

## Report of Strategic Policy Manager

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**Subject: Proposed Article 4 (1) Direction for 28 day use of land for camping, caravans and/or mobile homes and development of a Code of Conduct for Exempted Organisations.**

### **Purpose of Report**

This report seeks approval for:

- the introduction of a non-immediate effect Article 4 (1) Direction to remove permitted development rights for the use of land for camping, caravans and/or mobile homes for not more than 28 days, and
- Officers to prepare a voluntary Code of Conduct /Working Protocol for Exempted Organisations.

This report is also to inform Members of the findings of the consultation on Camping and Caravan Development undertaken from 29 May to 20 September. A report of Consultation is attached at Appendix A.

An Integrated Assessment which considers the potential impacts of the Article 4 Direction and Code of Conduct for Exempted Organisations is in Appendix B. The assessment considers the potential impacts with regard to Equality, Socio-Economic Duty, Welsh Language Standards, Biodiversity Duty and the Well-Being of Future Generations Act.

### **Background**

The National Park Authority agreed on 1 May 2024 to undertake consultation and engagement on a choice of options to manage camping and caravan site developments in the National Park.

The options consulted upon were:

- **Option 1:** No change to current practice.
- **Option 2:** To increase engagement with permitted development site operators (preferred option for Exempted Organisations alongside option 3).
- **Option 3:** To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites (preferred option).
- **Option 4:** To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites.
- **Options 5:** To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation Certification camping and caravan sites.

Options 2 and 3 were identified as the authority's preferred options. The Authority would also continue with current practice (option 1) and take enforcement action against breaches of planning control, where it is expedient to do so.

Public consultation and engagement was undertaken over a period in excess of three months from 29 May to 20 September. In terms of public consultation, notification via email or letter was sent to contacts on the Local Development Plan mailing list, planning agents and those who have already been contacted through meetings and workshops, along with Councillors in the National Park, key stakeholders, known campsites operating under exempted organisations, campsites operating with planning permission and exempted organisations. The consultation was available to view on the Authority's website and publicity of the consultation was undertaken with a press release and promoted on social media platforms.

During the consultation period, officers held a presentation and engagement event online for any members of the public or stakeholders to attend and a separate engagement event for City, Town and Community Councils. Officers also raised awareness and engaged with the public at local shows at Fishguard, Nevern, Pembroke and the County Show. Officers also raised awareness of the consultation at the quarterly Pembrokeshire Planning Agents forum meeting. Respondents were invited to complete a questionnaire online or submit comments in writing via letter or email.

A total of 120 responses were received to the online questionnaire. Emailed comments were also received from Statutory Consultees, other organisations and the public.

A Report of Consultation is attached at Appendix A. The main findings of the consultation were:

- The majority of those responding (62%) consider that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape. (Question 1)
- The majority of those responding to the survey (60%) consider that more controls are required for camping and caravan development. (Did not favour Option 1)
- There is majority support (61.7%) for introducing an Article 4 Direction to better manage sites currently operated under 28-day permitted development rights. (Option 3 – preferred option by National Park Authority)
- In addition, most respondents (59.8%) would support the National Park Authority increasing engagement with camping and caravan site operators. (Option 2 - preferred option by National Park Authority)
- Numerically there is an equal level of opposition and support (40.2%) to an Article 4 for sites currently operated by Exemption Organisations but with a greater strength of feeling expressed regarding opposition to the proposal. (Option 4)
- There is a greater level of opposition (42%) than support (34.6%) for introducing an Article 4 Direction for both Exemption Organisations and '28-day sites' to bring all sites operated as permitted development under control. (Option 5)

## **Article 4 for 28 day camp sites**

Under the current legislation, the '28 day rule' allows a landowner to use land without having to get formal planning permission for 28 days in a calendar year for a campsite with no caravans. Blocks of land of over five acres can be used for up to three caravans, or motorhomes or campervans for no more than two nights for a total of 28 days per calendar year. Blocks of any size can be used for the siting of one caravan for no more than two nights for a total of 28 days per calendar year. Similarly mobile homes may be stationed for no more than two nights for a total of 28 days per calendar year.

Whereas landowners establishing sites in England are required to notify the planning authority in advance of opening, this is not required in Wales. 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. There are no controls or licensing arrangements for temporary 'pop up' campsites – which makes them much easier to set up without any form of supervision or inspection.

Sites set up under the 28-day rule are not subject to any form of scrutiny. The current 28-day exemption has resulted in some cases in significant landscape impacts, with pitches being placed and, in some cases, gaining certificates of lawful use in locations in which planning permission would normally be refused. There is potential under the current legislation for significant individual and cumulative landscape impacts as well as other associated impacts on infrastructure and the environment such as unregulated foul water discharges adversely affecting watercourses. The current situation is also placing a significant burden on the Authority's enforcement officers who are asked to assess whether camping and caravan sites are in breach of planning regulations – assessing whether sites are breaching the 28 day limit is difficult without intensive monitoring, with frequent certificates of lawful use applications resulting.

Officers have undertaken engagement and consultation on a range of options and proposed the introduction of an Article 4 (1) Direction to remove permitted development rights for 28 day camp sites. This option was supported by the majority of respondents (61.7%). The removal of permitted development rights would require sites to seek planning permission through the submission of a planning application. This would allow officers to be made aware of where sites are operating, enabling officers to consider landscape, environmental, social and economic impacts.

The consultation did raise some opposition from land owners and site operators who raised concerns regarding the financial implications on landowners and the tourism industry. The Integrated Impact Assessment (Appendix B) provides a detailed consideration of the socio-economic impacts of the proposed Article 4(1) Direction. Critically, however, no planning fee is associated with applications which would have been permitted development prior to the Article 4 (1) Direction.

Officers recommend the following measures to address and try to mitigate these concerns:

- Introduce the Article 4 (1) Direction procedure which has a non-immediate effect. This would provide a lengthy lead-in time prior to implementation to give landowners and site operators sufficient time to find out the requirements of preparing and submitting a planning application.
- Establish a working protocol for Planning Officers to fast track applications submitted under the Article 4 Direction for campsites seeking to operate for up to 28 days (see Appendix E)
- Officers will consider granting longer permissions (five years) or giving permanent permissions where appropriate, in accordance with the adopted Local Development Plan or where material considerations indicate it may be appropriate.

### **Code of Conduct**

Officers propose undertaking increased engagement with Exempted Organisations through the preparation of a Code of Conduct /Working Protocol for Exempted Organisations. The Code of Conduct would operate in a similar manner to the established Marine Code and Outdoor Charter.

Officers propose the initiation of biannual meetings with Exempted Organisations and other relevant parties (to include statutory consultees such as Pembrokeshire County Council's licensing, highways, public protection, Welsh Government and Natural Resources Wales to agree a voluntary Code of Conduct/ Working Protocol. This would ensure there is an ongoing dialogue regarding the setting up and operation of exemption certificated sites in accordance with local and national policies and regulations.

### **Legal Background**

#### **- 28 day camp sites**

Article 3 and Schedule 2 Part 4 Class B of the Town and Country Planning (General Permitted Development) Order 1995 (the "1995 Order") provides an exemption for the use of land for temporary 'pop-up' campsites for up to 28 days a year without the need for planning permission.

Article 3 and Schedule 2, Part 5, Class A of the Town and Country Planning (General Permitted Development Order) 1995 (as amended) permits the use of land as a caravan site in circumstances referred to in paragraph A.2. This paragraph refers to those specified in paragraphs 2 to 10 of Schedule 1 of the Caravan Sites and Control of Development Act 1960. The 1960 Act permits, amongst other things, under paragraph 2: use of land as a caravan site for not more than 28 days with the siting of one caravan for no more than two nights; and under paragraph 3 use of land on land-holdings of 5 acres or more for the use of the land for up to 3 caravans or motorhomes or campervans. No structures other than the most basic, temporary facilities such as a standpipe and portaloos are permitted without planning permission.

Article 3 and Schedule 2, Part 5 Class B of the Town and Country Planning (General Permitted Development) Order 1995 and paragraph 2 of Schedule 1 to the

Mobile Homes (Wales) Act 2013 also permits using a mobile home on land for not more than 28 days with the siting of one mobile home for no more than two nights.

- **Exempted Organisations**

Camping exemption certificates (applications are made under section 269(6) of The Public Health Act 1936 and touring caravan exemption certificates (applications under paragraph 12 of Schedule 1 of The Caravan Sites and Control of Development Act 1960 (the “1960 Act”)) can also be granted, as can site licences under the 1960 Act and the Mobile Homes (Wales) Act 2013 and where they are Article 3 and Schedule 2 part 5 Class A and B of the 1995 Order provide an exemption for the use of land as a campsite.

- **Article 4 Direction**

Article 4(1) of the 1995 Order allows the National Park Authority, if it is satisfied that it is expedient that any permitted development rights should not be carried out unless permission is granted for it on an application, to give a direction that the permission granted by article 3 shall not apply.

The Town and Country Planning (General Permitted Development etc) (Amendment) (Wales) Order 2022, amended the procedures for making, varying or withdrawing any direction made under paragraph (1).

Article 4(1) directions can be made with or without immediate effect. Article 4(1) Directions are normally made when the character of an area of acknowledged importance would be threatened. The confirmation of an Article 4(1) Direction does not prevent planning permission being issued but requires planning permission to be sought for all proposals within a certain category. This provides the opportunity to support development which is consistent with the strategy and policies of the Pembrokeshire Coast National Park Local Development Plan 2 and other planning policies - it also allows for consultation with the general public and key regulators. It means that if necessary inappropriate development within the sensitive landscape of the National Park may be resisted, in accordance with the Authority’s statutory purposes.

The procedures for introducing an Article 4(1) Direction are sets out in the legislation. Officers will not serve notice on every owner or occupier as it is considered impracticable to identify or locate every camp or caravan site owner. The Authority will undertake the following measures as soon as practicable after the Article 4(1) Direction is made:

- Local advertisement in the Western Telegraph
- Issue a press release and advertise on social media
- Display notices at the following locations for six weeks: PCNPA Office at Llanion, Pembroke Dock, Oriel y Parc Visitor Centre, St Davids, Tenby De Valence Pavilion, Newport Memorial Hall, The Regency Hall Saundersfoot, Carew Castle, Castell Henllys Iron Age Village.
- Notify the following in writing: City, Town and Community Councils in the NP, All Members, Cllrs in the NP, Exempted organisations identified as operating in

Pembrokeshire, contacts on the LDP database, all those who responded to the camping and caravan consultation.

- Send a copy of the Article 4(1) Direction and map to Welsh Ministers
- The Article 4 (1) Direction and map will be available to view on the Authority's website and at The PCNPA Office at Llanion, Pembroke Dock and Oriel y Parc Visitor Centre, St Davids.

The number of owners or occupiers within the area to which the Article 4(1) Direction would relate makes individual service on owners or occupiers of land that may be impacted by the Article 4(1) Direction impracticable, but the legislation allows for publicising the making of the Article 4(1) Direction as set out above. Notices will however need to be regularly checked during the six week period.

### **Programme**

The proposed timetable for introducing the Article 4 Direction is set out below:

<b>Stage</b>	<b>Timescale</b>
Article 4 (1) Direction: Date of execution	December 2024
Notice of Article 4 Direction given with a 6 week period for formal representation	January/ February 2025
Report on formal representations to National Park Authority with a recommendation on whether to confirm or not. Members decide whether to confirm. If confirmed notice of confirmation must be given along with the date the Direction takes effect.	March / May 2025
Article 4 (1) Direction to take effect	1 January 2026

### **Legal Considerations**

These are dealt with in the body of the report.

### **Financial considerations**

The Authority has sufficient budget to undertake the procedures to introduce an Article 4 Direction.

When an Article 4 (1) Direction is introduced, the Authority is not able to legally charge a planning fee for any planning application for a 28 day site received – this would be a free application. There would therefore be a resource implication for the Authority in considering such applications. Set against this however, is the fact that the Authority's Enforcement Officers are currently spending considerable time dealing with reported planning breaches for which no fee is provided – overall it is the Officer view that the changes would simplify enforcement investigations and result in a net reduction in officer time on this area of work. Evidence from other areas operating an Article 4 (Gower AONB and the New Forest National Park) suggests that application numbers are relatively low, with some operators choosing

to either seek permission for a longer period of time or join an exempted organization (New Forest National Park).

Setting up a voluntary Code of Conduct / Working Protocol with exempted organisations would also represent a cost to the Authority. The Authority currently operates a similar system with the Marine Code and Outdoor Charter at a cost of £15,000 per year to administrate both codes. This would be an additional cost to the Authority, however it might be possible for Welsh Government or the organisations themselves to contribute towards this cost.

There is a small risk of financial compensation in certain limited circumstances. This is time limited and the Authority could seek to mitigate its losses.

### **Welsh language considerations**

Welsh language considerations are also covered in Appendix B, Part 2 Draft Integrated Assessment.

The process of preparing and approving the Article 4(1) Direction would need to be in accordance with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011 and the Welsh Language Standards Regulations (No.1) 2015).

The proposal would also bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas where relevant.

### **Biodiversity Duty and Decarbonisation**

As set out in Appendix B, Stage 2 Integrated Assessment under 'Section 6 Biodiversity Duty and Decarbonisation' introducing and confirming the Article 4(1) Direction would enable planning control which means that steps must be taken to be able to change use, i.e. a proposal must obtain planning permission from the Local Planning Authority.

At present there is a risk to waterways including Special Areas of Conservation where foul water is not being disposed of appropriately. A significant benefit of the Article 4 (1) Direction would be the control of this element. There is a process under Regulations 75 of the Conservation of Habitats and Species Regulations 2017 for LPA consent where someone intends to exercise permitted development rights in a way that might have likely significant effects on a Special Area of Conservation, however the National Park has never received an application under this process for a 28-day camping or caravan site and it has limited capacity to monitor when such effects arise.

The framework of the Local Development Plan 2 would be used to assess proposals. The appraisal covers biodiversity, air, land, water quality, access to open space, built heritage, CO2 emissions and sequestration etc. In summary, the proposals for an

Article 4 (1) Directions are likely to have a significant positive effect on the Authority's biodiversity duty and would support its decarbonisation agenda.

### **Equality, Socio- Economic Duty, Human Rights**

A Stage 1 Integrated Impact Assessment was completed for the NPA Report on 1 May 2024 and a stage 2 Integrated Impact Assessment has been completed following public consultation and to inform the recommendations in the report.

The Background Paper (Appendix A) shows that the Authority has sought over many years to employ less onerous measures to achieve compliance which has had limited impact. The preferred approach set out in this paper are considered on balance to be proportionate and necessary to protect the National Park and its purposes.

The Stage 2 IIA (appendix B) provides a detailed appraisal of protected characteristics and issues of equality.

The summary from the socio-economic impact recognises that the potential impact is generally positive for members of the public, however, 28-day sites provide an income for farmers, smaller-holders and rural businesses and there was concern that an Article 4 (1) Direction would restrict a form of income. It is acknowledged that there would be a cost implication to landowners if they appointed a planning agent to prepare and submit an application on the applicant's behalf. The Authority, however, does not receive a planning fee for these applications.

The following measures are proposed to reduce and potentially mitigate economic disadvantage to land owners and site operators:

- Introduce the Article 4(1) Direction procedure with non immediate effect. This would provide a lengthy lead-in time prior to implementation to give land owners and site operators sufficient time to find out the requirements of preparing and submitting a planning application.
- Establish a working protocol for Planning Officers to fast track applications submitted following the Article 4(1) Direction for campsites seeking to operate for up to 28 days (see Appendix E)
- Officers will consider giving permanent permissions where appropriate.

In relation to submitting the planning application there would be a period of engagement with those affected. The process of introducing an Article 4(1) Direction would:

- reduce the probability of any discrimination caused when members of the public do not receive information about changes that affect them or who feel that they do not have the ability to influence.
- include consulting and seeking the opinion of those who might be affected.
- Mean that there is better control of unregulated caravan and camping sites thus ensuring that:
  - the amenity of neighbouring properties and local communities are more fully considered.
  - Remote locations are more likely to be avoided for siting such sites which may be more difficult to access by emergency services.



### **Well-being of Future Generations (Wales) Act**

Appendix B, Stage 2 Integrated Assessment considers the proposals fit well within the well-being goals and 5 ways of working under the Future Generations (Wales) Act. Horizon scanning will continue as the project progresses.

### **Recommendation**

Members are asked to approve:

1. The making and publicising of an Article 4 (1) Direction to remove permitted development rights for 28-day rule camp sites with non-immediate effect as set out in the Background Paper Appendix C.
2. Officers to prepare a Code of Conduct /Working Protocol for Exempted Organisations as set out in the Background Paper Appendix C.
3. The Stage 2 Integrated Impact Assessment in Appendix B Part 1 and Part 2 to be published simultaneously for information.
4. A Report of Consultation is attached at appendix A, a draft Notice and Article 4 Direction are attached at Appendix D, a working protocol to fast track applications submitted following the Article 4(1) Direction at Appendix E and an Advice Note for applicants is at Appendix F.

# Report of Consultations - October 2024

## Camping and Caravanning Development in the Pembrokeshire Coast National Park

(Consultation Period: 29<sup>th</sup> May 2024 to 20<sup>th</sup> September 2024)



for

**Pembrokeshire Coast National Park Authority**

## **Contents**

Executive Summary .....	6
Purpose of the consultation.....	6
The Questionnaire.....	6
Main Findings.....	7
Questionnaire Results - overall .....	7
Questionnaire Results – respondent type .....	7
Additional Comments received.....	9
Recommendations .....	10
Introduction .....	11
Background .....	11
Pre-Consultation Engagement .....	12
This Consultation .....	12
Chapter 1 Questionnaire All Responses.....	15
Question 1 .....	15
Option 1.....	16
Option 2.....	17
Option 3.....	17
Option 4.....	17
Option 5.....	18
Summary.....	18
Chapter 2 Questionnaire Responses by Type of Respondent .....	20
'I operate a caravan and/or camp site which has planning permission' .....	21
'I operate a caravan and/or camp site under the '28 day' rule' .....	22
'I operate a caravan site and/or camp site which operates through an exemption certificate' .....	25
'I am a tourism operator' .....	26

'I am a local resident' .....	27
Question 1 .....	27
Option 1 .....	28
Option 2 .....	32
Option 3 .....	34
Option 4 .....	37
Option 5 .....	39
'I am a visitor' .....	40
'Prefer not to Say' .....	42
'Community' .....	43
Operating an 'Exemption Organisation' .....	43
Summary .....	45
Chapter 3 Additional Comments Received .....	47
Statutory Consultees .....	47
Pembrokeshire County Council – Planning Department .....	47
Pembrokeshire County Council – Public Protection .....	49
Pembrokeshire County Council – Highways .....	52
Dwr Cymru Welsh Water .....	53
Mathry Community Council .....	53
Llanrhian Community Council .....	53
Natural Resources Wales .....	54
Organisations .....	54
Grwp Resilience .....	54
CLA Cymru .....	55
Boutique Resorts .....	59
Friends of Pembrokeshire Coast National Park .....	60

National Trust.....	60
The Coal Authority.....	62
Public .....	62
Summary.....	65
Appendix A Press Release .....	67
Appendix B Online Questionnaire – separate PDF document .....	69

### **Tables**

Table 1 Pre- Consultation Workshop/Meeting .....	12
Table 2 This Consultation Engagement Events .....	13
Table 3 Stakeholder Type: Grouped for Analysis** .....	20
Table 4 Operators of Sites with Planning Permission snapshot of views.....	21
Table 5 Operators of Sites with Planning Permission - summary of comments.....	22
Table 6 28-day rule site operator – snapshot of views.....	22
Table 7 28-day rule site operator - summary of comments.....	23
Table 8 Exemption Certificate operators’ snapshot of views.....	25
Table 9 Exemption Certificate operators - summary of comments .....	25
Table 10 Tourism Operators - snapshot of views .....	26
Table 11 Tourism Operators - summary of comments.....	27
Table 12 Summary of Comments - Residents on Option 1 .....	29
Table 13 Summary of Comments Residents - Option 2 Increased Engagement.....	32
Table 14 Summary of Comments Residents - Option 3 Planning Permission 28 Day sites .....	34
Table 15 Summary of Comments - Residents Planning Permission for sites with Exemption Certificates.....	37
Table 16 Summary of Comments - Residents and Planning Permission for both Exemption Certificate Sites and 20 Day Sites. ....	40
Table 17 Visitors – snapshot of views.....	40

Table 18 Summary of Comments - Visitors .....	41
Table 19 'Prefer not to Say' – snapshot of views .....	42
Table 20 Summary of Comments - 'Prefer not to Say' .....	42
Table 21 Community Council representatives – snapshot of views .....	43
Table 22 Summary of Comments - Community Council representatives .....	43
Table 23 Exemption Organisations – snapshot of views.....	43
Table 24 Summary of Comments - Exemption Organisations .....	44
Table 25 Summary of Comments – Public.....	62

## **Figures**

Figure 1 Visual Harm to National Park landscape - Question 1 .....	15
Figure 3 No change to current practice - Option 1 .....	16
Figure 4 To increase engagement with permitted development site – Option 2 .....	17
Figure 5 To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites - Option 3 .....	17
Figure 6 To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites - Option 4 .....	17
Figure 7 To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation camping and caravan sites – Option 5.....	18
Figure 8 Question 1 - Residents - Visual Harm Caused Question – Question 1 .....	27
Figure 9 Residents - Views on Options Proposed .....	28
Figure 10 Option 1 Residents views on retaining the status quo – Option 1 .....	28
Figure 11 Increased Engagement – Option 2 .....	32
Figure 12 Planning Permission for 28 Day Sites - Option 3.....	34
Figure 13 Planning Permission for exemption certificate sites - Option 4 .....	37
Figure 14 Planning Permission for both Exemption Certificate and 28 Day Sites - Option 5 .....	39

# Executive Summary

## Purpose of the consultation

The National Park Authority report of the 1st of May 2024 advised that the current legal framework for caravan and camping, including the 28-day exemption has some significant landscape impacts in some cases. Some locations have gained certificates of lawful use for pitches placed in locations in where planning permission would normally be refused.

The National Park Authority resolved to carry out a public consultation on a preferred way forward:

- a) The potential introduction of an Article 4 (1) Direction removing permitted development rights for 28-day rule sites.
- b) The potential introduction of a Code of Conduct / Working Protocol for Exempted Organisations.

Prior to the consultation a series of workshops was undertaken by the National Park Authority to fine tune opinion on what options to consult upon. (November 2023 to March 2024)

For this consultation the National Park Authority published a press release and advertised the consultation on its website and social media. The National Park Authority also carried out a mail out and a series of engagement events. The primary means of responding was via a questionnaire.

## The Questionnaire

The National Park Authority consulted on a choice of options to manage camping and caravan site developments in the National Park.

The options consulted upon were:

- **Option 1:** No change to current practice.
- **Option 2:** To increase engagement with permitted development site operators (preferred option for Exempted Organisations alongside option 3).
- **Option 3:** To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites (preferred option).
- **Option 4:** To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites.
- **Options 5:** To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation Certification camping and caravan sites.

The online questionnaire also asked for responses to a question about the landscape impact of caravan and camping on the National Park:

*'Do you think that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape?'*

## Main Findings

### Questionnaire Results - overall

- The **majority** of those responding consider that temporary camping and caravan sites can have a **harmful visual impact** on the National Park's landscape. (Question 1)
- The **majority** of those responding to the survey consider that **more controls** are required for camping and caravan development. (Option 1)
- There is **strong support** for introducing an **Article 4 Direction** to better manage sites currently operated under **28-day permitted development rights**. (Option 3 – preferred option by National Park Authority)
- In addition, **most would support** the National Park Authority **increasing engagement** with camping and caravan site operators. (Option 2 - preferred option by National Park Authority)
- Numerically there is an **equal level of opposition and support** to an **Article 4 for sites currently operated by Exemption Organisations but with a greater strength of feeling expressed regarding opposition** to the proposal. (Option 4)
- There is a greater level of opposition for bringing Exemption Organisations and '28-day sites' under planning control. (Option 5)

### Questionnaire Results – respondent type

The selection of respondent type has been rationalised to allow for meaningful analysis.

