



**Brighton & Hove
City Council**

Planning & Public Protection

Hove Town Hall
Norton Road
Hove BN3 3BQ

Mr David Wilkes
UCO Review Team
Planning Development Management
Division
Department for Communities & Local
Government
1/E2 Eland House
Bressenden Place
London
SW1E 5DU

Date: 31st August 2011
Ref:: CLG – COU review
Phone: (01273) 292361/2263
e-mail: katie.rasdall@brighton-hove.gov.uk

Dear Mr Wilkes,

Response to Issues Paper: How change of use is handled in the planning system – tell us what you think.

Please find enclosed the response from Brighton & Hove City Council to the issues paper regarding how change of use is handled in the planning system. The enclosed response has also been sent via email therefore I would be grateful if you could confirm receipt.

The city council's response comprises a table in Appendix 1 listing the questions in the issues paper, accompanied by the relevant response. The table also encompasses other issues relevant to the issues paper and to this authority although not part of the formal list of questions.

The attached response is going to this council's Planning, Employment, Economy & Regeneration Cabinet Members Meeting on the 15th September for approval. This may result in amendments being submitted. This response is therefore being submitted in anticipation that it will be acceptable to the CLG. I will confirm this council's response after the meeting on 15th September.

Please do not hesitate to contact me if there are any queries.

Yours sincerely,

Katie Rasdall
Planning Projects Officer
Brighton & Hove City Council

BHCC response
How change of use is handled in the planning system – tell us what you think

Telephone: 01273 290000

www.brighton-hove.gov.uk

Printed on recycled, chlorine-free paper

August 2011



Planning & Public Protection

Hove Town Hall
Norton Road
Hove BN3 3BQ

Communities and Local Government

How change of use is handled in the planning system – tell us what you think
Issues Paper

Summary Statement

BHCC supports the review of the change of use process to enhance economic growth, ensure sufficient infrastructure is provided, promote sustainable development and support the aims of the Localism agenda. In general this council is supportive of retaining the four main use classes but notes that a thorough review to streamline the UCO would be a valuable exercise in rationalising the change of use system. Suggestions for alternative approaches are covered in the response to question 2.

Brighton & Hove City Council consider it important to recognise that many local authority services have a role to play in creating sustainable communities and carrying the shift in emphasis to a more localised approach of governance. The planning system is the lynch pin in drawing the objectives and deliverability of the services within local government together. The Plan-led system, Planners and Local Planning Authorities make significant contributions to shaping and making places that are successful, vibrant, cohesive, sustainable and attractive. Planning is about place-making and the Use Classes Order is one tool in ensuring that quality places are created for people to live and work.

BHCC response

How change of use is handled in the planning system – tell us what you think

August 2011

APPENDIX 1

Detailed responses from Brighton & Hove City Council

No.	Question	Response
1	Should material change of use continue to be considered as 'development' and handled through the planning system? If not, what alternative approach might be used?	<p>In answer to the question, material change of use should continue to be considered development. The current Use Classes Order is based upon the impact that each type of use generates. It is sensible and efficient to continue to consider the number of change of use applications for the following reasons:</p> <ol style="list-style-type: none"> 1. Imbalance of use classes. The change of use system allows local planning authorities like Brighton & Hove, where land is at a premium, to ensure there is a balance of land uses maintained in the context of economic cycles. This helps to maintain a mix of uses and create balanced places where people don't need to travel so far to work. This also helps to create sustainable communities and reduces the need to travel. 2. Undermining economic recovery. Removal of the UCO and change of use system will undermine the economy and its recovery. Changes of use application is not only a tool to protect the economy and businesses, but to ensure local amenity as part of local authorities' role in shaping cohesive, balanced, safe, stable and community oriented places. It allows the protection of employment uses that have a lower value than residential use. 3. Harmful affect on amenity. allows local planning authorities to assess the impact of the proposals that can be equal to those of full scale redevelopment proposals, for example, change of use to hot food takeaway. 4. Certainty and security. wealth is not only generated by a degree of flexibility in the planning system to support businesses, but is also generated through an element of certainty and security which the planning system offers, particularly considering the planning system is so effective in securing contributions for infrastructure and to mitigate potentially harmful effects of development. The UCO allows Local Planning Authorities to regulate land supply, assess impacts, allocate resources for communities and manage infrastructure provision 5. Protection of D1 uses. Change of use applications allows local authorities to either secure or protect D1 community uses. These uses have lower land values and are therefore susceptible to succumbing to other uses

