

**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:

Organisation (if applicable): Lichfields (agent) on behalf of [REDACTED]
[REDACTED]

email / telephone number: [REDACTED]

Your address: Lichfields, Belmont House, Churchill Way, Cardiff CF10 2HE

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:

[REDACTED] endorses the permanent retention of the additional days granted by Class A of Part 4A. Extending the time allowed for temporary uses of land from 28 to 56 days will have positive impact on the leisure and tourism sectors and subsequently to local economies, as recognised in the consultation document.

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:

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

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

Paragraphs 8.8 and 8.10

Paragraph 8.8 of the consultation document states:

"In cases when LPAs need to act quickly in order to deal with a threat to the amenity of an area, we want LPAs to have the power to make a direction removing permitted development rights immediately."

Paragraph 8.10 of the consultation document states:

"A Direction with immediate effect would last six months and would then expire unless confirmed by the LPA following consultation."

██████████ considers that if the Welsh Government wants LPAs to have increased powers to make an Article 4 Direction, then there must be a requirement for local consultation before any Article 4 Direction comes into force. The Welsh Government must allow for a sensible period (e.g. 6 to 8 weeks) of consultation and to ensure that any consultation is meaningful and widely publicised. The proposed amendment to Article 4 Directions allowing Directions with immediate effect should therefore not be permitted.

The making of Article 4 Directions to remove permitted development rights for minor operations will create significant additional workload for LPAs which are already stretched. It reinforces why the proposed amendment to Article 4 Directions allowing Directions with immediate effect should not be permitted.

Paragraph 8.15

Paragraph 8.15 of the consultation document states:

"We want to replicate article 4(3) of the GPDO to ensure permitted development rights related to national concerns, safety, and maintenance work for existing facilities cannot be withdrawn."

██████████ endorses the Welsh Government's approach to ensuring permitted development rights related to national concerns, safety and maintenance work for existing facilities cannot be withdrawn. Indeed, it is essential that ██████████ can carry out minor operations at their parks and resorts to ensure the safety of its team and guests, and to ensure that there is a timely approach to doing other minor works that have no impacts on third parties without having to endure the planning application process each time. It's important that local planning authorities are not overwhelmed with unnecessary applications.

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:

Whilst many land uses benefit from permitted development rights, holiday parks do not (except in relation to Site Licences and model standards). Permitted development rights should be introduced to enable smaller scale buildings and structures to be constructed/installed on holiday parks. We would be pleased to set out the scope of such permitted development rights for development that would not have a material effect on the wider environment. This would greatly reduce the number of small scale applications that LPAs need to process and enable holiday park operators to invest promptly.

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: ☐