



Householder Permitted Development Rights Consultation

Summary of responses to consultation



Permitted Development Rights for Householders

Summary of responses to consultation

Arup

November 2007
Department for Communities and Local Government: London

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1

Introduction

This report provides an analysis, understanding and summary of responses received in relation to Consultation Paper 2: Permitted Development Rights for Householders. The findings and conclusions outlined are based on an analysis of 459 responses. This report sets out the views of respondents, not the views of Government or Arup.

For the purpose of this analysis findings have been broken down into 5 respondent categories, these are;

- Government (local authorities, government agencies, devolved administration and regional organisations)
- Public (members of the public)
- Environment and community groups (includes amenity, voluntary and local groups, and parish and town councils)
- Business (business organisations and business Individuals), and
- Professionals and academics (including professional institutes and legal firms)

Of the 459 responses, 180 have been received from government bodies, 97 from the public, 102 from environment and community groups, 51 from businesses, and 29 from professionals and academics.

In summary, there is broad support for the majority of proposals set out in Consultation Paper 2: Permitted Development Rights for Householders, with a significant number of in-depth responses being received, providing policy makers with evidence and insight to help inform and develop future policy.

Section 4 of this report provides a list of abbreviations to assist in this report's understanding.

2

General Issues for Householder Development

2.1 An Impact Approach

Question 1 – Do you agree with the principle of an impact approach for permitted development?

Question 1			
	Answered	Yes	No
Government bodies	140	91%	9%
Public	43	79%	21%
Environment and community groups	66	82%	18%
Business	28	82%	18%
Professionals and academics	19	84%	16%
All	296	86%	14%

2.1.1 Summary of findings

General conclusions

The large majority of respondents who answered this question agreed that the impact approach to considering permitted development was the correct methodology. Overall 296 respondents answered this question, with 86% in agreement with the proposed changes. 14% of respondents disagreed with the new impact approach and felt there was merit in maintaining the current method of assessing permitted development.

Government bodies were the largest sector of respondents to this question: 91% were in favour of the impact approach. All other groups were also mainly in favour.

Specific comments

Comments upon the existing process highlighted its lack of transparency and anomalous results.

Supporting

- current GPDO is arbitrary, too complex and difficult to interpret which leads to confusion over what may be permitted. Proportionate approach based on impact is preferable as it will concentrate on those matters that are genuinely relevant
- current volume-based approach leads to unnecessary applications for development that have no impact outside of the site

Concerns

There were concerns about the proposals, with some feeling that the existing system was not in need of change:

- altering the system may mean LPA officers would have to spend extra time dealing with disputes
- would provide little or no protection for Green Belt/AONB. Extensions may have no direct impact on neighbours but huge impact on actual property and the surrounding environment. May be better to consider percentage volumes in these areas
- new proposals would allow neighbours to extend without regard to others

Suggestions

However, even with those who were in agreement over the impact approach, some had suggestions, particularly on the definition of what constituted an 'impact approach':

- must take into account all impacts, including drainage, preserving green space, car movements
- concerned about interpretation and who decides
- proposed approach should be more prescriptive
- need to link to sustainable development; perhaps model national and regional LDOs might show LPAs how principles of impact approach could be applied consistently and efficiently

2.2 Protection for Designated Areas

Question 2 – Do you agree with a restriction on development facing onto and visible from a highway in designated areas?

Question 2			
	Answered	Yes	No
Government bodies	137	95%	5%
Public	28	89%	11%
Environment and community groups	61	89%	11%
Business	22	91%	9%
Professionals and academics	15	87%	13%
All	263	92%	8%

2.2.1 Summary of findings

General conclusions

There has been a positive response to this question. Of the 263 respondents who answered this question, 92% agreed that a restriction on development facing onto and visible from a highway should be put in place.

The percentage of positive responses was consistently high across all sectors. This positive response rate does include some who felt that the general proposal was sound, but welcomed some modifications or alterations to the approach.

Specific comments

Supporting

- comments did not further those arguments within the Changes to Permitted Development Paper

Concerns

- impact should be considered from all aspects
- significant impact may also occur from rear of developments
- designated areas merit more protection than others, and visual impact is a key consideration

Suggestions

- clarification needed on ‘highway’, whether it was the adjacent principal highway or any highway
- better restriction would be to require planning permission for those extensions, which are visible from public vantage points – waterways, paths
- consideration should be given to the definition of ‘visible from’, as this could be dependant upon individual decision making and thus be open to discrepancies and anomalies. It was highlighted this may be a particular issue in highly prominent sites
- elevations should be subject to this restriction, streets may not be straight; rear or side elevations may be visible to wider area

Question 3 – Should the restriction apply in the same way to all types of designated area?

Question 3			
	Answered	Yes	No
Government bodies	130	90%	10%
Public	28	64%	36%
Environment and community groups	63	81%	19%
Business	21	57%	43%
Professionals and academics	14	57%	43%
All	256	80%	20%

2.2.2 Summary of findings

General conclusions

The analysis of the responses to this question shows a large majority in favour of the proposal. Of the 256 respondents who answered the question, 80% agreed that any restriction should be applied in the same way to all types of designated area.

Government bodies and environment and community groups show a high percentage in agreement with the proposal. Respondents from the public had a variable response with only 64% seeing merit in the proposal. Business and professionals and academics showed the highest negative response to applying restrictions across all types of designated area. It should be noted that many who answered yes, went on to clarify their response with a caveat covering the areas for restrictions.

Specific comments

Supporting

Comments did not further those arguments within the Changes to Permitted Development Paper

Concerns

- classification of areas may lead to some confusion
- each designated area has different pressures and threats
- not AONB, as these areas are too extensive
- this leads to current blanket bans on types of development which do not allow for sympathetic improvements

Suggestions

- impact on environment needs to be considered in its widest sense. World Heritage Sites should be included in list of designated areas
- should be different restrictions for conservation areas
- fine in less historic and less populous areas, but should be dependant upon character of area
- in terms of ease of operation of GPDO it would be better to have same restrictions applying to all types of designated area
- need clearer definition of 'all types of designated area'
- need to differentiate between built and natural environment designations

2.3 Compensation

Question 4 – Do you agree that, subject to safeguards to protect householders from abortive costs, the existing right to compensation for 12 months after any change to the GPDO is made is reviewed?

