

Permitted development rights for schools, assets of community value, defence and conservation

Consultation description

On 10 June 2026, the Government launched a consultation on proposed further changes to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. The consultation covers the following areas and further details are available at [Permitted development rights: schools, assets of community value, defence and conservation - GOV.UK](#). The closing date for comments is 5 August.

This consultation contains proposed changes to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.

The proposals are for:

- a) A time extension to allow schools with reinforced Autoclaved Aerated Concrete (RAAC) to construct temporary modular classrooms without a full planning application
- b) The removal of the right to demolish buildings listed as Assets of Community Value
- c) Several changes to the permitted development right that allows for development by the Crown on closed defence sites, including an increase in the height allowance (from 12 to 18 metres) where the building is more than 25 metres from a site's perimeter
- d) A new permitted development right will be established for conservation-based works within Environmental Delivery Plan (EDP) boundaries

Background

Environmental Delivery Plans (EDPs) were introduced under [Part 3 of the Planning and Infrastructure Act 2025](#) to provide a structured approach for addressing environmental impacts of development on protected sites or species. They will set out a package of conservation measures sufficient to address one or more environmental impacts of development and secure an environmental uplift. Rather than being limited to addressing the impact of a single development, an EDP will allow Natural England (and those acting on its behalf) to pool resources, allowing developers to meet legal obligations without conducting separate assessments for each project.

The proposed PD rights set out in the consultation provide a set of specific rights covering:

- a) Landscaping – excavations/deposits for pond creation, ditches/bunds, river re-profiling, scrapes, peat re-profiling (para 61) – no size/scale limit proposed, except no large, raised reservoirs
- b) Fences, gates, walls – in line with existing Class A of Part 2 limits (para 70)
- c) Footpaths, cycleways, bridleways – including for public access, not just maintenance (para 72)
- d) Small-scale structures – poles/posts/masts up to 15m high (3m near aerodromes); mounted structures up to 1m³; ground-level habitat structures up to 4m high/10m²;

unlimited below-ground structures; ditch-blocking/flooding structures up to 1m high (paras 74–79)

- e) Replacement of above-ground slurry stores and covers – up to 8m high (3m near aerodromes), footprint allowed to increase up to 10%
- f) SANG access infrastructure – one vehicular access, up to 10 car parking spaces, cycle parking, height barriers, pay-and-display, EV charging (paras 86–89)
- g) Temporary survey/investigation buildings, plant and machinery – no size/height limit, no prior approval needed, must be removed within 6 months
- h) Change of use of land and existing buildings for conservation purposes (but not public-facing uses like visitor centres/toilets)

The new PD rights would apply in Protected Landscapes and the Government proposes that no prior approval process would apply. The rationale given (para 58) is that Natural England already has statutory duties to advise LPAs on protected landscapes, so a prior approval process is said to be an "unnecessary burden" providing "few additional safeguards." The EDP itself must go through Natural England's own consultation process under the 2025 Act, in which National Parks, as consultees, could flag site-specific concerns. However uncertainties around the delivery of EDP's do remain.

National Parks England have prepared a detailed response to the consultation in respect of the impact of the proposals on Protected Landscapes. POS has not repeated the response of National Parks England but where appropriate has sought to reference impacts on Protected Landscapes.

POS Consultation Response

POS submitted its response to the consultation on 3rd August 2026, as drafted below. This was compiled using comments and responses from the DM Network (Vice chair) and Subject Specialist for various matters including Natural Resources, Development Management, Climate Change and Housing Delivery. It was also prepared in light of the National Parks England response.

