

Background Paper

Camping and Caravanning in Pembrokeshire Coast National Park –
Managing Impacts

May 2024

Pembrokeshire Coast National Park Authority

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1.0 Introduction

- 1.1 The benefits of camping and caravanning are well known and for many decades it has been a popular form of holiday for visitor to Pembrokeshire. Many of the large camping and caravan sites in the County were established in the 1950s and 60s, attracting holiday makers in their thousands. Alongside the sites offering space to pitch your own caravan or tent, many site owners started purchasing static caravans to let out during the holiday periods. Facilities within the caravans quickly developed within solid fuel heating, hot water and insulation allowing them to be used for longer period of the year. By the 1980s further refinements had become the norm with mains water and flushing toilets. The now luxurious interiors and plumbed in central heating have ensured their long-lasting appeal.
- 1.2 Touring caravans have also long been a familiar sight in Pembrokeshire, alongside tents – both of which have undergone their own evolution in terms of coping with the unpredictable weather and degree of comfort. The increase in size of the tourers and changes to driving licenses has led to many now being pitched on a single site for the entire season with the owners visiting as they wish. Alongside them has grown campervan ownership providing the ability to stop up for the night anywhere – on site or off, and the advent of glamping. A wide variety of structures are now commonly available to hire affording a high level of luxury for visitors whilst still offering the positive outdoor camping vibes.

2.0 The National Park

- 2.1 A National Park is the highest designation of landscape protection in the UK and is used to protect the most sensitive and highest quality landscapes from unacceptable development. Pembrokeshire Coast was designated a National Park in 1952. With no-where in the Park being more than 10 miles from the sea, it was granted the highest order of landscape protection mainly for its spectacular coastline. The legislation established to protect National Parks sets out two statutory purposes which are given great weight in decision-making. The first of these is to conserve and enhance the natural beauty, wildlife and heritage of the National Park. The second is to promote opportunities for public understanding and enjoyment of their special qualities. As conflict with delivering these two purposes can arise, the Sandford Principle provides that where there is conflict, greater weight shall be given to conserving and enhancing natural beauty, wildlife and cultural heritage.
- 2.2 The legislation also sets out a duty to foster the economic and social well-being of local communities provided that it is compatible with the purposes.
- 2.3 The National Park Authority is the planning authority within the National Park. The Authority is responsible for preparing the Local Development Plan, for determining planning applications and carrying out enforcement of unauthorised developments. All of this is undertaken within the overall context of the two purposes and supporting duty.

3.0 Planning Policy on Camping and Caravans

- 3.1 The 1950s and 60s rise in popularity of camping and caravanning came with a rapid increase of large sites around the coast of west Wales. When Dyfed County Council was formed in the 1970s they were tasked with preparing a Structure Plan for the County which, for the National Park and many other areas around the coast, was the first planning policy document. It contained policies for the whole County and also provided the context for Plans prepared by individual local authorities, including the National Park Authority.
- 3.2 The Structure Plan contained a policy to control any further development of camping and caravan sites. Within this context the first Local Plan prepared for the National Park and its successor Unitary Development Plan covering the whole of Pembrokeshire maintained the same policy position of restricting any further camping and caravan development within the National Park. The National Park Authority continued the same policy in the 2010 Local Development Plan. In all, that policy position that was in place for over three decades.
- 3.3 After 2010, camping and caravanning started once again to increase in popularity. Many of the existing sites were seeking changes from tent and touring caravan pitches to static caravans and there was a notable rise in the number of people visiting in campervans and motorhomes. This was also the start of glamping. Pressure was increasing for additional camping and caravan sites. As part of the review of the Local Development Plan and in preparation for its replacement, the National Park Authority commissioned a study in 2015 to examine the capacity of the National Park to absorb further camping and caravan development, without harming the landscape and its special qualities.
- 3.4 The study was used as part of the evidence base for preparing the policies of the second Local Development Plan (LDP2) and following adoption of the Plan in 2020 was published as Supplementary Planning Guidance¹. The Guidance identifies 28 landscape character areas throughout the National Park, all of which are at capacity or have very limited capacity to absorb further camping and caravan development without harm (see table in Annex 1 of this paper). The survey work was undertaken of sites with planning permission and the sites at the time known to be operating under Exemption Certificates. Twenty-eight-day sites were not included in the assessment due to their shifting nature and because the National Park Authority does not have the benefit of knowing the details of their location.

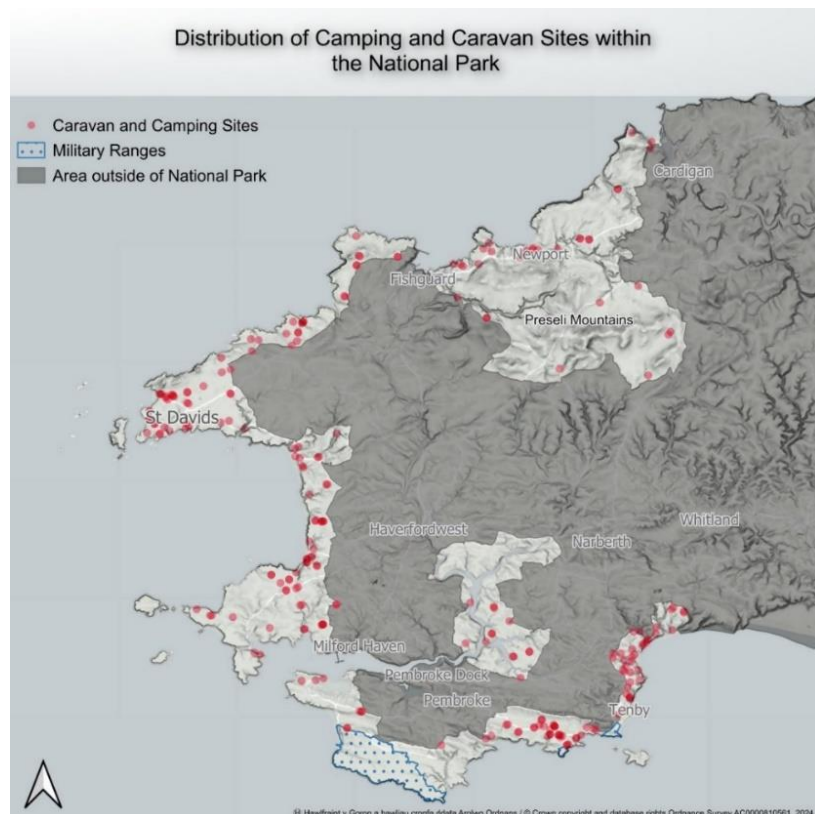
4.0 The Current Situation

- 4.1 In 2023 in the Pembrokeshire Coast National Park there were:
 - 5,100 static caravan pitches;
 - 1,000 touring caravan pitches (which can also be used by campervans and motorhomes);
 - 60 campervan only pitches;