	<b>Stakeholder Type: Grouped for Analysis**</b>	<b>Count</b>
1	I operate a caravan and/or camp site which has planning permission'	7
2	I operate a caravan and/or camp site under the '28 day' rule'	4
3	I operate a caravan site and/or camp site which operates through an exemption certificate;'	14
4	'I am a tourism operator'	3
5	I am a local resident'	75
6	'I am a visitor'	7
7	'Prefer not to say'	5
8	Contains 'Community'	2
9	Operating an 'Exemption Organisation'	2
10	Other	1
	<b>Total</b>	<b>120</b>

#### *Operators of sites with planning permission*

There was a majority view that harm is being caused to the National Park landscape with temporary caravan and camping. Also, there was the view that more needs to be done (Option 1 to retain the status quo was not supported). There was an equal balance of views on increased engagement with Exemption Organisations (Option 2) but strong support to bring 28-day sites under planning control (Option 3) as well as sites operating under an Exemption Certificate (Option 4).

#### *28 Day rule site Operator*

A small number of responses were from people who operate 28-day sites. The results show greater opposition to additional restrictions being introduced to control sites.



### *Exemption Certificate operators*

There was a majority view that temporary sites have an adverse impact on the National Park landscape. The results show that the majority of those operating sites through an Exemption Certificate consider that additional controls are necessary. There is majority support for Article 4 Directions to control 28-day sites and a much lesser support to bring in control for all Permitted Development camping sites. More than half of the respondents were opposed to an Article 4 Direction being introduced to control Exemption Certificate sites. Operators were however, in favour of the preferred option to increase engagement with permitted development site operators.

### *Tourism Operators*

Just a few of those responding identified themselves as 'Tourism Operators'. Only one person provided additional commentary. The response to the survey shows that there is both support for and opposition to increased engagement and for the introduction of an Article 4 Direction.

### *Residents*

There was a significant response from residents to the survey.

In response to Question 1 'Do you think that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape?' residents had strong majority view that temporary camping and caravan sites can have a harmful visual impact.

In terms of residents' views of Options 1 to 5:

- Residents were strongly in favour of needing to take action regarding how camping and caravanning is controlled by the National Park Authority. (Option 1)
- Residents were in the majority supporting the National Park Authority's preferred option to increase engagement with exemption organisations. (Option 2)
- Residents were again in the majority supporting the National Park Authority's preferred option to require planning permission for 28-day sites. (Option 3)
- Residents were balanced in both their strong opposition and support for requiring planning permission for sites with exemption certificates. There was however generally more support than opposition to the proposal overall. (Option 4)
- Residents were balanced in their opposition and support for the introduction of planning permission requirements for 28-day sites and for Exempted Certificate sites. (Option 5)

### *Visitors*

Visitors provided seven responses to the survey. They provided a mixed response both in support of and opposition to greater control of sites operated using permitted development rights.

### *Prefer not to Say*

Five commentators did not wish to say what type of stakeholder they were and were predominantly opposed to a change in approach.

### *Community Council representatives*

The two responses show strong support for greater engagement and an Article 4 Direction to remove 28-day permitted development rights.

### *Exemption Organisations*

Two Exemption Organisations responded to the survey. Exemption Organisations were supportive of greater engagement and placing controls on 28-day sites. They were not supportive of exempted sites being brought within planning control.

### *Additional Comments received*

In addition to completing the questionnaire email correspondence was also received.

### *Statutory Consultees*

Responses were received from Pembrokeshire County Council planning, public protection and the highways department.

- PCC's broad support is outlined along with the potential concern regarding displacement impacts on the Council's planning area, which may in turn require PCC to make planning interventions. This is identified as the primary anticipated planning impact. It will be important for the National Park Authority to liaise with the Council planning department in taking forward its recommended approach.
- The ongoing support and advice provided by Public Protection is outlined particularly as the National Park Authority goes forward with its preferred options.
- The Highways Department provided detailed comments on the Background Paper which are dealt with in Chapter 3.

Dwr Cymru supports the approach being taken as it will enable Dwr Cymru to assess the impact of developments upon water and sewerage networks.

Community Councils (2 responses) were concerned about partial implementation i.e. not including Exempted sites.

Natural Resources Wales advised 'A planning application ensures that all controls are put in place to safeguard the National Park from any adverse effects from non-regulated development, therefore any option which allows the above to be considered is our preferred option.'

In summary, statutory consultees were supportive of introducing increased controls to ensure impacts are properly assessed.

### *Other organisations*

Responses were received from a range of organisations. Views varied from opposition to controls of campervanning to opposition to controls on camping. There was opposition to any controls at all. The CLA Cymru highlighted issues such as:

- Burdens on rural business in Wales

- The need to ensure that permissions granted are permanent if these options are progressed.
- With the underfunding of National Park Authorities then this is what should be addressed to allow the planning authority to carry out its planning function rather introducing additional controls.

Responders also supported a controlled and regulated approach (Boutique Resorts). Friends of the National Park supported greater control being exercised but cautioned against placing an additional burden on landowners. Suggestions include providing a lead in time to applying for permission and fast-tracking applications. The National Trust were supportive of the approach being taken and wished to be kept informed.

### *Public*

There was a mix of comments emailed in from members of the public.

## Recommendations

1. The National Park Authority should go forward with its preferred options to the next stage and create an Article 4 Direction for 28-day sites. The overall response to the consultation would support the National Park Authority's preferred options (Option 2 and Option 3) going forward based on a starting point of concern for the harmful visual impact of temporary caravan and camping.
  - The majority of those responding consider that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape. (Question 1)
  - The majority of those responding to the survey consider that more controls are required for camping and caravan development. (Option 1)
  - There is strong support for introducing an Article 4 Direction to better manage sites currently operated under 28-day permitted development rights. (Option 3 – preferred option by National Park Authority)
  - In addition, most would support the National Park Authority increasing engagement with camping and caravan site operators. (Option 2 - preferred option by National Park Authority)
2. Detailed comments were provided on the Background Paper, and it is recommended that minor edits be undertaken before progressing to the next stage as set out in this report of consultations.
3. Comments were also provided regarding how to deal with planning applications to ease the transition for applicants. In responding to these suggestions the Authority is currently considering a protocol for certain types of planning application, including those for 28-day camping sites, to be fast-tracked. In addition, a long lead-in time to the implementation of the Article 4 Direction would give site operators sufficient time to find out the requirements of submitting a planning application. It may be possible for regular events to have longer planning permission where the location and approximate dates of operation are known. This would remove the need to apply for permission on an annual basis. Edits may be needed for example to the 'Draft Advice Note' as a result.

# Introduction

## Background

- 1.1 The National Park Authority report of the 1st of May 2024 advised that the current legal framework for caravan and camping, including the 28-day exemption has resulted in some cases in significant landscape impacts, with pitches being placed and, in some cases, gaining certificates of lawful use in locations in which planning permission would normally be refused.
- 1.2 The report advised that there is potential under the current legislation for significant individual and cumulative landscape impacts as well as other associated impacts on infrastructure and the environment such as unregulated foul water discharges adversely affecting watercourses. The current situation was seen to be placing a significant burden on the Authority's enforcement officers who are asked to assess whether camping and caravan sites are in breach of planning regulations.<sup>1</sup>

**Legal References:** Article 3 and Schedule 2 Part 4 Class B of the Town and Country Planning (General Permitted Development) Order 1995 (the "1995 Order") provides an exemption for the use of land for temporary 'pop-up' tented campsites for up to 28 days a year without the need for planning permission. Camping exemption certificates (applications are made under section 269(6) of The Public Health Act 1936 and touring caravan exemption certificates (applications under paragraph 12 of Schedule 1 of The Caravan Sites and Control of Development Act 1960 (the "1960 Act")) can also be granted, as can site licences under the 1960 Act and the Mobile Homes (Wales) Act 2013 and where they are Article 3 and Schedule 2 part 5 Class A and B of the 1995 Order provide an exemption for the use of land as a campsite. All the above therefore lie outside the control of the National Park Authority via the planning system.

- 1.3 The National Park Authority resolved to carry out a public consultation on a preferred way forward:
  - a) The potential introduction of an Article 4 (1) Direction removing permitted development rights for 28-day rule sites.
  - b) The potential introduction of a Code of Conduct / Working Protocol for Exempted Organisations.

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<sup>1</sup> <https://www.pembrokeshirecoast.wales/wp-content/uploads/2024/04/Report-14-24-Article-4.pdf>

## Pre-Consultation Engagement

1.4 In preparing the May 1<sup>st</sup>, 2024, report a range of options were considered through workshops and meetings listed below. <sup>2</sup>

Table 1 Pre- Consultation Workshop/Meeting

Pre- Consultation Workshop/Meeting	Date
National Park Authority Members	22 November 2023
Development Management Officers PCNPA	29 November 2023
Planning Officers PCC	29 November 2023
Stakeholder Workshop (Agents and Statutory Undertakers)	8 <sup>th</sup> February 2024
Tourism Stakeholders	9 <sup>th</sup> February 2024
Public Protection Pembrokeshire County Council	12 <sup>th</sup> February 2024
National Park Authority Members	21 <sup>st</sup> February 2024
Welsh Government	22 February 2024
Visit Pembrokeshire	21 <sup>st</sup> March 2024

## This Consultation

1.5 The Pembrokeshire Coast National Park Authority consulted on a choice of options to manage camping and caravan site developments in the National Park.

1.6 The options consulted upon were:

- **Option 1:** No change to current practice.
- **Option 2:** To increase engagement with permitted development site operators (preferred option for Exempted Organisations alongside option 3).
- **Option 3:** To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites (preferred option)
- **Option 4:** To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites.
- **Options 5:** To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation Certification camping and caravan sites.

1.7 In terms of publicity this included:

- A press release (copy in Appendix A to this paper). A website review shows publicity in a variety of locations.<sup>3</sup> The consultation was also promoted on social media platforms.
- An amendment to the relevant section of the National Park Authority's website.
- Notification of contacts on the Local Development Plan mailing list, planning agents and those who have already been contacted through

<sup>2</sup> <https://www.pembrokeshirecoast.wales/wp-content/uploads/2024/04/Report-14-24-Article-4.pdf> - see page 26 Table listing engagement events.

<sup>3</sup> Pembrokeshire Herald, Western Telegraph, Narberth and Whitland Today, CLA News, Pure West Radio, Amroth Community Council Facebook, Pembroke and Pembroke Dock Observer, Tenby Town Council Planning Agenda 4<sup>th</sup> June 2024.

meetings and workshops along with County Councillors in the National Park, key stakeholders, known campsites operating under exempted organisations, campsites operating with planning permission and exempted organisations website to refer to the consultation.<sup>4</sup>

1.8 The consultation period ran until **5 p.m. on Friday, 20 September 2024**. Some representations were received after the closing date, and are included in this Report of Consultations.

1.9 The consultation included an opportunity to complete an online questionnaire (copy in Appendix B to this report) to allow views to be submitted on the proposed options via the questionnaire. A total of 120 responses were received via the online questionnaire. Chapter 1 provides an analysis of these responses. Chapter 2 sets out an analysis of responses received separately from statutory consultees, Chapter 3 and Chapter 4 provides the comments received separately from organisations and members of the public respectively.

1.10 Supporting papers were available online during the consultation:

- [Background Paper 'Camping and Caravanning in Pembrokeshire Coast National Park – Managing Impacts'](#)
- [Draft Advice Note](#)
- [FAQs for public consultation on camping and caravanning](#)
- [Public Consultation Covering Letter](#)

1.11 Contact details for the Strategic Policy team at Pembrokeshire Coast National Park Authority were provided. Paper copies of documentation could also be provided, at a small cost. The National Park Authority also provided consultation materials at public libraries and advised if representors were having difficulties accessing documentation electronically alternative arrangements could be made.

1.12 During the consultation period the following engagement and publicity of the consultation:

Table 2 This Consultation Engagement Events

<b>This Consultation Engagement Event</b>	<b>Date</b>
<b>Online presentation and engagement event for City, Town and Community Councils</b>	9 July 2024
<b>Online presentation and engagement event for members of the public and any interested parties</b>	11 July 2024
<b>Fishguard Agricultural Show</b>	2 August 2024
<b>Nevern Show</b>	7 August 2024
<b>Pembroke Town and Country Show</b>	7 August 2024
<b>Pembrokeshire County Show</b>	14 and 15 August 2024

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<sup>4</sup> <https://www.pembrokeshirecoast.wales/get-involved/public-consultations/consultation-camping-and-caravan-site-development/>

1.13 Planning Officers also raised awareness of the consultation at the Planning Agents forum meeting on 12 September 2024.

# Chapter 1 Questionnaire All Responses

2.1 The online questionnaire first asked for responses to a question about the landscape impact of caravan and camping on the National Park:

*‘Do you think that temporary camping and caravan sites can have a harmful visual impact on the National Park’s landscape?’*

This was followed by an opportunity to offer a view on 5 potential options to help address the issues arising from unauthorised and poorly regulated camping and caravan sites:

- **Option 1:** No change to current practice.
- **Option 2:** To increase engagement with permitted development site operators (preferred option for Exempted Organisations alongside option 3).
- **Option 3:** To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites (preferred option)
- **Option 4:** To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites.
- **Options 5:** To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation Certification camping and caravan sites.

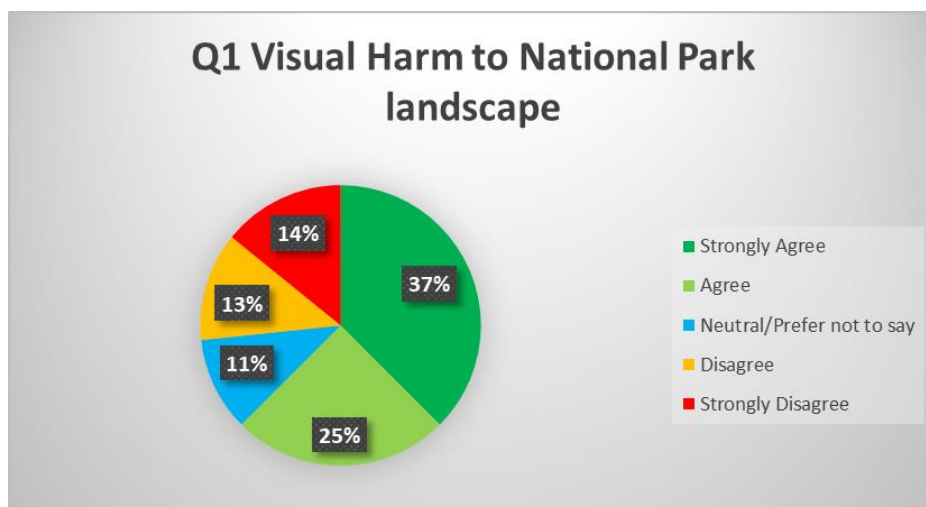
2.2 In addition, there was opportunity for to add additional commentary to explain what they considered to be the best course of action.

2.3 This section will look at all the responses received.

## Question 1

**‘Do you think that temporary camping and caravan sites can have a harmful visual impact on the National Park’s landscape?’**

Figure 1 Visual Harm to National Park landscape - Question 1





2.4 62% of respondents agreed with that statement with 37% disagreeing and 11% having a neutral viewpoint.

2.5 Analysis of the comments generally shows a considered assessment of the issues at play for the National Park itself as a designation.

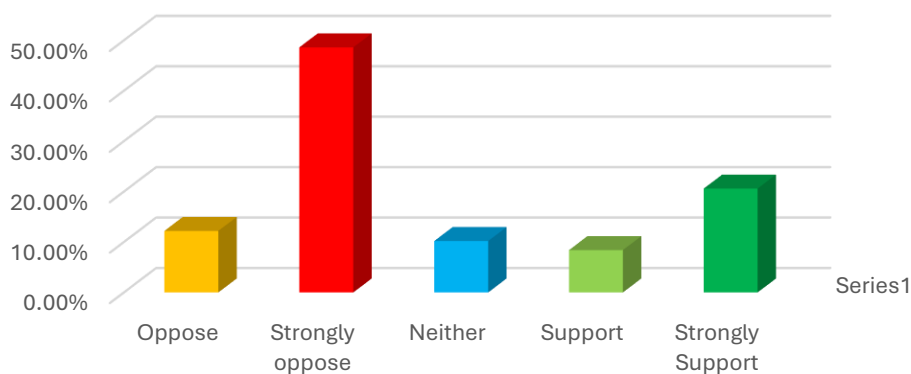
2.6 Issues highlighted included:

- Visual clutter against the National Park’s natural landscape.
- Sense of remoteness disrupted.
- Impacts on the ecosystem.
- Impacts on the environment in terms of pollution.
- Should be recognised as part and parcel of the offer
- Siting in ‘random’ fields particularly incongruous in coastal locations
- Leave as is because they are helpful to local farmers’ incomes.
- They are temporary and therefore what is the harm.
- Disturbance to wildlife and habitats.
- 28-day sites are low key.
- Landscape matters hugely
- ‘Visual impact’ are just buzzwords
- The way the question is worded is misleading
- There are impacts on dark skies at night.

2.7 The graphs below show the level of support and opposition from those who gave a response to the options proposed for next steps:

**Option 1**

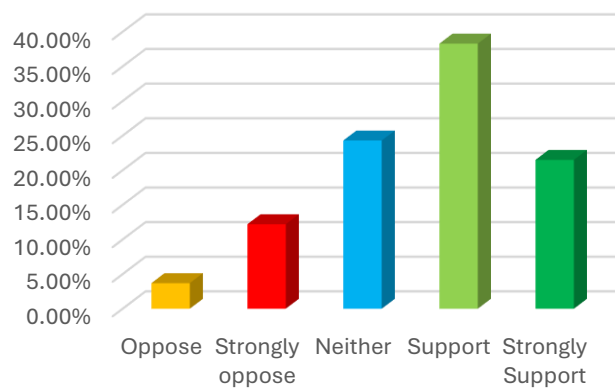
Figure 2 No change to current practice - Option 1



2.8 The response clearly shows that the majority of respondents to the survey consider that keeping the status quo of continuing through planning enforcement requires change. Over 60% of respondents were opposed to keeping the current means of controlling permitted development sites and under 30% in support.

## Option 2

Figure 3 To increase engagement with permitted development site – Option 2

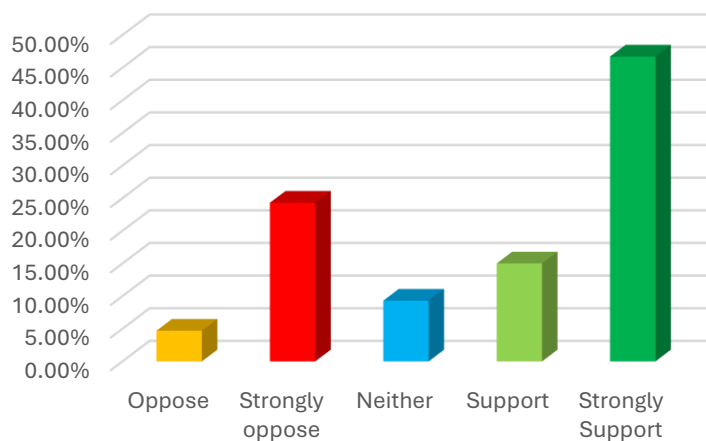


2.9 There was a high degree of support (59.8%) for more engagement with permitted development site operators with almost 40% of indicating strong support for this action. This shows strong support for the National Park Authority's preferred option.

2.10 Just under 16% of respondents would not support further engagement.

## Option 3

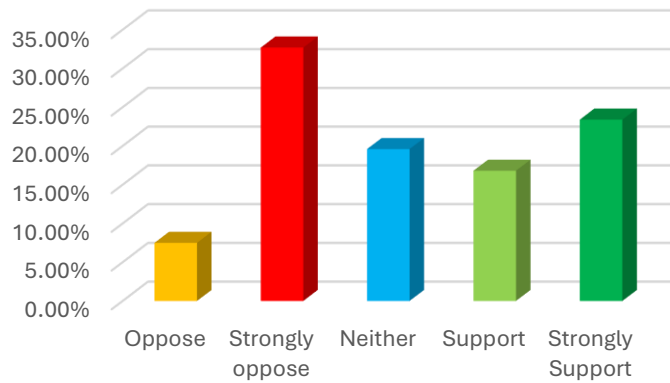
Figure 4 To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites - Option 3



2.11 Whilst there was considerable opposition to the introduction of an Article 4 Direction for 28-day sites (29%), the majority response was one of support (61.7%) for the National Park Authority's preferred option.

## Option 4

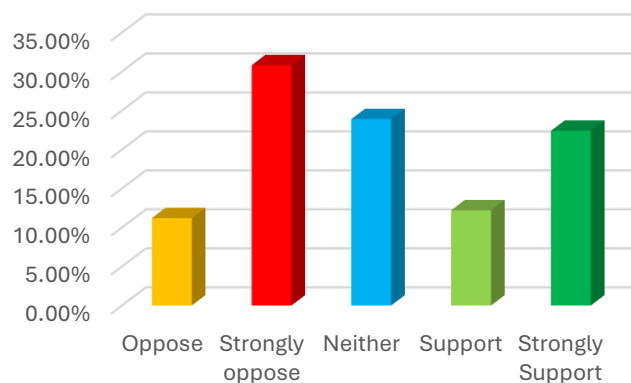
Figure 5 To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites - Option 4



2.12 Responses to this option showed an equal level of opposition and support (40.2%) but with views more strongly opposed to an Article 4 for sites currently operated by Exemption Organisations.

## Option 5

*Figure 6 To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation camping and caravan sites – Option 5*



2.13 Overall, here, there is a greater degree of opposition (42%) than support (34.6%) to introducing an Article 4 Direction to bring all sites operated as permitted development under greater control.

## Summary

- The **majority** of those responding consider that temporary camping and caravan sites can have a **harmful visual impact** on the National Park's landscape. (Question 1)
- The **majority** of those responding to the survey consider that **more controls** are required for camping and caravan development. (Option 1)
- There is **strong support** for introducing an **Article 4 Direction** to better manage sites currently operated under **28-day permitted development rights**. (Option 3 – preferred option by National Park Authority)
- In addition, **most would support** the National Park Authority **increasing engagement** with camping and caravan site operators. (Option 2 - preferred option by National Park Authority)

- Numerically there is **an equal level of opposition and support** to an **Article 4 for sites currently operated by Exemption Organisations but with a greater strength of feeling expressed regarding opposition** to the proposal. (Option 4)
- There is a greater level of opposition for bringing Exemption Organisations and '28-day sites' under planning control. (Option 5)

## Chapter 2 Questionnaire Responses by Type of Respondent

2.14 The online questionnaire first asked for responses to a question about the landscape impact of caravan and camping on the National Park:

*'Do you think that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape?'*

This was followed by an opportunity to offer a view on 5 potential options to help address the issues arising from unauthorised and poorly regulated camping and caravan sites:

- **Option 1:** No change to current practice.
- **Option 2:** To increase engagement with permitted development site operators (preferred option for Exempted Organisations alongside option 3).
- **Option 3:** To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites (preferred option)
- **Option 4:** To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites.
- **Options 5:** To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation Certification camping and caravan sites.

2.15 In addition, there was opportunity to add additional commentary to explain what they considered to be the best course of action.

2.16 This section will look at the responses received grouped by respondent type.

2.17 The survey asked for the respondent to select a category which best described them, with a drop-down menu offering a range of choices. People could choose from the list or add their own description. Sometimes respondents selected more than one category. The selections made have been rationalised to allow further meaningful analysis:

Table 3 Stakeholder Type: Grouped for Analysis\*\*

		Count
1	I operate a caravan and/or camp site which has planning permission'	7
2	I operate a caravan and/or camp site under the '28 day' rule'	4
3	I operate a caravan site and/or camp site which operates through an exemption certificate;'	14
4	'I am a tourism operator'	3
5	I am a local resident'	75
6	'I am a visitor'	7
7	'Prefer not to say'	5
8	Contains 'Community'	2
9	Operating an 'Exemption Organisation'	2
10	Other	1

	<b>Total</b>	<b>120</b>
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\*\* Residents who were also operating sites were selected solely as operator of a site

I am a local resident; we have a small field and camp in it/ allow wild camping maybe 5 times a year; was classified as a 28-day site operator

I operate a caravan and/or camp site under the '28 day' rule; I am a local resident; I operate a caravan site and/or camp site which operates through an exemption certificate; ' was classified as a 28-day site.