Question Number	Question	POS response
Schools affected by RAAC		
1	Do you agree that the existing temporary Class CB of Part 4 permitted development right should be extended by two years to 24 October 2028? • yes • no • don't know	Yes In the interests of continuing to provide for continuity of education and the safety and welfare of children. It is recognised that not all of the work has been completed and an extension of time seems appropriate. It is critical that schools which are affected by RAAC are able to rectify these issues as soon

	Please provide your reasons.	as possible, and with certainty that they can be completed.
2	Do you think that the proposed extension of the temporary permitted development right schools affected by RAAC could impact on: a) businesses b) local planning authorities c) communities? • yes • no • don't know Please provide your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.	Yes. But, whilst there could be an impact on nearby businesses and communities, the restrictions in place safeguard against any significant impact and this would be temporary not permanent i.e. the same principle as on other construction sites.
3	Do you think that the proposed extension of the temporary permitted development right for schools affected by RAAC could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation). • yes • no • don't know Please provide your reasons.	No
Assets of community value		
4	Do you agree that Class B of Part 11 should be amended to exclude assets of community	Yes as this will ensure consistency with the English Devolution and Community Empowerment Act 2026

	value and, in future, sporting assets of community value? • yes • no • don't know Please provide your reasons.	
5	Do you think that the proposed change in relation to the Class B of Part 11 permitted development right could impact on: a) businesses b) local planning authorities c) communities? • yes • no • don't know Please provide your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.	There is a potential impact on businesses that own such facilities as they will need to seek prior approval for demolition, but this impact is considered appropriate given the potential importance to the community of those assets. It is noted that many local planning authorities already include policies that seek to protect such assets unless there are material considerations that demonstrate that such an asset is, for example, no longer needed or viable. The proposed national change would help to support the effectiveness of such local plan policies by ensuring that proper consideration is given to the continued provision of important assets which are valued and/or needed by local communities. There is potentially a negative impact on LPA's due the potential for an increase in prior approval applications, therefore increasing workload. However, it is recognised that there is unlikely to be a significant number of such applications nationwide.
6	Do you think that the proposed removal of assets of community value and, in future, sporting assets of community value from the Class B of Part 11 permitted development right could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity;	POS considers that any impacts would be positive rather than negative.

	Race; Religion or Belief; Sex; and Sexual Orientation). • yes • no • don't know Please provide your reasons.	
Development by the Crown on closed defence sites		
7	Do you agree that the permitted development right is amended to allow an increase in the total floor space of any buildings for use as single living accommodation via erection or extension beyond 25% of the total floor space? • yes • no • don't know Please provide your reasons.	Yes The current threshold appears relatively modest and an increase will allow projects to come forward quicker and at a lower cost. POS recognises the need to provide a balance between managing the impacts of development and supporting national security needs. In addition, it is important to ensure that quality single living accommodation is provided. However, POS considers it important to address the longer-term implications of expanding permitted development rights on defence sites, particularly if the land later ceases to be used for defence purposes. Without safeguards, there is a risk that development could remain in place that would not have been granted permission had it not benefitted from Crown PD rights. There is clear precedent within existing permitted development legislation for requiring the removal of development once it is no longer needed. For example, Schedule 2, Part 4, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 requires that: <i>“Any buildings, moveable structures, works, plant or machinery permitted by Class A must be removed and the land restored to its condition before the development took place when the use of the land... ceases.”</i> POS suggests that a similar safeguard could be considered here to ensure that development authorised solely through

		Crown PD rights does not become a legacy constraint on future land use.
8	If yes, should this be an increase to: • 35% • 50% • Other. Please specify. Please provide your reasons.	35%. POS recognises the need to provide a balance between managing the impacts of development and supporting national security needs. The level of increase recommended by POS has been made in light of the proposal to remove the cumulative footprint restriction as per Question 11 below.
9	Do you agree that the permitted development right is amended to allow an increase in the total floor space of any non-residential building via erection or extension beyond 35% of the total floor space? • yes • no • don't know Please provide your reasons.	Yes POS recognises the need to provide a balance between managing the impacts of development and supporting national security needs.
10	If yes, should this be an increase to: • 45% • 50% • Other. Please specify. Please provide your reasons.	45%. POS recognises the need to provide a balance between managing the impacts of development and supporting national security needs. The level of increase recommended by POS has been made in light of the proposal to remove the cumulative footprint restriction as per Question 11 below.
11	Do you agree that the prior approval should no longer be triggered by a cumulative footprint of 4,000 square metres and instead by the scale of individual proposals? • yes • no	Yes as the cumulative footprint is an overly complex approach.