¹ [Caravan and Camping Supplementary Planning Guidance - Pembrokeshire Coast National Park](#)

- Over 400 unit pitches (can be used for tents, touring caravans, campervans and motorhomes)
 - 900 tent pitches.
- 4.2 All of the above pitches are within sites which have planning permission granted by the National Park Authority and a site license issued by Pembrokeshire County Council.
- 4.3 In addition to the above sites, permitted development rights allow for the operation of camping sites by members of recreational organisations (**Exemption Certificate sites**) and for owners of land holdings of over 5 acres (**28-day sites**) without the need for planning permission or site licenses. It is estimated that the recreational organisations provide an additional 1000 pitches in the National Park. The number of pitches offered on 28-day sites is not quantifiable but the use of this method of establishing a campsite is known to have increased substantially over the last decade or so.
- 4.4 The map below (Map 1) shows the distribution of camping and caravan sites with planning permission and exemption certificates throughout the National Park. The darker the shading of the points shows locations where there is a greater density of sites. Other than the high areas of the Preseli Mountains and the MoD Ranges at Castlemartin, there is a clear distribution of sites throughout the National Park.

**Map 1:
Distribution
of Camping
and Caravan
Sites in the
National Park**



- 4.5 In addition to the 7,500 pitches in the National Park, either with planning permission or operating under an exemption certificate, there remains a significant number of what are now popularly termed 'pop-up' camping sites. It would appear that these sites are using the 28-day permitted development rights to open a camping site without planning permission, but operate for a

much longer period of time, which can be up to 6 months of the year (Easter to end of September).

- 4.6 Unauthorised camping and caravan sites form a significant element of enforcement work undertaken by the Authority. Since 2018, over 60 separate files have been opened. The actual number of planning breaches is much higher than this, but the Authority does not have sufficient resources to follow up each reported breach. Prior to the pandemic, camping and caravanning issues made up 11.35% of all enforcement cases (2019). The numbers fell during 2020 and 2021 due to lockdown measures being in place during which time there were national restrictions on sites operating and on-site visits being undertaken by National Park Authority staff. In 2022 the percentage of camping and caravan enforcement cases was 9.5% and in 2023 had risen to just over 12%.
- 4.7 In response to enforcement action taken by the National Park against breaches of the 28-day rights, it is common for landowners to submit a Certificate of Lawfulness application. This is granted when the landowner can demonstrate that they have operated for a period of 10 consecutive years, for longer than the 28-day period, immediately prior to the application being submitted to the Authority and without any enforcement action having been taken during that time. The National Park Authority is not able to consider the application of planning policy in these circumstances. Between 2015 and 2023 there were 9 successful Certificate of Lawfulness applications adding a further 400 pitches in the National Park. The table below shows that Certificate of Lawfulness applications resulted in a much greater number of new pitches than those resulting from planning applications for new sites or changes within existing sites.

Table 1: Camping Sites granted Planning Permission/Certificate of Lawfulness between 2015 and 2023

	New Sites granted planning permission	Changes within Existing Sites	Certificate of Lawfulness (new sites)
Static caravan pitches	0	145	62
Touring caravan pitches	0	-223	62
Campervan pitches	0	15	17
Unit pitches	0	0	138
Tent pitches	0	-28	121
Glamping pitches	20	5	0
Total	20	-86	400

- 4.8 Of the pitches gained by means of a Certificate of Lawfulness, it is estimated by 86% (345 pitches) would not have been recommended for approval if judged against the Authority's planning policies on camping and caravanning. This demonstrates a significant undermining of the evidenced and examined policies of the LDP2 resulting in potentially harmful landscape and infrastructure impacts on the National Park.

5.0 Scrutiny and Control with Planning Applications

- 5.1 When planning applications are submitted for camping and caravan sites the National Park Authority scrutinises the proposal against the policies of the Local Development Plan (LDP2), the Authority's Supplementary Planning Guidance on Camping and Caravans (which is based on the landscape capacity study of 2015) and other relevant policies and guidance.
- 5.2 Policy 41 of LDP2 (see Annexe 2 to this document) relates to the provision and siting of new caravan and camping sites and extensions or changes to existing sites. New sites are permitted away from the coast and Preselis and in locations not intervisible with them. The policy refers to the need to avoid sensitive locations, for development to be assimilated into the landscape, that there should be no cumulative effects when considered in conjunction with other development, and the need to reuse existing building and structures rather than provide new, where possible.
- 5.3 The Supplementary Planning Guidance indicates where there is any space capacity in the landscape to accommodate new camping and caravan development, and advises on appropriate scale and operating times for new sites. It also provides guidance to minimise potentially harmful and visual impacts of new sites.
- 5.2 The Authority also seeks advice from statutory agencies including the Highway Authority, Natural Resources Wales, Dwr Cymru/Welsh Water and Pembrokeshire County Council's Public Health team. The outcome of the planning application is based on a thorough consideration of the policies and responses received.
- 5.3 Whilst each application will have particular elements, the main aspects for consideration by the Authority are:
- Landscape impact
 - Flood risk
 - Impact on neighbours
 - Highway safety
 - Drainage and waste management
 - Protected species and habitats
 - Operating times
 - Agricultural land quality
- 5.4 When planning permission is granted planning conditions are used to control:
- The site area
 - The number and type of pitches (static caravan, touring caravan, tent, glamping etc)
 - The layout of pitches and protection of areas of sensitivity
 - The period of operation of the site
 - Use of accommodation on the site for holiday use

5.5 Once a site is granted planning permission, a site license must be sought from Pembrokeshire County Council. The license will ensure:

- Adequate facilities such as toilets and showers for the number and type of pitches
- Suitable arrangements for disposal of refuse (trade waste agreement)
- Appropriate arrangements for water supply, wastewater and sewage disposal
- Suitable provision for chemical waste disposal
- Compliance with fire regulations (spacing of pitches and fire points etc)
- Appropriate safety and adherence to licensing requirements for other facilities on the site such as shops, restaurants, swimming pools, hot-tubs etc.