Question 4			
	Answered	Yes	No
Government bodies	129	97%	3%
Public	24	71%	29%
Environment and community groups	50	70%	30%
Business	20	70%	30%
Professionals and academics	14	71%	29%
All	237	90%	10%

2.3.1 Summary of findings

General conclusions

Only 237 respondents answered this question. Those who did answer show a positive response to the proposals. 90% agreed that the existing right to compensation for 12 months after any change to the GPDO should be reviewed.

Government bodies in particular have positive attitudes towards this proposal, with 97% agreeing to a review. There was also majority support from the other sectors.

Specific comments

Supporting

- proposals must put safeguards in place to avoid householders incurring abortive costs through the imposition of new restrictions. Delaying the implementation of the changes for 12 months would be a simple solution and gives enough warning

Concerns

Some concerns were raised about the parameters of any review including:

- will create an influx of applications and no resource saving for local authorities
- existing safeguards should remain in place

- people will make purchases, or long term plans, based on what is currently possible in terms of development – any changes to this should be subject to suitable compensation, taking into account the fact that many will be forced to move
- making changes tied to obtaining planning permission. If planning permission is unsuccessful as a result of GPDO changes then compensation rights should be maintained for 12 months

Suggestions

- should give LPAs 12 month lead time, and then there will be no need for compensation. Also provide householders with long enough time to undertake works. This is a reasonable and proportionate response

Question 5 – Do you consider that local planning authorities should be able to make an Article 4 Direction without the need for the Secretary of State’s approval at any stage?

Question 5				
	Answered	Yes	No	Sometimes
Government bodies	140	90%	8%	2%
Public	35	37%	54%	9%
Environment and community groups	60	95%	3%	2%
Business	25	40%	60%	0%
Professionals and academics	20	50%	45%	5%
All	280	77%	20%	3%

2.3.2 Summary of findings

General conclusions

There has been a large majority of positive responses to this question. 77% of those who answered the question felt that LPAs should be able to make an Article 4 Direction without the Secretary of State’s approval. 3% felt that these powers could be applied in certain instances, independently of the Secretary of State.

Almost all government bodies and environmental and community groups were in favour of the measures. In contrast however, the majority of business and public respondents were against the measures, with a majority feeling the Secretary of State should still have powers over Article 4 Directions.

Specific comments

Supporting

- current system is expensive and cumbersome, proposal will streamline and simplify the process
- LPA is in the best position to judge whether Article 4 Direction is applicable or not as they have better knowledge of local conditions
- proposal would enable LPAs to consider removing PD rights without needing Ministerial approval and provide flexibility
- the appeal process provides owners with a safeguard

Concerns

- the proposal would lead to a large increase in restrictions to permitted development and a lack of consistency between areas
- need to ensure that system is not open to abuse
- a general fear over lack of transparency and accountability in decision-making
- there should be clear principles which specify the limits to their powers

Suggestions

Those who felt that in certain circumstances there would be benefit from these powers noted:

- at an appropriate time to speed up the process, but the Secretary of State approval provides a useful check
- LPAs should have to provide strong justification for Article 4 Directions recently made and also update and review directions made under previous legislation to make them compatible with existing rules
- it was also noted by some respondents that care would need to be taken to ensure that the system is not open to abuse and that there should be no reduction in the transparency of decision-making.
- a standard set of criteria for Article 4 Direction should be put together with public consultation by LPA
- Secretary of State should review new Article 4 Directions before become effective, with statutory bodies and interested bodies proposing Article 4 Directions to the LPA, and the Secretary of State giving leave to hear an 'appeal' where necessary

Question 6 – Do you consider that, subject to safeguards to protect householders from abortive costs, the existing right to compensation as a result of the making of an Article 4 Direction should be reviewed?

Question 6			
	Answered	Yes	No
Government bodies	128	98%	2%
Public	25	60%	40%
Environment and community groups	58	88%	12%
Business	19	68%	32%
Professionals and academics	16	56%	44%
All	246	87%	13%

2.3.3 Summary of findings

General conclusions

246 respondents answered this question. Analysing those who did answer shows that overall 87% felt that the existing right to compensation as a result of making an Article 4 Direction should be reviewed.

Government bodies were almost all in favour, with 98% agreeing that there should be a review. Environment and community groups, along with business were also in favour, with 88% and 68% respectively agreeing to a review. Professionals and academics and the public had mixed views with 44% and 40% stating that there was no need for a review of the current measures.

Specific comments

Supporting

- would enable LPAs to consider Article 4 Directions, which they cannot currently do because of the cost implications arising from compensation
- householders should not suffer any financial loss, and that there should be a consistent approach, applying Article 4 Directions in an equal manner

Concerns

- some respondents felt existing rights to compensation should not be reviewed, and that Article 4 Directions are currently not to the householders' advantage

Suggestions

- any changes to the compensation procedures should be accompanied by a 12 month publicity campaign to advertise removal and avoid abortive costs, with the onus falling on LPAs to undertake

2.4 Removal of Permitted Development Rights

Question 7 – Should there be a requirement for planning authorities to review Article 4 Directions at least every five years?

Question 7			
	Answered	Yes	No
Government bodies	134	48%	52%
Public	26	73%	27%
Environment and community groups	57	74%	26%
Business	21	90%	10%
Professionals and academics	17	65%	35%
All	255	61%	39%

2.4.1 Summary of findings

General conclusions

The requirement for planning authorities to review Article 4 Directions every five years has drawn a mixed response. 255 respondents answered the question, with 61% of these agreeing that there should be a review every five years.

Government bodies had a slightly negative response with 52% against the principle of reviews. The public, environment and community groups, and professionals and academics were in favour. A large majority of business respondents were positive about changes, with 90% agreeing to the proposal.

It should be noted that of those who did feel there was a need for review, many commented that five years should be the minimum threshold. Indeed, the majority of those who responded negatively to this question felt that the five year period was too short.