Residents who were also visitors were classified as residents

A tourism operator who was also a resident was classified as a tourism operator

I operate a caravan and/or camp site which has planning permission; I am a tourism operator ;I am a local resident; Run a wellbeing sauna experience ;' was classified solely as a site operator with planning permission.

2.18 Respondents were given opportunity to provide additional comment for each of the options. A summary of the responses is provided below with responses grouped by type of respondent.

'I operate a caravan and/or camp site which has planning permission'

Table 4 Operators of Sites with Planning Permission snapshot of views

ID	Q 1 'Visual Harm Caused?'	Option 1: Status Quo	(preferred option)  Option 2: Increase engagement with permitted development site operators (for Exempted Organisations alongside option 3)	(preferred option)  Option 3: Introduce the requirement for planning permission for camping and caravan sites which can operate for up to 28 days	Option 4: Introduce the requirement for planning permission for camping and caravan sites which can operate with an exemption certificate	Option 5: Introduce the requirement for planning permission for both
5	Strongly Agree	Strongly oppose	Neutral	Strongly support	Support	Oppose
10	Strongly Agree	Strongly oppose	Strongly oppose	Strongly support	Strongly support	Strongly support
34	Strongly Disagree	Support	Strongly support	Neutral	Support	Neutral
50	Strongly Agree	Strongly oppose	Oppose	Strongly support	Strongly support	Strongly support
60	Agree	Strongly oppose	Support	Strongly support	Strongly support	Strongly support
118	Strongly Disagree	Neutral	Strongly oppose	Strongly oppose	Prefer not to say	Prefer not to say
123	Agree	Neutral	Support	Oppose	Oppose	Oppose

2.19 There was a majority view that harm was being cause to the National Park landscape with temporary caravan and camping. Also, there was the view that more needed to be done (Option 1 to retain the status quo was not supported). There was an equal balance of views on increased engagement with Exemption Organisations (Option 2) but strong support to bring 28-day sites under planning control (Option 3) as well as sites operating under an Exemption Certificate (Option 4).

Table 5 Operators of Sites with Planning Permission - summary of comments

	Summary of Comments	Recommended Response
a)	There was a general level of concern that permitted development sites are proliferating and are operating without regulation and outside of permitted development rights. There was support for increased regulation, provided that it is enforced.	Support for increased regulation but also the need for enforcement noted.
b)	Site operators were concerned that the operation of sites without required standards would have a detrimental impact on tourism to the detriment of sites which have had significant investment and provide a better experience.	Comments supporting the need for sites with standards that are positive for tourism noted.
c)	One operator supported increased control with the proviso that the National Park Authority is not overly restrictive and feels that the Authority should be more customer friendly.	The Authority has prepared a document as to how proposals would be considered, should an Article 4 Direction be made and what information would be required to submit an application. Applications would be determined against the policies set out in Local Development Plan 2.
d)	One operator feels that introducing greater control would have a negative impact on creativity and that having planning controls in place does not allow temporary trial of new ideas. The local economy is part of the National Park.	The planning system manages development and use of land in the public interest and has to consider the impact of any particular activity on the wider community and environment. The introduction of an Article 4 Direction for 28-day sites would not place an embargo on the operation of temporary sites. The purpose would be to ensure that they are appropriate located and that they operate for the appropriate time period, in accordance with any permission granted.

**'I operate a caravan and/or camp site under the '28 day' rule'**

2.20 A small number of responses were from people who **operate 28-day sites**. The table below shows greater opposition to additional restrictions being introduced to control sites.

Table 6 28-day rule site operator – snapshot of views

			(preferred option)	(preferred option)		
	Q 1 'Visual Harm Caused?	Option 1: Status Quo	Option 2: Increase engagement with permitted development site operators (for Exempted Organisations alongside option 3)	Option 3: Introduce the requirement for planning permission for camping and caravan sites which can operate for up to 28 days	Option 4: Introduce the requirement for planning permission for camping and caravan sites which can operate with an exemption certificate	Option 5: Introduce the requirement for planning permission for both
29	Disagree	Oppose	Neutral	Neutral	Strongly oppose	Oppose
62	Neutral	Strongly support	Support	Strongly oppose	Strongly oppose	Strongly oppose
95	Strongly Disagree	Strongly support	Strongly oppose	Strongly oppose	Strongly oppose	Strongly oppose
120	Strongly Disagree	Strongly support	Neutral	Strongly oppose	Strongly oppose	Strongly oppose

Table 7 28-day rule site operator - summary of comments

	Summary of Comments	Recommended Response
a)	Additional controls are not required. One person considered that the regulations are already too strict.	The background paper forming part of the consultation details the reasons why the National Park Authority consider that additional control is required.
b)	It was recognised that responsible site owners will have little impact on the National Park and that allowing small sites to increase will have much less impact than increasing the size of large static caravan sites.	Agree that sites have a variety of management regimes but the Authority has to look at the overall impact of permitted development. Many of the large sites existing today were in place before the introduction of the planning system. The background paper detailing the issues of permitted development sites show how they are impacting the environment which is a combination of size, management regime and proliferation in number.
c)	Many are operated by those who care about the environment.	Agree that this may be the case, but there are a variety of management regimes. Self-regulation varies greatly and the need for scrutiny by the appropriate authorities has also been flagged through the consultation.
d)	Camping sites considered to be a normal sight in rural areas.	Camping sites are a common site in rural landscapes generally, but it remains necessary to ensure that visual impact does not cause harm – particularly within National Park which must be afforded the highest status of protection from inappropriate developments (Planning Policy Wales 12 paragraph 6.3.8).
e)	These site operators feel that the National Park Authority needs to undertake its development management duties more	The 28-day site rule is very difficult to enforce as the 28 days need not be consecutively. Resources for



	<b>Summary of Comments</b>	<b>Recommended Response</b>
	effectively, particularly enforcement, rather than restricting 28-day sites.	<p>enforcement are limited and enforcement procedures themselves are lengthy.</p> <p>Additional controls will improve the Authority's ability to focus on where enforcement is necessary.</p>
f)	Sites like these are an income generator for farmers and small-holders and the land has plenty of time to recover during the winter months.	The fact that sites can contribute to farm incomes is not disputed. The incorrect use of the 28-day rule however is widespread and sites frequently operate for much longer periods. Whilst the land may recover, the number of sites and the length of operation is having a wider impact on the environment and local communities.
g)	One of the respondents considers that more evidence is needed, and comparison of visitor numbers with other locations in the UK. There was also comparison of the permitted development rights in Wales compared with England where land can be used for up to 60 days for camping.	<p>The Authority has set out its evidence in the background paper published as part of the consultation. Pembrokeshire may not have the same number of visitors as other parts of the UK but the proliferation of camping sites using permitted development rights and the widespread inappropriate use of those rights are impacting the landscape, environment and local communities including businesses established and operating within planning regulation.</p> <p>The Welsh Government consulted on increasing permitted development rights for camping in 2021/22. The National Park Authority did not support the extension of permitted development rights for camping sites for the reasons set out in the background paper to this current consultation. The Welsh Government has not made a further response on the results of the consultation exercise regarding camping.</p> <p>A further petition was submitted to the Senedd in November 2023 requesting that permitted development rights in Wales be brought into line with the 60 days permitted in England. The Minister responded that this would be considered again when the permitted development rights are next reviewed. No date has been set for that review.</p>

‘I operate a caravan site and/or camp site which operates through an exemption certificate’

2.21 There was a majority view that that temporary sites have an adverse impact on the National Park landscape. The table below shows that the majority of those operating sites through an Exemption Certificate consider that additional controls are necessary. There is majority support for Article 4 Directions to control 28-day sites and a much lesser support to bring in control for all Permitted Development camping sites. More than half of the respondents were opposed to an Article 4 Direction being introduced to control Exemption Certificate sites. Operators were however in favour of the preferred option to increase engagement with permitted development site operators.

Table 8 Exemption Certificate operators’ snapshot of views

ID	Q 1 'Visual Harm Caused?'	Option 1: Status Quo	(preferred option) Option 2: Increase engagement with permitted development site operators	(preferred option) Option 3: Planning permission for 28 day sites	Option 4: planning permission for exemption certificate sites	Option 5: Introduce the requirement for planning permission for both
11	Strongly Agree	Strongly oppose	Neutral	Strongly support	Strongly oppose	Strongly oppose
12	Disagree	Strongly oppose	Strongly support	Strongly support	Oppose	Strongly support
58	Agree	Strongly oppose	Support	Strongly support	Strongly oppose	Neutral
67	Disagree	Neutral	Neutral	Strongly oppose	Strongly oppose	Strongly oppose
83	Neutral	Strongly oppose	Strongly support	Support	Oppose	Oppose
84	Strongly Agree	Strongly oppose	Strongly support	Strongly support	Strongly support	Support
103	Disagree	Support	Support	Support	Strongly oppose	Neutral
109	Agree	Strongly oppose	Support	Strongly support	Strongly oppose	Neutral
110	Agree	Strongly oppose	Support	Neutral	Neutral	Neutral
111	Agree	Strongly oppose	Support	Support	Strongly support	Strongly support
112	Agree	Oppose	Support	Support	Oppose	Neutral
117	Strongly Agree	Strongly oppose	Support	Strongly support	Neutral	Neutral
121	Agree	Support	Support	Support	Strongly oppose	Strongly oppose
122	Disagree	Support	Strongly oppose	Strongly oppose	Strongly oppose	Strongly oppose

Table 9 Exemption Certificate operators - summary of comments

	Summary of Comments	Recommended Response
a)	Some expressed concern about visual and environmental impact, whilst other felt that as long they are in the right place then there is no visual harm. One	It is inevitable that some sites will have a greater visual impact than others. Many of the large holiday parks existed before the introduction of the planning

	Summary of Comments	Recommended Response
	respondent compared what they considered as a smaller impact of temporary sites compared with a permanent development in their area.	system. The introduction of additional control will help to ensure that any further visual impact is minimised and the landscape properly protected.
b)	A majority of people in this group expressed concern about unregulated sites undercutting sites with regulated standards and requirements. Some raised issues relating to the lack of regulation of pitch numbers, sanitation, commercial waste agreements, non-payment of business rates and lack of accountability when issues such as disturbance to neighbours arise. Two cited a lack of consideration of health and safety as an issue.	The way some sites are regulated and others not is one of the issues raised by the National Park Authority in the background paper published as part of the consultation. It is recognised that sites with planning permission and licences are subject to significantly greater statutory controls than those operating under permitted development rights and the consequences on individual site operators, the tourism industry, local communities and the environment.
c)	Several noted that they are aware of 28-day sites operating for longer periods each year.	Comments noted.
d)	Virtually all in this group detailed the degree of regulation required to operate a site with an Exemption Certificate. Those responding consider that they operate under responsible Exemption Organisations, some of which have additional environmental requirements.	It is agreed that some Exemption Organisations have a greater degree of environmental compliance than others. In some instances however compliance falls short of those that would be required by a planning authority and public protection.
e)	Some highlighted the contrast between these small sites and the large holiday parks and the different visitor experiences they offer.	There are a wide range of camping and caravan sites in the National Park, operating with planning permission and as permitted development sites.
f)	It was generally considered that these sites do not require additional regulation, although there was a majority support for additional engagement. Some expressed a need for a code of conduct or protocol for sites operating in the National Park. Such engagement however should not bring unduly severe restrictions that would cause sites to cease operation.	Additional engagement is a preferred option for the National Park Authority. Suggestions for a code of conduct or protocol are noted and welcomed.

**'I am a tourism operator'**

2.22 Just a few of those responding identified themselves as **Tourism Operators**. Only one person provided additional commentary. The response to the survey shown in the table below shows that there is both support for and opposition to increased engagement and for the introduction of an Article 4 Direction.

Table 10 Tourism Operators - snapshot of views

			(preferred option)	(preferred Option)		
ID	Q 1 'Visual Harm Caused?'	Option 1: Status Quo	Option 2: Increase engagement with permitted development site operators	Option 3: Planning permission for 28 day sites	Option 4: planning permission for exemption certificate sites	Option 5: Introduce the requirement for planning permission for both
87	Agree	Oppose	Support	Support	Support	Support
105	Agree	Oppose	Support	Neutral	Strongly oppose	Strongly oppose
116	Strongly Disagree	Strongly support	Oppose	Oppose	Oppose	Oppose

Table 11 Tourism Operators - summary of comments

	Summary of Comments	Recommended Response
a)	The approach proposed is too onerous and the evidence to support the case for an Article 4 Direction is insufficiently robust. Concern is also expressed about additional administration for the National Park Authority.	The Authority has set out its evidence in the background paper published as part of the consultation.  The 28-day site rule is very difficult to enforce as the 28 days need not be consecutively. Resources for enforcement are limited and enforcement procedures themselves are lengthy. Additional controls should improve the efficacy of any enforcement necessary.
b)	It is considered that the number of 28-day sites has decreased in the last 18 months and the question is asked whether it really is a problem.	The number of 28-day sites may have reduced from the peak immediately after the Covid-19 Pandemic lockdown. The number of sites operating annually and the ongoing potential for an increasing number to do so and the issues caused are considered to warrant further control by the Authority.

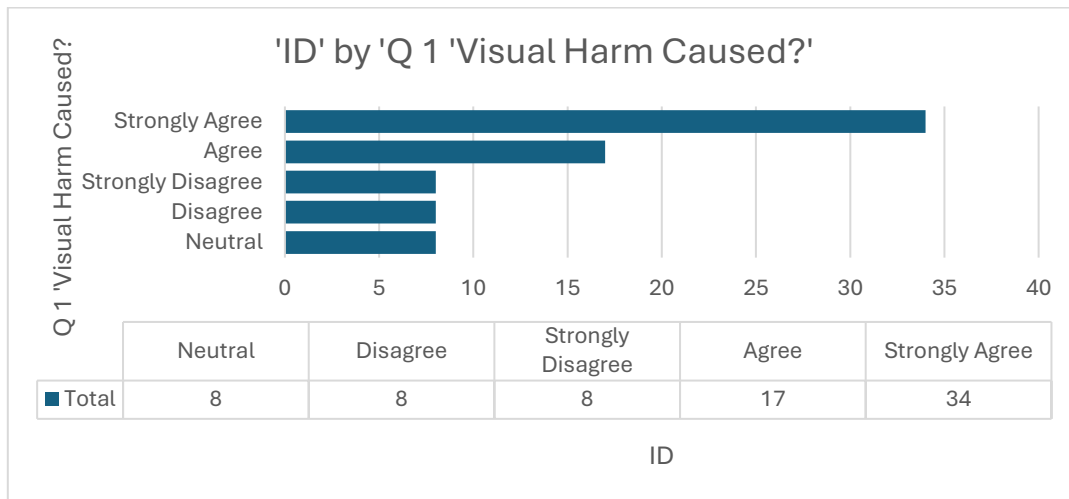
## 'I am a local resident'

2.23 The greatest number of those responding to the questionnaire were **residents**.

### Question 1

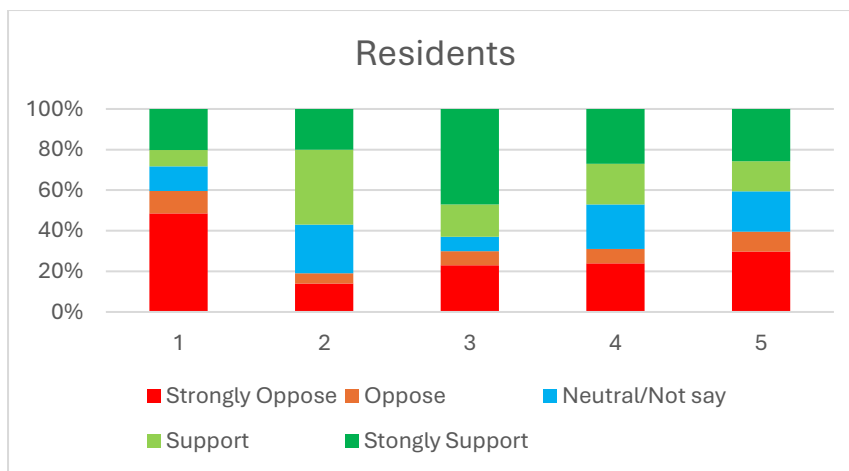
In response to Question 1 *'Do you think that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape?'* residents were in the strong majority advising that there temporary camping and caravan sites can have a harmful visual impact.

Figure 7 Question 1 - Residents - Visual Harm Caused Question – Question 1



2.24 In terms of Options 1 to 5 the graph below shows that the majority of residents consider more control over permitted development sites is required (option 1) and that this should be achieved through greater engagement (option 2 – preferred option) and introduction of an Article 4 Direction to control 28-day sites (option 3 – preferred option). A lesser number of residents would also wish to see additional controls for sites operated under Exemption Certificates (option 4). There was also opposition to all options.

Figure 8 Residents - Views on Options Proposed



### Option 1

2.25 Residents were strongly in favour of needing to take action regarding how camping and caravanning is controlled by the National Park Authority.

Figure 9 Option 1 Residents views on retaining the status quo – Option 1

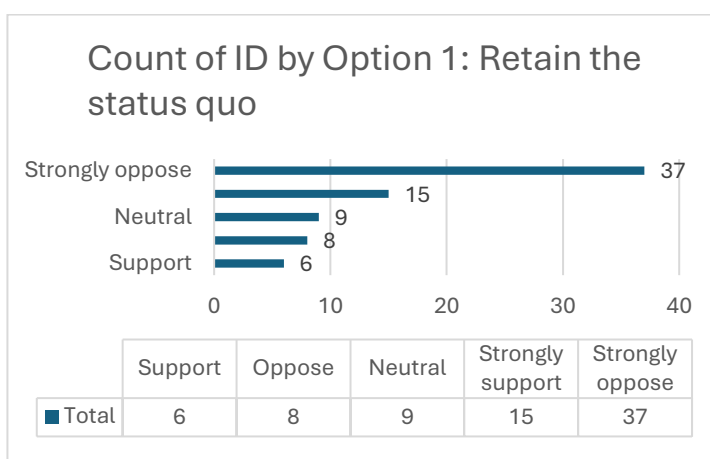


Table 12 Summary of Comments - Residents on Option 1

	Summary of Comments	Recommended Response
a)	Visual impact	Noted.
b)	<b>Erosion of tranquillity and natural beauty.</b>	Noted.
c)	<b>Harmful impacts to the environment –</b> flora, fauna, soil etc.	Noted.
d)	Too many sites – <b>more control is needed.</b> Feeling that the 28-day rule has become a free-for all and that the number of sites is increasingly annually in some areas.	Noted.
e)	<b>Lack of accountability for those operating the sites –</b> one cited issues of poor waste management attracting vermin and erosion of the areas outside of a 28-day site. Sites are having an impact on some communities.	Noted. The reasons cited are some of those detailed in the background paper forming part of the consultation.
f)	Causing additional loads on roads, sewage system etc.	Noted.
g)	Temporary structures give the wrong impression of the area.	By virtue of their status, there is significant potential for temporary structures to be inappropriately designed, constructed and sited.
h)	<b>Coastal locations, in particular,</b> are overcrowded in parts and can look like car parks.	There are issues of land being used for camping in popular coastal locations. Some are part of the road verge or coastal slopes and not part of any camping site.
i)	Several residents recognised that <b>visual impact may be greater in some locations than others</b> and that not all sites cause problems, but those that do should be subject to greater control.	It is inevitable that some sites will have a greater visual impact than others. The introduction of an Article 4 Direction would provide the Authority with the necessary control to deal with such issues. A Direction can be made for an area or type of

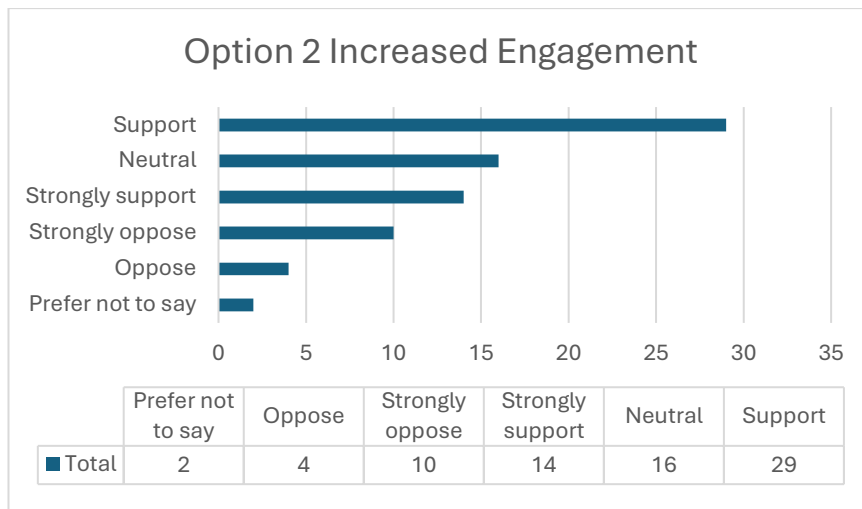
	Summary of Comments	Recommended Response
		development. It cannot be made on the basis of sites that are/not appropriate located in the landscape.
j)	Camping is part of a tourism destination and it's <b>good to see visitors enjoying themselves.</b>	Agree.
k)	It's a <b>positive and affordable way of encouraging people to visit Pembrokeshire.</b>	Agree.
l)	<b>Some sites are operated by people who do care about the environment.</b>	Agree that this may be the case, but there are a variety of management regimes. Self-regulation varies greatly.
m)	<b>It's a temporary use and any visual impact is short-lived.</b> Greater visual impact is caused by permanent structures such as wind turbines.	Whilst seasonal campsites may not operate all year round, most operate annually and their impact has increased as the number of sites and the period of operation has extended beyond that allowed under permitted development rights. Larger structures are, of course, prominent in any landscape This, in itself is not justification to allow smaller development to proliferate unchecked.
n)	<b>Permanent camping sites have greater visual impact</b> than temporary sites.	Many of the large holiday parks existed before the introduction of the planning system. The introduction of additional controls will help to ensure that any further visual impact is minimised and the landscape properly protected.
o)	Visual impact is a means of control used by the National Park Authority.	Visual impact is a means of assessing the impact of proposed development in the landscape and the National Park is one of the highest landscape designations in the UK.
p)	<b>More camping and camper vans should be encouraged to visit the National Park.</b>	The consultation is concerned about the negative impacts that uncontrolled development is having on the National Park landscape which is the reason why most visitors come to Pembrokeshire.

	<b>Summary of Comments</b>	<b>Recommended Response</b>
q)	Small, temporary <b>sites provide additional income for the agricultural sector.</b>	The fact that sites can contribute to farm incomes is not disputed.
r)	The National Park Authority has more pressing matter to deal with than this and <b>should instead be tackling</b> those causing greater offence and <b>significant breaches of planning control.</b>	The National Park Authority is required to deal with all reported breaches of planning control. The impact of a large number of camping sites is having a significant impact on the National Park.
s)	The existing legislation is sufficient. 28-day sites should be allowed to continue without need for greater bureaucracy.	Objection noted.
t)	Permitted development rights for camping <b>should be increased to 60 days</b> , as in England	<p>The Welsh Government consulted on increasing permitted development rights for camping in 2021/22. The National Park Authority did not support the extension of permitted development rights for camping sites for the reasons set out in the background paper to this current consultation. The Welsh Government has not made a further response on the results of the consultation exercise regarding camping.</p> <p>A further petition was submitted to the Senedd in November 2023 requesting that permitted development rights in Wales be brought into line with the 60 days permitted in England. The Minister responded that this would be considered again when the permitted development rights are next reviewed. No date has been set for that review.</p>
u)	Removing permitted development rights should be a last resort.	Agree. A range of other means of controlling the issue have been tried, as detailed in the background paper which was part of the consultation.