6.0 Permitted Development – Planning Permission not needed

6.1 There are two ways to operate camping and caravan sites as Permitted Development.

6.2 Exemption Certificate Sites

Organisations which meet certain requirements can apply to the Welsh Government for exemption certificates² under the Caravan Sites and Control of Development Act 1960 and Public Health Act 1936. To be eligible, organisations must have:

- A formal constitution;
- Objectives including the encouragement or promotion of a recreational activity; and
- The resources to arrange and supervise activities.

6.3 In England, Scotland and Wales there are 321 such organisations holding Exemption Certificates. Certificates are free of charge and are valid for up to 5 years.

6.4 There are 3 types of exemptions for caravan organisations:

- a) Paragraph 4 – allows use of land as a caravan site occupied by an organization holding a certificate of exemption granted by Welsh Government for up to 28 days on the site by no more than 3 caravans at any one time;
- b) Paragraph 5 – allows organisations to issue certificates (valid for 1 year) to owners/occupiers of sites stating that the land has been approved by them for use by their members for the purpose of recreation for no more than 5 caravans (or campervans/motorhomes);
- c) Paragraph 6 – allows organisations to arrange meetings of its members only, lasting up to 5 days (known as rallies).

² [Camping licence \(England and Wales\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

- 6.5 There is a further exemption for tented camping which allows the use of any camping ground owned by (or provided or used by organisation members) to be used for tented camping.
- 6.6 Guidance produced by the Welsh Government suggests that organisations may wish to seek the views of the local planning authority prior to a site being used and that they should be sensitive to the concerns of local residents. No other consultation with infrastructure providers or licensing bodies is required, although some of the organisations have their own standards and procedures and require member compliance throughout their operation. As part of their Certification requirements the organisations also inspect and monitor the sites.
- 6.7 In some cases where the National Park Authority has refused planning permission or indicated through the pre-application enquiry process that a proposal is unlikely to be supported for a camping site, the applicant has subsequently applied for membership to one of the Exemption Organisations and by doing so successfully opened a site in the same location. In other cases, objections raised by the National Park Authority regarding the setting up of some sites have been disregarded by Exemption Organisations.
- 6.8 Certificates have been granted to site operators allowing them to operate all-year round or at any time of year of their own choosing. This degree of autonomy is almost never permitted on sites with planning permission.
- 6.9 **28-Day Sites**
Sites set up under the 28-day rule are not subject to any form of scrutiny. Whereas landowners establishing sites in England are required to notify the planning authority in advance of opening, this is not required in Wales.
- 6.10 This way of setting up a camping site is allowed on land-holdings of 5 acres or more and permits the use of the land for up to 3 caravans or motorhomes or campervans and an unspecified number of tent pitches. No structures other than the most basic, temporary facilities such as a standpipe and portaloos are permitted without planning permission. The temporary nature of the sites is clearly to allow landowners to operate for a short period of time. The reality is, however, that sites operate in this way for several months at a time. This is clear in the number of Certificate of Lawfulness applications received by the National Park Authority in response to enforcement action being taken.
- 6.11 Complaints received about unauthorised sites include:
- Littering and use of public bins for dumping of waste
 - Waste water cassettes being emptied in hedgerows
 - Waste water cassettes being emptied in public toilets (often not connected to the mains sewer)
 - Noise to neighbouring properties
 - Congestion and traffic problems
 - Fires
 - Some communities have felt inundated with sites without any opportunity to raise their concerns other than through complaint after the sites are established.

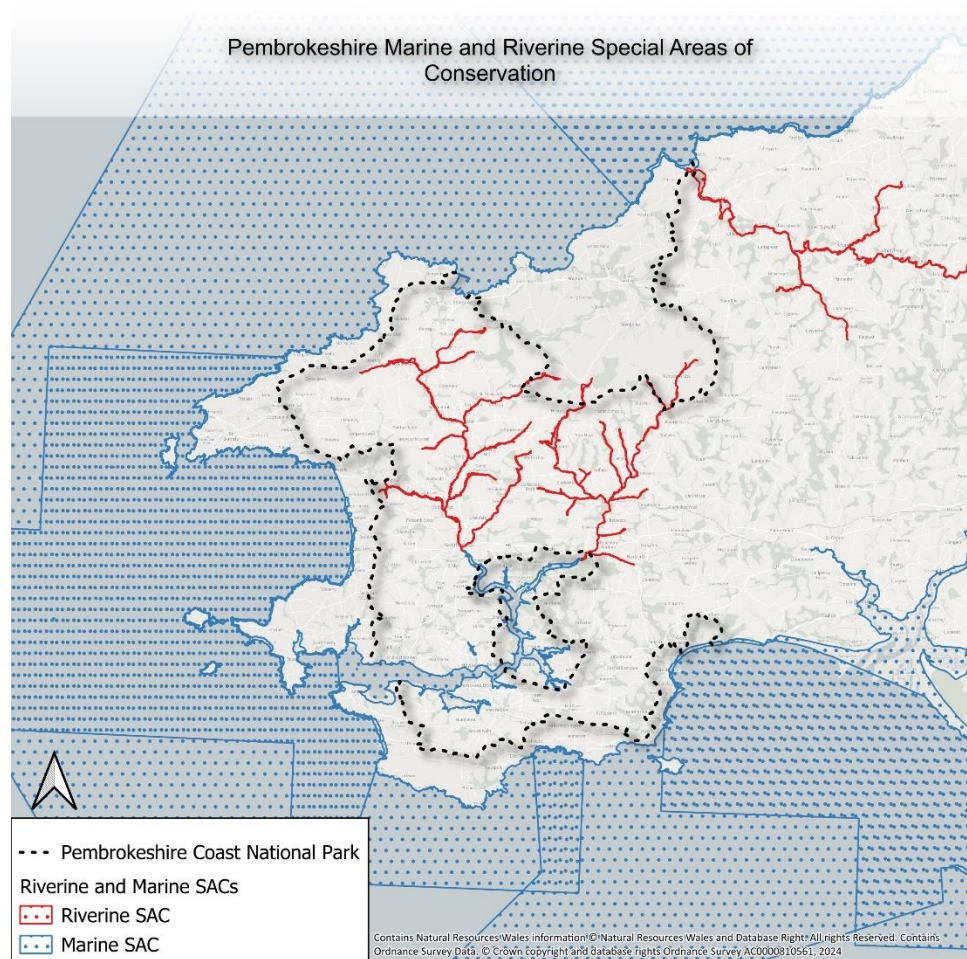
6.12 Sites set up through permitted development rights are not subject to the same scrutiny or public consultation as those requiring planning permission. Over the last few decades, laws and regulations to protect the natural environment have increased but permitted development sites are operating for the most part outside of the regulations. Particular concerns for the authorities relate to:

Table 2 Issues experienced

	Issue	Evidence and Reasons
a.	Risk to the landscape through individual and cumulative site impacts	<p>There is very limited capacity in the National Park for additional sites without harm to the landscape. This has been demonstrated through the development of the evidence base for the Local Development Plan 2 and the supporting Supplementary Planning Guidance on Caravan and Camping (see extract in Annexe 1). There are no restrictions on the number of sites nor pitches within sites arising through permitted development rights.</p> <p>A high number of Certificate of Lawfulness applications granted permission that would be contrary to planning policies intended to protect the National Park and its Special Qualities.</p>
b.	Over-burdening of infrastructure – particularly water supply, sewage management and highways.	<p>Parts of Pembrokeshire are affected by water supply issues which are generally highlighted through the planning application process by Dwr Cymru/Welsh Water. Permitted development site operators are not subject to the same requirements with potential for consequent deterioration of the supply.</p> <p>Lack of consultation with the authorities over private water supplies with potential for significant public health impacts.</p> <p>Failing water quality in the riverine and marine Special Areas of Conservation in Pembrokeshire (see map 2 below) potentially arising from unregulated foul water discharges.</p> <p>Sites are often accessed by narrow lane network unsuited to large increases in traffic, particularly by larger vehicles and caravans.</p>
c.	Potential for significant increase in phosphates.	<p>The potential for unregulated water discharges identified in b may lead to potential increases in phosphates within riverine and marine Special Areas of Conservation. Outdoor kitchens, individual toilets and showers and hot-tubs have become commonplace on many sites.</p>
d.	Camping sites being located in remote areas giving greater numbers of people instant access to sensitive locations and difficult terrains.	<p>Potential for damage and increased erosion caused to footpaths. Potentially dangerous accesses created down steep cliff edges to beaches.</p> <p>Increased reports of disturbance to wildlife, e.g. seals and their pups on beaches.</p> <p>Gradual erosion of sense of remoteness and appearance of elements associated with more established and managed environments.</p>

	Issue	Evidence and Reasons
e.	Complaints from operators of sites with planning permission and site licenses about the lack of scrutiny and monitoring of permitted development sites.	A two-tier system is in operation with significant variation in the requirements needed for lawful operation and subsequent levels of cost. Potential for the cumulative impact of the proliferation of permitted development sites resulting in planning applications for new camping sites not being supported.
f.	Lack of opportunity for public engagement or consultation on 28-day sites.	No opportunity for the public to comment on sites prior to their establishment, as there would be with planning applications. Enforcement can be taken after 28 days has lapsed but lengthy procedures mean that sites have generally closed for the season before it is completed.
g.	Undermining of the planning system in the National Park.	The Authority's LDP2 has gone through extensive and rigorous consultation and examination to demonstrate it is founded on sound evidence. Widespread and increasing use of permitted development rights is undermining the planning system.

**Map 2:
Pembrokeshire
Marine and
Riverine
Special Areas
of
Conservation**



7.0 Actions Taken to Date

7.1 The table below lists actions taken by the National Park Authority and others to try to monitor camping and caravan sites and control unauthorised developments.

Table 3: Actions to date to try to control unauthorised development

	Action	What has it achieved?	Is it still happening?
1.	Until the late 1990s the Authority worked with PCC Licensing to monitor sites by means of site visits (PCC) and a flown survey (PCNPA).	Regular monitoring of existing sites to ensure compliance with planning and licensing requirements and pitch occupancy monitoring.	No. This ended with the emergence of regularly updated aerial photography available to the Authority. Until the late 1990s the Authority worked with PCC Licensing to monitor sites by means of site visits (PCC) and a flown survey (PCNPA). updated aerial photography. Pembrokeshire County Council is obliged to make random visits to sites as part of the licensing scheme but their capacity to do this is constrained by resources.
2.	We used aerial photography to maintain the survey work formerly undertaken by means of the flown survey.	Regular monitoring of existing sites to ensure compliance with planning permissions granted and pitch occupancy monitoring. It also highlights some unauthorised developments, particularly those linked to existing caravan sites.	Yes. Our data is updated when aerial photography updates are published by Welsh Government.
3.	We compiled a comprehensive set of data, including mapping of all caravan and camping sites in the National Park.	Regular monitoring of existing sites to ensure compliance with planning permissions granted. It also helps to identify incidents of unauthorised development more promptly.	Yes. This is maintained and regularly updated.
4	We liaised with Pembrokeshire County Council to ensure that the number and type of pitches within each site tallied for the two	It provided a comprehensive and co-ordinated data set and identified anomalies which could be followed up via enforcement.	No. There was a change of personnel at PCC in 2016 following a re-organisation after which their resources were redirected to other issues.