Specific comments

Supporting

- LPAs should regularly review the need to retain the Direction, and the rights of owners should not be withdrawn except in exceptional circumstances
- reviews should be made public, all property owners should be consulted and an appeal procedure available

Concerns

- should consider the risk that Local Authorities may use this power to re-establish controls that have been removed through the current reforms
- unnecessary, LPAs should be able to decide for themselves when reviews are required
- unlikely that circumstances which justify an Article 4 Direction will change within five years. Review should be left to the discretion of LPA

Suggestions

- agree to review but consider five years a minimum time frame
- any review should be as simple as possible
- can be undertaken as part of LDF monitoring to justify designated areas as part of the LDF review process and should align with local plan/LDF cycle
- definition of review should be clarified. Would this require public consultation?
- benefits will come in the longer term; five years is too short, no time period is required
- review process would be time-consuming; five years is too short, a ten year review period would be more appropriate

Question 8 – Would there be benefit in making certain types of permitted development subject to a prior approval mechanism?

Question 8			
	Answered	Yes	No
Government bodies	140	18%	82%
Public	27	33%	67%
Environment and community groups	52	69%	31%
Business	21	33%	67%
Professionals and academics	15	33%	67%
All	255	32%	68%

2.4.2 Summary of findings

General conclusions

There is an overall lack of support for this proposal. Only 255 respondents answered this question, with 68% disagreeing to the need to make certain types of permitted development subject to prior approval.

This lack of perceived benefit was reflected strongly from government bodies, the public, business, and professionals and academics. Only those from environment and community groups could see benefit, with a majority agreeing with making certain types of development subject to prior approval.

Specific comments

Supporting

- useful for larger, more intrusive aspects of permitted development
- certain types of development will be recognisable as causing greater impact than others; these should be stipulated and require prior approval
- prior approval would represent a constructive approach

Concerns

- prior approval would be confusing for the public, and administratively difficult for LPAs. Has potential to result in more developments being at risk of enforcement action, due to a lack of understanding
- problem is that there can be no retrospective prior approval so some development that is at present PD that requires prior approval would lose its PD status if that approval were not sought
- adds complexity
- there would be no benefit in making certain types subject to prior approval (as shown by telecommunications prior approval system). It was felt that it would be a poor piece of planning legislation and an administrative nightmare, with significant cost implications

Suggestions

- it would be simpler to make all such constructions subject to planning, and would be better to clarify permitted development rights
- if the new system is based on impact, the development should either be acceptable as PD or it should require planning permission
- existing prior approval should be withdrawn completely and instead require either planning permission or be permitted development

Question 9 – If so, what types of permitted development should be subject to prior approval and what aspects of the development should be subject to approval?

2.4.3 Summary of findings

General conclusions

Many respondents did not answer this question, even if they had answered 'yes' to question 8. There were however, suggestions on what should be deemed applicable to prior approval.

Prior Approval Suggestions:

- all buildings and installations in designated areas should be considered, together with the effect on the local ecology and wildlife
- those having an increased impact at the boundary of a property: noise, health and safety, loss of security to neighbours' property, height of development, visual impact, potential of ecological impacts
- conservatories, sheds and boundary treatment
- these would need to be defined at the local level. Control over doors, windows, balconies, and architectural details of facades, painting, rendering, brickwork, use of front gardens for car parking

Aspects subject to Approval:

- any development that is considered under LPA guidelines to become detrimental to the enjoyment of an adjoining owner's interest
- developments which make an onerous impact on neighbours
- if bats are present householders should be aware of their obligations under Wildlife and Countryside Act. Permission should be required from Natural England if development has an impact on bats
- additions of small rooms that would increase the rateable value (as a size limiter)
- minor works visible from the roadside, rear facing or not

3

Recommendations on Types of Householder Permitted Development

3.1 Separate Order & Definition

Question 10 – Would there be benefit in having a separate development order containing just permitted development rights for householders?

Question 10			
	Answered	Yes	No
Government bodies	130	87%	13%
Public	26	81%	19%
Environment and community groups	54	85%	15%
Business	19	79%	21%
Professionals and academics	15	100%	0%
All	244	86%	14%

3.1.1 Summary of findings

General conclusions

There was a positive response to this question. Of the 244 respondents who answered this question, 86% agreed that there would be benefit in having a separate development order containing just permitted development rights for householders.

In terms of the split between sectors, all had a large majority in favour of the proposal. Indeed professionals and academics were unanimously in favour of a separate order.

The most common argument employed in support of the order was grounded in its ability to simplify permitted development rights for householders, reduce confusion and provide greater clarity for the general public.

Specific comments**Supporting**

- would simplify matters for householders and reduce the confusion with the GPDO and other non-household developments
- a separate document might be easier for householders, builders, agents and parish councils to understand
- it should be possible for the homeowner and any other interested party to be able to readily calculate what permitted development is allowed
- benefit is that a Householder Permitted Development Order can be reviewed and updated in isolation from other elements of Permitted Development. Should be reviewed every five years along with Article 4 Directions. If not, no point in having separate document

Concerns

- not obvious what benefit this would produce; existing document is clearly broken down by category, and a single information source for all
- may result in all parts of the order being separated leading to additional costs and possible errors
- It is important to maintain consistency and that the document is read as a whole and other effects are considered such as employment in the area.

Suggestions

- could have own section within GDPO folder (loose leaf)
- an online expert system to deal with enquiries, via planning portal would assist LPAs
- a plain English extract for householders' use would be appropriate

Question 11 – Do you have any comments on the proposed definitions?

Question 11			
	Answered	Yes	No
Government bodies	128	64%	36%
Public	24	58%	42%
Environment and community groups	46	46%	54%
Business	17	47%	53%
Professionals and academics	15	67%	33%
All	230	59%	41%

3.1.2 Summary of findings

General conclusions

The response rate to this question was low with just 230 respondents commenting on the proposed definitions. Respondents from government bodies provided the greatest number of comments on the proposed definitions. Only one response was received in relation to the proposed definitions for 'side elevations'.

There was a general consensus that the proposed definitions provide greater clarity than those which currently exist, with a caveat that the proposed definitions should be tested against real life situations to ensure their suitability prior to their application. Attention has also been directed to the need to clarify the definition of 'original', in order to prevent misinterpretation and conflict between applicants and LPAs. It has also been suggested that the new definitions should include 'sketches' to assist applicants in their understanding.