	• don't know Please provide your reasons.	
12	If yes, do you agree that the permitted development right is amended to instead require an application to the local planning authority for determination as to whether the prior approval of the authority is required as to siting and scale where an individual development is above a threshold of: • 2,000 square metres • 2,500 square metres • 3,000 square metres • Other. Please specify. Please provide your reasons.	Yes, as this allows a more bespoke and site specific impact response and assessment. We would suggest the lower limit of 2000 square metres. The level of increase recommended by POS has been made in light of the proposal to remove the cumulative footprint restriction as per Question 11 above.
13	Do you agree that Class TA of Part 19 is amended to allow extensions or alterations within 15 metres of the perimeter of the closed defence site? • yes • no • don't know Please provide your reasons.	No. See response to Question 16 below.
14	Do you agree that where the development is more than 25 metres from the perimeter of the closed defence site, Class TA of Part 19 is amended to allow: i) the erection of new buildings from 12 metres to up to 18 metres in height? • yes • no	No The amendment should replicate the wording in ii) in that it should read 'i) the erection of new buildings up to 18 metres in height or up to the height of the highest building on the site whichever is lesser.'

	• don't know Please provide your reasons. ii) extensions or alterations of up to 18 metres or up to the height of the existing building, whichever is lesser? • yes • no • don't know Please provide your reasons.	Yes. POS considers that such an approach would achieve a balance between providing greater freedom and flexibility and ensuring that new development is in keeping with the overall scale of development (as it relates to height) on the site in question. This is important particularly recognising that not all 'closed defence sites' are situated in isolated locations and/or can have wider impacts on the area including on, for example, the setting of listed buildings, conservation areas and sensitive landscape designations. The setting of such assets often go beyond the designation itself (or, in the case of listed buildings, beyond its curtilage) and should be taken into account but are not currently included within TA.1 (d).
15	Do you agree that the definitions of 'closed defence sites' and 'non-residential buildings' should be amended so as to refer to sites and buildings (respectively) used wholly or mainly for purposes connected with defence'? • yes • no • don't know Please provide your reasons.	No. Whilst POS agrees in principle that amendments to TA.5 (interpretation of Class TA) would be appropriate it would propose that the following amendments be made rather than those proposed within the consultation: 'closed defence site' means a site which is – (b) used exclusively or primarily for defence purposes, 'non-residential building' means a building which is used exclusively for defence purposes, or which provides ancillary uses intended to support defence personnel and/or their families.

		This clarification should assist in the removal of any ambiguity, with the onus on the MOD to demonstrate that 'wholly or mainly for the purposes of'.
16	Do you think that the proposed change in relation to the Class TA of Part 19 permitted development right could impact on: a) businesses b) local planning authorities c) communities? • yes • no • don't know Please provide your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.	Yes. POS considers that some of the proposed amendments could materially impact on the living conditions of residents in local communities. Whilst POS recognises that many closed defence sites are located on more isolated sites, there are a number of closed defence sites which are located within urban areas, and in very close proximity to residential properties (in both private ownership and for use by service families) and sensitive receptors (e.g. schools, hospitals, care homes). As such greater freedoms and flexibilities in relation to development in close proximity to the boundary of a site has the potential to give rise to a loss of amenity as a result of loss of privacy/sunlight and or daylight, noise, vibrations etc. POS is concerned that a 'one size fits all' approach has been proposed without recognising this.
17	Do you think that the proposed changes to the permitted development right for Crown Development on a closed defence site could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation). • yes • no • don't know Please provide your reasons.	Yes, in some circumstances in relation to age, disability and pregnancy and maternity as set out in the response to 16 above in relation to 'sensitive receptors.'
Development of conservation measures within Environmental Delivery Plans		

