

# Amendments to permitted development rights

## Details

### Q1. Details

Name

[REDACTED]

Organisation

[REDACTED]  
[REDACTED]

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

[REDACTED]

### Q2. Type (please select one from the following)

Business

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:

During the exceptional circumstances of the Pandemic these additional permitted development rights were granted as a response to the increase in demand of people wanting to holiday in the UK because they were unable to travel freely.

They should not be retained permanently for the reasons we have set out below.

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:**

The UK Caravan & Camping Alliance 2019 Economic Benefit Report ([www.ukcca.org.uk](http://www.ukcca.org.uk)) states that in Wales 15% of the tourism sector's GVA was generated by campsites and holiday parks. Which generated £1.33 billion in visitor expenditure, £761.4 million GVA, supported 24,677 jobs in coastal and rural areas.

We are a family run Caravan & Camping Park in North Wales. We have been developing our park for more than 20 years. During this time, we have worked closely with Gwynedd Councils' Planning Department, which at times, has been an expensive and lengthy process to obtain permissions to operate as a holiday park for caravans and camping. The applications have included many conditions to make sure and mitigate against any negative impacts on the highways, the landscape and neighbouring properties. Local residents are able to have their say on our applications and then decisions have been made in an objective way, with regard to the planning merits and potential impacts on the local area. This process provides controls to make sure that the land is used appropriately. Enabling us to offer our customers a great experience, which encourages people to return to the area and to support the local tourism industry.

The safety of our customers is paramount and not only do we have to operate in accordance with our planning permissions, we also have to operate in accordance with our Site Licence that is issued by the local council. Some of the conditions are listed below:

- restricting when caravans and tents can be on the site for human habitation and restricting the number of caravans that can be on the site at any one time.
- controlling the positioning of the caravans and regulating the use of other structures and vehicles including tents.
- fire safety and fire fighting controls
- to ensure that sanitary and other facilities, services and equipment are supplied and maintained.
- to ensure steps are taken to enhance the land, including planting/replanting bushes and trees. To reduce any impact on the environment and to encourage wildlife.

Our busiest months are July to August. During the exceptional circumstances of the pandemic, this was also the time when most landowners who hadn't gone through the planning and licensing process, allowed their land to be used temporarily for camping, using the temporary 56 day permitted use rule. This increase in temporary sites also increased risks. There were reports on the national and local news in 2020 and 2021 of the influx of tourists to areas which already had overburdened infrastructures. Causing safety issues by blocking roads and making them impassable for the emergency services. There were reports of problems of rubbish being left, along with excrement being left at the side of roads and campfire damage to land. Snowdonia was a prime example of this.

Our site licence conditions give us permission to only open between 1st March and 31st October. We are restricted to the number of tents and caravans. We have to ensure that there is sufficient spacing between units. We have to provide toilet and washing facilities. For every 30 pitches we must have a minimum of 1 WC, 1 Urinal, 2 Basins for men and 2 WC's and 2 Basins for women. For every 25 pitches we must have a minimum of 1 shower. These figures are a minimum. We actually have more facilities than this. It states that no pitch should be more than 90m from a Fire Point, which must include 2 water extinguishers (these need to be checked and certified each year). We also have to provide a disposal points for chemical/toilet waste and fresh water suitable for drinking. All our electric points need certifying by an approved electrician each year. All rubbish must be disposed of by a legitimate waste disposal business. Our business rates do not cover waste disposal it is another cost we incur. Landowners who run campsites under the permitted development rights are not required to provide the same level of facilities and therefore are able to charge less. This we feel creates unfair competition at a time of year when we would normally be at our busiest. We have to make the money during this time to make up for the the lower income in the colder months and helping our business to remain viable.

So any proposal to allow unregulated 56 day permitted use other than as an emergency pandemic response, risks the viability of established, regulated parks. It would also impact on the environment, the local community and the safety of those camping on the unlicensed 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.

Yes

**Comments:**

We feel these rights should NOT be made permanent.

However, if the Welsh Government decides to make these rights permanent, we feel additional measures need to be put in place to protect existing regulated businesses, the environment, highway users, neighbouring properties and the safety of the holiday makers who camp on the land.

Particularly, the legislation should be amended with the requirement that the landowner is get approval from the local planning authority before using the land for camping for 56 days. To obtain this approval the landowner should be required to provide details of the maximum number of units that would be on the site to comply with the minimum spacing standards, details of toilet and washing facilities to be provided. A plan showing the location of the site within the local road network so that the local Planning and Highways authorities can assess whether the use of the land will have any adverse impact on the local highway network. Details of how rubbish will be collected. Also proof that confirm that the site is not a Site of Special Scientific Interest nor a Special Area of Conservation and that it is not an important wildlife site.

By having a prior approval scheme it will ensure that a site that is not suitable for the 56 day rules will not automatically be able to operate to the detriment and safety of others. It will ensure that if prior approval is not granted then the landowner will be able to submit an application for planning permission and the use of the land will be considered objectively regarding to the planning merits of the scheme.

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?

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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.

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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.

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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.

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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.

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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.

Yes

**Comments:**

EV charging providers will most probably concentrate on more densely populated areas of Wales because it would be more lucrative for them. Which would mean that the more remote areas of Wales will be left behind. This could be addressed by introducing suitable policy measures, such as offering financial incentives to encourage EV providers to expand in more rural areas, as well as giving greater flexibility through permitted development rights.

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

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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

Other

**Comments:**

Do not have sufficient knowledge on the rules and regulations of this to comment.

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?

Do not have an opinion.

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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