Specific comments

Dwelling houses

- serious reservations about how you establish what this is; assumed the 1948 rule would not apply to the proposed definition
- more detail on the process of assessing a scheme on the 'balance of probabilities' is welcomed; assumed 1948 rule would not apply to this definition either?
- definition of 'original' difficult for really old or evolved buildings
- does 'original' mean as at the time these regulations are adopted, at the time the work is proposed or 1948?
- clarification is needed on whether garages and outbuildings are part of the original dwelling house

Original rear wall

- serious reservations about how you establish what this is. The 1948 date is well established and understood
- many properties were built before 1948; difficult to establish which is original rear wall. Lack of clarity could cause dispute between LPA and householder. The 1948 rule is well established and understood
- difficulties in determining principal elevations and original rear walls may occur, particularly where houses have more than one street-facing elevation
- better definition would be 'the wall of a dwelling house directly opposite the principal elevation'

- need clarification for corner plots which may have more than one principal elevation

Principal elevations

- what about corner houses with two principal elevations? Does that mean they have two original rear walls? Visual impact of development on these could be significant
- important to define this as the elevation facing the main highway serving the dwelling house

Side elevations

No specific comments were received in relation to the proposed definitions for ‘side elevations’.

3.2 Extensions

Question 12 – Do you agree with the proposed limits for extensions?

Question 12				
	Answered	Agree All	Disagree All	Mixed
Government bodies	137	58%	21%	21%
Public	37	41%	38%	21%
Environment and community groups	61	52%	26%	22%
Business	26	46%	38%	16%
Professionals and academics	16	38%	50%	12%
All	277	52%	28%	20%

3.2.1 Summary of findings

General conclusions

Responses to this proposal were mixed. Of those who responded 52% of all respondents agreed with all of the proposed limits, with a further 28% disagreeing to all, and the remainder being of mixed opinion.

The greatest level of agreement was received from those respondents grouped under government bodies, with 58% of these respondents agreeing with all of the proposed limits. Environment and community groups were also supportive with 52% agreeing to all. Half of professionals and academics disagreed with all of the proposed limits.

These mixed quantitative findings are reflected in the comments received. For example, respondents in agreement with proposals stated that the limits are sensible and well thought out, whilst providing a good balance between the interests of all parties. In contrast, those who disagreed with many of the proposals argued that there was little point in moving from a volume based approach, with proposed limits being too generic and bearing no relationship to the size of the property or curtilage, leading to disproportionate extensions.

1. Principal elevations

There was a strong level of agreement to these proposed limits. Comments included:

- agree, but also introduce the 45-degree rule (BRE Site Layout Good Practice for Daylight and Sunlight), to avoid overshadowing neighbours
- can still be seen from rear vantage points if no surrounding development
- permission for small porches would create undue workload for LPA

2. Maximum depth of single storey

Level of agreement was mixed to these proposed limits, with the balance of opinion towards agreement. Comments included:

- unduly onerous for properties with a large curtilage
- depth outlined is too big, four or five metres could have significant impact. (Most LPA guidance typically three metres)
- no mention of permitted width
- concern that five metre deep extension with four metre high ridge could have significant impact on adjoining properties
- single storey side extensions give rise to significant impacts. Householder Development Consents Review (HDCR) is wrong to suggest impacts can be managed via permitted development rights

3. Maximum depth of more than one storey

Level of agreement was mixed in relation to these proposed limits, with the balance of opinion towards agreement. Comments included:

- depth outlined is too big, three or four metres could have significant impact
- proposals well in excess of what most authorities set out in guidance notes, four metres deep could have significant impact
- would leave no options for extension in terraced house

- could cause unacceptable harm to rear properties, especially for terrace or semi-detached properties; change to three metres deep for terraced and semi detached properties
- yes, but many new estates with detached properties are very close together; four metres could have impact on neighbours of such properties

4. Within two metres of boundary

There was a strong level of agreement to these proposed limits. Adverse comments included:

- impractical and inappropriate
- would leave no options for extension in terraced house
- central rear extensions not consistent with the built environment in certain areas, where most tend to be at one side rather than central
- could result in very large extensions

5. Eaves and ridges

There was a strong level of agreement to these proposed limits. Adverse comments included:

- is the eave height measured from the applicant's, or neighbour's ground level?
- severely restricts rear dormers, would require many more planning applications, therefore defeating the point of simplified PDR
- new permitted development rights limits may allow two storey side extensions; extensions up the ridge via permitted development rights could result in poor design

6. To the sides of a dwelling

Responses to these proposed limits were broadly positive. Comments included:

- would leave no options for extension in terraced house
- too generous in high density development
- side extensions should be at least one metre from boundary
- allowance is too restrictive for a substantial proportion of houses; instead allow extension to be as wide as original provided does not exceed 14 metre in width. Gives a sliding scale of widths relating to size of house
- need to specify eaves height limit to prevent too many flat roofs, as applicants will try to make the most out of the limits

- assumes a traditional street layout; one size fits all approach will not work
- maintenance access is often not provided due to building flush to neighbouring property; gap must be provided
- may artificially encourage single storey extensions, when two storey may be more appropriate

7. Two storey extensions

Responses to these proposed limits were broadly in favour. Comments included:

- would leave no options for extension in terraced house
- only requiring a seven metres set back from rear property boundary is insufficient; could result in back to back extensions which are only 14 metres apart
- minimum should be ten metres not seven metres from back boundary. seven metres could seriously prejudice privacy of occupiers if two extensions are back to back
- suggests no rear extension above one storey
- results in back to back extensions, being too close together

8. Roof pitch of extensions

There was a strong level of agreement to these proposed limits. Adverse comments included:

- yes, but in practice many developments reduce the roof pitch to the minimum to get the quantity of development they want; can lead to ugly flat roofs on top of extensions. And many extended houses have more than one roof type
- no, severely restricts rear dormers and defeats object of simplifying permitted development rights
- roof pitches on extensions more than one storey high should match that of existing house

9. Side facing windows

There was a strong level of agreement to these proposed limits. Adverse comments included:

- side facing windows should not be permitted within two metres of a boundary. Side facing windows should be limited in area to a small proportion of the elevation

