



ACS Submission: Changes to permitted development rights in Wales

The Association of Convenience Stores (ACS) welcomes the opportunity to respond to the Welsh Government's Consultation on Changes to permitted development rights in Wales. ACS represents the UK's 50,000 convenience stores including Spar, the Co-op, One Stop and thousands of independent retailers that play a key role in communities, providing essential goods and services.

We value the opportunity to share our members views, particularly in relation to 6 of the consultation, which focuses on Reverse Vending Machines (RVMs). Our members broadly support measures that introduce greater flexibility and planning freedoms to help businesses in our sector play a more active role in Wales's journey to Net Zero.

Q22 Do you agree with the revised dimensions for permitted development for RVM outbuildings, to a maximum of 40 square metres, and to a maximum height of 3.5 metres?

Yes. For convenience retailers the majority of RVMs will be hosted inside stores. Some retailers may choose to host RVMs externally to their premises, for example petrol forecourts where they have car parking spaces. External RVMs require a small shelter to protect the RVM and customers from the weather. However, space constraints within our sector means that RVMs offered a not likely to exceed 2m² to 3m². Therefore, the proposals to accommodate shipping containers are not as relevant to businesses in the convenience sector.

We would welcome further discussion with the Welsh Government on the following points in the consultation:

- No part of the development should protrude beyond a wall facing onto the highway and be within 5 metres of that highway.
- No part of the development will be constructed within 15 metres of the curtilage of a building used for residential purposes.

Convenience stores and petrol forecourts trade at the very heart of communities, close to roads and residential premises. RVMs are unlikely to be installed "through the wall", but instead against external walls of premises near external car parking spaces. The permitted development rights should account for this format, and we question is the current wording on "protruding beyond a wall facing" may impact small external RVMs setting in convenience stores and petrol forecourts.

We have similar concerns with the "15 metres of the curtilage of a building". Convenience stores and petrol forecourts tend to be close to residential premises and will be operating machines with lower volumes of returns and less noise pollution. We would welcome further

conversation with the Welsh Government on this threshold in relation to convenience stores or other smaller premises.

We welcome planning policies that streamline processes and support sustainable business operations. Ongoing engagement with industry will be key to ensuring planning frameworks remain responsive and fit for purpose, especially with continued innovation of RVMs and the final decisions about the format and materials in scope of DRS in Wales.

Q23 Do you agree that DRS should not be subject to any specific exceptions relating to advertisement consent and should be subject to the same constraints as exist for other similar developments, such as cashpoints?

We would welcome further discussion with the Welsh Government on the types of constraints this will affect. In many existing DRS systems there is a requirement to include scheme branding on machines. In addition, for commercial reasons, digital display screens on RVMs can include advertising. We would not want businesses to have to engage in a planning application for branding being included on RVMs.

Q24 Do you agree that 15 metres distance from the curtilage of a building which is used for residential purposes is a sufficient distance to mitigate the noise impact of recycling of glass? If not, do you have any information which would assist in justification of a differing distance?

We have concerns that a blanket 15-metre distance requirement may present challenges, particularly for small retailers operating on small neighbourhood sites. These businesses may have limited flexibility in locating RVMs or glass collection points further away from residential boundaries.

It is also important to recognise that modern RVMs are increasingly designed with noise mitigation in mind. Advances in internal padding, cushioning, and container handling technology have significantly reduced operational noise levels, minimising disruption even in close proximity to residential areas.

We look forward to continued engagement on these important issues, please contact Alexandra.margetts@acs.org.uk for any further information on this submission.