Option 2

Figure 10 Increased Engagement – Option 2



2.26 Residents were in the majority supporting the National Park Authority’s preferred option to increase engagement with exemption organisations.

Table 13 Summary of Comments Residents - Option 2 Increased Engagement

	Summary of Comments	Recommended Response
a)	<p>Have a strong code of conduct. Non-compliance should lead to the site being closed down.</p> <p>There is a need for certain standards to be met on sites</p> <p><b>Voluntary codes are worthless and frequently ignored without consequence.</b></p>	<p>The National Park Authority can encourage engagement and a code of conduct for site operators, as they do with other activities in the National Park. Compliance is, however, voluntary. The efficacy of such an approach will depend on the willingness of Exemption Organisations/Site Operators to comply with a Code. Compliance and effectiveness would require monitoring over an agreed period of time with potential for additional controls to be introduced if needed.</p>
b)	Education is preferable to enforcement.	Support noted.
c)	Site owners would know what is required and not permitted.	Support noted.
d)	<b>Engagement is good, but if followed by enforcement when sites breach their rights.</b> Engagement alone will not work.	Any continued breaches of planning control would require action by the Authority.
e)	The Exemption Organisations are known to the National Park Authority and greater engagement would be effective. Some	Support noted.

	Summary of Comments	Recommended Response
	have their own regulations which will help with compliance.	
f)	<b>The National Park Authority needs to be more proactive in addressing the problem.</b>	This proposal is part of the Authority's bid to proactively deal with the issue.
g)	This may be a reasonable compromise without the need for costly enforcement.	Support noted.
h)	Any additional costs should be borne by the site operators.	Applications for development formerly permitted as permitted development but controlled by an Article 4 Direction are not charged. Other costs arising from the use of land would continue to be a matter for site operators.
i)	<b>Increased engagement should be for all sites</b> , not just those operated under permitted development rights.	Agree that this would be beneficial.
j)	Not sure that engagement would be effective as there is little self-regulation. Many exemption certificate sites operate over their pitch numbers in times of peak demand with potential impacts on infrastructure.	It is known that there are widespread camping and caravan operations that are not in accordance with the relevant permitted development rights. Effective engagement would require agreement from all parties.
k)	<b>The 28-day system works well as it is</b> and most landowners don't use their 28 days available to them.	There is widespread camping and caravan operations that are not in accordance the 28-day system for camping as set out in the Background Paper to the consultation.
l)	Concern about <b>a biased approach for the rich</b> compared with those with an alternative lifestyle.	Operation of any site with proper management will require a degree of investment. Applications to operate seasonal sites will be judged on planning matters and not on the operator.
m)	This would <b>increasingly burden overworked planning officers.</b>	The 28-day site rule is very difficult to enforce as the 28 days need not be consecutively. Resources for enforcement are limited and enforcement procedures themselves are lengthy. Additional controls should improve the efficacy of any enforcement necessary.
n)	Question the right for Exemption Organisations to override the opinions of local residents, councils and National Park Authorities when they have no planning training and a vested interest in	There are a wide range of organisations that hold an Exemption Certificate. They are subject to certain procedures but it is agreed that they are not as stringent as those required through the planning process, nor are they

	Summary of Comments	Recommended Response
	<p>increasing the number of sites they operate.</p> <p><b>The Exemption Organisations have become the de-facto planning authority and should be replaced by the National Park Authority.</b></p> <p>Closer working with Exemption Organisations is needed to ensure control of 28-day sites joining them.</p>	<p>all statutory requirements. It is hoped that effective engagement with the organisations will help to improve standards across the board.</p>
o)	<p><b>Small, basic sites do not have environmental impacts.</b></p>	<p>Sites of all sizes will have potential to have environmental impacts without the right checks and balances in place.</p>
p)	<p>The National Park Authority has a duty to protect the National Park. There are already sufficient campsites and the Authority does not need to seek permission of those who only care about profiteering.</p>	<p>Agree that the Authority has a duty to protect the National Park which is set out in legislation. Permitted development rights are also set out in legislation. In this instance it is necessary to review that right as there has been an increase in the number of camping sites operating in this way which is now causing significant issue.</p>

### Option 3

2.27 Residents were again in the majority supporting the National Park Authority's preferred option to require planning permission for 28-day sites.

Figure 11 Planning Permission for 28 Day Sites - Option 3

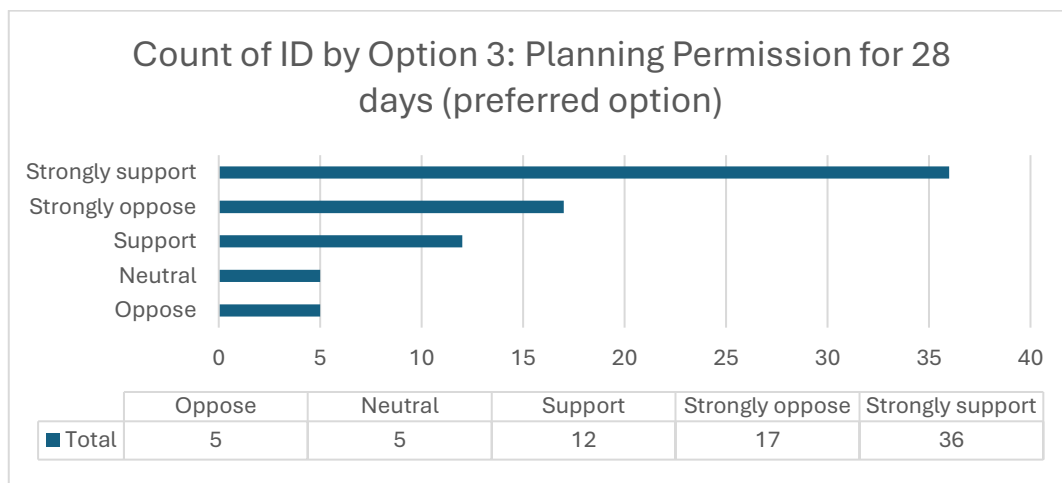


Table 14 Summary of Comments Residents - Option 3 Planning Permission 28 Day sites

	Summary of Comments	Recommended Response
a)	<b>Introducing an Article 4 Direction is essential to ensure protection of the environment before a site is used and help to manage the impact on public services, waste management and road and protect historic assets and sites.</b>	Support noted.
b)	<b>Would help to balance the economic benefits of tourism with needs and well-being of local residents.</b>	Support noted.
c)	It would help to control the number of visitors to the area.	Whilst the intention is not to control visitor numbers, the impacts of the proliferation of sites within particular areas may be a material consideration when considering planning applications.
d)	This is needed to ensure sites have the proper facilities and <b>locals can be properly consulted on applications.</b>	Support noted.
e)	This is needed as 28-day sites are having an impact both on the National Park environment and on sites that have planning permission and are required to meet with regulations.	Support noted.
f)	<b>There are too many sites not being properly managed.</b> It is currently a free-for-all.	Support noted.
g)	Support this, with the exception of land being used solely by the landowner for their own use for camping.	Comments noted. Landowners are permitted to use land within a domestic curtilage (garden) of their property. Outside of this the 28-day rule is applicable which would be controlled by an Article 4 Direction.
h)	The 28-day rule should not be permitted in the National Park. <b>All campsites should be judged against planning policies and guidelines.</b>	Support noted.
i)	There would be a problem for sites knowing which days they would operate in advance.	It would be for individual site operators to decide their operating period(s).
j)	This would be detrimental to those who run well-organised rallies.	This option is to remove permitted development rights for 28-day sites. It would not affect the permitted development rights enjoyed by Exemption Organisations.
k)	<b>This would impose additional costs on a struggling industry.</b>	Applications for development formerly permitted as permitted development but controlled by an Article 4 Direction are not charged. There may be costs to comply with other requirements to operate a camping site safely and in accordance with regulations.

	<b>Summary of Comments</b>	<b>Recommended Response</b>
l)	This would increase the workload of overstretched Officers.	The 28-day site rule is very difficult to enforce as the 28 days need not be consecutively. Resources for enforcement are limited and enforcement procedures themselves are lengthy. Additional controls should improve the efficacy of any enforcement necessary.
m)	Those who breach permitted development rights will breach planning conditions with impunity from action from the National Park Authority.	Views noted. The aim of the proposals is to ensure better management and enforcement efficacy.
n)	This action is draconian and unnecessary.	Objection to the proposal noted.
o)	Would prefer that 28-day sites are not permitted, particularly in protected areas.	This option result in all landowners needing to apply for planning permission for 28-day sites.
p)	Will increase the number of sites operating under Exemption Certificates.	There is potential for landowners to join Exemption Organisations to run campsites but increased engagement with those organisations should help to ensure adequate controls and standards are maintained.
q)	<b>Would not want rights taken away from me as a landowner and would be prepared to protest.</b>	Views noted.
r)	<b>This is a money-making scheme for the National Park Authority.</b>	Applications for development formerly permitted as permitted development but controlled by an Article 4 Direction are not charged.
s)	<b>It would prevent spontaneous and flexible camping.</b>	There are many campsites in Pembrokeshire. Bringing 28-day sites under planning control will allow these seasonal sites to continue providing pitches for campers.
t)	Shouldn't make things harder for farmers to boost their income.	Applications for development formerly permitted as permitted development but controlled by an Article 4 Direction are not charged. There may be costs to comply with other requirements to operate a camping site safely and in accordance with regulations.
u)	There is also a duty to support those who live and work in the National Park.	Agree. The 1995 Environment Act sets out the National Park Purposes which are to conserve and enhance the National Park and secondly to promote public understanding and enjoyment. Where there is a conflict, the first Purpose is given primacy. The Duty to foster the economic and social well-being of local communities is undertaken in the context of the Purposes.

	<b>Summary of Comments</b>	<b>Recommended Response</b>
v)	All temporary commercial uses should require planning permission.	Certain types of development are permitted without the need for the grant of planning permission. This is set out in legislation. Article 4 Directions can be used where there is an identified problem caused by permitted development.
w)	Should be for permanent and long-duration sites only.	Permanent and long-stay camping and caravan sites are subject to planning permission.

## Option 4

2.28 Residents were balanced in both their strong opposition and support for requiring planning permission for sites with exemption certificates. There was however generally more support than opposition to the proposal overall.

Figure 12 Planning Permission for exemption certificate sites - Option 4

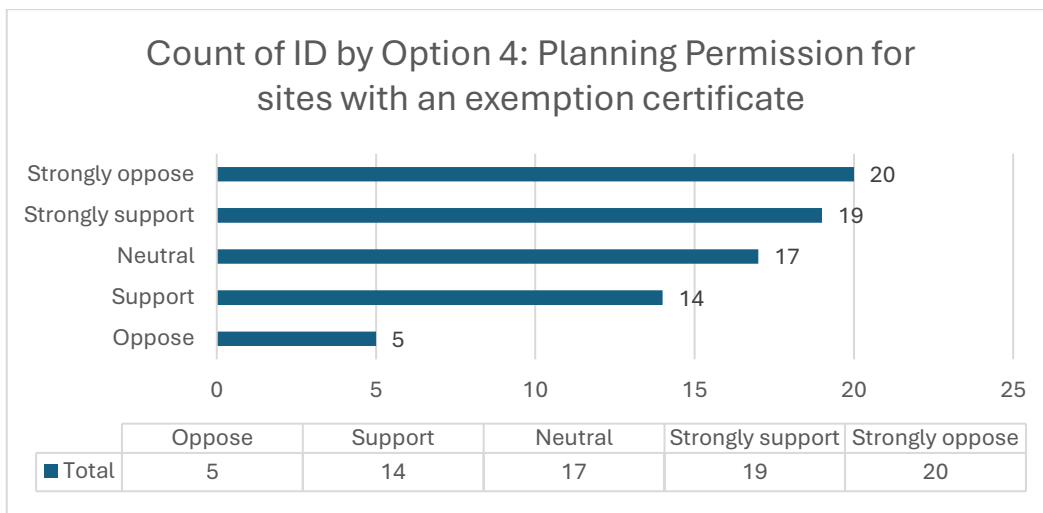


Table 15 Summary of Comments Residents - Planning Permission for sites with Exemption Certificates

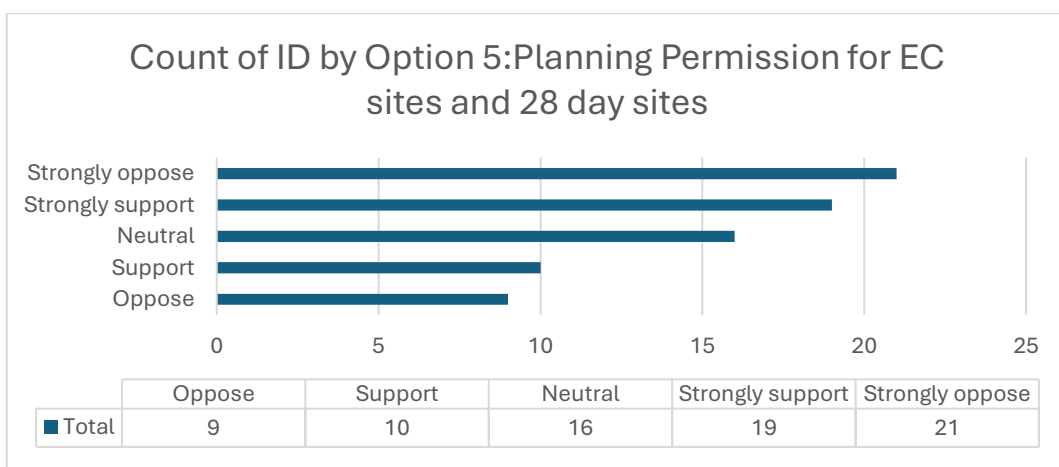
	<b>Summary of Comments</b>	<b>Recommended Response</b>
a)	Would allow for rallies to be held for longer periods of time.	Rallies run by Exemption Organisations are permitted for up to 5 days. Longer rallies require planning permission to be granted.
b)	Should be the same rules for all – no exemptions.	Views noted.
c)	They have more controls than 28-day sites, but it would still be beneficial to include these sites in an Article 4 Direction to safeguard the landscape.	Views noted.

	Summary of Comments	Recommended Response
d)	<b>Introduce this option if sites do not engage in a meaningful way.</b>	Views noted.
e)	The situation has become out of hand and requires legislation.	Views noted.
f)	<b>This would allow development to continue whilst protecting the beauty of the National Park.</b>	Views noted.
g)	Self-regulation is not effective enough.	There are many Exemption Organisations and the way they manage their sites varies. The National Park Authority is hoping that greater engagement will help to manage issues that currently cause problems for communities and the environment.
h)	All commercial activity should require planning permission.	Certain types of development are permitted without the need for the grant of planning permission. This is set out in legislation. Article 4 Directions can be used where there is an identified problem caused by permitted development.
i)	<b>A number of new Organisations have been established in recent years as a way of getting around the need for planning permission.</b>	View noted.
j)	A good idea for new Exemption Certificate sites – but not those already operating.	The Authority is not proposing an Article 4 Direction for sites operated through Exemption Organisations at present.
k)	<b>Without the same controls for all, former 28-day site owners would seek to join Exemption Organisations, not all of which operate within the confines of their permitted development rights. The same rules for all should apply.</b>	It is likely that some landowners will wish to join Exemption Organisations to continue operating their camping sites. There are many Exemption Organisations and the way they manage their sites varies. The National Park Authority is hoping that greater engagement will help to manage issues that currently cause problems for communities and the environment.
l)	Increased bureaucracy and costs.	The need for additional control is set out in the background paper which is part of this consultation. Planning applications for development which was previously permitted development before the introduction of an Article 4 Direction are not subject to a charge.

	Summary of Comments	Recommended Response
m)	There would be no need for an exemption certificate if they required planning permission.	Agree.
n)	<b>The existing system operates effectively.</b>	The background paper which forms part of this consultation sets out the reasons why the National Park Authority considers additional control is required.
o)	The Exemption Organisation's application process is similar to a planning application but with less bureaucracy. Consultation with the National Park Authority can prevent a Certificate being issued.	The degree to which Exemption Organisations apply regulations varies. Prior consultation with the National Park Authority is a requirement, but objections raised have not always been taken into account. It is hoped that greater engagement with this sector will improve operations across the board.
p)	<b>Increasing restrictions for farmers in this way would have a bad outcome for the National Park Authority.</b>	Views noted.
q)	Increased burden on overworked planning officers.	The 28-day site rule is very difficult to enforce as the 28 days need not be consecutively. Resources for enforcement are limited and enforcement procedures themselves are lengthy. Bring 28-day under planning control and increasing engagement will help to manage workloads.

## Option 5

Figure 13 Planning Permission for both Exemption Certificate and 28 Day Sites - Option 5





2.29 Residents were balanced in their opposition and support for the introduction of planning permission requirements for 28-day sites and for Exempted Certificate sites.

Table 16 Summary of Comments - Residents - Planning Permission for both Exemption Certificate Sites and 20 Day Sites.

	Summary of Comments	Recommended Response
a)	<b>Planning permission removes ambiguity on the right to operate a campsite.</b>	Views noted.
b)	This is the only way to have a sustainable tourism industry.	Views noted.
c)	All sites should be subject to planning permission to create an equal playing field.	Views noted.
d)	No temporary permissions should be given. All commercial activity requires quality investment which should be subject to planning controls.	Views noted.
e)	The more control the National Park Authority has, the better the Park will be protected.	Views noted.
f)	<b>Increasing bureaucracy on a struggling industry.</b>	The need for additional control is set out in the background paper which is part of this consultation. Planning applications for development which was previously permitted development before the introduction of an Article 4 Direction are not subject to a charge.
g)	<b>This will not be monitored or enforced.</b>	The actions being proposed by the National Park Authority as a preferred option will help to achieve greater monitoring and enforcement.
h)	Those using agricultural land for amenity for up to 28 days a year should not be encumbered by greater bureaucracy.	Objection noted.

'I am a visitor'

2.30 **Visitors** provided 7 responses to the survey. They provided a mixed response both in support of and opposition to greater control of sites operated using permitted development rights.

Table 17 Visitors – snapshot of views

			(preferred option)	(preferred Option)		
ID	Q 1 'Visual Harm Caused?'	Option 1: Status Quo	Option 2: Increase engagement with permitted development site operators	Option 3: Planning permission for 28 day sites	Option 4: planning permission for exemption certificate sites	Option 5: Introduce the requirement for planning permission for both

17	Strongly Disagree	Strongly support	Neutral	Strongly oppose	Strongly oppose	Strongly oppose
19	Strongly Disagree	Strongly support	Neutral	Strongly oppose	Strongly oppose	Strongly oppose
22	Disagree	Support	Neutral	Strongly oppose	Neutral	Strongly oppose
31	Strongly Agree	Strongly oppose	Strongly support	Strongly support	Support	Support
33	Neutral	Support	Strongly support	Oppose	Strongly oppose	Oppose
55	Strongly Agree	Strongly oppose	Strongly support	Strongly support	Strongly support	Strongly support
98	Strongly Agree	Strongly support	Support	Strongly support	Strongly support	Strongly oppose

Table 18 Summary of Comments - Visitors

	Summary of Comments	Recommended Response
a)	There is concern that additional restrictions <b>would create unnecessary paper-work, and increased regulation would increase costs for those using the sites and become less attractive for temporary events.</b>	The need for additional control is set out in the background paper which is part of this consultation. Planning applications for development which was previously permitted development before the introduction of an Article 4 Direction are not subject to a charge.
b)	Some visitors consider that <b>there are not many sites causing a problem</b> and any visual impact is short-lived.	The issues set out in the Background Paper as part of this consultation are sufficient to warrant the need for additional controls. Visual impact is one element of the issue and other environmental and social impacts are having long-term effects.
c)	<b>Sites are good for the local economy and have worked well without regulation.</b>	The need for additional control is set out in the background paper which is part of this consultation.
d)	It was recognised that 28-day sites provide additional income for farmers.	Views noted.
e)	Additional controls could have an impact on the efficiency of the National Park Authority.	The 28-day site rule is very difficult to enforce as the 28 days need not be consecutively. Resources for enforcement are limited and enforcement procedures themselves are lengthy. Bring 28-day under planning control and increasing engagement will help to manage workloads.
f)	<b>Other visitors strongly supported additional regulation, citing damage to the natural beauty of the National Park and the devaluing of reasons why people visit. They also recognised the potential for established sites to be undermined and impact on other services.</b>	Views noted.
g)	One visitor considered the proposals to be a restrictive rather than a regenerative	The proposals will allow camping sites to continue operating in appropriate

	Summary of Comments	Recommended Response
	approach. Another visitor wanted an increase in provision of niche camp sites.	locations. Requiring such sites to submit planning applications will provide the opportunity for the proper scrutiny of the potential effects of the site on local communities and the environment and assist with a regenerative approach to tourism.  The National Park Authority does not operate caravan or camping sites.

'Prefer not to Say'

Table 19 'Prefer not to Say' – snapshot of views

ID	Q 1 'Visual Harm Caused?'	Option 1: Retain status quo	Option 2: Increase engagement with permitted development site operators (preferred option for Exempted Organisations alongside option 3)	Option 3: Introduce the requirement for planning permission for camping and caravan sites which can operate for up to 28 days (preferred option)	Option 4: Introduce the requirement for planning permission for camping and caravan sites which can operate with an exemption certificate	Option 5: Introduce the requirement for planning permission for both
27	Disagree	Strongly support	Strongly oppose	Strongly oppose	Strongly oppose	Strongly oppose
45	Prefer not to say	Prefer not to say	Prefer not to say	Prefer not to say	Prefer not to say	Prefer not to say
48	Agree	Strongly oppose	Strongly oppose	Strongly oppose	Support	Support
78	Strongly Disagree	Strongly support	Prefer not to say	Strongly oppose	Strongly oppose	Strongly oppose
86	Strongly Disagree	Strongly support	Strongly oppose	Strongly oppose	Strongly oppose	Strongly oppose

2.31 Five commentators did not wish to say what type of stakeholder they were and were predominantly opposed to a change in approach.

Table 20 Summary of Comments - 'Prefer not to Say'

	Summary of Comments	Recommended Response
a)	One was strongly in favour of bringing operators within the control of planning and considered that currently harm was being caused to the National Park landscape by the operation of temporary camping and caravan sites.	Views noted.

b)	The remaining four that provided comment wished to retain the status quo were opposed to further controls being introduced.	Views noted.
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## 'Community'

3.1 Two **Community Council representatives** responded to the survey.

Table 21 Community Council representatives – snapshot of views

ID	Q 1 'Visual Harm Caused?'	Option 1: Status Quo	(preferred option) Option 2: Increase engagement with permitted development site operators	(preferred option) Option 3: Planning permission for 28 day sites	Option 4: planning permission for exemption certificate sites	Option 5: Introduce the requirement for planning permission for both
36	Strongly Agree	Strongly oppose	Strongly support	Strongly support	Oppose	Strongly oppose
61	Agree	Strongly oppose	Strongly support	Strongly support	Neutral	Neutral

3.2 The table above shows strong support for greater engagement and an Article 4 Direction to remove 28-day permitted development rights.

Table 22 Summary of Comments - Community Council representatives

	Summary of Comments	Recommended Response
a)	The main issues raised by the Community Councils relate to impacts of unregulated camping on local communities and visual impact. Commentators advised that the National Park Authority should be proactive in addressing breaches of permitted development rights and that greater engagement is key to improving the situation.	Views noted.

## Operating an 'Exemption Organisation'

3.3 Two **Exemption Organisations** responded to the survey. Exemption Organisations were supportive of greater engagement and placing controls on 28-day sites. They were not supportive of exempted sites being brought within planning control.