- only enforceable during building, unenforceable after
- not practical, lack of ventilation
- yes, but need to have some form of ventilation (potentially standard condition for top opening vent 1.7m above first floor level)
- non-opening windows would be a health hazard, need means of escaping a fire

10. Materials

There was a strong level of agreement to these proposed limits. Adverse comments included:

- a building may already be a mix of styles, especially if evolved over time, which would require discussion with LPA
- still doesn't prevent extension being visible
- need to discuss with LPA if there is no clear, overall style. LPAs should determine what is reasonable
- definition of 'matching'; brick manufacturers change over time and therefore so does design and colour
- definition of cladding needs redefining

11. No raised terraces etc

There was a strong level of agreement to these proposed limits. Comments included:

- should only apply above ground floor, and items covered should not count against the permitted maximum
- should be permitted except where they invade privacy of neighbours or in conservation area
- unclear as to what is intended to be achieved; proposal could outlaw much of this development

12. Maximum 50% coverage

There was a strong level of agreement to these proposed limits. Comments included:

- clarification needed over what constitutes a private garden area, especially for corner plots
- maximum should not apply in Green Belt or flood plain areas

- yes, but 'private garden area' should be defined to prevent access paths, driveways and utility spaces being included in the calculations
- has only ever been a problem for some terraced properties
- better to refer to curtilage of the dwelling and reduce coverage to 33%; should be once only and not successive
- suggest a maximum of 20%

Designated areas – general comments

The importance of restricting permitted development rights for two storey extensions in such areas has been identified.

3.3 Roof Extensions

Question 13 – Do you agree with the proposed limits for roof extensions?

Question 13				
	Answered	Agree All	Disagree All	Mixed
Government bodies	130	81%	11%	8%
Public	36	53%	42%	5%
Environment and community groups	51	76%	18%	6%
Business	25	24%	76%	0%
Professionals and academics	16	31%	56%	13%
All	258	67%	26%	7%

3.3.1 Summary of findings

General conclusions

Responses to this proposal were generally positive. Of those who responded 67% agreed with all of the proposed limits, with only 26% disagreeing, and 7% being of mixed opinion.

There is a noticeable difference in opinion however between respondents. 81% of government bodies for example agreed with all of the proposed limits for roof extensions, with just 11% disagreeing with each of the proposals. In contrast a minority of professional and academic bodies agreed with all of the proposals, with the majority of business, and professional and academic bodies disagreeing with all of the proposals.

A common argument expressed suggests that the proposals for roof extensions are likely to generate planning applications for a large number of loft conversions, due in part to the rear dormer being one metre away from the eaves, and side roof extensions not being permitted. Consequently, it is suggested, the proposed limits will enforce greater restraint over the form of residential development.

1. No roof extension to come forward of roof plane

There was a strong level of agreement to these proposed limits.

Comments received related to negative responses:

- this excludes a loft conversion for many homes by preventing adequate headroom; but permits ugly, arbitrary 'sheds-on-the-roof' for larger and often more sensitive properties
- if no side roof is permitted it will lead to major increase in planning applications
- semi detached properties have staircase on outside wall and therefore require side dormer for second staircase
- few roof extensions can meet the criteria of one metre above eaves and one metre below the ridge

2. Roof extensions to be a minimum of one metre above eaves

There was a strong level of agreement to these proposed limits, with comments received however mainly identifying the proposals as highly restrictive. Comments included:

- will not allow roof extension in terraced houses as stairs adjacent to party wall. one metre ridge will be hard to achieve in most houses
- unacceptably restrictive
- to set it one metre from party wall and side eaves would restrict the design of some conversions. Restriction of rear dormers to one metre below ridge is disaster – ridge would need to be 3.5 metres
- should not apply where the extension is purely to enlarge a window to increase natural lights into structure
- one metre from eaves, ridge and party wall would make loft conversions in most houses impossible. Staircases would be tricky to build due to lack of room
- unclear whether one metre is in a vertical plane or along the line of roof
- likely to mean all dormer roofs will require planning permission; requirement that roof extension not to be higher than ridge of original dwellings would be adequate

- will do little to reduce level 2 and 3 impacts. One metre would exclude dormer window on most houses because it would push the roof too low leaving insufficient headroom, therefore producing more planning applications

3. Materials to match existing dwellings

There was a strong level of agreement to these proposed limits.
Comments included:

- yes, but remember existing dwelling may have a mix of styles already
- yes, but may require discussion with LPA if no clear housing style
- not always practical to use brick and stone for dormer cheeks and faces
- 'matching' is subjective

4. No raised terraces etc

There was a strong level of agreement to these proposed limits.
Comments included:

- yes, but need also to include external staircases
- including railings, walls or balustrades to be added to the dwelling house
- does this include balconies, created by cutting back existing roof, that do not create new volume?

5. Obscure glazing

There was a broad level of agreement to these proposed limits.
Comments included:

- may require some ventilation
- suggest a new limitation on the size of and alignment of glazed openings in large dormer windows; they should be smaller than, and in vertical alignment with windows in the floor below
- yes, but remember need for ventilation/fire escape
- any window on side roof extension other than dormer will be velux and therefore no direct view
- side windows should allow restricted opening

Some negative responses to this proposal included:

- restrictive and unrelated to impact. Windows only need to be fixed and obscure glazed if they are within ten metres of a facing boundary
- non-opening windows are not realistic, top opening should be allowed providing obscure glazing

3.4 Roof Alterations

Question 14 – Do you agree with the proposed limits for roof alterations?

Question 14						
	1. Maximum upstand of 150mm			2. No maximum % coverage		
	Answered	Agree	Disagree	Answered	Agree	Disagree
Government bodies	124	76%	24%	126	66%	34%
Public	28	71%	29%	28	64%	36%
Environment and community groups	49	71%	29%	48	60%	40%
Business	22	68%	32%	22	64%	36%
Professionals and academics	17	76%	24%	16	75%	25%
All	240	74%	26%	240	65%	35%

3.4.1 Summary of findings

General conclusions

There was a positive response to this question. Of those who answered either of the questions, a large majority agreed with the proposal for a maximum up stand of 150mm, with a further majority agreeing with the proposal of no maximum percentage roof coverage.