No.	Question	Response
		<p>6. Control of harmful impacts. Due to the potential impacts of a change of use, some harmful, change of use should remain part of the definition of development as defined in Section 55 of the Town and Country Planning Act (1990) (as amended)</p> <p>7. Impediment to business. Removal of change of use is likely to result in an inappropriate mix of uses. Residential uses becoming employment uses will result in a conflict between uses and make it harder for businesses to operate efficiently and where necessary operate 24 hours.</p> <p>Concerns:</p> <ul style="list-style-type: none"> • Undermine Localism Agenda. The abolition of change of use controls will undermine the aims of the Localism agenda, for example by removing control over securing local community facilities, loss of local shopping parades and local business units. • Weaken LDO. Local Development Orders would be undermined without the UCO, resulting in local communities unable to decide which kind of development would be acceptable in their area. As such this would undermine aims of the Localism agenda to allow communities to become more involved. • Loss of employment land. In Brighton & Hove where there are significant physical constraints (topography, sea and SDNP) and land is at a premium, loss of employment land and business premises would devastate the local economy. If, for example, large amounts of land and buildings were converted to residential use, this would have the effect of considerable out-commuting which in itself is unsustainable and is contradictory to the Localism agenda. • Inequality. The change of use system also ensures that there is sufficient, balanced and appropriate spatial allocation of land uses. Complete liberalisation of the UCO and the removal of the change of use system are likely to result in concentrations of land uses where land values for particular uses are high. This can lead to inequality where the less mobile and footloose uses are unable to adapt as quickly, usually smaller businesses who do not have the same capability to terminate leases or make capital investments to new premises. • Long term provision and short term gains. There is also the concern that a honey pot effect will create further inequality between areas or render such organisations as Local Economic Partnerships redundant if they are unable to influence the spatial provision of land uses and realise their long term regenerative aspirations for Enterprise Zones, rather than just experiencing the instant effect of attracting fast growing businesses. • Rationalisation. The cost implications for redefining the provisions in the UCO should be considered and be evidenced against the efficiency of the current system and other economic

No.	Question	Response
		factors, particularly in this era of fiscal austerity, that contribute to or stifle current growth.
2a	Is the Use Classes Order an effective deregulatory tool to simplify the approach to managing change of use nationally in the planning system?	<p>Yes, although a review of the UCO and allowing it to be adapted to local circumstances is a timely and welcome approach.</p> <p>The UCO is seen as an effective deregulatory tool in managing change of use both nationally and locally for the following reasons:</p> <ul style="list-style-type: none"> • Impacts. Broadly based on impact which is the simplest methodology for assessment and also makes it easier for the public to articulate their concerns on the basis of impact when COU application is submitted. The change of use system does not hinder the movement and therefore the expansion of businesses and other uses, but it enables a systematic change of use so as to holistically consider the impacts locally • Land supply. The UCO allows Local Planning Authorities to regulate land supply, assess impacts, allocate resources for communities and manage infrastructure provision • Certainty. It provides certainty for businesses, occupiers of business units and landlords • Autonomy. The UCO is a useful deregulatory tool which allows local authorities to plan positively for economic growth, jobs, housing and better social equality. However, it is acknowledged that the impact of some uses differs in some areas. Therefore, the UCO may benefit from introducing a hierarchy framework giving some areas greater autonomy for flexibility such as town and city centres, where detrimental impacts may be to a lesser degree. This could be integrated with LDO which allow locally permitted development rights. <p>Concerns regarding a removal of the UCO:</p> <ul style="list-style-type: none"> • Less investment. Without the UCO, investors have the potential to swing between uses attracting the highest land value • Undermining the plan-led system. Risk of 'land banking' a variety of uses to realise the highest land value, undermining the plan-led system and its responsibility to make provision for all types of uses. This will result in the inequality over the provision of sufficient land/premises for affordable housing or community uses as a result of land banking is also a serious concern. This council questions where those in housing need will live if the scope to consider change of use applications is not subject to the current assessment criteria • Physical degradation. It is well documented that transient residential populations hinder

