

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): Pembrokeshire Coast National Park

email / telephone number: [REDACTED]

Your address: Llanion Park, Pembroke Dock SA72 6DY

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:

The 56 days permitted change of use should not be applied to National Parks. Particular to Pembrokeshire Coast National Park, the change of use allows for use of agricultural fields to become campsites which are unlegislated and are frequently located in visually sensitive locations, such as coastal areas, which detracts from the special qualities of the landscape of the National Park. The beauty of the National Park is a draw for tourism and the potential impact of 56 days operated campsites at visually sensitive locations, of National importance, could have a harmful impact on the tourism draw of the area. the Authority's Local Development Plan contains evidenced policies to direct camping developments to appropriate locations and the 56 day proposal significantly undermines these policies.

Furthermore the use of camp sites for 56 days is in direct competition with established sites who also require support in recovery from the impacts of the pandemic.

The use of Certificated sites already allows for sites without the requirement for planning permission, as such the extension of the change of use to 56 days is not required within National Parks.

The 56 pd days can also be used for car parking areas which runs contrary to local sustainable schemes and encourages the use of private vehicles to access tourism hot spots, where local authorities and WG should not be making changes which consequently encourages less sustainable ways of travel and can have a harmful impact on the landscape.

PCNPA consider that the change to 56 days should not be implemented, however if it is we request that it does not apply to National Parks.

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:

An increase in complaints received about the prevalence of pop-up campsites-, which ~~is~~are almost impossible to enforce due to the resource intense requirements of collecting evidence when 56 ~~day~~days have been exceeded.

Monitoring 28 day change of use has historically been a challenge-, the move to 56 days has made it impossible to gather sufficient evidence to carry out any enforcement action.

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:

Removal ~~do to~~ the change of use to campsites within National Parks altogether in order to protect the special qualities of the area.

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:

No comment

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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 <input type="checkbox"/>	No <input type="checkbox"/>	Other <input type="checkbox"/>
	Comments: It would be easier for the public and local authorities to interpret the regulations if there was a blanket 28 days applied to all uses .		

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 checked="" type="checkbox"/>	Other <input type="checkbox"/>
	Comments: The change of use to A3 should not be applied to these proposed changes, this may result in a dominance of A3 uses within Town centres adversely impacting on the mix of commercial offer, vitality and vibrancy of a town centre. We have planning policies which ensure that our town centres are not dominated by one type of use and offer a vibrant experience and a range of uses to serve the community and visitors alike. Furthermore there are often amenity issues associated with A3 uses and outdoor seating which need to be carefully to be considered. PCNPA have received complaints this year in respect of noise and disturbance to residential properties, following the temporary change to the regulations. The requirement for a planning application would allow the local planning authority to place appropriate conditions on such change of use to protect amenity.		

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 checked="" type="checkbox"/>	Other <input type="checkbox"/>
	Comments: See response to Q16 in respect of amenity concerns.		

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 checked="" type="checkbox"/>
	Comments: Welcome the proposal that this does not apply in Article 1 (5) land.		

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

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:		

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:		

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

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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 checked="" type="checkbox"/>	Other <input type="checkbox"/>
	Comments: Careful consideration needs to be given to the implications of developments in respect amenity, landscape, biodiversity, phosphates etc. However if the PD rights are temporary it is acceptable.		

Q.16	Do you agree with the proposals for amending Article 4 Directions?		
	Yes <input checked="" 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: ☐