

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): One Voice Wales

email / telephone number: [REDACTED]
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Your address:

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SA18 3AF

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 <input type="checkbox"/>	No <input type="checkbox"/>	Other <input checked="" type="checkbox"/>
	Comments: While we understand the need to balance social, economic and environmental considerations and acknowledge that all places across Wales will be facing		

different pressures, our main concern in relation to the increase in days is the impact on already stretched enforcement teams and on this basis we would not support the increase.

We have seen the RTPI response and share its concerns; OVW having a specific focus on the community aspects of place making. Towns face different pressures and we are not yet in a position to establish the appropriate balance's between interests, especially in the light of the pressure's on enforcement

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:

No comment. Local planning authorities (LPAs) alongside other departments (including Environmental Health, Highways, economic development etc should be consulted) will be best placed to comment on the issues that have arisen – both positive and negative

Furthermore, our members would need to be consulted as our recent surveys have concentrated on other Covid themes.

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:

It is noted that under A3 – the sale of hot food for consumption off the premises is not permitted.

When taken together with the provisions for “outdoor server provision “and related issues of awnings and highway use covered in Q’s 7-9 there are several issues:

- Hospitality providers often produce a hybrid offer on and off the premises
- The boundary of outside space is often imprecise, overcrowded and not policed by the owner or manager.
- The limiting of these and related provisions covered below, to the Town Centre as defined in the existing development plan needs review. It applies particularly to coastal areas with costal hospitality areas.

The first two should initially be attended to by the landlord/owner /manager in the context of established links with the local authorities and police. Facilitation can be aided by the provision of a Local Authority town centre manager, the

establishment of a BID and inclusive governance to include the local town council and business associations.

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 ☒

No ☐

Other ☐

Comments:

Markets are usually held on a regular basis weekly or monthly. If extended over a weekend 56 days may be too short. But they are a use which chimes with sustaining place vitality, on the whole are viewed positively and where there are established management regimes .

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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 ☐

No ☐

Other ☐

Comments: No comment

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 ☐

No ☒

Other ☐

Comments:

No. One Voice Wales does not support this proposal which will have a significant impact on the future and vitality of our town centres - at a time when there remains much uncertainty.

We agree with the RTPI's points that we are not yet able to make such a decision and that such research as there is, would not support it. Many towns in Wales if left to the market would suffer. Previous regeneration initiatives by the Government and related Public Bodies (such as the Market Towns Initiative) have addressed the need for proactive support. Fresh initiatives to take account of new short- and longer-term threats to the town centres will need coordinated approaches to include community and town councils.

Independent research published last year sets out the complex issues and importance of small towns in Wales. [Small Towns, Big Issues: independent research report \(gov.wales\)](#) The study found, in relation to the case study towns, that "Despite their differences, all face the same problem that the business models of the main actors shaping our towns threaten to undermine

delivery of Welsh Government's new vision and the good intentions of local authorities (pp.13-14). Based on this evidence we would therefore suggest that blanket changes to PDRs are not the best way to address these important issues. Experience from other nations has shown that attempts to address complex place-based issues by relaxing permitted development rights has resulted in sub-standard development taking place. We would stress caution in attempting to address important issues in this way. Instead, we would support a holistic, collaborative, evidence-based approach that is properly resourced and supported by the relevant stakeholders.

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 ☐ No ☒ Other ☐

Comments:

See comments in relation to LPA resources

Q6

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 ☐ No ☒ Other ☐

Comments:

See comments in relation to LPA resources

Q.10 Do you have any comments regarding Part 3A?

Yes ☐ No ☒ Other ☐

Comments:

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

Yes - See comments in relation to LPA resources

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 checked="" type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

Yes

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 checked="" type="checkbox"/>	Other <input type="checkbox"/>
	Comments:		

While we understand and support the need to increase charging points, this should not be at the cost of townscape or setting. The need for electric charging points in the street may have implications for trees with the scale of new cabling works required. Work will be needed to improve integration with street lighting etc.

Rather than focusing on changes to permitted development rights, we would instead question whether all stakeholders, including owners of the street lighting infrastructure, town and community councils, highway authorities etc. are all engaged with the issue sufficiently and have the resources to deliver?

Whilst supporting the accelerated rollout of electric vehicle infrastructure we share the RTPI's concern with preserving townscape and setting where they are identified in planning policy and likely to result in clutter.

We also agree that simply extending development rights, as exists with telecommunication's infrastructure at present, is too crude a mechanism and needs an holistic approach with the community and other stakeholder's

Q.15 Do you agree with reintroducing permitted development rights for the protection of poultry and other captive birds?

Yes ☐

No ☐

Other ☐

Comments:

No comment

Q.16 Do you agree with the proposals for amending Article 4 Directions?

Yes ☐

No ☐

Other ☐

Comments:

No comment

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:

No comment

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:

You mention in paragraph 2.19 that you are to undertake a Regeneration led review of Town Centre Policy. You refer to a number of land use planning

policies. Presumably other factors, stakeholders and policy fields will be involved. Many agencies and stakeholders e.g. Audit Wales, Business Organisations, are interested in the institutional context and co-ordination beyond land use provisions. Issues include leadership and the inclusion of stakeholders and administrative instruments such as CPO's and alternatives to business rates.

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: ☐