food security has never been more important we would like to see government policies that support farming and food production as an activity. Extending permitted development rights that actively encourage farmers to move out of farming/ related enterprises to non -related businesses such as sport and leisure activities not only has huge multifaceted impact on the rural environment but also devalues farming as an occupation and sends out the wrong message. We do support the re-use of agricultural buildings to activities related to/ required to support enterprises associated with the main farming/horticulture / forestry activity.

We are concerned that the combination of allowing farm buildings of increasing magnitude to be constructed without requiring planning consent coupled with permitted development rights for the conversion of smaller buildings is encouraging a movement away from family run, smaller mixed farm businesses towards larger specialised farm units. These diverse farms have played a critical role in shaping the countryside that we all enjoy and are central to maintaining biodiversity. We would like to see more government measures to support mixed farming.

The extension of Permitted Development Rights to Agricultural Buildings is resulting in a decrease in opportunities for new entrants to the farming industry. Where once it might have been possible to purchase a 'starter unit' of a few buildings and some land, these buildings are now being sold for development.

### **1) Agricultural building to dwellinghouses (Q25, Q26, Q27)**

The extension of permitted development rights to allow change of use of Agricultural Buildings to dwellinghouses (Class Q) in 2014 has already facilitated unsustainable development in the open countryside going against the 'golden thread' of sustainable development that runs through the National Planning Policy Framework. Whilst some farm units are situated close to villages many are in remote locations with poor vehicle access making them unsuitable for use as 'rural housing estates'.

Not all agricultural buildings are historic stone/brick buildings the vast majority are more modern structures of steel/ concrete frame construction with fibre cement sheet roofs, (frequently containing asbestos) or steel. These are often unsightly buildings, which are unsuitable for conversion to domestic dwellings. Facilitating the conversion of these buildings to alternative uses perpetuates their presence in the countryside. Loss of derelict barns in the countryside, which are frequently used as roosting sites for Barn Owls and bats, has a detrimental impact on Wildlife.

We recognise that there is a need to provide affordable and social rented housing for rural workers and local people in rural areas. Whilst the stated intention of the amendments is to provide homes for this sector of the rural community it is unlikely to do so unless it is coupled with a specific mechanism to ensure affordability and that the homes provided are truly available primarily for rural workers and local people.

Q.25 Do you agree that the smaller and larger home size limits within the agricultural buildings to dwellinghouse right (Class Q of Part 3) should be replaced with a single maximum floorspace limit?

c) No Change

Q.26 Do you agree that an overall limit on the amount of floorspace that can change use, set at 1000 square metres, should be introduced for the agricultural buildings to dwellinghouses right (Class Q of Part 3)?

b) No

Increasing the amount of floor space that can change use from 865 square metres to 1000 square metres, will result in an increase in the number of homes that can be built to which we are opposed.

Q.27 Do you agree that the 5-home limit within 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?

b) No

Increasing the number of homes that can be constructed on a single agricultural unit from 5 to 10 is a huge increase. Potentially resulting in small housing estates being developed in remote rural locations.

**Article 2(3) Land (Conservation Areas, Areas of Outstanding Natural Beauty, National Parks)  
(Question 31)**

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?

b) No

We strongly object to the proposal to amend the right to allow agricultural buildings in Article 2(3) land to be converted to residential dwellings for the following reasons: -

- Many agricultural buildings in AONBs, National Parks etc are relatively modern buildings which are of poorer quality appearance than traditional stone/brick barns. These buildings have been granted planning consent to fulfil an agricultural function. Should they no longer be required for the use they were originally intended, it would be better that they were removed, and the land restored than re-used for residential purposes.
- Domestication of these buildings with result in planting of gardens, construction of driveways, etc which will have an urbanising effect landscape.
- Loss of wildlife habitats – redundant agricultural buildings old and new provide and important home to a range of protected wildlife. For example, bats and owls.
- Increase in light pollution.

**Enabling the change of use of other Rural Buildings to Residential (Q 39/ 40)**

Q.39 Do you agree that permitted development rights should support the change of use of buildings in other predominantly rural uses to residential?

b) No

Other rural buildings can provide essential premises for small businesses which are a vital element of a thriving rural economy. Allowing these to be converted to residential dwellings may result in these premises no longer being available for commercial/ alternative uses.