	Action	What has it achieved?	Is it still happening?
	Authorities. Regular liaison meetings continued for a time.		
5.	In 2017 we produced and published an information leaflet for caravan and campsite operators.	It provided easy to read information for site owners and those intending to operate sites.	Yes. The leaflet remains available on our website ³ but is not widely publicised.
6.	An additional enforcement officer was employed to visit as many camping and caravan sites as possible to raise awareness of the 'do's and don'ts' of running a campsite under the various methods.	Provided easy to read information and raised awareness of monitoring being undertaken by the National Park Authority.	No. The additional officer was deployed for a limited time period only when additional resources became temporarily available.
7.	In 2015 we commissioned a study to inform future local planning policy on camping and caravanning in the National Park.	Provided the evidence required to support a policy change in the Local Development Plan from a long-standing policy of restraint to one identifying where limited further development can be considered.	Yes. The policy is in operation and the study is used as Supplementary Planning Guidance.
8.	In 2021 we had a meeting with the Welsh Government officer responsible for issuing the Exemption Certificates to organisations to communicate our concerns about the widespread abuse of the system.	Raised awareness of the problems facing this Authority with Welsh Government.	No. The issue wasn't recognised by the WG Officer and they were not minded to take any action.
9.	We have raised the issue of unauthorised camping at the all Wales Camping and Caravan Forum, also attended by Welsh Government and representatives of the camping and caravan industry.	Provided information to the sector and others attending the meeting and garnered support for seeking further control for sites established under the 28-day rule.	Yes. The Forum meets twice a year and the issue is regularly discussed.
10.	We have attended local meetings organised by the all Wales Camping and Caravan Forum and	Provided information to the sector locally and garnered support for seeking further control of	Yes. We attend meetings whenever possible although they have been

³ [28 Day Guide](#)

	Action	What has it achieved?	Is it still happening?
	also by Pembrokeshire County Council to present information and awareness of issues to the local operators.	Certificated Sites and 28-day sites operating outside of their permitted rights.	less frequent since the covid lockdown.
11.	We liaised with Pembrokeshire County Council, the Police, National Trust and other agencies to control widespread and significant unauthorised camping in the 2020 and 2021 seasons.	Aimed to protect the landscape and environment from unauthorised camping outside of sites and the consequences of very high numbers of visitors to the area.	Yes. Meetings occur sporadically to deal with specific issues/locations.
12.	Where opportunities arise and where appropriate we have encouraged operators of Exemption Certificate sites to apply for planning permission.	Ensures sites remain appropriate in terms of location, size etc.	Yes. Ongoing where opportunities arise.
13.	We responded to the Welsh Government's consultation regarding the extending of 28 days to 56 days for pop-up campsites stating the reasons why we would be opposed to such a change.	The Welsh Government has not yet responded to this element of the consultation.	Yes. Awaiting response/action from Welsh Government.
14.	Further liaison with Welsh Government regarding the issuing of Exemption Organisation Certificates.	The Welsh Government has agreed to consider the issues raised further.	Yes. Awaiting response/action from Welsh Government.
15.	Stakeholder workshops held with statutory undertakers and exemption organisations to raise awareness of the issues and initiate further action.	There was a range of responses including support for the removal of permitted development rights; increased engagement and not wanting any change to the current regime.	Yes. This current consultation exercise is the next step in gathering wider opinion on the issues and possible actions, if any, required.

8.0 Options for Change

8.1 The National Park Authority recognises that camping and caravanning are an important way for visitors to enjoy the National Park, as well as the benefits it brings for health and well-being. The Authority and other organisations are moving towards a regenerative tourism strategy where visitors have a positive experience and positive impact and deliver a net benefit to the natural environment.

8.2 The negative impacts being created by the proliferation of permitted development camping sites do not comply with the regenerative strategy and have significant potential to cause harm to the National Park. The matter therefore requires a response from the National Park Authority. Annexe 3 to this paper shows a table of pros and cons of permitted development camping sites which has been developed through evidence gathering internally and externally and through workshops and meetings.

8.3 Other locations with similar issues have addressed the problem by introducing an Article 4 Direction. Such a Direction would remove permitted development rights. It would not prevent new camping sites from being established, but planning permission would be required to do so.

8.4 **Experience from Elsewhere**

- Cornwall – Extensive areas of the Cornish coast have been subject to Article 4 Directions to control camping and caravanning since the 1970s. Cornwall is very similar to Pembrokeshire in having a very long and dramatic coastline and is very popular with visitors. The areas are designated as Areas of Outstanding Natural Beauty.
- Gower – An Article 4 Direction has been in place for the whole of Gower Area of Outstanding Natural Beauty since 1979. When it was introduced the then Welsh Officer decision notice accepted heavy camping pressures and abuse of permitted development rights taking place. There has been support for and criticism of the Direction since its introduction but no significant or successful challenge to its implementation. The majority of planning applications for camping and caravanning sites are approved by the Council. More recently they have been using the Gower Landscape and Sensitivity and Capacity Study (similar to the National Park Authority's Supplementary Planning Guidance) to help guide new development to the least sensitive locations and have found this to be useful in controlling landscape impacts. They do not consider that they would have been able to achieve this without the Article 4 Direction being in place.
- New Forest National Park Authority – The Authority introduced an Article 4 Direction in September 2022 in response to increasing pressures on the National Park due to campers. There was general support from the public for additional controls following a consultation exercise. The Direction removes permitted development rights for 28-day sites. Following a change of legislation in England which increased the number of days that sites could be allowed to operate under permitted development rights, the Article 4 Direction needed to be amended which was done in September 2023. The New Forest National Park Authority provides additional guidance for site operators including the long-term management of the land and compliance with Habitats Regulations.

8.5 There are several options available to Pembrokeshire Coast National Park Authority to manage new camping and caravan sites.