No.	Question	Response
		<p>community cohesion and a sense of ownership over their environment. Transient businesses are likely to have the same effect and lead to the physical degradation of high streets and business estates as businesses are deterred from investing in structures and infrastructure, particularly if leases are short</p> <ul style="list-style-type: none"> • Affordable housing. The planning system including the change of use system is an important mechanism to secure affordable housing. A significant proportion of affordable housing is secured through windfall sites as a result of change of use applications over 10 units. Given government cuts including grant funding, affordable housing at a time when it is needed most, needs to be secured through as many transparent means as possible. There is concern about delay and reduction in the delivery of affordable housing due to withdrawal of grant funding.
2b	If not, do you have views on what an alternative deregulatory approach to managing change of use might look like?	<p>The UCO is an effective tool and does need some minor amendments rather than an alternative system. Where local circumstances arise, a specific approach to managing change of use can be adopted. Below are a list of suggestions which provide scope for review and reform of the current system.</p> <ul style="list-style-type: none"> • There may be scope to simplify though the prior approval process used for proposals mostly related to telecommunications development. The application would be made on the presumption that the principle of the development would be acceptable and the LPA has a specified time period in which to object. Criteria for objection, such as no external changes, and thresholds would accompany this process. A full planning application would be the default position if change fell outside the accompanying criteria. The implications are increased work for officers and the need for more resources. • In order to support businesses and encourage the use of empty commercial premises, Brighton & Hove City Council proposes that a system similar to discontinuance powers used to control advertisements could be applied if the UCO was removed altogether. This would allow local authorities to continue to mitigate detrimental impacts. Evidence of any detrimental impact on the amenity of neighbouring properties would trigger a discontinuance notice. Compliance with the notice and evidence of nuisance will require specialist involvement from disciplines such as Environmental Health and Planning Enforcement. The implications of this would be increased levels of nuisance, conflict, increased resources for managing compliance through enforcement notices. This would not be a welcome measure. • Enhance the role of pre-application meetings. Enshrine a pre-application protocol in national policy for development over a certain threshold. Many developers complain that the planning system is a

No.	Question	Response
		<p>barrier. Whilst there are requirements that need to be met through the planning application process. The planning system acts as the link between all the factors that make a place sustainable, cohesive and pleasant to live and work in. Brighton & Hove City Council offers pre-application advice service to build effective, open and communicative working relationships with developers, commercial and private. This secures the best outcomes and a more efficient and effective transition between concept through to submission of a planning application to decision to implementation.</p> <ul style="list-style-type: none"> • Enable councils to develop a more pro-active approach. The city council works in a pro-active way to engage with agents and developers, amongst other key stakeholders involved in planning processes, to ensure they are aware of the services available, have the opportunity to attend seminars and have the tools to engage effectively when it comes to development proposals. • Brighton & Hove City Council concurs with Planning Minister Greg Clarke comments that, “Empty properties can drain the life away from town centres...” (News item in Meanwhile Spaces, 25.06.2011). Interim uses and meanwhile spaces are welcome and actively sought by Brighton & Hove City council through their economic development services working in partnership with Development Management and Local Interest groups. “Removing bureaucratic barriers in the planning system...” will of course be welcomed by professionals and the public alike. However, barriers to change, be they short term or long term, come in two forms; process barriers and policy barriers. The planning system is keen to avoid empty premises, although short terms gains of filling an empty space should be weighed against the long term benefits of ensuring a balance of uses. • Brighton & Hove City Council suggests the adoption of a legislative framework and the National Planning Policy Framework after which further consultation on the reform of the current deregulatory tools should take place. This will give local authorities a better opportunity to fully articulate the advantages and disadvantages of the current deregulatory tools within the context of the range of reforms that the government is proposing. As the prior approval process currently attracts no fee, the government could consider revising the current fee structure to ensure local authorities have sufficient income to resource operational changes in the planning system.
3	The UCO and PD rights allow changes without	Local Development Orders are an excellent idea in the context of Localism and to promote local flexibility. The take-up of LDO’s needs to be promoted. LDO’s are considered a positive tool for planning, enhancing