18	It is proposed that Natural England and operators on its behalf benefit from a national grant of planning permission for the implementation and maintenance of conservation measures within an EDP amounting to development. Do you agree? • yes • no • don't know Please provide your reasons.	Yes POS recognises the importance of bringing forward conservation measures in a timely and effective manner.
19	It is proposed that any national grant of planning permission would not apply on the site of a scheduled monument. Do you agree? • yes • no • don't know Please provide your reasons.	Yes, to ensure the appropriate protection is in place, and that the effects of such measures on a scheduled ancient monument should be assessed on a case-by-case basis.
20	It is proposed that if any part of the development is in a conservation area, prior approval on the impact of the siting and appearance of the development on the character and appearance of the conservation area would be required. Do you agree? • yes • no, development in a conservation area should be permitted without the need for prior approval • no, development should not be	Yes, to allow the impact on the CA to be assessed.

	permitted in a conservation area • don't know Please provide your reasons.	
21	It is proposed that if any part of the development is in a World Heritage Site, prior approval on the impact of the siting and appearance of the development on the Outstanding Universal Value of the World Heritage Site would be required. Do you agree? • yes • no, development in a World Heritage Site should be permitted without the need for prior approval • no, development should not be permitted in a World Heritage Site • don't know Please provide your reasons.	Yes, to ensure suitable protections are in place. The effects of such measures on the Outstanding Universal Value of a World Heritage Site should be assessed on a case-by-case basis. POS would also suggest that this should be widened to apply not just to the World Heritage Site itself but also its associated buffer zone.
22	It is proposed that if any part of the development is on the site of a registered park, garden or battlefield, prior approval on the impact of the siting and appearance of the development on the special historic interest of the asset would be required. Do you agree? • yes • no, development on the site of a registered park, garden or battlefield should be permitted	Yes The effects of such measures on these heritage assets should be assessed on a case-by-case basis.

	without the need for prior approval • no, development should not be permitted on the site of a registered park, garden or battlefield • don't know Please provide your reasons.	
23	It is proposed that if any part of the development is on the site of a protected wreck, prior approval on the impact of the siting and appearance of the development on the historical, archaeological or artistic importance of the protected wreck would be required. Do you agree? • yes • no, development on the site of a protected wreck should be permitted without the need for prior approval • no, development should not be permitted on the site of a protected wreck • don't know Please provide your reasons.	Yes The effects of such measures on a protected wreck should be assessed on a case-by-case basis.
24	It is proposed that if any part of the development is on the site of a listed building or land within its curtilage, prior approval on the impact of the siting and appearance of the development on the building, its setting or any feature of special or historic interest	Yes The effects of such measures on a listed building or land within its curtilage should be assessed on a case-by-case basis. However, POS would suggest that the consideration of a listed building's 'setting' can go beyond its curtilage and this should be reflected in the regulations.

	which it possesses would be required. Do you agree? • yes • no, development on the site of a listed building or land within its curtilage should be permitted without the need for prior approval • no, development should not be permitted on the site of a listed building or land within its curtilage • don't know Please provide your reasons.	
25	Where development is subject to prior approval on the basis of land designation, this would apply in respect of most of the permitted development proposed in this consultation chapter (with the exception of temporary development for surveys and investigation, as set out in paragraphs 90 to 92). Do you agree? • yes • no • don't know Please provide your reasons.	Yes, given the temporary nature and accompanying definition.
26	It is proposed that development be permitted in protected landscapes with no prior approval process. Do you agree? • yes • no, development in protected landscapes should be permitted subject to prior approval • no, development should not be permitted in protected landscapes • don't know Please provide your reasons.	No, Development should not be permitted in protected landscapes, to allow for their impact to be assessed via the planning process. It is recommended that prior approval on siting/appearance is retained within Article 2(3) areas (including National Parks and the Broads), consistent with the treatment proposed for conservation areas, registered parks/gardens and listed buildings. National Park statutory purposes as set out in section 5 of the National Parks and Access to the Countryside Act 1949, as substituted by section 61(1) of the Environment Act 1995 and the statutory purposes of the Broads