Table 4: Options

	Option	Outcome
i.	To continue to enforce against unauthorised development reported to the Authority.	This would retain the status quo which has not been sufficiently effective to date.
ii.	To increase engagement with permitted development site operators.	This may be effective for Exemption Organisation sites as the Organisations are established and known to the Authority. It would be difficult to achieve for 28-day sites as operators are not required to notify the Authority and are therefore largely unknown unless reported as an Enforcement breach.
iii.	To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites.	This would give the Authority the ability to properly consider applications for this type of sites as well as allowing opportunity for public consultation and liaison with other regulators. It would also reduce the potential for abuse of permitted development rights for sites operating for more than 28 days.
iv.	To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites.	This would give the Authority the ability to properly consider applications for sites currently operated under certificate. The likely effect would be for operators to cease membership of such organisations and therefore reduce any positive effects from increased engagement for good practice with the Exemption Organisations.
v.	To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation camping and caravan sites	The outcome of this would be a combination of items iii and iv above.

9.0 Summary and Conclusions

9.1 The National Park has long been a popular destination for visitors coming for camping and caravan holidays. Whilst recognizing the benefits of camping for those wishing to enjoy the National Park, the National Park Authority is responsible for protecting against harm to the protected landscape – within the remit of the two purposes and duty assigned by legislation. It also has a duty under the Environment Act 2006 known as the Section 6 duty which requires

that public authorities that exercise their functions have a duty to maintain and enhance biodiversity and promote the resilience of ecosystems.

- 9.2 Following several decades of restrictive planning policies limiting the development of new camping and caravan sites, the National Park Authority commissioned a study in 2015 to examine what capacity there is to accommodate more sites without harm to the landscape. The conclusion was that there is only very limited capacity in some locations, whilst others are already at capacity. The study was used to inform the current Local Development Plan (LDP2) and subsequently was adopted as Supplementary Planning Guidance to the Plan.
- 9.3 LDP2 and the Supplementary Planning Guidance are used when determining planning applications for camping and caravan proposals. Permitted development rights, however, also allow the creation of new sites without the need for planning permission. There are types of permitted development rights:
- Exemption organisation sites
 - Twenty-eight day sites
- 9.4 This form of development has contributed greatly to the number of camping and caravan pitches in the National Park but without the degree of scrutiny or public consultation given by sites going through the planning application process. In addition, widespread abuse of 28-day permitted development rights has resulted in sites being granted lawful use in locations that would not comply with planning policy. This is undermining the Authority's ability to properly plan for the area and also conflicts with the Authority's strategy of regenerative tourism.
- 9.5 The National Park Authority has deployed various means of trying to manage the situation and fulfil its responsibility to protect the National Park and its special qualities. These have met with limited success and now it is considering the need to use an Article 4 Direction. Other parts of England and Wales with similar characteristics and issues as those faced by in the National Park are already using Article 4 Directions to control the permitted development rights for camping and caravanning.
- 9.6 There are several options for the National Park Authority to consider relating to how much additional control is required to resolve the issues which are set out fully in this paper and summarized below:

Table 5: Issues

	Issue	Exemption Organisation Sites	28-Day Sites
1.	Accountability of site operators	Have to be an established organisation, with certain requirements in place, scrutinised by Welsh Government. Degree of scrutiny of individual site operators	No accountability.

	Issue	Exemption Organisation Sites	28-Day Sites
		varies between a wide range of Exemption Organisations.	
2.	Lack of scrutiny of proposals prior to site set up	Some Organisations have their own standards and procedures in place and are encouraged to consult the National Park Authority and other regulators by Welsh Government.	No consultation with the planning authority or any other bodies is required.
3.	Monitoring of operations once site is opened	Organisations are required to inspect sites annually. Some inspect more frequently. There is variation between organisations in the standards and monitoring undertaken.	None required.
4.	Consultation with neighbours	Not required but Organisations should seek to minimise disturbance to neighbours.	None required.
5.	Misuse of Permitted Development rights	Matters dealt with by the National Park include: Unauthorised structures; Operating for more than the permitted number of caravan pitches; Operating for longer than the permitted period.	Matters dealt with by the National Park include: Landscape impact; unauthorised structures; Operating for significantly longer than the permitted period; nuisance caused to neighbours and the wider community; traffic congestion.

9.7 There are several options available to Pembrokeshire Coast National Park Authority to manage new camping and caravan sites. Having carefully weighed the options available, the Authority's preferred option is to introduce an Article 4 Direction to remove permitted development rights for 28-day camping and caravan sites. Alongside this Officers of the Authority consider that introducing a voluntary Code of Conduct / Working Protocol for exempted organisations could improve and enhance standards and effective working practices. The two preferred options are highlighted in bold in the table. This paper and the wider context around the issues are being presented for information as part of a public consultation on this issue.

Table 6: Preferred Options shown in bold⁴

	Option	Outcome
i.	To continue to enforce against unauthorised development reported to the Authority.	This would retain the status quo which has not been sufficiently effective to date.
ii.	To increase engagement with permitted development site operators. (Preferred option for Exempted Organisations alongside Option iii).	This may be effective for Exemption Organisation sites as the Organisations are established and known to the Authority. It would be difficult to achieve for 28-day sites as operators are not required to notify the Authority and are therefore largely unknown.
iii.	To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites. (Preferred Option)	This would give the Authority the ability to properly consider applications for this type of sites. It would also reduce the potential for abuse of permitted development rights for sites operating for more than 28 days.
iv.	To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites.	This would give the Authority the ability to properly consider applications for sites. The likely effect would be for operators to cease membership of such Organisations and therefore reduce any positive effects from increased engagement for good practice with the Exemption Organisations.
v.	To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation camping and caravan sites	The outcome of this would be a combination of items iii and iv above.