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

These proposed changes will impact on local businesses, planning authorities and communities. Change of use of these buildings should require a formal application for

change of use in order that the public can determine whether any benefits outweigh the negative impacts resulting as outlined above.

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

Whilst undoubtedly these changes to Class Q will lead to the delivery of additional homes it is not guaranteed that they will be targeted primarily at rural workers, or, that they will be in the places that they are needed.

**2) Supporting the agricultural sector through additional flexibilities. (Q43, Q44, Q46, Q47, Q48, 49, Q50, Q51, Q52, Q53, Q54, Q55)**

Dorset CPRE are keen that rural economies are sustainable. In the first instance we would like to see that farming, horticulture and woodland management businesses are supported. Over recent years there has been a loss of small farms and opportunities for new entrants to start farming enterprises. Extending permitted development rights to facilitate the conversion of agricultural buildings to uses outside of agriculture, will potentially result in an uplift in value of small farms/ clusters of agricultural buildings with land which will place them outside the reach of people who would like give farming a go.

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?

b) No

In our opinion permitted development rights should only be extended to facilitate the change of use of agricultural buildings to uses that are complimentary/ related to the farming/ horticultural/ forestry business (s) already taking place on the holding.

Q.44 Do you agree that the right be amended to allow for buildings and land within the curtilage to be used for outdoor sports, recreation, or fitness?

b) No

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.

We support extending the permitted development rights to allow agricultural buildings to change use to allow processing of **agricultural/horticultural** raw goods produced on site.

Q.46 Should the right allow for the change of uses to any other flexible commercial uses?

b) No

### **Allowing mixed uses**

Q.47 Do you agree that the right be amended to allow for a mix of the permitted uses?

b) No

### **Amount of floorspace that can change use.**

Q.48 Do you agree that the right be amended to increase the total amount of floorspace that can change use to 1000 square metres?

b) No

### **Prior notification/approval triggers**

Q.49 Is the trigger as to whether prior approval is required set at the right level (150 square metres)?

b) No

Any change of use of agricultural buildings should require prior approval as a minimum. We would prefer that a full application is required.

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

Allowing the change of use of an Agricultural Building under Class R can have a huge impact on communities, for example storage and distribution uses (Class B8) can result in an increase in large vehicles and other vehicle movements on narrow lanes and should require a formal planning application.

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.

On the proviso that the use of new buildings constructed using this permitted development right is restricted to the agricultural use originally intended.

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

Agricultural buildings have an adverse impact on scheduled monuments and any proposed extensions to agricultural buildings or new buildings should require a formal assessment/ planning application.

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.

On the proviso that the use of the extended building is restricted to the agricultural use originally intended and subject to compliance with existing protection measures.

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?

b) No.

Buildings of this scale/size have a huge impact and their suitability should be formally assessed by a formal planning application.

Q.55 Do you agree that we remove the flexibility for extensions where there is a designated scheduled monument?

a) Yes.

Extending the size agricultural buildings in the vicinity of a scheduled monument should require a formal planning application as it will have a detrimental impact on these important monuments.

Q.56 Do you think that any of the proposed changes in relation to the Part 6 permitted development rights could impact on: a) business b) local planning authorities c) communities?

a) Yes

Allowing agricultural buildings to be further extended on units of 5 ha (12 acres) to 1250 sq.m (13,454 sq. ft) will have a huge adverse impact on local businesses and communities as an agricultural building of this size on a relatively small holding is most likely to be used for intensive agricultural purposes such as chicken farming, intensive indoor dairy units etc which have huge environmental impacts and can negatively impact on local businesses and communities and should require a formal planning application.

### **3) Markets - Temporary use of Land (Class B of Part 4)**

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.

c) No change

Extending permitted development rights to allow land to be temporarily used up to 28 days (approx. fortnightly) is moving towards a permanent use that should require a formal planning application as such uses can place a strain on local infrastructure and can have impact on the local environment and potentially disturb archaeological

remains. The temporary use of land for motorsports not only creates pressure on local infrastructure but also noise and other pollution disturbing the quiet enjoyment of the countryside by the public.