		Authority (Norfolk and Suffolk Broads Act 1988 and Broads Authority Act 2009). In addition, National Park / The Broads Authorities, as local planning authorities – may pick up other potential constraints that NE does not have a remit for – such as whether large scale wetland creation could impact on say existing access/recreation interests or archaeology.
27	Beyond the mechanisms already outlined in paragraph 59, should we seek to control the development of conservation measures on land where it may restrict future development and land uses? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of how such controls would function and what types of safeguarded or allocated land they should apply to.	Yes. POS considers that a balance needs to be struck in relation to restricting future development and land uses. At the very least land which is identified in emerging or adopted local plans for development, and in emerging or adopted Minerals Local Plans should not be restricted. This reflects the 'plan-led' system that we operate within and that such development should not be fettered. Whilst it is acknowledged that conservation measures would be the subject of consultation this would not provide sufficient certainty for local planning authorities, developers or communities. POS is particularly concerned about the suggestion that local planning authorities could make use of Article Four Directions. This would place a significant burden on local planning authorities (and in some instances could be liable to pay compensation) and does not necessarily provide certainty. In particular, it could be perceived that there is a conflict of interest in terms of outcome recognising that the Secretary of State for Housing, Communities and Local Government has the ability to cancel or modify an Article Four Direction and is also responsible for 'making' Environmental Delivery Plans.'
28	It is proposed that landscaping, including excavations and deposits, be permitted. Do you agree? • yes • no	Yes Whilst the principle is supported, this route would not capture any archaeological or unexploded ordnance / contaminated land constraints assessments.

	• don't know Please provide your reasons.	The nature and scale of the landscaping (and in particular excavations and deposits) could, in some cases, have an adverse effect on the wider landscape or, reflecting on the nature of measures identified in paragraph 61, could have unintended consequences particularly in relation to fluvial or surface water flooding. Retaining the prior notification procedure would correct this, or prior consultations should include archaeological assessments produced by a competent person, in the same way contamination is catered for in paragraph 67. As a more general point, some EDPs will include the provision of conservation measures within protected sites including Special Areas of Conservation, Special Protection Areas and Ramsar sites. Some measures would, in other circumstances, be subject to consideration under the Habitats Regulations. As the 'maker' of EPDs it could be argued that the Secretary of State is the 'competent' authority and would have regard to the views of Natural England. POS considers that this raises an interesting procedural point notwithstanding the fact that POS would hope that Natural England would have assessed EPD measures within such sites to ensure that they did not have an adverse effect on the integrity of such assets.
29	It is proposed that removing minerals from the site and bringing waste materials on to the site should be conditioned as set out in paragraph 62. Do you agree? • yes • no • don't know Please provide your reasons.	Yes In some cases, the requirement to not remove mineral deposits from the land covered by the EDP may not be practical, could undermine the objectives of the measures proposed and/or have visual impacts.
30	It is proposed that prior consultation with the Environment Agency on flood risks as set out in paragraphs 63 and 64 would be required. Do you agree? • yes	Yes, to ensure due consideration of this important issue. However, there is also a need to recognise and reflect the roles and responsibilities of Local Lead Flood Authorities in relation to surface water flooding within the process as

	• no • don't know Please provide your reasons.	required in the National Planning Policy Framework
31	It is proposed that landscaping, including excavations and deposits, are not subject to any conditions or limitations on their overall size or scale. Do you agree? • yes • no • don't know Please provide your reasons. If you have answered no, please provide details of any proposed size or scale conditions or limitations.	No. Whilst the introduction of landscaping for nature is supported, the installation of large features may result in harm to the landscape, particularly in National Landscapes, and may not be appropriate at such a scale within that character area. A prior consultation to the LPA within National Landscapes is recommended so feedback can be provided in a short timeframe. See also response to Question 29 above.
32	It is proposed that a contamination screening assessment and, depending on the outcomes of the assessment, prior approval on contamination risk as set out in paragraphs 66 and 67 would be required. Do you agree? • yes • no • don't know Please provide your reasons.	Yes, to safeguard against the potential for contamination.
33	Are there any other conditions or limitations that should apply to landscaping, including excavations and deposits? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of the additional conditions or limitation and any supporting evidence.	Yes. See response to Question 28 above.
34	It is proposed that the development of fences etc. as set out in paragraph 70 should be permitted. Do you agree? • yes • no	No. The size, design and siting of fences could, in some instances have visual impacts on the locality, including in relation to areas of public access via Public Rights of Way or

