

Please reply to: Cllr Nesil Caliskan  
Leader of the Council  
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Phone: 020 8379 4116

Date: Thursday 28 January 2020

Ministry of Housing, Communities and Local  
Government  
2 Marsham Street  
London  
SW1P 4DF  
***Sent Via Email***

Dear Rt Hon Robert Jenrick MP

**Re: Proposed Changes to Permitted Development Rights**

The Government's proposals to support delivery of housing through new permitted development rights for the change of use from the Commercial, Business and Service use class to residential represent a grave threat to Enfield's local economy and the ability of local residents and businesses to recover from this pandemic.

As an elected leader, I understand the needs and challenges facing our communities and want to raise our deep concerns about these proposals. Permitted development on this scale will erode local democracy and control, leading to worse outcomes for local residents.

The housing crisis in Enfield is significant. Housing prices are 12 times our median income. Of our 125,000 households, 3,500 are in temporary accommodation, unable to afford the rising rents in the private sector. Accelerating the delivery of good housing is the biggest single factor in reducing crime and anti-social behaviour, improving health and raising educational attainment. Decent housing improves life chances and I (we) believe everyone in Enfield deserves a home to live in.

This proposal for permitted development will have a negative effect on the ability of Enfield's town centres to intensify and redevelop. Enfield wants to direct new housing creation to our town centres, but through intensification of land use which also provides for local economic development. Without the local control that planning policy and local decision making provides, ad hoc conversion of economic land use into residential will constrain future development potential and reduce the number of homes that Enfield can build. This will lead to an increased reliance on green belt release to deliver on our housing targets.

Permitted development also fails to provide the design quality, environmental standards, and community benefits secured through planning applications, harming local communities.

The proposed rights will also impact on national government finances and could result in a significant shortfall in our local collection fund depending on the type and position of commercial or business property converted into residential. There is a real possibility this right will lead to further cuts in local services for our most vulnerable residents, alongside providing them with poor quality housing. Government should provide a more detailed analysis of the likely impact of this proposal on business rates and council tax receipts before considering this proposal and provide safeguards that any shortfall will be met centrally.

An alternative proposal to government, which will support housing delivery, is to create a high street planning fund, providing a grant to cover any new Local Development Order for a high street which increases housing supply. This would be similar to the grants local councils receive to support neighbourhood plans, and would encourage more redevelopment of high streets for more, and better quality, homes.

I urge you to reconsider the fee charged for prior approval applications, which are less than what the Government charges for a pavement trading license. The fees do not come close to covering the cost of administering the application and the long list of considerations required.

Your government, in its White Paper on Planning, states that its committed to a more proactive planning system and to promoting beauty and design. Permitted Development is the exact opposite of proactive planning, and all the experience and evidence to date in Enfield indicates that it creates low-value and undesirable homes which are far away from anyone's definition of beautiful.

I hope this letter outlines the clear case for rethinking the proposals you have set out and urge you to support proactive planning in local government.

I look forward to receiving your response.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Nesil Caliskan', with a stylized flourish at the end.

**Cllr Nesil Caliskan**  
**Leader of the Council**