Government bodies and professionals and academics showed the greatest level of agreement with the proposals. The majority from all other groups were supportive.

Comments suggest that in principle the proposed limits adequately address the issue of roof coverage and provide clarity to applicants. There is a level of concern however that the definitions used are ambiguous and require refining.

Specific comments

In relation to the proposed maximum upstand of 150mm very few comments were received. Particular concern was raised that a lack of control would lead to unacceptable results due to incongruous design in many locations.

In relation to the proposal for no maximum percentage coverage, comments were predominantly received from those in disagreement with the proposal.

Supporting

- no justification to control percentage roof cover

Concerns

- covering whole roof could have considerable visual impact and markedly change the character of whole building
- may create proliferation of unsuitable and amateur micro generation
- partial covering can often be visually inferior
- reflection & design will be incongruous in many locations. No control will lead to unacceptable results

Suggestions

- should be 40% so that roofing material is still dominant
- accept that energy efficiency considerations need to be balanced against visual amenity. Alterations to side elevations may be just as visible as those on the front, so should also be restricted in conservation areas
- 100% PV panel cover will be unsightly and change character. 60% (coverage) Entec proposal is supported (Entec (2007) Domestic Installation of Microgeneration Equipment: Final Report from a Review of the related Permitted Development Regulations)
- there is an obvious correlation between the extent of roof coverage and visual impact; should not exceed 50% without consent

3.5 Curtilage Developments

Question 15 – Do you agree with the proposed limits for the curtilage developments?

Question 15			
	Answered	Yes	No
Government bodies	133	78%	11%
Public	29	45%	45%
Environment and community groups	57	63%	21%
Business	19	68%	26%
Professionals and academics	17	35%	47%
All	255	67%	21%

3.5.1 Summary of findings

General conclusions

There was a positive response to this question. Of those who answered the question, over two-thirds, 67% agreed with each of the proposals, with just 21% disagreeing with all of them, and with the remainder of respondents being split in their view.

There is a noticeable difference in the level of agreement between government bodies and business respondents, and respondents from the public, and professional and academic bodies. The majority of government bodies and business respondents agreed with all of the proposed limits for curtilage development, in contrast to just 45% of the public and 35% of professional and academic respondents.

It was suggested that the proposals do not give enough consideration to the size of large properties and their curtilage, where moderate developments may not in fact have a significant impact; one argument was, therefore, that the proposed limits to curtilage development will lead to such buildings requiring planning permission where they currently do not.

1. Principal elevation

There was a strong positive response to this proposed limit. Comments received included:

- the limit should be dependent on the size of the house
- limitations to erections of outbuildings adjacent to highways
- limitations should be adjacent to highways that run to the rear of curtilage
- no outbuilding, garage, or swimming pool to come forward from the principal elevation or side elevation facing a highway

2. Outbuildings and garages

There was a strong positive response to this proposed limit. Comments received included

- need to clarify the definition of single storey
- is a storage area in the eaves regarded as a storey?
- no PDR to be allowed within curtilage of listed buildings
- brings control to potential incongruous development in conservation areas

3. Maximum eaves height of buildings

There was a strong positive response to this proposed limit. Comments received included:

- need to clarify the definitions of monopitched and flat roofs
- need to specify where measurement should be taken from
- yes, but specify height limit for flat roofs
- suggest that limits are maximum overall four metres with a dual pitched roof, and three metres with monopitched
- potential inconsistency with allowance for extensions

4. Within two metres of a boundary

There was a strong positive response to this proposed limit. Comments received included:

- concern that central rear extensions are not consistent with the character of the built environment

5. Maximum combined ground coverage

A mixed response to this proposal has been received, with a balance of agreement in favour. Comments received included:

- there should be more appropriate guidance for gardens larger than 100 sq m
- unnecessarily restrictive for large curtilages
- limits based on volume are against the principle of the impact approach
- clarify 'private garden area'
- yes, but distance from property is too far away
- proposals will have an adverse visual impact on AONBs

6. No raised terraces

There was a strong positive response to this proposed limit. Comments received included:

- issue of decking needs more consideration
- include exception for sloping sites
- proposal is at odds with limit for maximum height of decking to be 0.3 metres

7. Maximum 50% coverage

A positive response to this proposed limit was received. Comments received included:

- would add considerably to run-off
- should be no more than 30%
- cumulative impact of coverage can impact on AONB
- yes, should not apply in Green Belt or floodplain
- yes, but define 'private garden area'

8. Maximum height of decking

A broadly positive response to this proposed limit has been received. Comments included:

- far too restrictive
- to what ground level would maximum height apply?
- needs careful drafting to avoid confusion; ground level should take into account slope and pre-existing ground levels
- is at odds with proposal six relating to raised terraces, verandahs or balconies
- 20 metres threshold for outbuildings is considered excessive. five metres or ten metres preferable
- should apply to Conservation Areas
- should be 0.3 metres from existing ground level
- should be amended to read "maximum height of decking to be 0.3 metres from lowest point"

Designated areas – general comments

Concern has been expressed that the proposed maximum area to be covered by outbuildings, garages and swimming pools (located more than 20 metres from the host dwelling house) should be limited to ten square metres, is too great.

3.6 Hard Surfaces

Question 16 – Do you agree that there should be no national restriction on hard surfaces?

Question 16			
	Answered	Yes	No
Government bodies	125	28%	72%
Public	31	42%	58%
Environment and community groups	64	22%	78%
Business	21	57%	43%
Professionals and academics	14	57%	43%
All	255	32%	68%

3.6.1 Summary of findings

General conclusions

The response to this question was negative. Of those who answered the question, 68% disagreed that there should be no national restriction on hard surfaces.

Environment and community groups and government bodies expressed a higher level of opposition to the proposal with 78% and 72% of respondents disagreeing that there should be no national restriction, compared to just 43% of business and 43% of professional and academic bodies. A majority of responses received from the public were opposed.

Comments in support of change were made with reservations, including the need to have regard to the impact on run-off, biodiversity and the landscape, and the need to use porous materials.

Specific comments

Supporting

Comments did not further those arguments within the Changes to Permitted Development Paper.