⁴ Repeat of Table 4, above

Annexe 1: Landscape Character Areas – Summary of Capacity for Additional Camping, Caravan and Chalet Development

LCA no.	Name	Capacity					
		Overall rating	New sites	Extensions with increased accomm	Extensions with no increase in accomm	Changes within sites	Landscaping /layout improvements
1	Saundersfoot Settled Coast	No/at capacity	None	None	Very limited	Yes	
2	Tenby	No/at capacity	None	None	None	Yes	
3	Caldey Island	No/at capacity	None	N/A	N/A	N/A	
4	Manorbier/ Freshwater East	Limited	Limited	None	None	Yes	
5	Stackpole	No/at capacity	None	None	N/A	Limited	
6	Castlemartin/ Merrion Ranges	Limited	Limited	None	N/A	Limited	
7	Angle Peninsula	Limited	Limited	None	None	Limited	
8	Freshwater West/ Brownslade Burrows	No/at capacity	None	N/A	N/A	N/A	
9	Marloes	Limited	Limited	Very limited	Very limited	Yes	
10	Skomer and Skokholm	N/A	N/A	N/A	N/A	N/A	
11	Herbrandston Refinery Fringe	Limited	Limited	None	None	Limited	
12	St Brides Bay	Limited	Limited	Very limited	None	Yes	
13	Brandy Brook	Limited	Limited	Limited	None	No need	
14	Solva Valley	Limited	Limited	N/A	N/A	N/A	
15	Dowrog and Tretio Commons	Limited	Limited	Limited	Limited	Yes	
16	Carn Llidi	No/at capacity	N/A	N/A	N/A	N/A	
17	St Davids	No/at capacity	None	None	None	Limited	
18	St David's Headland	No/at capacity	Very limited	None	None	Yes	
19	Ramsey Island	No/at capacity	N/A	N/A	N/A	N/A	
20	Trefin	Limited	Very limited	None	None	Yes	
21	Pen Caer/Strumble Head	Limited	Very limited	None	N/A	Yes	
22	Mynydd Carningli	Limited	Very limited	N/A	N/A	N/A	
23	Newport	No/at capacity	None	None	None	Limited	
24	Dinas Head	Limited	Limited	Very limited	None	Yes	
25	Cemaes Head	Limited	Limited	Limited	None	Limited	
26	Cwm Gwaun/Afon Nyfer	Limited	None	Limited	None	Limited	

Annexe 1: Landscape Character Areas – Summary of Capacity for Additional Camping, Caravan and Chalet Development

LCA no.	Name	Capacity					
27	Mynydd Preseli	Limited	Limited	Limited	Limited	Limited	
28	Daugleddau	Limited	Very limited	Very limited	Very limited	Yes	

Extract from adopted Supplementary Planning Guidance – Caravans and Camping

Annexe 2: Policy 41 of the Adopted Local Development Plan

Policy 41 Caravan, Camping and Chalet Development

New Caravan, Camping and Chalet sites and changes of pitch types within existing sites will be considered away from the coast and Preselis and in locations not intervisible with them.

Extensions to existing sites will be considered where the extension is in a well-screened location.

Extensions to existing sites with no increase in pitch numbers to achieve clear environmental improvement in relation to landscaping and layout will be permitted where existing sites have highly prominent parts, often visible from the coast and inshore waters, and where extensions allow pitches to be transferred to more discreet locations.

Proposals coming forward as set out above must ensure that:

- a) New development (including ancillary facilities) and changes within sites avoid sensitive locations**
- b) Units are sited so that they can be readily assimilated into the landscape without causing an unacceptable adverse effect on the National Park landscape (see Policy 14).**
- c) There are no unacceptable adverse cumulative effects when considered in conjunction with other development in the locality (see Policy 14).**
- d) Any ancillary facilities should, wherever possible, be located in an existing building or as an extension to existing facilities. If no existing building is available the need for additional facilities must be clearly demonstrated and commensurate with the scale of development (see also Policy 42).**
- e) Enhancement opportunities achieve an overall environmental improvement whereby there are clear benefits in reducing the impact on the surrounding landscape.**

4.212 The Caravan, Camping and Chalet Landscape Capacity Assessment provides both generic and detailed advice on what is meant by terms such as 'away from the coast and Preselis' and 'sensitive locations', how to assimilate proposals into the landscape and how to mitigate and enhance. The tailored recommendations and guidance for each landscape character area takes precedence over the generic guidance on siting, mitigation and enhancement which is set out in Appendix B to the Assessment.

4.213 Opportunities for new sites and extensions to existing sites are generally small-scale, catering for seasonal touring caravan or camping pitches. There may be a very small number of opportunities for medium scale proposals. Opportunities for new large-scale static sites were not found. The table below sets out what is meant by site size (small, medium large) and what is meant by the terms (seasonal or static). Size thresholds were derived from a preliminary assessment of a sample of different developments in the

Pembrokeshire landscape taking into account the scale and pattern of the landscape.

Table 7 Definition of Different Types of Development

Type of development and site size	Definition
Static: large	Static units including caravans, chalets and pods/hard structure glamping options on a site above 3Ha.
Static: medium	Static units including caravans, chalets and pods/hard structure glamping options on a site >0.5Ha-3Ha.
Static: small	Static units including caravans, chalets and pods/hard structure glamping options on a site 0-0.5Ha.
Seasonal: large	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents above 3Ha.
Seasonal: medium	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents >0.5Ha- 3Ha.
Seasonal: small	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents 0- 0.5Ha.

4.214 The definition of touring units includes touring caravans, tents, trailer tents and motor-caravans, motorhomes, touring vans and campervans.

4.215 Glamping is defined as a form of accommodation which has been pre-erected on-site and can include yurts, tepees, pods, treehouses and safari tents, although it can be provided by a range of other structures. The degree of locational permanence, scale and design will determine how these structures are considered.

4.216 Soft 'glamping' options such as yurts, tepees, safari tents and bell tents will be treated as touring units or seasonal development provided they are removed from site when they are not in use and/or for the majority of the year and the site allowed to grass over. Where associated fixed infrastructure such as decking, fencing or solar panels is proposed, the tents may be considered the same as static caravan development. Each proposal will be considered on a case-by-case basis.

4.217 Hard 'glamping' options such as pods or wooden tents or other hard structures may be considered to be the same as touring or static caravans or lodges in

accordance with the statutory definition of a caravan in Appendix C of the Caravan, Camping and Chalet Landscape Assessment. This depends on whether the structure can be removed easily off site in one piece, if it has a permanent concrete base, is permanently connected to an electrical supply or to other services such as water and waste disposal or has ancillary structures such as decking, fencing or solar panels associated with it. The decision on its status will be made on a case-by-case basis.