No.	Question	Response
	<p>planning applications nationally. However, they can be extended locally to meet local needs through LDOs (and soon through NDOs). Is this model effective and is it sufficiently flexible to meet most circumstances?</p>	<p>permitted development rights rather than restricting them. Once established an LDO should create sufficient flexibility to carry out development in a way that meets local needs. In addition, an LDO should provide a degree of certainty with regard to development types and thresholds, which is attractive to investors.</p> <p>The Local Development Order is more refined tool to support neighbourhood planning as it allows local communities to decide and acceptable level and type of development. As mentioned earlier, it also allows local authorities to take account of the spatial impacts.</p> <p>Brighton & Hove City Council has not implemented an LDO as yet therefore is unable to provide an opinion on whether LDO's are an effective model. However, it is envisaged the LDO would be a useful tool relating predominantly to business, commercial and community premises within defined areas, neighbourhoods or sites and perhaps relate to a specific outcome such as renewable energy.</p> <p>LDO's can be used to enable a number or single changes through PD rights, can be revoked or given a specific timeframe and can be area or site specific. It allows Local Planning Authorities to maintain governance over the impacts by restricting it to a single or small number of changes and is consulted upon widely therefore community groups and interested parties have an opportunity to engage and influence the outcome. Also it gives community groups the opportunity to access premises that otherwise might lie vacant.</p> <p>In the appropriate circumstances and locations, a LDO is a positive, flexible and responsive tool which extends permitted development rights rather than restricting them and has the potential to be time limited, particularly if the rate of economic progress fluctuates or declines over the plan period. There is scope for a Local Development Order to be informed by existing background documents that have undergone consultation, such as design guides.</p> <p>However, whilst there are advantages to the LDO route, this mechanism does not attract a fee given that planning applications will be reduced. An LDO like any other piece of policy will need monitoring and possible enforcement and income from planning application fees allow Local Authorities to deploy sufficient and appropriate resources to encourage and implement development, including temporary uses.</p> <p>Local Development Orders can be made to assist with community objectives such as sporting facilities or</p>

No.	Question	Response
		<p>renewable technologies. A LDO appears to be more responsive, particularly if neighbourhood demographics and aspirations change or businesses undergo rapid evolution. An LDO's flexibility can be realised in a site specific or area wide document encompassing just a single use or a range of uses. NDO's endorse democratic processes currently enshrined within the planning system and will also enable local communities to enable particular uses based on the needs and characteristics of the community. It enables local government to work closely to identify community needs and ensure NDO's comply with Local Plans. Clarification over how LDO's will work in tandem with NDO's or how they would add benefit to a LDO will be welcome.</p> <p>There is concern that an NDO may disadvantage some residents or businesses through the majority referendum process. An NDO relies on the formation of a neighbourhood forum; therefore there is some risk of social exclusion of minorities unable to engage effectively. Local Economic Partnerships work across authorities and their ability to work co-operatively with each authority and businesses may be frustrated through localised inconsistencies over land use where a NDO has been driven by a neighbourhood forum and subsequently implemented.</p> <p>Care needs to be taken with the extension to Permitted Development rights through, for example, a LDO and in cases where extended PD rights include not only existing buildings and brownfield sites, but also agricultural land, which has the potential to be contaminated.</p>
4	Do you think that the current classes of use in the UCO are still appropriate?	<p>Yes, the current four broad classes of use in the UCO are still appropriate but need to be updated in response to changes in modern business practices. As the current classes of use in the UCO are separated broadly on the basis of impact, the separation of the classes is appropriate in order to seek consent for change of use where the impacts are significantly different. The classes within the UCO in conjunction with PD rights provide certainty for both commercial developers and householders.</p> <p>As mentioned above some uses should be evaluated given evolving changes in the way those uses operate or levels of intensity due to technological changes or working practices such as, B1, B2 and B8 use categories that have been blurred.</p> <p>The UCO is still an appropriate tool to divide uses according to their impact and restrict movement to between some in order to take account of their impacts. There is more flexibility for movement between business uses than there is between residential and commercial uses.</p>

