

Amendments to permitted development rights

Details

Q1. Details

Name

[REDACTED]

Organisation

Private individual

Preferred contact details (Email address, phone number or address)

[REDACTED]
[REDACTED]

Q2. Type (please select one from the following)

Responding in a private capacity

Q3. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Questions

Q4. Q1. Should the additional days granted by Class A of Part 4A be retained permanently, permitting temporary uses to take place for up to 56 days (28 days for specified uses) in a calendar year?

No

Comments:

The long standing policy to control temporary uses has served the planning system well. The temporary uses can give rise to substantial detrimental harm and the relaxation of policy would undermine the longstanding integrated land use and transport planning strategy in this country, which to date has served us well. It ensures that the proposed land uses don't give rise to any material harm to landscape and seascape character, bio-diversity, amenity of existing residents in relation to noise, disturbance and visual intrusion, and detriment to highway safety. The control of the uses also ensures that in relation to tourism i.e. caravan and camping sites, there are not hotspots, where the use is so intensive, that it damages local landscape/seascape character, the local economy, the amenity of residents, bio-diversity and gives rise to unacceptable highway congestion and detriment to vehicular and pedestrian safety.

The relaxation of the planning rules came about as a result of the Pandemic to assist the viability of businesses in the short term, but the harm which would arise from relaxing the planning controls, would result in long term irreversible harm. The economy has already opened up to tourism abroad. Those who lost out on income during the lockdowns will probably have made up for it from the huge demand for holidays in the UK over the last two years with the associated increase in holiday prices. In relation to the National Parks, a statutory purpose is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to conserve and enhance the special qualities of the Park. The Sandford principle applies whereby, where there is irreconcilable conflict between for example, supporting the local economy, supremacy is given first to the protectionist principle. By relaxing the control this statutory purpose would no longer be able to be fulfilled. Maximising profit for the landowner would most likely be paramount.

Pembrokeshire Coast National Park adopted planning guidelines in June 2021 in relation to caravans and camping, so there are up to date planning policies, against which planning applications can be thoroughly assessed. They were based on detailed analysis and evidence which informs policy. Such developments are directed away from the most sensitive landscape and seascape areas and where they would give rise to demonstrable harm. To give an idea of the complexity and sensitivity of issues in the National Park, I draw your attention to the fact that criterion to be considered include:-

- The coastal edge, to include primarily pastoral sloping landscape which forms a backcloth to the coast
- Impact on the skyline
- Impact on the slopes of mountains/hills i.e. Snowdon, The Presili Hills
- The traditional pattern of existing settlements
- Key view points from recreational boat trip routes
- Areas of tranquility and wildness
- The strength of intervisibility with the seascape area, and visibility against the backdrop of hills
- The presence of existing camp sites in the immediate area
- Views from key places such as headlands and coastal paths
- Dark skies
- Impact on archaeology, scheduled monuments, and the setting of historic sites i.e. promontory forts, castles, fortified towers
- Impact on bio-diversity, including protected species and Sites of Special Scientific Interest

The relaxation would not allow for cumulative impact to be taken into account.

- Whilst it doesn't come under planning fire risk is also an issue, particularly with climate change and the land becoming very dry more frequently. Camp sites tend to have BBQ's and fire pits with the increased fire risk.

Q5. Q2. Do you have any evidence as to any benefits and impacts as a result of introducing the additional number of days for temporary uses to take place since April? If yes, please specify.

Yes

Comments:

A camp site of up to 200 pitches was open last year between Easter and September, in a particularly sensitive coastal location next to the cliffs in the Pembrokeshire Coast National Park. It was visible from both the coastal path and boat trips on the sea and visually intrusive. Not only from the standpoint of the many tents, camper vans, but the associated cars which in themselves detract from the short and long distance views i.e. (sun shining on windscreens), which detract from the sensitive landscape. It was on a site where there have been protected badgers in the recent past in the locality and a sett on adjacent land very close to the common boundary with the field where the camping was taking place. The field which was being used for camping could have been a foraging area for the badgers or there could have been tunnels under the land. Protected red kites, buzzards, kestrels and peregrine falcons are regularly seen hunting for prey over the field and choughs have been seen on the cliffs at the local beach.

Road access is extremely poor with a single carriageway width with very high steep banks adjacent and just the odd passing space. Caravans and motor homes would have difficulty accessing the site on the immediate roads. It was dangerous to vehicular and pedestrian safety to have a use which could generate a minimum of 200 vehicles in this location.

Physical engineering works were carried out in association with the camp site which would have needed planning permission but were not applied for. These could have harmed a protected species. Temporary structures were erected in association with the camp site. It is not clear if these have been removed after the temporary period extension expired. There would need to be resources to ensure that they are and I expect with scarce resources the National Park would not have the manpower to monitor and enforce removal of harmful structures.

Contrary to supporting other local business such as restaurants and pubs, local businesses were not happy as they were inundated by tourists and some shut their doors to/were very hostile to tourists as they just wanted to service the pre-Pandemic existing local community. This had the negative impact of closing their doors to long standing tourists to the area from existing long established camping, caravan and chalet sites.

Q6. Q3. Do you have views on whether there should be additional restrictions on the use of this PDR to mitigate against potential impacts of making this permanent? If yes, please specify.

Other

Comments:

I think this is too complicated a subject area to be subject to restrictions, as every site will have a different context and material factors to be taken into account. Individual sites need to be considered on a case by case basis, taking into account the sites individual circumstances and features.

Q7. Q4. Should the number of days for holding a market generally be extended? If Yes, what is an acceptable number of days for holding a market? What conditions should apply to manage the planning impacts?

No Response

Q8. Q5. Should any additional days over the permitted 14 days be provided for markets operated by or on behalf of a local authority?

No Response

Q9. Q6. Do you agree the permitted changes of use within town centres should become permanent? If not, please provide your reasons for disagreeing.

No Response

Q10. Q7. Do you agree the permitted development right for the use of the highway adjacent to a hospitality use for that purpose should be made permanent? If not, please provide your reasons for disagreeing.

No Response

Q11. Q8. If you answered yes to Q7, are any additional conditions required to mitigate potential amenity impacts?

No Response

Q12. Q9. Do you agree the permitted development right for the installation of awnings at hospitality uses should be made permanent? If not, please provide your reasons for disagreeing.

No Response

Q13. Q10. Do you have any comments regarding Part 3A?

No Response

Q14. Q11. Do you have any comments regarding Part 12A?

No Response

Q15. Q12. Do you agree that HMOs should not benefit from permitted development rights for alterations and extensions to a dwellinghouse granted by Part 1 of the GPDO? If not, please provide your reasons for disagreeing.

No Response

Q16. Q13. Do you agree with the proposed alterations to Class F? If not, please suggest alternative approaches, restrictions or thresholds that could be adopted.

No Response

Q17. Q14. Do you agree greater flexibility should be provided through permitted development rights to accelerate the rollout of electric vehicle charging infrastructure? If not, please provide your reasons for disagreeing.

No Response

Q18. Q15. Do you agree with reintroducing permitted development rights for the protection of poultry and other captive birds?

No Response

Q19. Q16. Do you agree with the proposals for amending Article 4 directions?

No Response

Q20. Q17. We would like to know your views on the effects of the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q21. 18. We have asked a number of specific consultation questions. If you have any related issues which we have not specifically addressed, please use the space below to raise them.

No Response

Submit your response

Q22. If you want to receive a receipt of your response, please provide an email address.

Email address

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