	• don't know Please provide your reasons.	impact on the openness of an area. See also response to Question 28 above.
35	Are there any other conditions or limitations that should apply to the development of fences etc.? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of the additional conditions or limitation and any supporting evidence.	Yes Fences and means of enclosure can alter the character of a landscape dramatically but can be successful if using materials or fencing styles which are historically found in the area. A limitation that the fencing style/material should be appropriate for the area should be included.
36	It is proposed that the development of footpaths, cycleways and bridleways as set out in paragraphs 72 and 73 be permitted. Do you agree? • yes • no • don't know Please provide your reasons.	Yes, although see response to Question 28 above.
37	Are there any other conditions or limitations that should apply to the development of footpaths, cycleways or bridleways? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of the additional conditions or limitation and any supporting evidence.	Yes The materials used for access routes needs to be appropriate. The excessive use of tarmac/hoggin material may not be appropriate for the site, and will read as a scar on the landscape. A condition that materials must be appropriate for the site, or that prior consultation with the LPA, particularly in National Landscapes is required, as this would mitigate this.
38	It is proposed that the development of structures should be permitted. Do you agree? • yes • no • don't know Please provide your reasons. If you have answered no, please specify which structures your comment relates to.	Yes – subject to the following: • that it is made clear that such structures are required for the purposes of providing wildlife or ecological habitat creation and/or monitoring; • that further consideration is given to the potential of increasing incidents of bird strikes for measures to support bird populations in close proximity to operational airfields; and • having had regard to the response to Question 28 above.

		given the restricted nature of the structures, this seems reasonable. In relation to bird strikes it is considered that wind turbine farms should be included as well as operational airfields.
39	It is proposed that the development of a pole, post or mast and any associated structure (for the purposes of wildlife monitoring and habitat creation) to be mounted above ground level on it (or on a tree, existing structure or building) be limited in terms of size and height as set out in paragraphs 75 and 76. Do you agree? • yes • no • don't know Please provide your reasons and be clear if it relates to the pole etc. or the associated structure.	Yes POS considers this necessary in order to take into account wider visual amenity considerations. However in protected Landscapes it is recommended that Prior Approval is required to manage the height and impact.
40	It is proposed that the development of structures at ground level for the purpose of providing a wildlife habitat (or a purpose ancillary to a wildlife habitat, such as access or monitoring) be limited in terms of size as set out in paragraph 77. Do you agree? • yes • no • don't know Please provide your reasons.	Yes , in principle but see response to Question 28 above.
41	It is proposed that the development of structures below ground level for the purposes of providing wildlife habitats and monitoring be limited in terms of size as set out in paragraph 78. Do you agree? • yes • no	yes but see response to Question 28 above