No.	Question	Response
		<p>BHCC welcomes being consulted on proposals to modernise and streamline the categories within the UCO. More flexibility between selected class should be explored as part of a comprehensive review of the UCO which may involve integrating some classes. Some uses that are designated 'sui generis' such as petrol filling stations, most of which have significant amounts of retail and long opening hours, could be reviewed and based on their impact and incorporated into one or other of the use classes. Indeed, as all sui generis uses require planning permission, an opportunity exists to incorporate sui generis uses into appropriate classes.</p>
5	<p>The current regime seeks to secure a balance between deregulation and protecting the citizen. Has the right balance been struck or should there be more deregulation than is currently allowed through the UCO and PD rights?</p>	<p>Yes, the right balance has been struck subject to some adjustment and modernisation of the UCO and the GDPO. Introduction of further flexibility and deregulation of the UCO and PD rights will facilitate more control at a local level to respond to changing commercial practices and economic cycles.</p> <p>There is further scope for deregulation provided Local Planning Authorities can continue to assess impact. Change of use that results in a negative impact is unsustainable. The city council considers that the current system is useful in protecting business and householders alike and is optimistic that it will work with LDO's, NDO's and the emerging NPPF.</p> <p>It is considered that the current system works and the benefits of LDO's can be realised within the current system which further deregulates the UCO at a local level which supports the aims of the Localism agenda.</p> <p>In a plan-led system many local authorities resist the loss of business premises unless assessed to be genuinely redundant, particularly small businesses, not because local authorities are resistant to change, but due to their responsibility to create balance between making sufficient land available for all uses over the plan period for the future. In the current economic climate, there is pressure on local authorities to allow land uses to change to the highest value land use. Local authorities are duty bound to balance short term gains against the long term requirements for all uses over the plan period whilst managing changing circumstances and incorporating sufficient flexibility in local plan policies to support change and growth.</p>
6	<p>Does the current</p>	<p>Yes, subject to the updating of the UCO. It is more appropriate for central government to influence barriers to growth through national policy and local policy making rather than by removing the UCO. This would</p>

No.	Question	Response
	operation of the UCO go far enough to remove inappropriate barriers to growth and allow for potential for changes of use that boost growth?	<p>induce the implementation of LDO's and NDO's.</p> <p>The UCO in itself provides certainty to the development industry and affords the protection of certain uses such as offices, light industrial, creative industry and D1 community uses as such growth as a result of the UCO is implied. There are many barriers to growth including financial barriers, which is why BHCC is keen to enable even small and incremental growth where the current poor economic performance and a shrink in lending has curbed growth.</p> <p>As mentioned above there is potential for further flexibility to be enshrined in policy for enactment at a local level. BHCC welcomes a review of all processes and sectors, including planning, that are a factor in the UK's slow growth and low productivity, particularly where this is evidence based thus enabling a balanced quantification of in appropriate barriers to growth.</p>
7	How should ancillary uses be treated within the UCO?	<p>The current use classes order will benefit from incorporating guidance on the provision or evolution of ancillary uses for each category and it should form part of the overall review. The way modern businesses operate should be considered as part of the review of the UCO. Businesses and A type uses don't always sit comfortably or neatly into the categories within the UCO. As mentioned above, the UCO should be reviewed and simplified.</p> <p>It is acknowledged that businesses evolve and the way they operate may change significantly. It is only when an ancillary use grows to such an extent that it changes the nature of the permitted use or become an amenity issue, that ancillary uses can become problematic. The LPA should be able to continue to ensure that ancillary uses do not have a negative impact on the adjacent physical, economic and social environment.</p> <p>Through discussion, the issue of ancillary uses was identified as presenting some difficulties in ascertaining the proportion of ancillary use, particularly in mixed use premises. In this respect, the UCO would benefit from some refining. For example, anecdotal evidence suggests that a business which proposes a mix of A1, A3 and A5 uses often finds difficulty allocating a proportion for each use through their business models as this is dependant on the behaviour of their patrons, seasonality, weather and other factors affecting the fluctuation of each use. This may be particularly true of café businesses where the premises may be divided into seating, take away counter and retail element (mixed A3, A5 and A1 use).</p>

