

Permitted Development Amendments to the Town and Country Planning (General Permitted Development) Order 1995

Consultation Response Form

Respondents are encouraged to submit their responses online:

<https://www.smartsurvey.co.uk/s/5RJZZK/>.

Alternatively, please complete the consultation response form and email to
planconsultations-e@gov.wales.

Your name:

[REDACTED]

Organisation (if applicable): Friends Pembrokeshire Coast National park

email / telephone number:

[REDACTED]

Your address:

[REDACTED]

[REDACTED]

Q.1 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?

Yes ☐

No ☒

Other ☐

Comments: In relation to campsites the temporary extension was in response to the pandemic and in particular the need to provide accommodation for the increased number of visitors due the inability to travel abroad. This was a pragmatic and welcomed idea in the circumstances but it was a change triggered by the exceptional situation as opposed to a part of a long term, strategic plan.

The case for adopting this permanently, particularly in National Parks, has not been made and would require a far more evidence based approach. Planning law and guidance has been developed over decades of careful consideration and we believe this change would amount to a confusing free-for-all with potentially disastrous consequences.

A few particular points:

- The National Park purposes are to
 1. *To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks.*
 2. *To promote opportunities for the public understanding and enjoyment of the special qualities of the Parks.*

There is also a duty to foster economic development but this should not be to the detriment of the two purposes. The proposed

extension would risk damaging the established balance between conservation, enjoyment and the economy which has been developed strategically over decades.

- Doubling the allowable time would transform the economic viability of temporary sites and lead to proliferation. A new business model would emerge.
- Coastal hot spots would inevitably be the preferred locations and would be affected throughout the summer season. These places often carry the highest landscape value and are subject to the highest level of protection. This proposal would circumnavigate the usual processes of impact assessment.
- There is a recognised pressure in the most iconic parts of the National Park which will require a planned approach to future visitor management. This proposal would exist outside any such planned approach.
- The ability to control the scale, type and nature of each individual site would be almost impossible. Local Authorities do not have the resources to micro manage such a transformation.
- The supporting infrastructure to run a site for 56 days would lead to problems with waste management, sewage disposal, ancillary buildings, access roads etc., which would probably appear even if contrary to guidance or law. Again, enforcement is notoriously difficult.
- Existing approved sites would be at a considerable financial disadvantage and would be subject to a far higher set of standards and regulation.
- No form of registration, licencing or monitoring is proposed in this consultation which would lead to a totally unmanaged sector.

Q.2 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 ☐

No ☒

Other ☐

Comments: There can be little sound evidence around this topic given the very short time it has been running. Anecdotal evidence suggests that the picture is very mixed.

Q.3 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.

Yes ☐

No ☒

Other ☐

Comments:

Proper research is required to provide the necessary evidence. There are a range of potential mitigations but these would require meaningful research prior to making a permanent change.

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Q.4	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?		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.5	Should any additional days over the permitted 14 days be provided for markets operated by or on behalf of a local authority?		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.6	Do you agree the permitted changes of use within town centres should become permanent? If not, please provide your reasons for disagreeing.		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.7	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.		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.8	If you answered yes to Q7, are any additional conditions required to mitigate potential amenity impacts?
	Comments:

Q.9	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.		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.10	Do you have any comments regarding Part 3A?		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.11	Do you have any comments regarding Part 12A?		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.12	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.		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.13	Do you agree with the proposed alterations to Class F? If not, please suggest alternative approaches, restrictions or thresholds that could be adopted.		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.14	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.		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.15	Do you agree with reintroducing permitted development rights for the protection of poultry and other captive birds?		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.16	Do you agree with the proposals for amending Article 4 Directions?		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Q.17	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?		
	Comments:		

Q.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.		
	Comments:		

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: ☐