Concerns

- hard surfacing has significant impact upon surface water run-off, drainage and flooding

- reduces local biodiversity and diminishes local amenity and detracts from street scene
- apparent contradiction between this question and sections 6, 7 and 8 of Question 15 relating to the imposition of national restrictions on curtilage developments
- porous hard standing may result in contamination from standing vehicles
- some surfaces not appropriate for disabled access
- paving front gardens can have a significant visual impact on area's character, particularly in designated areas; however, restrictions would result in huge increase in the number of applications
- restrictions are required and they should be national; difficult to control under Article 4 Direction

Suggestions

- support a 50% coverage of front garden, with use of porous materials
- recommend Government consider 50% restriction as a reasonable compromise
- should be clear guidance from central government covering environmental aspects to be taken into account by LA according to their particular circumstances
- this matter would be usefully dealt with by coding or Local Development Orders
- limits should match those proposed by White Young Green Report (White Young Green Planning (2007) Householder Development Consents Review: Implementation of Recommendations)
- should be a sliding scale of allowance based on likely impact of surface water run-off
- recommend that White Young Green proposal is explored further, in particular the need for all hard surfaces to be porous. Gardens are essential to biodiversity

4

Abbreviations

AONB	Area of Outstanding Natural Beauty
GPDO	General Permitted Development Order
HDCR	Householder Developer Consents Review
LDO	Local Development Order
LDF	Local Development Framework
LPA	Local Planning Authority
PDR	Permitted Development Rights

5

Annex 1: List of Respondents

ACA Planning Advisory Group
Allen, Richard
Allerdale Borough Council
Allied Welsh Ltd
AP Gas and Solar
Arnie Maclauren
Ashfield District Council
Ashford Borough Council
Ashley Wilson Solicitors
Association of Consultant Architects
Association of English Cathedrals
Association of North Thames Amenity Society
Avon Wildlife Trust
Aylesbury Vale District Council
Badger Developments
Bailey MP, Andrew
Barbergh District Council
Barcombe Parish Council
Barton, Lousie
Basingstoke and Deane Borough Council
Bat Conservation Trust
Bath & North East Somerset Council
Bath Preservation Trust
Bedford Borough Council
Bell Cornwell Chartered Town Planners
Bexley Council
Bidford-on-Avon Parish Council
Billericay Town Council
Birmingham City Council
Bishop, Tony
Black Notley Parish Council

Blackheath Park Conservation Group
Blackpool Council
Bolsover District Council
Boxley Parish Council
Boyle, Julie
Braintree District Council
Bratt, Christine
Braunstone City Council
Bridgenorth District Council
Brighton & Hove City Council
Bristol City Council
British Waterways
Brixton Society
Brookes Associates
Building Plans & Services Ltd
Bull, M.C
Burley, Ken
Burnley Borough Council
Burr, Sara
Cable MP, Vincent
Calderdale Council
Cambridge City Council
Cambridge University Hospital
Campaign for the Protection of Rural England
Cannock Chase Council
Capitas
Castle Point Borough Council
CgMs Consulting Ltd
Chapman, Jim
Chapman, Kate
Chartered Institute of Environmental Health
Chelmsford Borough Council
Chesterfield Borough Council
Chichester District Council

Chichester Harbour Conservancy Planning Committee
Chiltern District Council
Chislehurst Society
Chobham Parish Council
City of London Law Society
Civic Trust
Clareville Court Residents Society Limited
Clear Sky Loft Conversions
Cleethorpes Constituency
Cleeve Parish Council, Milton, Nicola
Coghlan, Robin
Colchester Borough Council
Comission for Local Administration in England
Community and Regional Planning Services
Conquer, Ben
Consumer Council for Water
Cornwall AONB Partnership
Cornwall Gardens Residents Association
Cornwall Mews South Residents Association
Cotswolds Conservation Board
Council for National Parks
Country Land & Business Association
Cromwell Road Association
Dacorum Borough Council
Dale, Andrew
David, Lovell
Davis, Julie
Denby Dale Parish Council
Derbyshire District Council
Devon Conservation Forum
Devon County Council
Dindayal, Vidur
Ditchling Parish Council
Dixon, Richard

Donaldson, Richard
Dorridge and District Borough Council
Dorset County Council
Drawing Room
Dudley Borough Council
Earl's Court Square Residents Association
East Devon District Council
East Dorset District Council
East Riding of Yorkshire Council
Eastbourne Borough Council
Eastleigh Borough Council
Edwards, Steve
Egerton Gardens Mews Residents Association
Elmbridge Borough Council
Elsted and Treyford Parish Council
Emerson Group
Enfield Society
English National Park Authorities Association
English Partnerships
Environment Agency
Environment Services
Epping Town Council
Epsom & Ewell Borough Council
Epsom Protection Society
Estates Business Group
Ewhurst Parish Council
Exeter City Council
Explore Investments
Fareham Borough Council
Federation of Master Builders
Firth, Darren
Flynn, John
Forest of Dean Council
Forest, K W

Gedling Borough Council
Glebe Place Chelsea Residents Association
Gloucester City Council
Gloucestershire Urban Regeneration Company
Goring Parish Council
Gowen, P & N
GP Planning Ltd
Granthwaite, Marion
Gravesham Friends of the Earth
Greater Manchester Planning Enforcement Officers Forum
Green Street Green Village Society
Guppy, S
Hadleigh Town Council
Hagan, Brian
Hames, Richard
Hammersmith & Fulham Historic Buildings Group
Hampshire & Isle of Wight Planning Officers Group
Harrogate Borough Council
Hassocks Parish Council
Hatch End Association
Haynes, Brian
Heard, Tim
Heath & Hampstead Society
Heritage Loft Ltd
High Wycombe Society
Highways Agency
Hinkley and Bosworth Borough Council
House Builders Association
Howarth, Norman
Hughenden Parish Council
Hunt, Alison
Huxley, Kirsty
Ibbitson, Stephen
Institute of Historic Building Conservation