Table 23 Exemption Organisations – snapshot of views

			(preferred option)	(preferred option)		

ID	Q 1 'Visual Harm Caused?'	Option 1: Retain status quo	Option 2: Increase engagement with permitted development site operators	Option 3: Planning permission for 28 day sites	Option 4: planning permission for exemption certificate sites	Option 5: Introduce the requirement for planning permission for both
88	Agree	Oppose	Support	Strongly support	Oppose	Neutral
106	Neutral	Oppose	Support	Strongly support	Strongly oppose	Strongly oppose

3.4 The table shows that there is a good degree of conformity of responses given by the Exemption Organisations.

Table 24 Summary of Comments - Exemption Organisations

	Summary of Comments	Recommended Response
a)	There is no support for the 'retain the status quo' option, <b>but there is support for additional engagement with the National Park Authority and for an Article 4 Direction to control 28-day sites.</b>	Views noted.
b)	Unsurprisingly, the Exemption Organisations do not support additional controls for sites under their own supervision.	Objection noted.
c)	<b>There is a proliferation of 28-day sites in Pembrokeshire and particularly the National Park, particularly since the Covid Pandemic.</b> In one instance it was considered that saturation point has been reached.	Views noted.
d)	Whilst recognising that the 28-day rule provides income for landowners, <b>there was a general feeling that the economic benefits for some need to be balanced to protect the wider interests of local communities and the landscape.</b>	Views noted.
e)	The potential for returns with minimal investment was regarded as under-cutting well-established sites and generally reducing the overall standards across the industry.	Views noted.
f)	<b>Majority support for an Article 4 Direction to control 28-day sites.</b> If this is not agreed then there is a need for greater controls – possibly with prior-notification, such as in England.	Support noted.
g)	Both of the <b>Exemption Organisations consider that their operations are responsible and have adequate</b>	Support and views noted.

	Summary of Comments	Recommended Response
	<p><b>regulation.</b> Many such organisations have been operating UK-wide for many decades and maintain high standards. It was recognised however that there is a wide range of organisations and little regulation about who is granted exemption status. Both organisations welcomed greater engagement between themselves and the National Park Authority, with a need for all of the organisations to be part of the process in the interests of fairness.</p>	

## Summary

### *Operators of sites with planning permission*

There was a majority view that harm is being caused to the National Park landscape with temporary caravan and camping. Also, there was the view that more needs to be done (Option 1 to retain the status quo was not supported). There was an equal balance of views on increased engagement with Exemption Organisations (Option 2) but strong support to bring 28-day sites under planning control (Option 3) as well as sites operating under an Exemption Certificate (Option 4).

### *28 Day rule site Operator*

A small number of responses were from people who operate 28-day sites. The results show greater opposition to additional restrictions being introduced to control sites.

### *Exemption Certificate operators*

There was a majority view that that temporary sites have an adverse impact on the National Park landscape. The results show that the majority of those operating sites through an Exemption Certificate consider that additional controls are necessary. There is majority support for Article 4 Directions to control 28-day sites and a much lesser support to bring in control for all Permitted Development camping sites. More than half of the respondents were opposed to an Article 4 Direction being introduced to control Exemption Certificate sites. Operators were however in favour of the preferred option to increase engagement with permitted development site operators.

### *Tourism Operators*

Just a few of those responding identified themselves as 'Tourism Operators'. Only one person provided additional commentary. The response to the survey shows that there is both support for and opposition to increased engagement and for the introduction of an Article 4 Direction.

### *Residents*

There was a significant response from residents to the survey.

In response to Question 1 'Do you think that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape?' residents had strong majority view that temporary camping and caravan sites can have a harmful visual impact.

In terms of residents' views of Options 1 to 5:

- Residents were strongly in favour of needing to take action regarding how camping and caravanning is controlled by the National Park Authority. (Option 1)
- Residents were in the majority supporting the National Park Authority's preferred option to increase engagement with exemption organisations. (Option 2)
- Residents were again in the majority supporting the National Park Authority's preferred option to require planning permission for 28-day sites. (Option 3)
- Residents were balanced in both their strong opposition and support for requiring planning permission for sites with exemption certificates. There was however generally more support than opposition to the proposal overall. (Option 4)
- Residents were balanced in their opposition and support for the introduction of planning permission requirements for 28-day sites and for Exempted Certificate sites. (Option 5)

#### *Visitors*

Visitors provided seven responses to the survey. They provided a mixed response both in support of and opposition to greater control of sites operated using permitted development rights.

#### *Prefer not to Say*

Five commentators did not wish to say what type of stakeholder they were and were predominantly opposed to a change in approach.

#### *Community Council representatives*

The two responses show strong support for greater engagement and an Article 4 Direction to remove 28-day permitted development rights.

#### *Exemption Organisations*

Two Exemption Organisations responded to the survey. Exemption Organisations were supportive of greater engagement and placing controls on 28-day sites. They were not supportive of exempted sites being brought within planning control.

## Chapter 3 Additional Comments Received

3.1 Emailed comments were also received from Statutory Consultees, other organisations and the public. Comments received are set out below and analysis provided.

### Statutory Consultees<sup>5</sup>

#### Pembrokeshire County Council – Planning Department

##### *Covering Letter*

Thank you for consulting Pembrokeshire County Council on the Background Paper on Camping and Caravanning in the Pembrokeshire Coast National Park – Managing Impacts. Please find attached a copy of the Individual Cabinet Member Report and Decision, which sets out PCC's response to the consultation.

PCC is broadly supportive of this document but identifies a potential issue arising through displacement impacts on the Council's planning area, which may in turn require PCC to make planning interventions. This is identified as the primary anticipated planning impact. We have also commented on a number of matters of detail, including the potential for landowners to use other permitted development rights should those relating to the 28-day rule be made subject to an Article 4 Direction.

Also, so that you are aware, the Head of Cultural, Leisure, Tourism and Registration Services at PCC, Mike Cavanagh, was contacted about this consultation but in terms of the potential impacts on the tourism industry in the County considers that Visit Pembrokeshire and individual business are best placed to respond. Hence this response primarily picks up the planning service aspects.

We look forward to working collaboratively with you on this and other planning matters in the future to ensure that as far as possible a consistent and complementary approach to planning policy is taken across Pembrokeshire.

##### *Extract from the Response of the Individual Cabinet Member*

The PCNPA's preferred options are considered to be sensible, although if taken forward through planning policy interventions they will have an impact on the way in which the tourism industry in the County operates. Visit Pembrokeshire and individual tourism businesses are best placed to respond on those matters. However, there are also land use planning implications for PCC's area of planning jurisdiction, the main one being the potential for displacement impacts if new restrictions are put in place in the PCNP.

These would be most likely to affect those locations closest to the National Park boundary, which are already under pressure. South-east Pembrokeshire outside the National Park is most likely to be so affected, but there are other locations in the Council's area of planning jurisdiction that might also be affected.

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<sup>5</sup> Not submitted as part of the questionnaire.



Should such impacts arise, that might require PCC to consider taking further measures / actions such as the introduction of Article 4 Direction(s) to offset any negative consequences. That might, in turn, lead to further displacement impacts in locations farther away from the National Park boundary.

Clearly, there is a lot of uncertainty about whether any displacement impacts would be of a minor nature or more substantial. However, the potential is there for the PCC Planning Service to have to respond through policy interventions of its own and should additional planning applications come forward in PCC's planning area, that would increase the workload of the Development Management team and potentially other teams at the Council as well, for instance if legal assistance was required. At a time where staff and financial resources are constrained, the ability to take on additional work is a concern.

PCC also has some minor comments and suggestions to put forward for PCNPA's consideration. PCNPA's response is in **bold**:

- Paragraph 1.1, sentence 4 – minor typo' – the second 'within' should say 'with'. **Agree**<sup>6</sup>
- Paragraph 3.1 it is correct that Dyfed County Council was formed in the 1970s (1974). However, the Dyfed Structure Plan was not the first planning policy document there were earlier ones, prepared by the 1889-1974 iteration of Pembrokeshire County Council, although their status is not known. **Noted and reference to the Dyfed Structure Plan being the first planning policy document is deleted.**
- Paragraph 3.2 last sentence minor typo delete the second that. **Agree.**
- Paragraph 4.8 sentence one minor typo replace by with that. **Agree.**
- Paragraph 6.12 to note that the phosphates potentially arising in riverine SACs from unregulated water discharges will probably be limited by geography. It might be different in the marine (tidal) NP locations, but it is possible / likely that the more significant problem in the marine areas will be related to nitrates / agriculture. **Noted, however, description provides sufficient clarity.**
- Section 7, table 3 actions to date to try to control unauthorised development there are things in this table for all interested organisations to be aware of, including PCC. However, the comment under point 8 that The issue (relating to Exemption Certificates) was not recognised by the WG Officer and they were not minded to take any action is a particular concern. This matter comes up again under point 14 (Exemption Organisation Certificates) where Awaiting response / action from Welsh Government is recorded. PCC has similar experiences for certified sites and lack of action by Welsh Government.
- Paragraph 9.2 the conclusion of the 2015 study that there is only very limited capacity in some locations, whilst others are already at capacity, in relation to the potential for new camping and caravan sites in the National Park. The situation on this matter in locations outside the National Park is varied and PCC will be consulting on draft SPG on a Camping, Caravans and Chalet Landscape Capacity Assessment in the near future (this

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<sup>6</sup> 'Recommended Response' highlighted in blue.

will form SPG to the emerging LDP 2 and the consultation will take place alongside PCC's LDP 2, Deposit Plan 2). **Noted.**

· Paragraph 9.7 / Table 6 – PCC has some concerns that PCNPA's preferred option of introducing an Article 4 Direction to remove permitted development rights for 28-day camping and caravan sites (option 3) might result in landowners using other permitted development rights instead, which in turn might result in more certified sites and potentially could have more of an impact than those resulting from sites operating under the 28-day rule. There is potential for those currently operating 28-day sites to sign up to Exemption Organisations. **Noted. The preferred option of the National Park Authority is, however, to increase engagement with those organisations which will help to ensure that a responsible approach is taken. Monitoring of the outcomes of any action will be used to decide if further control will be necessary.**

· Table 6 point i the option is to continue to enforce against unauthorised development reported to the Authority. The outcome is recorded as This would retain the status quo which has not been sufficiently effective to date. However, PCC considers that PCNPA might still wish to do this, alongside the new measures set out elsewhere? **Agree. This will be clarified in the NPA Report that enforcement action will continue where expedient to do so.**

**The recommendation is therefore to submit the above comments as PCC's response to the PCNPA's consultation.**

**Recommended Response:** PCC's broad support is noted along with the potential concern regarding displacement impacts on the Council's planning area, which may in turn require PCC to make planning interventions. It will be important for the National Park Authority (NPA) to liaise with the Council planning department in taking forward its recommended approach. The NPA does not consider there would be significant displacement from a proposed Article 4 (1) Direction regarding the 28 day use of land for camping as the Direction would apply to the use of land. However, there may be instances where a landowner has land within both the NP and in PCCs area and there could be displacement in these circumstances. There would be potential for greater displacement if an Article 4 Direction were introduced to withdraw permitted development rights for Exempted Organisations as these organisations may actively look for potential sites in Pembrokeshire outside of the National Park in order to meet demand in Pembrokeshire.

In terms of the matters of detail a suggested response has been provided in **bold**.

## Pembrokeshire County Council – Public Protection

Below are Public Protection responses provide against the questionnaire plus additional comments.

Do you think that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape? (the response from PCC is highlighted in yellow)

Strongly agree

Agree

**Neutral**

Disagree

Strongly disagree

Prefer not to say

Please indicate your view on the following options:

**Option 1: Do nothing**

Strongly support

Support

Neutral

Oppose

Strongly oppose

Prefer not to say

**Option 2: Increase engagement with permitted development site operators (preferred option for Exempted Organisations alongside option 3)**

**Strongly support**

Support

Neutral

Oppose

Strongly oppose

Prefer not to say

**Option 3: Introduce the requirement for planning permission for camping and caravan sites which can operate for up to 28 days (preferred option)**

**Strongly support**

Support

Neutral

Oppose

Strongly oppose

Prefer not to say

**Option 4:** Introduce the requirement for planning permissions for camping and caravan sites which can operate with an exemption certificate.

Strongly support

Support

Neutral

Oppose

Strongly oppose

Prefer not to say

**Option 5:** Introduce the requirement for planning permission for camping and caravan sites which can operate for 28 days and can operate with an exemption certificate.

Strongly support

Support

Neutral

Oppose

Strongly oppose

Prefer not to say

**Additional comments:**

We would also strongly favour engagement with the exempt organisation sites as given in option 2

If they proceed then will bring a lot of pop up sites for regulation or these sites will disappear. Note they are not proposing to charge a planning fee, so nothing for operators to lose by applying , going to be a lot of enforcement for them to deal with those that don't apply

We acknowledge that this would lead to a difference between planning authorities unless PCC took the same approach.

In terms of Licensing it would not necessarily follow that a licence is needed, licensing exemptions will still apply, but some will likely be captured by licence requirements, so more sites for licensing.

We would welcome closer working (licensing and planning) sharing of information with national park on any exempt organisation or 28 day sites identified and with any codes of practice / engagement for these sites.

**Recommended Response:** The ongoing support and advice provided by Public Protection is appreciated particularly as the National Park Authority goes forward with its preferred options.

## Pembrokeshire County Council – Highways

Please see below highway authority comments on the Camping Consultation – background paper, with a response from PCNPA in **bold**.

- Does this apply to van conversions which tend to avoid on street restrictions, as well as caravans and campervans? **7If the vehicles are used for camping purposes then they would be included.**
- Para 5.3 – refers to Highway Safety, should also include sustainable access/access to facilities. The paragraph is highlighting issues caused by sites not licensed by the local authority. **Promoting active and sustainable travel is a planning consideration when considering planning applications and a requirement within the Authority’s LDP2. Recommend that it is added to the list of aspects considered.**
- Para 5.4 –makes no reference to transport assessments, sustainable travel, active travel or suitability of the infrastructure. These are issues which are considered in determining planning applications. **This paragraph refers to planning conditions.**
- Para 6.7 – that’s a loophole that seems to disregard local need and suitability, would it be possible to set up a quality charter with such organisations. **One of the preferred options of the National Park Authority is to increase engagement with Exemption Organisations which could potentially include a protocol or charter.**
- Table 3 Point 1 & 2– aerial photography updates happen once per year, which means we are looking at previous event and not live events. PCC enforcement staff is noted as being restrained by capacity, this unfortunately will not score high on the prioritising of resource. **The proposals are for the area within the National Park only.**
- Table 3 – Point 3 – If not already done, can the mapping be shared with PCC? This may be useful for enforcement and licencing purposes. **Yes.**
- Table 3 – Point 5 – may be useful to have a link from the PCC website to the PCNPA site to help publicise. **Agree.**
- Table 3 – Point 8 – is it worth liaising with WG from a road safety and active travel/accessible perspective, with regards to exemption certificates? **Continued liaison with Welsh Government is needed to cover this and other issues raised in the background paper. Assistance from the Highway Authority would be welcomed.**

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<sup>7</sup> ‘Recommended Response’ highlighted in blue.

□ Table 6 – Option 2 and 3 – preferred options supported by CHA (County Highway Authority); with a heavier inclination to Option 3. **Support noted.**

**Recommended Response:** In terms of the matters of detail a suggested response has been provided above in **bold.**

### Dwr Cymru Welsh Water

‘We note that the Local Authority’s preferred option is to introduce an Article 4 Direction to remove permitted development rights for 28-day camping and caravan sites (Option 3), and we would be supportive of the proposal as it will enable DCWW to assess the impact of developments upon our clean water and sewerage networks.’

**Recommended Response:** Support noted and welcomed.

### Mathry Community Council

‘Mathry Community Council discussed the current consultation on Camping and Caravanning within the Park. Councillors felt that the removal of permitted rights for some sites would be difficult to enforce and police and would therefore not be implemented properly. The Council was therefore not in favour of this removal.’

**Recommended Response:** The Community Council’s concerns regarding partial implementation are noted. The intention was also to introduce further engagement with exemption site organisations and operators. This would however need to be monitored and further action taken if needed in due course.

### Llanrhian Community Council

‘I am writing on behalf of Llanrhian Community Council in response to the PCNPA consultation on camping and caravanning in the Coast Park. The matter was discussed at the last meeting of the Community Council on the 5 September 2024.

The Council strongly supports Option V, namely the introduction of an Article 4 Direction to remove permitted development rights for 28-day sites and for Exemption Organisation camping and caravan sites.

The Council sees no reason why any camping or caravan site should not be subject to planning permission and site licensing. Given the existence within the Coast Park and surrounding areas of sufficient permitted and licensed sites, the Council also sees no reason why Exemption Organisations should need to use any others.’

**Recommended Response:** Support by the Community Council for a comprehensive approach is noted. The overall response from the consultation was to favour the 28-day

sites being brought under planning control. The intention was to also introduce further engagement with exemption site organisations and operators. This would however need to be monitored, and further action taken if needed in due course.

## Natural Resources Wales

'We have reviewed the consultation documents and have the following comments to make: Section 5 (scrutiny and control with planning applications) of the camping background paper lists the main aspects for consideration by the Authority during the planning application process:

- Landscape impact
- Flood risk
- Impact on neighbours
- Highway safety
- Drainage and waste management
- Protected species and habitats
- Operating times
- Agricultural land quality

A planning application ensures that all controls are put in place to safeguard the National Park from any adverse effects from non-regulated development, therefore any option which allows the above to be considered is our preferred option.'

**Recommended Response:** Support by NRW for what a comprehensive approach is noted. The overall response from the consultation was to favour the 28-day sites being brought under planning control. The intention was to also introduce further engagement with exemption site organisations and operators. This would however need to be monitored, and further action taken if needed in due course.

## Organisations<sup>8</sup>

### Grwp Resilience

'I feel that camping should be a permitted right, but caravans are different.'

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<sup>8</sup> Not submitted as part of the questionnaire.

I am glad people with land can earn a bit from camping, if there are ways to ensure the areas are nature rich and beautiful, and natural camping is allowed e.g. compost loos, wood fires from sustainably managed woods for cooking, non mains water use and vehicle greening and reduction

People camping is exactly what we want, reduces pressure on housing and encourages closeness to nature, horrified that the park would be doing anything to make it less easy and prevalent.'

**Recommended Response:** Opposition to the preferred options in relation to non-caravan forms of camping are noted. The background paper and resultant preferred options has sought to provide a balanced approach to more properly manage impacts on the environment. Adverse impacts occur as a result of both caravan and non-caravan type camping. The proposals do not bar proposals coming forward in the right place with the proper infrastructure needed to avoid damage to the environment.

## CLA Cymru

'The CLA is the membership organisation for owners of land, property and businesses in rural England and Wales. We help safeguard the interests of landowners and those with an economic, social, and environmental interest in rural land and the rural economy. CLA Cymru has approximately 2,600 members in Wales who between them own and manage roughly half of the rural land in Wales. Our membership is engaged in all sectors of the rural economy and includes farmers, landowners and around 250 types of rural business.

CLA Cymru welcomes this opportunity to respond to the consultation on the structure of Camping and Caravanning Development in the National Park.

We note the National Parks acknowledgment of the benefits of the camping and caravanning industry to the local area and its evolution over the last 70 years or so. However, the industry is also important to the stability of the rural economy, particularly at a time of changing land management priorities and the need to diversify on on-farm incomes opportunities. In addition, the industry is vital to ensuring the National Park's duty to foster the economic and social well-being of local communities.

Rural tourism is a significant driver of economic activity in Wales. It generates income and employment opportunities for local residents, helping to diversify rural areas beyond traditional sectors like agriculture and forestry. Due to agricultural transition, changing weather patterns and advances in technology, farm diversification is at the forefront for many agricultural and rural businesses. Farm diversification is crucial for several reasons and has the opportunity to support not only a farm business but also the local community, local economy and provide a betterment to the environment. It must be enabled cost effectively and with minimal administrative burden.

Despite the contribution the tourism sector makes, it is under increasing pressures from regulation changes and cost of living impacts. These include the introduction of the 182 minimum days for holiday lets, the ongoing concern and uncertainty on the introduction of the tourism tax, uncertainty and delays with the planning system, the business rates system, and a lack of clarity of post-European Union (EU) investment funding.

For many urban visitors, rural tourism such as camping creates a unique experience which not only provides leisure, mental health, and recreational benefits but can also, if done



properly, lead to increased ecological knowledge and information about green consumerism and food security.

Access to green spaces is increasingly important and within an established National Park designation is a crucial part of the park's own objectives.

The increasing pressures to the tourism industry and uncertainty within the agricultural sector could result in a devastating impact for the rural economy, specifically on the sustainability of land-based businesses. Alongside issues such as poor connectivity, a lack of infrastructure, transport links and financial investment constraints, options are limited to for CLA members and rural communities.

The consultation on camping and caravanning development in the National Park presents options for the management of new camping and caravanning sites. The options include the improvement of existing working practices or the implementation of an Article 4 Direction to remove permitted development rights (PDRs) for camp sites. Class B, Part 4 of Schedule 2 of the Town, and Country Planning (General Permitted Development) Order 1995 (GPDO) permits the '*use of any land for any purpose for not more than 28 days in total in any calendar year*' and specifically permits the use of land for a camping or caravan site. This PDR provides CLA members with a vital opportunity to diversify their landholdings and contribute to the rural economy and tourism industry. In July 2023, Pitchup.com estimated that 34% of holidays in Wales involved camping or caravanning, compared to just 20% in England and 21% in Scotland, and that demand for camping holidays in Wales had increased by a third as compared 2022.

Until July 2023, the PDRs available for camping in England and Wales were the same. However, in July 2023 the PDR was amended in England and a new PDR (known as Class BC) was introduced, allowing the use of land as a recreational campsite for up to 50 tents for 60 days in any calendar year. This saw a reduction in the number of permitted tents but an increase in the number of days permitted from 28 to 60. This amended PDR allows farmers and landowners to run pop-up sites for tents, campervans, and motorhomes for up to three months without the need to apply for planning permission. They must, however, notify the local planning authority of the site they intend to use and the dates in which they will be using it for. In addition, the new PDR in England requires applicants to provide toilet and waste facilities, and the planning authority must be informed on their location. Similar changes to the PDR would be welcome in Wales and would not only create a more level playing field in terms of the market but also increase the authority that planning departments have over these sites.

The proposal at option three of the consultation to introduce an Article 4 Direction to remove the PDR under Class B, Part 4 of the GPDO would put landowners with an interest in the National Park at an unfair disadvantage. The removal of the PDR shall result in the need for the submission of a planning application for every camping and caravanning site within the area designated. This comes at a cost for not only the landowner but will result in an increased need for resource with the planning authority. In respect of unauthorised camping and caravanning sites, at paragraph 4.6, the consultation states '*the Authority does not have sufficient resources to follow each reported breach.*' However, the additional workload created via the submission of additional planning applications shall not remediate this issue and will require additional resource.

Those sites that currently operating in breach of the 28-day PDR are already in the process of breaching planning rules. If an Article 4 Direction is put in place, it is unlikely that this will deter those sites already in breach. As such, there would be no reduction in

sites and no reduction in the subsequent submission of Lawful Development/Use Certificates. Therefore, enforcement will still be a large part of the authority's workload.

There are numerous sites within the National Park that operate appropriately under the existing PDR, removing this right would penalise those individuals through the requirement of a planning application but will not penalise those acting unlawfully. It is felt that the proposals under options three, four and five will not achieve the goal of reducing the need for enforcement or gaining control of the situation within the National Park authority. This is fundamentally due to the following concerns regarding the need to obtain planning permission:

- the speed in which planning applications are processed.
- the speed of statutory external consultee responses to planning applications.
- the interaction between planning departments and other local authority departments; and
- the lack of understanding of proposals forming planning applications and the wider impact of planning decisions.

It is unknown how many sites are operating under the 28-day rule as 'pop up' camping sites so estimating the man hours needed to cope with applications for these sites may be hard to quantify. If planning permission is required for the operation of these sites, it should be on a permanent basis rather than temporary. This would reduce the risk of potential annual delays and costs for applicants but would also reduce the administrative burden for the planning authority and statutory consultees.

Our recommendation is that the National Park proceeds with the proposed option one – continue to enforce against unauthorised development reported to the authority. An alternative option would be to introduce the requirement for prior notification for sites operating under Class B, Part 4 of the GPDO (the 28-day rule). This would bring the PDR in line with the recently amended PDR in England under Class BC, Part 4 of the GPDO. Another option would be to introduce a similar PDR as Class BC.