	• don't know Please provide your reasons.	
42	It is proposed that any structure developed at or below ground level for the purposes of blocking ditches, diverting watercourse or flooding land be limited to a maximum of 1 metre in height above the prevailing land level. Do you agree? • yes • no • don't know Please provide your reasons.	No. POS considers that this doesn't appear to align with the processes identified earlier in the consultation relating to flood risk considerations. As such any structure of this nature should be subject to prior consideration by the Environment Agency and/or the Local Lead Flood Authority.
43	It is proposed that the maintenance, improvement or other alteration of an existing structure should be conditioned as set out in paragraph 81. Do you agree? • yes • no • don't know Please provide your reasons.	No. POS considers that this misses the opportunity secure benefits where there are existing visual impacts where this would not impact on the wildlife/ecological objectives for which it has been provided. In addition it should be made clear that this only relates to structures used for the purposes of wildlife and ecological habitat creation/monitoring.
44	Are there any other conditions or limitations that should apply to the development of such structures? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of the additional conditions or limitation and any supporting evidence.	See responses to Questions 28 and 44 above. minor typo - a "to" is missing after opportunity on line 2
45	It is proposed that the replacement, improvement or alteration of an existing above ground slurry store; and the erection, construction, improvement or alteration of above ground slurry store covers be permitted. Do you agree? • yes • no	Yes in principle, however an 8m tank in a protected landscape may be harmful, depending on the individual circumstances of the site. It is therefore recommended that if the slurry tank exceeds 3m within a national landscape, a prior consultation is required with the LPA.

	• don't know Please provide your reasons. If you have answered no, please specify whether your comment relates to above ground slurry stores or slurry store covers.	
46	It is proposed that the height, size and siting of above ground slurry stores and covers be limited to the parameters as set out in paragraph 84 and 85. Do you agree? • yes • No • don't know Please provide your reasons.	Yes the proposed limits appear reasonable
47	Are there any other conditions or limitations that should apply to the development of above ground slurry stores or covers? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of the additional conditions or limitation and any supporting evidence.	No
48	It is proposed that the development of a single vehicular access, of up to 10 car parking spaces, structures for cycle parking, height barriers and pay and display machines in connection with an EDP SANG be permitted. Do you agree? • yes • no • don't know Please provide your reasons. If you have answered no, please specify which element your comment relates to.	Yes, in most cases it is considered that the EDP will assess the environmental impact, however POS is concerned that in Protected Landscapes development of this scale would introduce urban features into a natural landscape which could harm the enjoyment of the area, dark skies and tranquillity. This PD right should not therefore be applied in Article 2(3) areas. See also POS responses to Question 28 above and Questions 49 and 50 below.
49	It is proposed that the development of any hard	No.

	surfacing be conditioned as set out in paragraph 87. Do you agree? • yes • no • don't know Please provide your reasons.	Whilst the proposal takes account of groundwater contamination risks by requiring a hard surface in such instances it does not take into account the potential effect of such an approach on areas at risk from surface water flooding.
50	It is proposed that Natural England be required to seek prior approval on transport, highways and access impacts prior to commencing the development of a vehicular access or car park as set out in paragraph 88. Do you agree? • yes • no • don't know Please provide your reasons.	Yes. However, it should be clear that the matter of the safe operation of the highway network and the visual impact of such provision form part of the matters that can be considered.
51	It is proposed that the existing electric vehicle recharging permitted development rights (Class D and Class E of Part 2 of the General Permitted Development Order) be amended as set out in paragraph 89. Do you agree? • yes • no • don't know Please provide your reasons.	Yes to ensure consistency with the GDPO and to encourage sustainable movement. Subject to ensuring that this would not result in an adverse effect on existing vegetation such as veteran trees, historic hedgerows etc.
52	Are there any other conditions or limitations that should apply to the development of a single vehicular access, of up to 10 car parking spaces, structures for cycle parking, height barriers, and pay and display machines? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of the additional conditions or limitation and any supporting evidence.	Yes As set out in the response to Q48, the introduction of pay and display machines/parking barriers introduces urban features into a natural landscape. It should be a condition that such equipment is kept to a minimum and should use a colour scheme appropriate for the surrounding area (i.e. green in a forestry area).