Institution of Civil Engineers
International Centre for Conservation Education
Ipswich Borough Council
Isle of Wight AONB Partnership
Jacobs, Richard
Johnson, Jacqui
Joint Committee of the National Amenity Society
Jones, Jonathan
JS Designs (London) Ltd
Jubilee Place Residents Association
Julian Adams Loft Conversion Design
Kennet District Council
Kensington and Chelsea Environment Round Table
Kent Downs Area of Outstanding Natural Beauty
Kent, Jerry
Kerrier District Council
Kettering Borough Council
King, Susanne
Kingston Seymour Parish Council
Kingston-upon-Hull City Council
Kyriacou, John
Ladder Community Safety Partnership
Lakeland, Glenda
Lancaster City Council
Lancaster District Council
LAPD Architecture & Urban Regeneration
Laurence, Nick
Lawsons
Leeds City Council
Leigh-on-Sea Town Council
Lewis, Mark
Lewis, R F
Lifestyle Loft Conversions
Living Green Center

Local Government Association
Locke, John
Loft Company
Loft Conversion Concepts
London Borough of Barnet
London Borough of Bromley
London Borough of Bromley
London Borough of Croydon
London Borough of Hammersmith & Fulham
London Borough of Havering
London Borough of Hillingdon
London Borough of Merton
London Council
London Planning Administrative Officers Group
Longridge Town Council
Mackay, Marilyn
Maclaren, Arnie
Maldon District Council
Manchester City Council
Mansfield District Council
Marilyn Mackay
Mark, A
Marlborough Court Residents Association
Marlow Society
Marlow, Ian
Marsfield Parish Council
Martlesham Parish Council
McAndrew, Colin
McCarthy, June
Medway Council
Merseyside Conservation Officers Group
Mid Sussex District Council
Millar, Duncan
MMC Lofts

Mole Valley District Council
Monks, Graham
More Space/Loft Rooms
Mortlake with East Sheen Society
Mulberry Walk Residents Association
Murphy, Alan
Muswell Hill Conservation Area Advisory
Naccarato, John
National Caravan Council
National Farmers Union
National Green Specification
National Landlords Association
National Organisation of Residents Associations
National Planning Forum for England
Natural England
New Forest District Council
Newtonia Limited
Nixs, Chris
North East Federation of Civic and Amenity Societies
North Cornwall District Council
North East Chamber of Commerce
North East Federation of Civic and Amenity Societies
North Finchley Agenda 21 Environmental Forums
North Hertfordshire District Council
North Norfolk District Council
North Warwickshire Borough Council
North Wiltshire District Council
North York Moors National Park Authority
Norwich City Council
Notcutt, Pam
Nottingham City Council
O'Leary, A
O'Leary, Shaun
Oak, Fran

O'Neill, Adam
Ordnance Survey
Ottershaw Society
Owen, Philip
Painswick and District Conservation Society
Painswick Parish Council
Pangbourne Parish Council
Paramore, Peter
Paris, Sandra
Parry, Siacn
Peak District National Park Association
Pent, R
Pepperell, Kevin
Permitted Development Services Ltd.
Persicone, Natalie
Pert, R
Peterborough City Council
Planet Saver
Planning Aid for London
Planning Inspectorate
Planning Officers Society
Plummer, S
Plymouth City Council
Powell, Kay
Premier Lofts Ltd
Primrose Hill Conservation Area Advisory Committee
Pritchard-Gordon, Paddy
Rambridge, Michael
Rayners, Mark
Razor Investments Ltd
Reading Borough Council
Redcar & Cleveland Borough Council
Redshull, Robin
Regent's Park Conservation Area Advisory Committee

Ribble Valley Borough Council
Riley, Tim
Roberts, Dave
Roberts, Nicola
Rochford District Council
Room Maker
Rooney, Gavin
Rother District Council
Rotherham Metropolitan Borough Council
Royal Avenue Residents Association
Royal Borough of Kensington and Chelsea
Royal Horticultural Society
Royal Institute of British Architects
Royal Institute of Chartered Surveyors
Royal Society for the Protection of Birds
Royal Town Planning Institute
RPS Planning & Development Ltd
Runnymede Borough Council
Rushcliffe Borough Council
Rushmoor Borough Council
Salisbury District Council
Salter, Lin
Samaroo, Deva S.
Sandwell Metropolitan Borough Council
Scott, Patricia
Seaford Town Council
Sedgefield Borough Council
Sefton Council
Sevenoaks District Council
Seymour Walk Residents Association
Shaftesbury Mews Co Ltd.
Shawfield St Residents Association
Shropshire District Council

Skipton Town Council
Slater, D
Slater, Jack
Smith, Judy
Sohnius & Perry Ltd
Somerset Strategic Planning Conference
South Cambridgeshire District Council
South Cambs District Council
South Downs Joint Committee
South Gloucestershire Council
South Kesteven District Council
South Norfolk Council
South Oxforshire District Council
South Shropshire District Council
Southampton City Council
Spelthorne Borough Council
St Edmundsbury Borough Council
Stadweton, R
Stafford, Jenny
Stanley Gardens Residents Association
Stinson, Nicola
Stock Construction
Strachan Design Associates LTD
Stratford-upon-Avon District Council Liberal Democrat Group
Sturgess, Nigel
Surrey Planning Officers Association
Tandridge District Council
Tangent Projects
Taunton & District Civic Society
Taunton and District Civic Society
Taylor, Caron
Taylor, Ray
Taylor, Ray D.

Taylor, Susanne
Teesdale Edistrict Council
Teignbridge District Council
Thames Water
Thanet District Council
Tiverton Civic Society
Tollitt, Penelope
Tonbridge & Malling Borough Council
Top Flight Ltd
Torbay Council
Towers Perrin
Travis Perkins
Traicher, David
Trevor Roberts Associates
Tyler, Bill
United Utilities
Uttlesford District Council
Val Mason
Vale of White Horse District Council
VELUX Company
Wandsworth Borough Council
Ward, Christopher
Ward, Ian
Warwick District Council
Waste Management Alliance
Watson, Andrew
Welwyn Garden Society
Welwyn Hatfield Council
West Berkshire Council
West Devon Borough Council
West Dorset District Council
West Oxfordshire District Council
West Sussex County Council

Westminster City Council
Winchester City Council
Wing, David
Winterbourne, Margaret
Woking Borough Council
Woldingham Parish Council
Woods Bagot
Worcester City Council
Wroysbury Parish Council
Wycombe District Council
Zabrana, Trudie