The CLA understands the underlying issues of an underfunded planning system and the difficulties that planning authorities face in terms of recruitment and retention. The CLA has produced the Senedd Cross Party Group (CPG) for Rural Growth's report, *Generating Growth in the Rural Economy: an inquiry into rural productivity in Wales*<sup>9</sup>. Chapter 4 focusses on housing and planning and recommends additional funding for additional planning officers in all planning authorities in Wales. Whilst this is a recommendation for the planning system as a whole rather than related specifically to this consultation, it must be recognised that the planning system cannot continue to operate in its current state. Landowners and providers of rural tourism must not feel the brunt of the wider issue of resourcing via loss of PDRs such as the 28-day rule for camping.

We understand the additional pressures NP facilities to cope with visitor numbers but with increased numbers of visitors and lack of destination management across Wales, can Wales afford to increase barriers to facility development to cope with visitor numbers?

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<sup>9</sup> [https://www.cla.org.uk/news/largest-ever-cross-party-senedd-investigation-into-the-needs-of-the-rural-economy/?\\_gl=1\\*1r6xf50\\*\\_up\\*MQ..\\*\\_ga\\*MTk4NDM5MzI3Mi4xNzI1NDY5NDg0\\*\\_ga\\_L7QVREE7XE\\*MTcyNTQ2OTQ4NC4xLjAuMTcyNTQ2OTQ4NC4wLjAuMA..](https://www.cla.org.uk/news/largest-ever-cross-party-senedd-investigation-into-the-needs-of-the-rural-economy/?_gl=1*1r6xf50*_up*MQ..*_ga*MTk4NDM5MzI3Mi4xNzI1NDY5NDg0*_ga_L7QVREE7XE*MTcyNTQ2OTQ4NC4xLjAuMTcyNTQ2OTQ4NC4wLjAuMA..)

January to June 2023, saw trips to the countryside or a village made up 26% of trips taken in Wales, an increase from the same period in 2022 (from 24%). Some 19% of trips were taken to coastal areas. Compared to the rest of Great Britain, countryside and coastal areas make up a considerable proportion of all trips taken; nearly 50% in Wales, compared to just over 30% in the UK as a whole. To allow the sector to grow responsibly and with flexibility of timely decision making the negative impacts of increased bureaucracy must be considered if the resolution of the real issues will not be met.

#### Key Points:

- We do not support the proposal to implement an Article 4 Direction removing permitted development rights for the operation of camping and caravan sites for up to 28 days in any calendar year. This will be an unnecessary burden to rural businesses and will put Wales at a disadvantage to English businesses operating in the same way.
- If deemed necessary, any planning permissions granted must be on a permanent basis rather than a temporary basis. This would lessen the administrative burden to the planning authority and applicants.
- Any proposal to remove permitted development rights must not set a precedent for future decision making within the National Park authority. It must be recognised that permitted development rights have a part to play in the planning system as a whole but also in the National Park. Their use is economical as it leads to savings on planning department resources and allows that resource to be better spent focussing on larger scale development or the preparation of planning policies.
- Underfunding and lack of resource in National Park and local authorities should not be the reason for the removal of permitted development rights that contribute in such a substantial way to the rural economy and tourism. For this reason, option one is the most sensible within this consultation and improved funding must be sought and provided on a national level to assist planning departments in addressing the resourcing issue which is at the heart of the problem for the planning system.'

**Recommended response:** The intention of this proposal is to ensure that National Park communities, environment and landscape is not compromised by increasingly harmful effects of camping operating under and beyond permitted development rights.

The benefits of camping to the local economy are acknowledged, but issues detailed in the background paper to this consultation highlight the need for an appropriate balance to be struck. The Authority's preferred option of introducing an Article 4 Direction for 28-day sites will allow landowners to continue using their land as camping sites with the appropriate checks and balances in place to redress the need to protect the National Park communities, environment and landscape.

Increased engagement with site operators will help with managing how sites are operated and managed.

The need for 28-day sites to apply for planning permission will provide the National Park Authority with an improved record of sites operating within and outside of planning controls.

The assumption that those currently breaching planning regulations will continue to do so is supposition. The National Park Authority has a responsibility to protect and enhance the

special qualities of the National Park which is currently being undermined by the increasing number of sites operating under and beyond permitted development rights.

Agree that it is not known how many applications would be submitted for 28-day sites. Decisions will need to be made in accordance with the Local Development Plan and any other material planning considerations.

The need for introducing stricter controls on camping and caravanning in the National Park are set out in the background paper to this consultation. The number of sites operating under the umbrella term 'permitted development rights' has increased significantly in recent years which increased the pressure on the Authority's enforcement resources. The absence of requirements to control an increasingly prevalent way of operating camping sites with regard to matters such as waste, water and protection of the environment is having a detrimental impact on the Special Qualities of the Park and some of its communities.

A change to a prior notification system and permitted development rights is not within the powers of the National Park Authority and would require Welsh Government action. It is not considered that such a change would provide sufficient control to address the adverse impacts being experienced regarding increased numbers of camping sites operating under permitted development rights.

## Boutique Resorts

'My feedback / opinion on the topic however can be quickly summarised and I am more than happy to add more to it at a round the table meeting if it would help. As a long standing existing holiday park owner who has to adhere to all the relevant rules and regulations to keep my licence to operate, it is easy to imagine my discord with non licensed operators being able to set up with no such standards to adhere to, making for an unfair commercial environment. Further to that it gives way to poor and in fact dangerous experiences being had by visitors who may then be put off from future visits to our lovely county.'

However, my view is that these pop ups, if controlled and regulated, could be a positive addition to the tourism offer at peak times when there is often too little capacity. Allowing land owner to open up at these times, if applied for in advance and having to meet the same site licence criteria as we do, would serve to allow that boost of tourism activity in a positive way so I feel that rather than banning it, the authority should seek to control it instead.

What there is a lack of in the county is more luxury and modern accommodation that todays all year round visitors are looking for. Utilising short term permissions to take the camping pitches would keep that accommodation stock available and existing operators could then be encouraged to convert their camping pitches to a smaller number of high quality accommodation that attracts all year round visitors to bolster the economy and job creation for the long term prosperity of the area.'

**Recommended Response:** Support for a controlled and regulated approach is noted. The Local Development Plan (LDP2) for the National Park allows for a change of pitch types within existing camping and caravan sites.

## Friends of Pembrokeshire Coast National Park

'We recognise the need to manage the impact of temporary campsites on the special qualities of the National Park. Whilst there are some benefits in terms of enabling greater access to the National Park, the health and wellbeing benefits of outdoor camping and the benefits to the local economy, we consider these are outweighed by the adverse impacts, particularly the impact on the landscape capacity and water quality. We therefore support the proposed actions and the adoption of options 2 and 3, as set out in the consultation document.

When implementing the changes in respect of the 28 day sites, the NPA needs to take steps to mitigate the impacts of applying for planning permission. This imposes an additional burden on landowners whose sites are currently well managed and could deter landowners from holding one off events. Steps which could be taken include:

- Allowing sufficient lead time for applying for permission
- No requirement to apply for permission every year for regular events (such as festivals)
- Enabling fast track applications if permission needed for an event

Whilst we understand the reasons why it is recommended that the article 4 direction is not extended to exempted sites, the NPA needs to work with Exempted Organisations to develop a robust Code of Conduct to ensure that organisations improve and enhance standards and operate effective working practices.

We remain concerned that 400 pitches are operating under Certificates of Lawfulness, most of which would not have been granted planning permission. This highlights the weakness of the current enforcement regime which has allowed these sites to operate beyond the 28 day limit without any enforcement action being taken for 10 years.

For the new regime under the Article 4 direction to be effective, the NPA will need to ensure that there are sufficient resources for enforcement and monitoring.'

**Recommended Response:** Support for the preferred options is noted along with the advice regarding the need for ongoing monitoring and enforcement.

The Authority is currently considering a protocol for certain types of planning application, including those for 28-day camping sites, to be fast-tracked. In addition, a long lead-in time to the implementation of the Article 4 Direction would give site operators sufficient time to find out the requirements of submitting a planning application. It may be possible for regular events to have longer planning permission where the location and approximate dates of operation are known. This would remove the need to apply for permission on an annual basis.

## National Trust

'I refer to the above consultation and provide the response from National Trust to the consultation.

We own and manage 157 miles of the Welsh Coast including some of the most iconic areas of the Pembrokeshire Coast. One step in 10 on the Wales coast path runs through National Trust land. Our engagement with visitors lies at the heart of our business operations including coastal car parks, a diverse tourist accommodation offer, visitor centres, access, school and education visits and land management.

Tourism remains the mainstay of the economy of Pembrokeshire, and National Trust is proud of the part it plays in providing a warm welcome to locals and visitors alike. We have a camping offer at our main site in Gupton and several of our tenants in Pembrokeshire provide a camping offer to visitors. NT is an Exempted Organisation under Paragraphs 4,5,6 of the Caravan and Control of Development Act 1960 and has a camping exemption under Paragraph 269 of the Public Health Act 1936.

National Trust welcomes the opportunity to comment on this consultation.

National Trust fully supports the National Park in its current approach to manage camping and caravan site developments in the National Park. NT endorse the suite of issues identified within Table 5 of the consultation. We will continue to work with the National Park on site specific and wider policy issues (as discussed within para 11 of Table 3).

NT supports the considerable work completed by the National Park in taking forward the LDP2 policies and Supplementary Planning Guidance for new and existing sites in the National Park.

National Trust accepts the need for action in this area and would not support the do-nothing option (Option 1).

National Trust support the National Park Authority option to introduce an Article 4 Direction to remove permitted development rights for 28-day camping and caravan sites (Option 3). We also support the proposed increased engagement with permitted development site operators and Exempted Organisations by introducing a voluntary Code of

Conduct / Working Protocol (Option 2).

We welcome greater engagement and monitoring of the issues addressed in the background paper and hope that sufficient resources can be made available (both within the NPA and other key organisations such as NRW and CADW) to implement the proposed measures.

In terms of the specific questions raised in the consultation, the response is provided below.

- Do you think that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape? Strongly Agree.

-Option 1 (Do nothing option). Strongly oppose.

-Option 2 (Increase engagement with Site operators). Strongly support.

-Option 3 (Remove 28 day permitted development). Support.

National Trust wish to be kept informed of progress in relation to this consultation.'

**Recommended Response:** Support for the preferred options is noted along with the need for the National Trust to be kept informed of progress.

## The Coal Authority

‘The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the Pembrokeshire Coast area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.

I have reviewed the consultation and note it relates to Camping and Caravan Site developments in the area. I can confirm that the Planning team at the Coal Authority have no specific comments to make on this.’

**Recommended Response:** Noted

## Public <sup>10</sup>

3.2 There were six further responses from members of the public which are summarised in the table below with a recommended response.

*Table 25 Summary of Comments – Public*

	<b>Summary of Comments</b>	<b>Recommended Response</b>
a)	Camping should be a permitted right, but caravans are different.	Camping is undertaken in a range of accommodation including tents, caravans, campervans, motorhomes, tipis, yurts, shepherd huts and pods. Under permitted development rights, limited numbers of non-tent accommodation is allowed but landowners do not always control numbers. Large numbers of tents can also cause problems.
b)	Glad that people with land can earn money from camping where natural and nature-rich areas are used for natural camping with compost toilets, managed woods, non-mains water and green travel.	Noted, however permitted development rights do not specify these requirements.
c)	Camping reduces pressures on housing and encourages closeness to nature.	Camping is one type of visitor accommodation. There are a wide

<sup>10</sup> Not submitted as part of the questionnaire.

	<b>Summary of Comments</b>	<b>Recommended Response</b>
	Park should not do anything to make it less prevalent.	range of places for visitors to stay within the National Park and that is personal choice. The proposal is to control the impacts that camping is having on local communities and the environment. This may include the need to control the number of sites operating in a particular area.
d)	I have read the documents and have the benefit of the workshop that was arranged for Members on this subject and I am content with the Authority's proposed option 3 together with increasing engagement with permitted development site operations which is option 2.	Noted.
e)	Local authorities are bound to consider the needs of all consumers. There is a huge demand for camping 'Aires' which are popular with motorhome and campervan users throughout Europe. They are complementary to camping sites and provide over-night stop over pitches. Campsites are used for longer stays. Council car parks could be used for this use.	The increasing demand for Aires is acknowledged but it is not part of this current consultation.
f)	Day-time parking for motorhomes and camper vans is an important consideration. Many National Park and Pembrokeshire County Council car parks prohibit overnight parking. These are therefore not adequately provided for.	Noted. This is not a matter for this current consultation.
g)	Article 4 will prevent any new campsites and aires within the National Park.	This would not be the result of the preferred options proposed. New sites/aires would require planning permission.
h)	Rallies will require planning permission	This option is to remove permitted development rights for 28-day sites. It would not affect the permitted development rights enjoyed by Exemption Organisations.
i)	It would be detrimental to local businesses and tourism.	Applications for development formerly permitted as permitted development but controlled by an Article 4 Direction are not charged. There may be costs to comply with other requirements to operate a camping site safely and in accordance with regulations.
j)	The number of motorhome and campervan users has increased in recent	The rule of 5 per site is written in the permitted development legislation and cannot be amended by the



	Summary of Comments	Recommended Response
	years and the rule of 5 per site is inadequate.	National Park Authority. Where planning permission for sites is sought, the number of campervan pitches can be a matter for consideration.
k)	Many motorhome and camper van owners are retired and respectful and leave sites in a better condition than before.	Views noted.
l)	Pub car parks are used in some locations for overnight stays.	Using pub car parks for overnight camping is not allowed under current permitted development rights and requires planning permission.
m)	My understanding is that some exempt organisations (Caravan and Camping Club, for example) will not licence a site if the LPA offers substantial objections to the proposal.	Most Exemption Organisations undertake consultation with the National Park Authority. This is not currently a requirement for landowners operating a 28-day site.
n)	<p>If the Welsh Government introduced a condition that all proposed sites, on initial application or any subsequent renewal, should be referred to the LPA, and, if the LPA objected, then the proposal might be refused or amended accordingly.</p> <p>Any requirement that exempted organisations should merely 'have regard' for the LPA's would, of course, be inadequate.</p>	<p>Welsh Government guidance for Exemption Organisations include a 'model code of conduct' which states that <i>'The organisation will agree to move from and avoid any sites to which the local authority objects'</i>.</p> <p>There are varying degrees of compliance from the Exemption Organisations in meeting the code. It is hoped that the preferred option to improve engagement with the operators will achieve a better understanding and application of agreed outcomes.</p>
o)	Details provided of a site which appears to have expanded in area. Any such extensions in area or numbers of pitches should not be allowed without referral to the planning or licencing authorities.	Twenty-eight day sites are not limited to specific areas and there is potential to expand. Exemption Organisations generally indicate the landholding when consulting the planning authority although definition of a specific site area is not required under current arrangements. The preferred options would help to ensure site sizes are scrutinised.
p)	Exemption Organisations should be brought under stricter regulation by Welsh Government, particularly within protected landscapes. All proposals should be subject to review by the National Park Authority and any conditions complied with.	This would be a matter for Welsh Government.

	<b>Summary of Comments</b>	<b>Recommended Response</b>
q)	Exemption Organisations should withdraw site certificates where conditions are breached.	Welsh Government has the ability to do this in some circumstances.
r)	The National Park Authority should monitor all sites.	The preferred options would help to achieve better overall monitoring of sites.
s)	Oversight of sites by Exemption Organisations appears to be very limited. Bringing 28-day sites and Exemption Organisation sites under control with an Article 4 Direction is the most effective way of dealing with this issue.	Support noted.

## Summary

Responses were received from Pembrokeshire County Council planning, public protection and the highways department.

- PCC's broad support is outlined along with the potential concern regarding displacement impacts on the Council's planning area, which may in turn require PCC to make planning interventions. This is identified as the primary anticipated planning impact. It will be important for the National Park Authority to liaise with the Council planning department in taking forward its recommended approach.
- The ongoing support and advice provided by Public Protection is outlined particularly as the National Park Authority goes forward with its preferred options.
- The Highways Department provided detailed comments on the Background Paper which are dealt with in Chapter 3.

Dwr Cymru supports the approach being taken as it will enable Dwr Cymru to assess the impact of developments upon water and sewerage networks.

Community Councils (2 responses) were concerned about partial implementation i.e. not including Exempted sites.

Natural Resources Wales advised 'A planning application ensures that all controls are put in place to safeguard the National Park from any adverse effects from non-regulated development, therefore any option which allows the above to be considered is our preferred option.'

In summary, statutory consultees were supportive of introducing increased controls to ensure impacts are properly assessed.

### *Other organisations*

Responses were received from a range of organisations. Views varied from opposition to controls of campervanning to opposition to controls on camping. There was opposition to any controls at all. The CLA Cymru highlighted issues such as:

- Burdens on rural business in Wales
- The need to ensure that permissions granted are permanent if these options are progressed.

- With the underfunding of National Park Authorities then this is what should be addressed to allow the planning authority to carry out its planning function rather introducing additional controls.

Responders also supported a controlled and regulated approach (Boutique Resorts). Friends of the National Park supported greater control being exercised but cautioned against placing an additional burden on landowners. Suggestions include providing a lead in time to applying for permission and fast-tracking applications. The National Trust were supportive of the approach being taken and wished to be kept informed.

#### *Public*

There was a mix of comments emailed in from members of the public.

## Appendix A Press Release

*For immediate release*

*Wednesday 1 May 2024*

### **Public to be consulted on the issue of temporary campsites within the National Park**

Pembrokeshire Coast National Park Authority will soon be gathering views from members of the public on the impact of caravan and campsites in the National Park.

In a National Park Authority meeting on 1 May 2024, Authority Members approved a proposal to consult with the public on a range of proposed options to control caravan and campsites. The consultation does not cover existing sites with planning permission, but focuses on temporary sites operating under what are known as permitted development rights.

Feedback from the consultation will help to inform how the Authority considers permitted development rights in the future, with a number of options currently being considered.

The Authority's preferred option is the introduction of an Article 4 Direction, which would mean operators of temporary 28-day campsites within the National Park would require planning permission.

The second preferred option is to introduce a voluntary code of conduct for exempted organisations, which currently have the right to run or approve caravan and campsites without the need for planning permission or a licence.

At present, there are 7,500 pitches within the boundaries of the Pembrokeshire Coast National Park, either with planning permission or operating under an exemption certificate. There is also a significant number of what are now popularly termed 'pop-up' camping sites, operating under the 28 Day Rule.

Concerns have been raised in recent years however, due to increasing numbers of operators not adhering to the 28-day permitted development rights, with many temporary campsites operating for a much longer period of time, which can be up to 6 months of the year.

Sara Morris, Pembrokeshire Coast National Park Authority's Director of Placemaking, said: "While these forms of development have contributed greatly to the number of camping and caravan pitches in the National Park, it has also given rise to campsites coming into existence without the degree of scrutiny or public consultation given to sites going through the official planning application process.

"As well as putting a strain on the Authority's ability to fulfil its main statutory purpose of conserving and enhancing the natural beauty, wildlife and heritage of the National Park, the current situation is also undermining our ability to properly plan for the area and pursue a strategy of regenerative tourism."

The National Park Authority commissioned a study in 2015 to examine what capacity there is to accommodate more sites within the National Park without harm to the landscape. The conclusion was that there is only very limited capacity in some locations, while others are already at capacity.

In addition to this, informal workshops conducted with statutory undertakers in late 2023 highlighted concerns around potential impacts on water quality and capacity as well as these landscape concerns.

The consultation, which will be launched in late May, will run until 5pm Friday 20 September 2024 and will be made available at [www.pembrokeshirecoast.wales/get-involved/public-consultations/](http://www.pembrokeshirecoast.wales/get-involved/public-consultations/) upon launch.

Following public feedback, Members will consider the next steps required. If an Article 4 Direction is chosen as a preferred option, then a formal notice regarding this process will be issued in October 2024 with the opportunity for formal responses to be made to the Authority over a three month period. The potential introduction of any such Article 4 Direction would then take place in Autumn 2025.

## **Ends**

**Caption:** Pembrokeshire Coast National Park Authority will be consulting with members of the public on the impact of temporary campsites in the National Park.

Appendix B Online Questionnaire – separate PDF document

# Questionnaire for consultation on Camping and Caravanning Development in the National Park

This consultation is seeking your views on the best way forward for the Authority to address camping and caravan developments in the Pembrokeshire Coast National Park.

The Town and Country Planning (General Permitted Development) Order 1995 (as amended) allows temporary caravan and campsites to operate without the need to apply for planning permission as follows:

- for up to 28 days a year
- for up to 60 days a year with an exemption certificate

The National Park Authority and other organisations in Pembrokeshire 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. Evidence set out in the Consultation Background Paper on Camping and Caravanning in Pembrokeshire Coast National Park – Managing Impacts – sets out issues that have arisen from an increase in camping and caravanning activity, particularly in the last decade. The Background Paper sets out a number of options to manage new camping and caravan sites and we are seeking your views on the options.

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 (option 3). Alongside this Officers of the Authority consider that increasing engagement with permitted development site operators, particularly Exempted Organisations by introducing a voluntary Code of Conduct / Working Protocol could improve and enhance standards and effective working practices (option 2).

The Authority welcomes your views on the proposed options to inform the future action that the Authority will take.

**Do you think that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape? \***

Strongly Agree

Agree

Neutral

Please expand on your answer below:

**Please indicate your view on the following option: \***

Strongly support

Support

Neutral

**Option 1:** Do nothing

Reason for response:



**Please indicate your view on the following option: \***

Strongly support      Support      Neutral

**Option 2:**

Increase engagement with permitted development site operators **(preferred option for Exempted Organisations alongside option 3)**

Response:



**Please indicate your view on the following option: \***

Strongly support      Support      Neutral

**Option 3:**

Introduce the requirement for planning permission for camping and caravan sites which can operate for up to 28 days **(preferred option)**

Response:

**Please indicate your view on the following option: \***

Strongly support      Support      Neutral

**Option 4:**

Introduce the requirement for planning permission for camping and caravan sites which can operate with an exemption certificate

reason for response:

**Please indicate your view on the following option: \***

Strongly support      Support      Neutral

**Option 5:**

Introduce the requirement for planning permission for camping and caravan sites which can operate for 28 days and can operate with an exemption certificate

response:

If you have any additional comments on your answers, or a different preferred option, please add below:

Which of the following best describes you? \*

- I operate a caravan and/or camp site which has planning permission
- I operate a caravan site and/or camp site which operates through an exemption certificate
- I operate a caravan and/or camp site under the '28 day' rule
- I am a tourism operator
- I am a local resident
- I am a visitor
- Prefer not to say
- Other

If you like to be contacted about the progress of this consultation, please leave your name and email address below:

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## PCNPA Integrated Assessment Template

**Title of what is being Assessed: Measures to control camping and caravan development in the National Park: Article 4 (1) Direction for 28-day camp sites and a Code of Conduct for Exempted Organisations (Stage 2)**

**Is this a staged Integrated Assessment:** Yes. Stage 1 Integrated Assessment was completed for NPA on 1 May 2024 prior to consultation. This is a stage 2 Integrated Assessment following the public consultation period. It is proposed to progress with options 2 and 3:

Option 2: the introduction and consultation on an Article 4 (1) Direction to withdraw permitted development rights for 28 day camp sites, and

Option 3: the introduction of a voluntary code of conduct/working protocol for Exempted organisations regarding the selection and operation of sites

This document is a multi-purpose tool ensuring the appropriate steps are taken in our plan, policy and decisions making processes to:

- Comply with the Public Sector Equality Duty (we are required to assess equality impacts under the Welsh Specific duties.)
- Demonstrate that we have shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the Socio-Economic Duty.
- Ensure we are considering impact on Health and Well-being
- Ensure consideration of the Welsh Language Standards.
- Ensure we are considering the Section 6 Biodiversity Duty and wider decarbonisation considerations in our plans and decision-making processes.
- Ensure we are considering the Well-being Goals for Wales, 5 Ways of Working under the Well-being of Future Generations Act and any relevant future trends/ horizon scanning information.