53	It is proposed the development of temporary buildings, plant, machinery and apparatus in, over, or under land, for the purposes of survey or investigation set out in paragraphs 91 and 92 should be permitted. Do you agree? • yes • no • don't know Please provide your reasons.	Yes in principle. However POS would recommend that the wording in relation to the requirement for removal should align with Schedule 2 Part 4 Class A (temporary buildings and structures) of the GDPO as set out below: A.2 <i>Development is permitted by Class A subject to the conditions that, when the operations have been carried out—</i> <i>(a) any building, structure, works, plant or machinery permitted by Class A is removed, and</i> <i>(b) any adjoining land on which development permitted by Class A has been carried out is, as soon as reasonably practicable, reinstated to its condition before that development was carried out.</i> This is for the sake of consistency.
54	Are there any other conditions or limitations that should apply to the development of temporary buildings, plant, machinery and apparatus for the purposes of survey or investigation? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of the additional conditions or limitation and any supporting evidence.	No
55	It is proposed that any land and buildings on that land, be permitted to be used for the purposes of conservation in accordance with proposals in an EDP, as set out in paragraphs 93 – 95. Do you agree? • yes • no • don't know Please provide your reasons.	Yes, to allow flexibility of uses in an appropriate way.

56	Are there any other conditions or limitations that should apply to the use of land, and buildings upon that land, for the purposes of conservation measures in accordance with proposals in an EDP? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of the additional conditions or limitation and any supporting evidence.	No
57	Should any other development be permitted to be undertaken by Natural England for the purposes of implementing conservation measures in accordance with proposals in an EDP and maintenance of the site? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of the development and any supporting evidence.	The measures outlined in this consultation are comprehensive. However, measures should also be extended to other trusted bodies, such as the Environment Agency, Forestry England and National Park Authorities. Each have aspirations to develop nature recovery schemes but also face the same costs and time restraints as Natural England would for schemes identified by an EDP. Further consultations should cover widening these rights to other trusted organisations.
58	Are there any other conditions or limitations (including prior approvals or land exclusions) that should apply to development permitted for the purposes of implementing conservation measures in accordance with proposals in an EDP and maintenance of the site? • yes • no • don't know Please provide your reasons. If you have answered yes, please provide details of the conditions and limitations and any supporting evidence.	No

59	Do you think that permitted development flexibilities proposed to support the development of conservation measures within an EDP could impact on: a) businesses b) local planning authorities c) communities? • yes • no • don't know Please provide your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.	Yes. These are articulated in various responses above.
60	Do you think that permitted development flexibilities proposed to support the development of conservation measures within an EDP could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation). • yes • no • don't know Please provide your reasons.	No
61	Do you think that permitted development flexibilities proposed to support the development of conservation measures within an EDP could give rise to environmental impacts that should be considered against the five environmental principles? (integration, prevention, rectify at source, polluter pays, and precautionary). • yes • no • don't know	Yes. See responses to various questions above.

	Please provide your reasons.	
--	------------------------------	--

Conclusion

POS broadly supports the Government's proposed amendments to permitted development rights but stresses the need for proportionate safeguards and continued local oversight. POS agrees with extending temporary permitted development rights for schools affected by RAAC to ensure continuity of education and pupil safety, and supports removing Assets of Community Value from demolition rights to strengthen protection of valued community facilities.

For closed defence sites, POS accepts increases in floorspace and height thresholds but raises concerns about loosening controls near site boundaries, particularly where defence sites sit close to homes, schools, hospitals or other sensitive receptors. POS favours clearer definitions of defence-related buildings and supports shifting prior approval triggers to individual proposal size rather than cumulative footprint.

POS supports enabling Natural England to implement Environmental Delivery Plan (EDP) conservation measures more efficiently, but insists that development within designated heritage or landscape areas must still require prior approval. POS strongly opposes allowing development in Protected Landscapes without prior approval, emphasising the statutory purposes and local expertise of National Parks and the Broads.

Across conservation-related PD rights, POS highlights risks relating to landscape impact, archaeology, flood risk, contamination and future land-use conflicts. It recommends additional conditions, appropriate material choices, limits on scale, and consultation with LPAs and relevant agencies. POS also warns against conservation measures unintentionally restricting development on land allocated in local or minerals plans.

Overall, POS supports the intent to streamline essential works for schools, defence and nature recovery, but calls for a more nuanced regulatory framework that protects communities, landscapes, heritage assets and future development potential.