No.	Question	Response
8	Are the current PD rights relating to the temporary use still appropriate? If not, how do you think they should be amended?	<p>The PD rights for temporary uses relates to the use of land only and does not extend to the temporary use of buildings. BHCC considers it appropriate to extend temporary uses to buildings.</p> <p>Temporary change of use for creative industries to occupy smaller business units is already proactively pursued by BHCC and it would be useful to adjust legislation to catch up with current practices.</p> <p>Some screening criteria should be applied to temporary uses of buildings such as ensuring the unit is completely vacant, a checklist to avoid amenity and impact issues and a threshold for how long the temporary use would occupy the premises.</p>
9	Should change of use of buildings be allowed on a 'temporary' basis without the need for a planning application?	<p>Yes, there is potential to consider extending the 28 day rule to buildings for certain uses. Temporary uses should be subject to separate restrictions where listed buildings are concerned in order to preserve the nation's built heritage. Screening criteria should also be applied to temporary uses of buildings such as ensuring the unit is completely vacant, a checklist to avoid amenity and impact issues and a threshold for how long the temporary use would occupy the premises. The Local Planning Authority should be informed of the change.</p> <p>It is considered that the extension of temporary uses for buildings would work between businesses rather than between businesses and residential uses. Developers are unlikely to change the use of offices on a temporary basis to housing due to the costs in conversion. However, it could be used to prevent blight in vacant shop units that sit within A classes. Equally, employment uses could lend themselves to adaption for creative industries and community uses.</p> <p>B&HCC are keen to ensure businesses obtain as much assistance as possible to adapt to the changes in economic circumstances and already much work is done with Local Enterprise Partnerships, Economic Forums and the business community to enable businesses to find space that they need through mechanisms such as business properties databases.</p> <p>Given that the NPPF is in draft, the Decentralisation and Localism Bill has not been enacted and that B&HCC is still preparing its Core Strategy in the context of many changes, it is envisaged that an expedient route to allowing temporary uses in buildings to meet local needs will be set within the national</p>

No.	Question	Response
		policy framework, supported by changes in the current legislative provisions.
	Other issues	Observations
10	Building Control	There is scope for other regulators within local authorities such as Building Control or Environmental Health to assess the impacts of change if some of the classes within the UCO are amalgamated.
11	Localism Bill	There are concerns that the removal of the UCO will undermine the aims of localism and its emphasis to support communities, enabling them to participate.
12	Recent consultations - Proposed permitted change between B uses and C3 uses	<p>Policy Exchange produced a research note in March 2011 entitled “More homes: Fewer empty buildings” indicating the rationale for a reform of the Use Classes Order. Page 8 of this document dedicates two paragraphs to the likely disruption of allowing B uses to transfer to C3 uses. It states, “Reform of the UCO would not involve the release of any more land for building.”</p> <p>However, on page 7 it states that “the planning system will hopefully be able to respond by providing further land for commercial purposes” when the market recovers. In an authority like Brighton & Hove with significant physical constraints, there will be no scope to find in the future employment uses lost from this measure, considering much of it would have naturally been developed for the highest land values; predominantly housing. The supposition that there is likely to be few problems regarding amenity or traffic for “undeveloped land that has already been zoned for non-residential development” is not supported with evidence and in the experience of this council, is largely irrelevant.</p> <p>An article published on Conservative Home (www.conservativehome.co.uk) by Policy Exchange advocates a one size fits all approach to change of use. The proposal to extend permitted development rights to allow change of use from B1 to C3 goes against the localism agenda by imposing a nationally based system to replace the existing one. The proposal for change from office to residential does not allow flexibility or local authorities to exercise choice to respond to local circumstances.</p>

No.	Question	Response
13	Land values	<p>The UCO and planning through regulation of supply of land uses. Where land is restricted and there are significant physical constraints, the balance of uses can be compromised by unrealistic land values. BHCC does not have sufficient land to 'play' with and spiralling land costs will render investment in development projects financially unviable. Cheaper land elsewhere will attract investors and therefore jobs, resulting in unsustainable patterns of commuting and possibly the formation of 'dormitory suburbs'. Local authorities have a duty to protect certain land uses that attract much lower values, such as community uses or educational uses which are vital to a sense of community and sustainably development.</p>
14	National Park	<p>BHCC is bounded by the sea and the newly designated South Downs National Park (SDNP), which extends around its borders eastwards, northwards and westwards. BHCC and the SDNP share planning jurisdiction in some areas of BHCC where boundaries cross over therefore expansion of the city is constrained and land availability for all types of uses is restricted due to the impacts on the SDNP.</p>
15	Any other issues	<p>The underlying tone of this paper suggests that the planning system hinders economic growth. It is important that in reviewing a range of reforms to stimulate economic growth that evidence is provided to support this view and that a range of measures working in tandem are considered. The performance of the planning system and its relative importance in the UK economy should be evidence based and compared with the performance of other fiscal measures such as taxation, public subsidy of banks, exchange rates, business rate relief etc. There is concern there is insufficient evidence to make a case that planning is solely responsible for vacancy rates in commercial premises, although it is acknowledged that planning has a key role to play in ensuring amendments to an inherited set of policies and legislation are effective and meet local requirements.</p>