### **Benefits of undertaking an Integrated Assessment:**

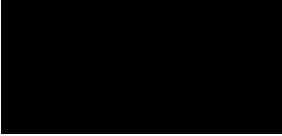
- Gain a better understanding of those who may be impacted by the plan, decision, policy, or practice.
- Better meet differing needs and become more accessible and inclusive.

- Enable planning for success – identifies potential pitfalls and unintended consequences before any damage is done.
- Prevent poor decisions, or worse, having to reverse decisions, thus avoiding cost and reputational implications.
- Demonstrate decisions are thought through and have taken into account the views of those affected.
- Enable us to manage expectations by explaining the limitations within which we are working (e.g. budget)
- Help avoid risks and improve outcomes for individuals.
- Remove inappropriate or harmful practices and eliminate institutional discrimination.
- Ensure we put the Welsh and English Language on an equal footing.
- Ensure we are embedding biodiversity and decarbonisation considerations in everything that we do.

### Section 1 – Details of the Strategic Plan, Policy, or Decision

<p><b>Name of Strategic Plan, Policy or Decision being assessed</b></p>	<p>Introducing an Article 4 (1) Direction to enable the management of the caravan and camping sites that do not currently require planning permission when operating for a 28 day period in the manner specified under:</p> <ol style="list-style-type: none"> <li>1. Class B of Part 4 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended) permits the temporary use of any land for a range of uses for not more than 28 days in total in any calendar year. This permitted development does not include the use of the land as a caravan site but does permit tents.</li> <li>2. Class A of Part 5 of Schedule 2 of the Town and Country Planning (General Permitted Development Order) 1995 (as amended) permits the use of land as a caravan site in circumstances referred to in paragraph A.2. This paragraph refers to those specified in paragraphs 2 to 10 of Schedule 1 of the 1960 Act. The 1960 Act permits under paragraph 2 use of land as a caravan site for not more than 28 days with the siting of one caravan for no more than two nights. Under paragraph 3 it permits use of land on land-holdings of 5 acres or more for the use of the land for up to 3 caravans or motorhomes or campervans. No structures other than the most basic, temporary facilities such as a standpipe and portaloo are permitted without planning permission.</li> <li>3. Class B of part 5 of Schedule 2 of the Town and Country Planning Act (General Permitted Development Order) 1995 (as amended) permits the use of a mobile home for not more than 28 days with the siting of the mobile home for no more than 2 nights.</li> </ol>
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	Setting up a voluntary Code of Conduct for Exempted Organisations regarding the selection and operation of sites								
<b>Department/ Service Area</b>	Planning								
<b>Officer Responsible for Impact Assessment</b>	Name: Emma Gladstone (Strategic Policy Manager). Stage 1 was undertaken by Martina Dunne M & S Town Planning Ltd on behalf of Sara Morris.								
<b>Responsible Senior Manager</b>	Name: Sara Morris Title: Director of Placemaking, Decarbonisation and Engagement								
<b>Timetable for the Assessment</b>	<p>Stage 1 Assessment to accompany the National Park Authority Committee papers NPA 1st May. The Stage 1 Assessment was undertaken prior to a 3-month public consultation.</p> <p>This Stage 2 Assessment is undertaken post consultation and the proposal is to introduce a non-immediate Article 4 (1) Direction for 28-day caravan and camping sites and establish a Code of Conduct /Working Protocol for Exempted Organisations, subject to NPA approval on 11 December 2024.</p> <p>The proposed timescale for introducing the Article 4(1) Direction is as follows:</p> <table border="1"> <thead> <tr> <th>Stage</th> <th>Timescale</th> </tr> </thead> <tbody> <tr> <td>Article 4 (1) Direction: Date of Execution</td> <td>December 2024</td> </tr> <tr> <td>Notice of Article 4 Direction given with a 6 week period for formal representation</td> <td>January to February 2025</td> </tr> <tr> <td>Report on formal representations to National Park Authority with a recommendation on whether to confirm or not. Members decide whether to confirm. If confirmed notice of</td> <td>March or May 2025</td> </tr> </tbody> </table>	Stage	Timescale	Article 4 (1) Direction: Date of Execution	December 2024	Notice of Article 4 Direction given with a 6 week period for formal representation	January to February 2025	Report on formal representations to National Park Authority with a recommendation on whether to confirm or not. Members decide whether to confirm. If confirmed notice of	March or May 2025
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	confirmation must be given along with the date the Direction takes effect.		
	Article 4 (1) Direction to take effect	1 January 2026	
<b>Monitoring and Review of Assessment</b>	See above under Timetable for the Assessment.		
<b>STAGE 2 (POST PUBLIC CONSULTATION): Chief Executive Sign Off – Completed Assessment and Summary/ Recommendations</b>	<div style="text-align: right;">Sign off date:</div> <div style="text-align: center;">  </div> <div style="text-align: right;">26/11/2024</div>		

## Section 2 – Aims and Overview of the Strategic Plan, Policy, or Decision

<b>What is its proposed purpose?</b>
<p>To introduce a non-immediate effect Article 4 (1) Direction for the whole of the Pembrokeshire Coast National Park. The Article 4 (1) Direction would remove permitted development rights for the use of land for camping and/or caravans for not more than 28 days. Currently permitted development rights allow:</p> <ul style="list-style-type: none"> <li>(a) Tents and trailer tents to be used for no more than 28 days in a calendar year.</li> <li>(b) No more than three caravans to be stationed for no more than two nights for each caravan at any one time for no more than 28 days in a calendar year in total on land of 5 acres or more.</li> <li>(c) No more than one caravan/mobile home to be stationed for no more than two nights for no more than 28 days in a calendar year in total on land of less than 5 acres.</li> </ul> <p>This means, following the implementation of an Article 4 (1) Direction there would be a need to obtain planning permission to use land in the manner set out above. These developments are currently regarded as 'permitted development rights' in accordance with the Town and Country Planning Order (Permitted General Development) 1995 (as amended), i.e. that the use of land of 5 acres or more as a caravan site in the circumstances prescribed without the need to obtain planning permission for that use.</p>



**Explanatory Note of Permitted Development Rights under The Town and Country Planning (General Permitted Development) Order 1995: Part 5 A Permitted Development:**

**PERMITTED ON A '28 DAY' SITE**

- Tents and trailer tents
- Glamping accommodation without solid bases
- Moveable structures on wheels or skids in connection with the use of the site, including portable toilets.
- Vehicles used solely for transportation to the site (cars, vans, and trailers)
- Land over five acres – up to three caravans can be pitched at a time. The maximum stay for each caravan is two nights.
- Land under five acres – only one caravan can be pitched at a time. The maximum stay for any caravan is two nights.

**NOT PERMITTED ON A '28 DAY' SITE**

- Glamping accommodation with solid bases – including but not restricted to: yurts, tipis, pods, and bell tents
- Any permanent structures including but not restricted to: agricultural buildings, toilet blocks, shops, laundry rooms
- Mobile holiday homes, Recreational Vehicles (RVs)
- Temporary facilities on wheels or skids that require separate licensing, including but not restricted to: 'burger vans'
- Any electrical hook-up points and/or substantial utilities services such as stand-alone sinks uncharacteristic of agricultural fields.

Land combined within existing caravan sites cannot be used as a 28-day site.

To introduce a voluntary Code of Conduct / working protocol for Exempted Organisations regarding the selection and operation of sites to comply with National Park planning policies and other statutory undertaker requirements.

**Is it new or existing and under review?**

New

**What will change as a result of it and/or what changes are being proposed?**

See above under '**What is its proposed purpose?**'. Planning permission would be required for the use of land for camping and/or caravans for not more than 28 days.

The Code of Conduct / Working Protocol for Exempted Organisations would improve dialogue and collaboration with Exempted Organisations to ensure compliance with the Authority's planning policies and other statutory undertaker requirements.

### What are its anticipated notable outcomes (positive and negative)?

#### Positive:

- More comprehensive control to assessing the impacts of caravan and camping in the National Park, enabling the Authority **to ensure that proposals are compatible with the strategy of the Pembrokeshire Coast National Park Local Development Plan 2 and the purposes of National Parks**. The purposes of National Parks are to:
  - Conserve and enhance the natural beauty, wildlife, and cultural heritage of the area.
  - Promote opportunities for the public understanding and enjoyment of the special qualities of the Parks.The duty to foster the economic and social well-being of local communities within the National Park is in pursuit of those purposes.
- **A re-focusing of National Park Authority resources** (and those of partner organisations) from being reactive to unauthorised caravan and camping sites to building relationships with exemption organisations and other key stakeholders.
- Introducing an Article 4 (1) Direction for the entire area would ensure that **the amenities of the National Park's residents are protected, including those individuals with protected equality characteristics**. It would also ensure that the vision and objectives of a range of relevant strategies and policies, are considered when assessing the appropriateness of the proposed development (in accordance with the local planning policy guidance). **Note** that these policies and strategies have also been subject to a relevant Impact Assessment. Furthermore, it is noted that this method of introducing the Article 4 (1) Direction would ensure there is no doubt regarding the geographical area where the intervention would be implemented and this would ensure that the residents of the entire National Park are subject to the same intervention/protection.
- The Code of Conduct would improve dialogue and collaboration with Exempted Organisations regarding the selection and operation of sites in compliance with national regulations, local planning policies and other statutory undertaker requirements.

#### Negative:

- **Individual landowners** who have operated a 28-day rule site in the past or are intending to do so would be required to apply for planning permission. No application fee is required for those proposals which would have benefited from the 28-day permitted development rule. Costs may be incurred where a planning consultant is engaged. Guidance is provided by the Authority setting out how proposals would be considered – see Appendix D to the NPA's Report, 1 May 2024. The Article

4(1) Direction would be implemented without immediate effect which would provide a 12 month period to seek planning permission which is considered to be a sufficient time frame.

- The Code of Conduct / working protocol would be voluntary and Exempted Organisations may not sign up to the Code of Conduct.
- The establishment of the Code of Conduct would incur a cost to the Authority. The cost is estimated as £15,000 per year. This would be an additional cost to the Authority, however it might be possible for Welsh Government or the organisations themselves to contribute towards this cost.

#### **Detail the budget implications relating to it?**

Budgetary provision is made for the Article 4 (1) Direction within existing budgets. The Authority is not able to legally charge a planning fee for any planning application for a 28 day site received – this would be a free application. There would therefore be a resource implication for the Authority in considering such applications. Set against this however, is the fact that the Authority's Enforcement Officers are currently spending considerable time dealing with reported planning breaches for which no fee is provided – overall it is the Officer view that the changes would simplify enforcement investigations and result in a net reduction in officer time on this area of work.

Setting up a voluntary Code of Conduct / Working Protocol with exempted organisations would also represent a cost to the Authority. The Authority currently operates a similar system with the Marine Code and Outdoor Charter at a cost of £15,000 per year to administrate both codes. This would be an additional cost to the Authority, however it might be possible for Welsh Government or the organisations themselves to contribute towards this cost.

Having considered approaches elsewhere, direct administrative implications for the National Park Authority are set out below:

#### **Pros**

- Reduction in enforcement cases for the Authority
- Reduction in number of Certificate of Lawfulness applications and high pitch numbers in sensitive areas
- Fee payable for applications wishing to operate beyond current PD rights.
- Reduction in complaints
- Develop positive relations with site operators.
- Greater knowledge and control over sites and location

**Cons**

- Cost of preparing and implementing an Article 4 Direction
- No fee applications for new sites for 28-day use
- Increased number of applications in short-term
- Increased number of Certificate of Lawfulness applications in short-term
- Increased officer time for liaison

**Indicate which groups of people will be, or potentially could be, impacted upon by its implementation (e.g. service users, employees, volunteers, people living in particular communities)? Please include any equality or socio-economic disadvantaged groups likely to be affected**

National Park landowners (land of more than 5 acres). Farming Community. Residents of Pembrokeshire. Visitors to Pembrokeshire. Rangers. Planning/Enforcement Officers. Members.

**Is the policy related to, influenced by, or affected by other policies or areas of work (internal or external) and any assessments carried out on them?**

Yes, the Local Development Plan 2 and its associated Assessments, i.e. Strategic Environmental Appraisal, Sustainability Appraisal, Habitats Regulations Assessment, Equalities Impact Assessment.

### Section 3 – Considering the Evidence and Assessing Impact

This section considers what data, information, consultation, and engagement feedback has been reviewed as part of the plan, policy, or decision development process. Relevant information will then be used to assess potential impact of the plan, policy or decision and potential mitigating action needed. Gaps in data and knowledge are also noted.

#### Equality/ Socio Economic Disadvantage and Inequality of Outcomes/ Health Inequalities and Outcomes

Depending on what is being assessed you can either take a thematic approach or a group focused approach, please speak to the Performance and Compliance Co-ordinator to find out what approach will best suit what you are assessing.

If it is not suitable to include detailed evidence information, data, and engagement/ consultation feedback in the table itself, please attach this information as an Appendix and make summary reference to them in the table when needed.

#### Group focused Impact Approach

Protected Characteristics/ Socio Economic Disadvantage and Inequality of Outcomes/ Health and Well-being Outcomes and Inequalities	Do you have evidence or reason to believe that this will or may affect any of the following Protected Characteristics/ Socio Economic Disadvantage and Inequality of Outcome/ Health and Well-being Outcomes and Inequalities? Consider both positive and negative impacts. Reference relevant evidence and information from engagement feedback.	Response/ Mitigation/ Any additional actions needed
Age	<p>The potential impact is neutral.</p> <p>Introducing and confirming the Article 4 Direction would enable planning control which means that mandatory steps must be taken to be able to establish a 28-day caravanning and camping site, that is, a proposal must obtain planning permission from the Local Planning Authority.</p>	Noted that potential impact is neutral in terms of approach to introduce the Article 4 Direction.

	<p>The requirement to submit a planning application does not impact on a particular age group.</p> <p>In relation to submitting the planning application there would be a period of engagement with those affected which enables any adult age group to participate and engage in the process. This means there would be an opportunity for any person to submit observations on the proposal.</p> <p>This means that the process of introducing an Article 4 Direction would:</p> <ul style="list-style-type: none"> <li>➤ reduce the probability of the discrimination caused when members of the public do not receive information about changes that affect them or who feel that they do not have the ability to influence.</li> <li>➤ Require consulting and seeking the opinion of those who are affected.</li> <li>➤ ensure there is better control of unregulated caravan and camping sites thus ensuring that: <ul style="list-style-type: none"> <li>○ the amenity of neighbouring properties and local communities are more fully considered.</li> <li>○ Remote locations are more likely to be avoided for siting such sites which may be more difficult to access by emergency services.<sup>1</sup></li> </ul> </li> </ul> <p>The Authority will implement the Article 4 Direction across the Local Planning Authority area meaning that the implementation would be the same in every area.<sup>2</sup></p> <p>With proposals being subject to planning permission they would be subject to the policies of Local Development Plan 2. Local Development Plan 2 was subject to an Equality Impact Assessment<sup>3</sup> which screened all policies against</p>	
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<sup>1</sup> Workshop with Stakeholders 8<sup>th</sup> February 2024 and Pros and Cons table attached to this assessment.

<sup>2</sup> Workshop with Stakeholders 8<sup>th</sup> February 2024 and Pros and Cons table attached to this assessment.

<sup>3</sup> <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/>

	<p>potential impact on protected characteristics under the Equality 2010. The Authority considered relevant evidence to understand the likely or actual effect of policies and practices on protected groups.</p> <p>This included ensuring Local Development Plan policies do not unlawfully discriminate, identifying any adverse impacts on protected groups, considering how the policy or practice could better advance equality of opportunity and considering whether the policy would affect relations between different groups. Where negative impacts were identified mitigating action or explanatory information was provided.</p> <p>In terms of demonstrating 'due regard' the assessment was considered at distinct stages by Officers and Members in terms of the Preferred Strategy, consultation for the Local Development Deposit Plan and Focussed Changes. The Matters Arising Changes were screened for equality impacts, none of the proposed Matters Arising Changes were considered to result in any negative equality impacts for people with protected characteristics under the Equality Act 2010 and no further assessment was considered necessary.</p> <p>The consultation was advertised and circulated to key stakeholders, contacts on the LDP 2 database, known campsite operators and exempted organisations, City, Town and Community Councils, Councillors and NPA Members. The consultation was available to view on the National Park Authority's website. The PCNPA's Communications team circulated a press release and advertised the consultation on social media platforms. A total of 119 responses were received via the online questionnaire and respondents were also able to submit responses in writing via email or post. Officers also engaged with the public and interested parties at online presentation and engagement events and local shows in Pembrokeshire. This engagement has supported participation from a range of individuals and groups.</p>	
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	The consultation did not gather any information from respondents on their age group.	
Disability	<p>See previous for Age</p> <p><a href="#">Pembrokeshire Council Licence Conditions for a Tent Site/ holiday site for touring caravans include following requirement:</a></p> <p>The requirement for a planning application would enable particular consideration to be given to the needs of the disabled in the provision made for water points, toilets, washing points and showers.</p>	Noted that there is potential for positive impacts for disabled access and provision to be considered as part of a planning application.
Gender Reassignment	See previous for Age	Noted that potential impact is neutral in terms of approach to introduction (as per Age).
Pregnancy and Maternity	See previous for Age	Noted that potential impact is neutral in terms of approach to introduction (as per Age).



Race	<p>See previous for Age</p> <ul style="list-style-type: none"> <li>Pembrokeshire has a higher % of people identifying as White: Gypsy or Irish Traveller at 0.5% (560) than Wales at 0.1%.</li> </ul> <table border="1" data-bbox="551 220 1686 515"> <thead> <tr> <th data-bbox="551 220 913 288">Ethnic group (detailed)</th> <th colspan="2" data-bbox="913 220 1301 288">Iacu2021:Pembrokeshire</th> <th colspan="2" data-bbox="1301 220 1686 288">country:Wales</th> </tr> <tr> <td></td> <th data-bbox="913 288 1144 357">number</th> <th data-bbox="1144 288 1301 357">%</th> <th data-bbox="1301 288 1532 357">number</th> <th data-bbox="1532 288 1686 357">%</th> </tr> </thead> <tbody> <tr> <td data-bbox="551 357 913 403">Total: All usual residents</td> <td data-bbox="913 357 1144 403">123,363</td> <td data-bbox="1144 357 1301 403">100.0</td> <td data-bbox="1301 357 1532 403">3,107,496</td> <td data-bbox="1532 357 1686 403">100.0</td> </tr> <tr> <td data-bbox="551 403 913 472">White: Gypsy or Irish Traveller</td> <td data-bbox="913 403 1144 472">560</td> <td data-bbox="1144 403 1301 472">0.5</td> <td data-bbox="1301 403 1532 472">3,370</td> <td data-bbox="1532 403 1686 472">0.1</td> </tr> <tr> <td data-bbox="551 472 913 515">White: Roma</td> <td data-bbox="913 472 1144 515">34</td> <td data-bbox="1144 472 1301 515">0.0</td> <td data-bbox="1301 472 1532 515">1,843</td> <td data-bbox="1532 472 1686 515">0.1</td> </tr> </tbody> </table> <p data-bbox="551 515 1686 794"> <small>TS022 - Ethnic group (detailed)  ONS Crown Copyright Reserved [from Nomis on 9 July 2023]  Population: All usual residents  Units: Persons  Date: 2021  In order to protect against disclosure of personal information, records have been swapped between different geographic areas and counts perturbed by small amounts. Small counts at the lowest geographies will be most affected.</small> </p> <ul style="list-style-type: none"> <li>Local Development Plan 2 has Policy 53 Gypsy, Traveller and Showpeople Sites:</li> </ul> <p data-bbox="645 948 1686 1377"> Proposals for Gypsy, Traveller and Showpeople sites will be permitted where: a) The applicant has demonstrated there are no suitable pitches available within existing authorised sites or land available within existing settlement limits; and b) the site is well located to serve the needs of Gypsy, Travellers or Showpeople including the need to access local services; and c) the site has good access to a public road which is safe and direct; and d) the site is suitable for the development and on site services and facilities can be adequately provided; and e) amenity issues for both residents on the site and neighbouring properties are adequately addressed; and f) the proposal does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided </p>	Ethnic group (detailed)	Iacu2021:Pembrokeshire		country:Wales			number	%	number	%	Total: All usual residents	123,363	100.0	3,107,496	100.0	White: Gypsy or Irish Traveller	560	0.5	3,370	0.1	White: Roma	34	0.0	1,843	0.1	<p>Noted that potential impact is neutral in terms of approach to introduction (as per Age).</p> <p>The proposed introduction of a non-immediate effect Article 4 Direction for the whole of the Pembrokeshire Coast National Park will not impact on proposals for Gypsy, Traveller and Showpeople sites under Policy 53.</p>
Ethnic group (detailed)	Iacu2021:Pembrokeshire		country:Wales																								
	number	%	number	%																							
Total: All usual residents	123,363	100.0	3,107,496	100.0																							
White: Gypsy or Irish Traveller	560	0.5	3,370	0.1																							
White: Roma	34	0.0	1,843	0.1																							

	<p>4.299 in the LDP2 notes “The Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment (2015 GTANA) sets out the need for Gypsy and Traveller sites and Travelling Showpeople’s yards in Pembrokeshire.147 No need has been identified in the Pembrokeshire Coast National Park. It is recognised that need for a Gypsy and Travellers site may arise outside of the findings of the Gypsy and Traveller Needs Assessment. Where this is the case the Authority will consider applications on a case by case basis in line with the criteria set out above and, in accordance with Circular 005/2018 ‘Planning for Gypsy, Traveller and Showpeople Sites’</p> <p>Impact: The introduction of a non-immediate effect Article 4 Direction for the whole of the Pembrokeshire Coast National Park would not impact on proposals for Gypsy, Traveller and Showpeople sites under Policy 53.</p>	
Religion or Belief	See previous for Age.	Noted that potential impact is neutral in terms of approach to introduction (as per Age).
Sex	See previous for Age.	Noted that potential impact is neutral in terms of approach to introduction (as per Age).
Sexual Orientation	See previous for Age	Noted that potential impact is neutral in terms of approach to introduction (as per Age). representations received.
Marriage and Civil Partnership	See previous for Age.	Noted that potential impact is neutral in

		terms of approach to introduction (as per Age).
Socio economic disadvantage and inequalities of outcome (Equality Act 2010 context)	<p>Introducing and confirming the Article 4 Direction would enable planning control which means that mandatory steps must be taken to be able to change use, i.e. a proposal must obtain planning permission from the Local Planning Authority.</p> <p>In relation to submitting the planning application there would be a period of engagement with those affected. This means there would be an opportunity for any person to submit observations on the proposal. This means that the process of introducing an Article 4 Direction would: -</p> <ul style="list-style-type: none"> <li>➤ reduce the probability of the discrimination caused when members of the public do not receive information about changes that affect them or who feel that they do not have the ability to influence.</li> <li>➤ require seeking the opinion of those who are affected.</li> </ul> <p>It is also intended, if progressed, to implement the Article 4 Direction across the Local Planning Authority area meaning that the implementation would be the same with the National Park.</p> <p>The Article 4 Direction, however, is not in place in the neighbouring local planning authorities of Pembrokeshire County Council, Ceredigion or Carmarthenshire, so there is potential for perceived economic disadvantage amongst landowners who could potentially operate a 28 day site within the National Park.</p> <p>The Authority prepared a Pros and Cons Table of Permitted Development Rights as they operate which is attached to this IIA. Stakeholders were provided an opportunity to comment at two exploratory workshops in February 2024.</p>	<p>Feedback from Exploratory Workshops in February 2024 provided an opportunity to develop a Table identifying pros and cons which was attached to the stage 1 Assessment. It has also provided an opportunity to consider how to deal with impacts by modifying the Authority's approach to the proposal.</p> <p>This has resulted in a proposal for biannual meetings with Exemption Organisations to monitor the operation of sites, deal with operational issues, to improve dialogue with operators, to develop</p>

	<p>The table in the 'Economic' Row and the 'Visitor' row provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park. Both positive and negative implications are identified.</p> <p>The Article 4 (1) Direction would require the submission of a planning application. Consideration of the planning requirements would allow potentially for the positives to continue and improve, and the cons mitigated.</p> <p>No application fee is required for those proposals which would have benefited from the 28- day permitted development rule. Costs may be incurred where a planning consultant is engaged.</p> <p>The assessment of a planning application for the 28 day use of land for camping could, however, lead to a refusal of planning permission where the cons could not be addressed satisfactorily. The planning system in Wales plays a crucial role in managing land use and development. Its purpose is to ensure the efficient and sustainable use of land while balancing the needs of development and conservation. This is particularly important in a National Park. Applicants can appeal the Authority's decision.</p> <p>The consultation responses raised some concern from respondents that 28 day sites are an income generator for farmers and small-holders. The Country Landowners Association Cymru highlighted issues such as:</p> <ul style="list-style-type: none"> <li>▪ Burdens on rural business in Wales</li> <li>▪ The need to ensure that permissions granted are permanent if these options are progressed.</li> <li>▪ With the underfunding of National Park Authorities then this is what should be addressed to allow the planning authority to carry out its planning function rather introducing additional controls.</li> </ul>	<p>a Voluntary Code of Practice and a Complaints resolution procedure. Exemption Organisations permitted development rights were originally also being considered for an Article 4 Direction.</p> <p>For 28-day sites the requirement to submit a planning application for proposals would be supported by:</p> <ul style="list-style-type: none"> <li>- A guidance note - See Appendix D to the Committee's covering report from 1 May 2024</li> <li>- A no fee requirement for what are 28-day site proposals</li> <li>- A lead in time for introducing</li> </ul>
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	<p>Friends of the National Park supported greater control being exercised but cautioned against placing an additional burden on landowners</p> <p>It was also suggested to provide a lead in time to applying for permission and fast-tracking applications.</p> <p>The Authority does propose the undertaking the following measures to reduce and potentially mitigate potential economic disadvantage by:</p> <ul style="list-style-type: none"> <li>- Using the Article 4(1) Direction procedure which has a non immediate effect and would provide a 12 month lead in time prior to implementation to give land owners and site operators sufficient time to find out the requirements of preparing and submitting a planning application.</li> <li>- Establish a working protocol for Planning Officers to fast track applications which are received due to the Article 4 Direction for campsites seeking to operate for up to 28 days.</li> <li>- Officers will consider giving permanent permissions where appropriate.</li> </ul>	<p>the Article 4 Direction to allow applicants an adjustment time to get their planning permissions in place (e.g.12 months)</p> <ul style="list-style-type: none"> <li>- The Authority will fast track applications received due to the Article 4 Direction (see Appendix E)</li> <li>- Permanent permissions will be considered where appropriate</li> </ul>
Intersectionality considerations	See previous for Age and Socio economic disadvantage and inequalities of outcome	See response in Age and Socio economic disadvantage and inequalities of outcome.