- 4.218 Touring units should be removed from site when not in use. Storage for touring units should preferably be in suitable existing buildings or, in some limited circumstances in well screened, unobtrusive sites not visible from publicly accessible areas on land or sea.
- 4.219 Cumulative Impacts: In considering cumulative impacts a key principle to be applied is that if a particular type of development at a particular scale is acceptable in a given landscape character area this does not mean that, if implemented, that it would be appropriate or acceptable to increase the size or intensify the use of the site in future. The sensitivity of the Landscape Character Area would be likely to stay the same and the capacity may reduce in order to safeguard and meet the National Park's special qualities and purposes.
- 4.220 Conditions: A condition to ensure that holiday accommodation is used for holiday use and not occupied as a person's sole or main place of residence will be included on any permission granted. Seasonal sites or pitches will usually be permitted to operate from the beginning of May to end of September.
- 4.221 This policy excludes caravanning and camping permitted by the '28-day rule' and sites operated under Certificates granted by Exempted Organizations.

Annexe 3: Pros and Cons of Camping and Caravan Sites established through permitted development rights

Caravan and Camping in the National Park – Permitted Development⁵ - Pros⁶ and Cons⁷

Note: Individual sites will exhibit these pros and cons to varying degrees

	Pros	Cons
Economic	<ul style="list-style-type: none"> Income generation and spend in the locality.⁸ Employment generator Temporary land take. Marginal land used. Exempted sites tend to be small scale.⁹ Farmers can diversify. Able to act now. 	<ul style="list-style-type: none"> 'Uneven playing pitch' for competitors Agricultural land quality may be affected Land temporarily withdrawn from agricultural use
Visitor	<ul style="list-style-type: none"> Health and wellbeing opportunities increased. Increased choice of place for recreational activity. Increased access potential to local history /culture, e.g. Smaller sites tend to be small scale friendly. Smaller sites tend to be quieter, attract groups or can easily control those booking. 	<ul style="list-style-type: none"> Access to the National Park may not be in the 'right place'. Some hotspots – over visited. Amenity of neighbours. Noise Light. Unsocial hours Potential for conflict with other visitors and communities. Visitor safety a concern.¹⁰ Sometimes visitor conflict is on the same site

⁵ **Scale:** The average Certificated Site is 12 pitches from figures PCNPA (and Greener Camping Club, which is 11 pitches). Whereas 28 day and unregulated sites have unlimited numbers of pitches. This has implications for the scale of potential impacts shown in the table below.

⁶ Includes findings of [The Outjoymment Report - The Camping and Caravanning Club](#)

⁷ **Advisory** comments only by the National Park Authority on Exemption Sites. No opportunity to comment on 28-day sites.

⁸ Income generated by Camp Sites is more heavily weighted to the **site's own marketing and website efforts**, so large corporate Online Travel Agents (OTA's) generally get less of a cut compared to 28-day sites that use OTA's which siphon off up to 20% of revenue from these temporary sites in the county. Basically, a temporary site has less value to the local economy than an established, reliable.

⁹ The average Certificated Site is 12 pitches from figures PCNPA (and Greener Camping Club, which is 11 pitches). Whereas 28 day and unregulated sites have unlimited numbers of pitches and no assessment of suitability of location.

¹⁰ **Visitor's safety:** Permitted Development Rights is putting people into different locations for recreation than they would generally go. Recreation is managed through known access points, e.g. car parks. Visitor's to more remote areas may not benefit from advice or signage regarding, for example beach safety, or travelling on difficult terrain to access the beach.

	Pros	Cons
Environment	<ul style="list-style-type: none"> • Access to the National Park increased. • Connect to nature opportunity.¹¹ • Connect with landscape opportunity. • Connect to historic environment opportunity. • Set aside opportunity.¹² 	<ul style="list-style-type: none"> • Soil impaction/ erosion possible • Water Quality may be affected – Phosphates. • Flood Zones may be impacted and site equipment damage from flood events. • Landscape impacts. Special Qualities¹³ Night sky. • Ecology¹⁴ may be affected. • Archaeology may be affected. • Water connection¹⁵ • Cumulative Impacts of camp sites in one location <p>Sewerage capacity</p> <ul style="list-style-type: none"> • Sewage disposal is a potential issue.¹⁶ • Water supply¹⁷ • Water contamination¹⁸
Traffic		<ul style="list-style-type: none"> • May lead to congestion. • Vehicles unsuitable for minor roads. • Opportunity to locate in more accessible locations potentially lost. • More likely to be reliant on the private car in remote locations.

¹¹ An annual operating site creates an opportunity for **planning for the environment**. Temporary sites create temporary approaches to this important factor. Nature needs to be considered as a commercial gain, not just an agricultural loss.

¹² For example, draft proposals are expecting farmers to plant 10% of their land with trees. Campsites within these areas are a **perfect partnership opportunity**.

¹³ **Special Qualities:** Coastal Splendour, Diverse Geology, Diversity of landscape, Distinctive settlement character, Rich historic environment, Cultural heritage, Richness of habitats and biodiversity, Islands, Accessibility, Space to breathe, Remoteness, tranquillity and wildness, The diversity of experiences and combination of individual qualities.

¹⁴ Proximity to **habitats and species**. If more remote areas are being accessed and people camp over night rather than passing through, then there is more potential for disturbance. For example, disturbance to the seal pup population.

¹⁵ **Water connection**, water provision on the sites. Some people are thinking of providing bore holes. This should be captured by the private water supplies regulations. There are also fixtures and fittings regulations. Sites/pipes may not be tested. Water contamination is a serious concern.

¹⁶ **Sewage:** Where is the sewage going? Natural Resources Wales (NRW) advise that there is a lot of private drainage (e.g., septic tanks and package treatment plants that are unregulated as people are unaware that the need to approach NRW for an exemption or a permit.

¹⁷ **Water Supply:** With the increase in summer population how is the water supply monitored for unregulated sites.

¹⁸ **Water provision** to hot tubs also concern. Potential dangers to environmental health. Potential E-Coli outbreak.