<p>Health and Well-being Outcomes and Inequalities</p>	<p>The Authority prepared a Pros and Cons Table of Permitted Development Rights as they operate – attached to this Assessment. Stakeholders were provided an opportunity to comment at two exploratory workshops and during a consultation during the summer 2024.</p> <p>The table in the ‘Economic’ Row and the ‘Visitor’ row provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park.</p> <p>Both positive and negative implications are identified. Were an Article 4 Direction to be confirmed then this does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated. A number of Public Health positives and negatives are identified in the Pros and Cons table in terms of 28 days and unregulated sites.</p> <p>Pros related to impact on increasing visitor opportunities linked to Health and Well-being and access to National Park and its nature opportunities, landscape opportunities and historic environment opportunities. It also notes that these smaller sites tend to be quieter, this may have positive health benefits for people who may struggle when having to access noisier sites. However, it is also noted in cons that there is potential for conflict with other visitors and communities and sometimes visitor conflicts on the same site so in some cases these sites may cause increased stress for visitors and wider communities.</p> <p>Cons highlight potential negative impacts can have on neighbours in terms of noise, light and unsocial hours and also potential for conflict with other visitors and communities and sometimes visitor conflicts on the same site. Visitor Safety Concern is also highlighted. Significant concerns are also raised relating to public/ environmental health in terms of water contamination (including issues of</p>	<p>Although the proposal would impact on people’s opportunities to access the Park through 28 days and unregulated sites or potentially access smaller/quieter sites it has potential to help improve wider issues relating to concerns raised around public/ environmental health in terms of risk related to water contamination (including issues of sites/pipes not being tested), water provision to hot tubs and risks around e-coli outbreak. This proposal has potential to help mitigate potential public health risks.</p> <p>It also could help mitigate issues relating to visitor safety concerns and</p>
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	<p>sites/pipes not being tested), water provision to hot tubs and risks around e-coli outbreak. The issue of wider water quality impacts are also raised linked to sewage and also phosphates.</p> <p>The facilities and structures on many of the sites have also become increasingly sophisticated with many having flushing toilets, showers, hot tubs etc. as well as accommodation that remains in situ for the entire operating period. In some cases this is all year round. There is little or no regulation for many of these additional facilities which have potential impacts in terms of water supply and waste water management.</p> <p>Impact: Although an Article 4 Direction would impact on people's opportunities to access the Park through 28 days and unregulated sites or potentially access smaller/quieter sites it has potential to help improve wider issues relating to concerns raised around public/ environmental health in terms of risk related to water contamination (including issues of sites/pipes not being tested), water provision to hot tubs and risks around e-coli outbreak. This proposal has potential to help mitigate potential public health risks. It also could help mitigate issues relating to visitor safety concerns and visitors and communities and sometimes visitor conflicts on the same site.</p> <p>Were an Article 4 Direction to be confirmed then this does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated.</p>	<p>visitors and communities and sometimes visitor conflicts on the same site.</p> <p>Were an Article 4 Direction to be confirmed then this does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated</p>
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### Public Sector Equality Duty Considerations

<p>How does the Strategic Plan, Policy or Decision being assessed promote equality of opportunity?</p>	<p>The consultation on Camping and Caravan Development in the National Park has allowed people the opportunity to influence what is happening in their community – see Group focused impact assessment above. The Article 4 Direction for 28 day use of land for camping would mean that planning permission is required, which enables people the opportunity to comment on applications.</p>
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	<p>There is also the issue of what is termed an ‘uneven playing field’ where those site operators that operate within regulation and planning control where relevant have a greater burden of costs and resource implications than those operators that function without these controls.</p> <p>The proposals would go towards setting up a more even playing field.</p>
<p>How does the Strategic Plan, Policy or Decision promote good relations?</p>	<p>Consultation and engagement sessions held during 2024 on the proposals has enabled the National Park Authority to be transparent on the issues regarding camping and caravan development and enabled the authority to build relations with stakeholders and the public. A further consultation period will be held in early 2025 on the proposed Article 4 (1) Direction to withdraw permitted development rights for the 28 day use of land for camping. When the Article 4 (1) Direction comes into force planning applications would be required for 28 day camp sites which would require the national park authority to consult key stakeholders and advertise the planning application. All representations made would be considered by the authority which builds good relations.</p> <p>The proposal should enable well planned campsites in accessible locations, avoiding those that cause amenity concerns for neighbours.</p> <p>When the Authority devises a Code of Conduct /Working Protocol with Exempted Organisations, this would enable the authority to be proactive through both the biannual meetings and through pre-application advice etc.</p> <p>The refusal of a planning permission or misinterpreting the proposal as a complete stop to caravan and camping could cause bad feeling. There can also be tensions with local communities if planning permission is granted, despite concerns being raised from neighbouring residents.</p>
<p>Does this Strategic Plan, Policy or Decision have the potential to cause unlawful direct or indirect discrimination?</p>	<p>The main aim of the Article 4 Direction would be to seek to facilitate and secure appropriate opportunities within the framework of national and local planning policy for caravan and camping. Therefore, it is not acting based on any illegal discrimination, harassment, or persecution.</p>
<p>Does this Strategic Plan, Policy or Decision have the potential to exclude certain group of people from</p>	<p>Consultation on the proposals and on individual planning applications would ensure representations are considered promoting inclusivity and encourages participation. Currently 28-day site proposals do not require public engagement. It is not the intention of an Article 4 (1) Direction to limit 28 day sites but provide information on where the sites are operating and ensure they are located in</p>



obtaining services, or limit their participation in any aspect of public life?	appropriate locations in the National Park which have an acceptable impact on the landscape, environment and communities.
Will any of what is being assessed by wholly or partly carried by contractors or in partnership with other organisations. If yes, what steps will you take to comply with the General Equality Duty in regard to procurement and/ or partnerships?	<p>Yes. M&amp;S Planning Ltd have worked with the Authority in holding workshops, preparing the evidence paper and Report of Consultations.</p> <p>If yes, what steps will you put in place:</p> <ul style="list-style-type: none"> <li>- Requiring Exploratory Workshops as part of the commission</li> <li>- Requiring the preparation of an Integrated Impact Assessment of the proposal</li> <li>- Ensuring that formal consultation complies with the National Park Authority's Local Development Plan Delivery Agreement for engaging with the public.</li> <li>- Requiring papers to be prepared for workshops, Committee meetings including the preparation of reports of consultations on feedback from consultations carried out.</li> </ul>

### Data/ Engagement Gaps

Do you have any data/ engagement gaps?	<p>A Background Paper was prepared to accompany the formal consultation and has been updated to accompany the consultation on the Article 4(1) Direction to be undertaken in early 2025.</p> <p>Responses received to the consultation undertaken from 29 May to 20 September 2024 have been considered. 120 consultation responses were received via the online questionnaire and a number of responses were received via email and post from statutory consultees, other organisations and the public. The responses received have been considered by Officers and a Report of Consultation has been prepared. The Report of Consultation will be reported to National Park Authority to inform their final decision on whether to progress with an Article 4 (1) Direction to withdraw permitted development rights for the 28 day use of land for camping and caravans.</p>
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If yes, can further information be obtained or additional engagement to fill any of these data gaps?

See previous answer.

### Equality/ Socio Economic Disadvantage and Inequality of Outcomes/ Health Inequalities and Outcomes - Summary/ Recommendation from Assessment to be included in Committee/ Leadership Team Report

Equality Summary/ Recommendation from Assessment:

The potential impact is generally positive for members of the public, however, the consultation did generate some comments that 28 day sites are an income generator for farmers, small-holders and rural businesses and there was concern that an Article 4 Direction would restrict farmers from generating an additional income. The Report of Consultation responds to comments received. The Article 4 Direction would not charge for planning applications. There may be costs to comply with other requirements to operate a camping site safely and in accordance with regulations. It is also acknowledged that there would be a cost implication to landowners if they appointed a planning agent to prepare and submit an application on the applicant's behalf.

Some potential mitigation measures were raised in the consultation:

- Provide a lead in time to applying for permission
- Fast track applications
- Ensure that permissions granted are permanent

In relation to submitting the planning application there would be a period of engagement with those affected. This means there would be an opportunity for any person to submit observations on the proposal.

The process of introducing an Article 4 Direction would:

- reduce the probability of the discrimination caused when members of the public do not receive information about changes that affect them or who feel that they do not have the ability to influence.
- Include consulting and seek the opinion of those who might be affected.
- Mean that there is better control of unregulated caravan and camping sites thus ensuring that:
  - the amenity of neighbouring properties and local communities are more fully considered.

- Remote locations are more likely to be avoided for siting such sites which may be more difficult to access by emergency services.<sup>4</sup>

### **Socio Economic Disadvantage and Inequality of Outcomes Summary/ Recommendation from Assessment:**

The potential impact is generally positive for members of the public, however, the consultation did generate some comments that 28 day sites are an income generator for farmers, small-holders and rural businesses and there was concern that an Article 4 Direction would restrict farmers from generating an additional income. The Report of Consultation responds to comments received. The Article 4 Direction would not charge for planning applications. There may be costs to comply with other requirements to operate a camping site safely and in accordance with regulations. It is also acknowledged that there would be a cost implication to landowners if they appointed a planning agent to prepare and submit an application on the applicant's behalf.

Some potential mitigation measures were raised in the consultation:

- Provide a lead in time to applying for permission
- Fast track applications
- Ensure that permissions granted are permanent

On balance it is recommended that the Article 4 Direction would be of benefit in terms of addressing socio economic disadvantage and inequality because introducing and confirming the Article 4 Direction would:

- Provide opportunities for any person to submit observations on the proposal and any subsequent application which are not currently available.
- If implemented across the Local Planning Authority area this would mean that the implementation would be the same in every area.
- Were an Article 4 Direction to be progressed then this does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated.

The assessment of proposals could, however, lead to a refusal of planning permission where the cons could not be addressed satisfactorily. The planning system in Wales plays a crucial role in managing land use and development. Its purpose is to ensure

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<sup>4</sup> Workshop with Stakeholders 8<sup>th</sup> February 2024 and Pros and Cons table attached to this assessment.

the efficient and sustainable use of land while balancing the needs of development and conservation. This is particularly important in a National Park. Applicants can appeal the Authority's decision.

For 28-day sites the requirement to submit a planning application for proposals would be supported by:

- A guidance note - See Appendix D to the Committee's covering report for the draft.
- A no fee requirement for what are 28-day site proposals
- A lead in time for introducing the Article 4 Direction to allow applicants an adjustment time to get their planning permissions in place (e.g. 12 months)

**Health Inequalities and Outcomes Summary/ Recommendation from Assessment:** Both positive and negative implications are identified have been identified under the current permitted development rights approach to caravan and camping – see Pros and Cons Table at the end of this assessment. The table in the 'Economic' Row, the 'Visitor' row and the Environment Row provides a summary of the pros and cons with a range of comments from positive well being to issues in relation to water contamination.

Were an Article 4 Direction to be progressed then this does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated.

## Welsh Language

If it is not suitable to include detailed evidence information, data, and engagement/ consultation feedback in the table itself, please attach this information as an Appendix and make summary reference to them in the table when needed.

Area	Do you have evidence or reason to believe that this will or may impact on the Welsh Language in any of the following areas? Consider both positive and negative impacts. Reference relevant evidence and information from engagement feedback.	Response/ Mitigation/ Any additional actions needed
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Use of Welsh Language	<p>The process of preparing and consulting on the options to control Camping and Caravan Development in the National Park has been carried out in accordance with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011) with all information available bilingually. No concerns or issues regarding the Welsh language have been raised by respondents.</p> <p>The Article 4 (1) Direction would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas.</p>	<p>Welsh Language Standards to be complied with.</p> <p>Positive that an Article 4 (1) Direction would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas.</p>
Number of Welsh Speakers	See above.	See above.
Fluency and Confidence of Welsh speakers and learners to use Welsh	See above.	See above.
Sustainability of Welsh Language Communities	See above.	See above.
Welsh Language Standards	See above.	See above.
Other considerations	N/A	

### Data/ Engagement Gaps

Do you have any data/ engagement gaps?	<p>A Background Paper has been prepared to accompany the formal consultation – Appendix A to the Committee Report. This document has formed part of the consultation and comment invited on the data.</p> <p>Public consultation and engagement was undertaken over a period in excess of three months from 29 May to 20 September. In terms of public consultation, notification via email or letter were sent to contacts on the Local Development Plan mailing list, planning agents and those who have already been contacted through meetings and workshops along with County Councillors in the National Park, key stakeholders, known campsites operating under exempted organisations, campsites operating with planning permission and exempted organisations. The consultation was available to view on the Authority’s website and publicity of the consultation was undertaken with a press release and promoted on social media platforms. During the consultation period, officers held a presentation and engagement event online for any members of the public or stakeholders to attend and a separate engagement event for City, Town and Community Councils. Officers also raised awareness and engaged with the public at local shows at Fishguard, Nevern, Pembroke and the County Show. Officers also raised awareness of the consultation at the Planning Agents forum meeting. Respondents were invited to complete a questionnaire online or submit comments in writing via letter or email. The Authority does not consider there to be any engagement gaps.</p> <p>A further consultation will be held on the introduction of the Article 4(1) Direction in early 2025.</p>
If yes, can further information be obtained or additional engagement to fill any of these data gaps?	See above.

**Welsh Language - Summary/ Recommendation from Assessment to be included in Committee/ Leadership Team Report**

**Welsh Language Summary/ Recommendation from Assessment:**

The process of preparing and approving the Article 4 Direction would need to be in accordance with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011) and the Welsh Language Standards Regulations (No.1) 2015).

The proposal would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas.

### Section 6 Biodiversity Duty and Decarbonisation

If it is not suitable to include detailed evidence information, data, and engagement/ consultation feedback in the table itself, please attach this information as an Appendix and make summary reference to them in the table when needed.

Please note: For National Park Management Plan and Local Development Plan separate Sustainability Appraisal (incorporating Strategic Environmental Assessments) are required.

Area	Do you have evidence or reason to believe that this will or may impact on the Biodiversity or Decarbonisation in any of the following areas? Consider both positive and negative impacts. Reference relevant evidence and information from engagement feedback.	Response/ Mitigation/ Any additional actions needed
Natural Environment - Biodiversity	<p>The consultation responses highlighted concern about impacts on the environment in terms of pollution and impacts on flora, fauna, soil etc. The consultation responses also highlighted a lack of awareness regarding the environmental impacts the operation of sites can have.</p> <p>Introducing and confirming the Article 4 Direction would enable planning control which means that mandatory steps must be taken to be able to change use, i.e. a proposal must obtain planning permission from the Local Planning Authority.</p>	This is a potentially positive outcome.

	<p>The framework of the Local Development Plan 2 would be used to assess proposals, in particular Policy 10 Sites and Species of European Importance, Policy 11 Nationally Protected Sites and Species and Policy 12 Local Areas of Nature Conservation.</p> <p>The Authority has also prepared a Pros and Cons Table of Permitted Development Rights as they operate – attached to this Assessment. Stakeholders were provided an opportunity to comment at two exploratory workshops. The ‘Environment’ row of the table provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park. Both positive and negative implications are identified in the table. An Article 4 Direction does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated.</p>	
<p>Natural Environment – Air, Land and Water Quality</p>	<p>See above response. Please also refer to the ‘Economic’ row in relation to agricultural land quality and Policies of the Local Development Plan. Please refer to Policy 9 Light Pollution, Policy 12 which deals with Sites of Geological Interest, Policy 29 Sustainable Design, Policy 30 Amenity, Policy 31 Minimising Waste, Policy 32 Surface Water Drainage, Policy 34 Flooding and Coastal Inundation.</p> <p>Linked to the introduction of an Article 4 Direction would be inclusion of Public Protection for licensing which includes checks on:</p> <ul style="list-style-type: none"> <li>➤ Number and type of sanitation facilities.</li> <li>➤ Disposal of refuse</li> <li>➤ Water supply and wastewater disposal</li> <li>➤ Appropriate locations for chemical toilet disposal</li> </ul> <p>Appropriate safety on site and appropriate licensing for any facilities on-site such as shops, restaurants, swimming pools, hot tubs etc.</p>	<p>This is a positive outcome.</p>



<p>Natural Environment – Access to Open and Green/ Blue Spaces</p>	<p>Stakeholders were provided with an opportunity to comment at two exploratory workshops and a consultation period.</p> <p>The table in the ‘Environment’ Row provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park.</p> <p>Both positive and negative implications are identified.</p> <p>An Article 4 Direction does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated.</p> <p>There may, however, be less access to open space in terms of camping in the open as more remote locations are more likely to be unacceptable in terms of impacts on landscape and the use of the private car.</p>	<p>This is a balanced outcome ensuring that access is managed to avoid harm to the National Park.</p>
<p>Built Environment – Built Heritage</p>	<p>Stakeholders were provided an opportunity to comment at two exploratory workshops.</p> <p>The table in the ‘Environment’ Row provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park in relation to the historic environment. Both positive and negative implications are identified.</p> <p>An Article 4 Direction does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated. Policy 8 d) ‘the historic environment is protected and where possible enhanced’ would be considered when reaching conclusions on applications submitted.</p>	<p>This is a balanced outcome ensuring that the historic environment is not harmed.</p>

CO2e Emissions or Mitigations	Stakeholders were provided an opportunity to comment at two exploratory workshops. When discussing the Pros and Cons table the table was edited to include the need to locate sites in more accessible locations. The Article 4 Direction will require the submission of a planning application. Planning applications will be assessed against the adopted LDP 2 which contains policy 59 Sustainable Travel which seeks to ensure there are opportunities to travel other than by private car and policy 60 'Impacts of Traffic.' By not progressing with an Article 4 Direction the private car is more likely to be used.	This is a positive outcome.
Co2e Sequestration / Storage	The Biodiversity policies of the Local Development Plan 2 alongside the Biodiversity Supplementary Planning Guidance would provide the framework for considering proposals and avoiding damage to sensitive sites.	This is a positive outcome.
Adapting to the effects of Climate Change	Proposals would be considered against the policies of the Local Development Plan 2 in particular, Policy 34 Flooding and Coastal Inundation and its supporting policies.	This is a positive outcome.
Resources Use – Energy efficiency and consumption	Impacts here are likely to be limited. See above for CO2e Emissions or Mitigations commentary.	Neutral impact.
Resources Use – Prevention, reduction, re- use, recovery, or recycling waste	Linked to the introduction of an Article 4 Direction would be inclusion of Public Protection for licensing which includes checks on: <ul style="list-style-type: none"> <li>➤ Number and type of sanitation facilities.</li> <li>➤ Disposal of refuse</li> <li>➤ Water supply and wastewater disposal</li> <li>➤ Appropriate locations for chemical toilet disposal</li> <li>➤ Appropriate safety on site and appropriate licensing for any facilities on-site such as shops, restaurants, swimming pools, hot tubs etc.</li> </ul>	Positive outcome.
Resource Use - Sustainable Procurement	Not applicable.	

Transport – Accessible Transport Provision	See above for Co2 emissions.	Positive impact more likely
Transport – Sustainable Modes of Transport	See above for CO2 emissions	Positive impact more likely.
Any other considerations	N/A	

### Data/ Engagement Gaps

Do you have any data/ engagement gaps?	<p>The Background Paper has been prepared to accompany the formal consultation and introduction of the Article 4 Direction – see Appendix A to the Committee Report.</p> <p>The public consultation was undertaken from 29 May to 20 September. Responses have been considered and a Report of Consultation has been prepared and has informed the recommendations.</p> <p>A formal consultation period is required alongside NPA’s Notice of Declaration of intention to implement an Article 4 Direction. These responses will be considered prior to the NPA confirming the Article 4 Direction coming into force.</p>
If yes, can further information be obtained or additional engagement to fill any of these data gaps?	See above.

### Section 6 Biodiversity Duty and Decarbonisation - Summary/ Recommendation from Assessment to be included in Committee/ Leadership Team Report

Section 6 Biodiversity Duty and Decarbonisation Summary/ Recommendation from Assessment:

In summary the proposals are likely to have a significant positive effect on the Authority's biodiversity duty and would support its decarbonisation agenda.

### Consideration of 7 Well-being Goals for Wales and 5 Ways of Working under the Well-being of Future Generations (Wales) Act and any relevant future trends/ horizon scanning information

If it is not suitable to include detailed evidence information, data, and engagement/ consultation feedback in the table itself, please attach this information as an Appendix and make summary reference to them in the table when needed.

Well-being Goals/ Ways of Working	How have the following been taken into account? Reference relevant evidence and information from engagement feedback.	Response/ Mitigation/ Any additional actions needed
A Prosperous <sup>5</sup> Park/ Pembrokeshire/ Wales	See commentary under 'Socio economic disadvantage and inequalities of outcome.'	See across. A balanced approach to employment and income generation is proposed within a framework to protect the National Park environment.
A Resilient <sup>6</sup> Park/ Pembrokeshire / Wales	Please see commentary under 'Section 6 Biodiversity and Decarbonisation duty' above and see commentary under 'Socio economic disadvantage and inequalities of outcome'.	See across. A balanced approach to employment and income generation is proposed within a framework to protect the National Park environment.

<sup>5</sup> An innovative, productive, and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.

<sup>6</sup> A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic, and ecological resilience and the capacity to adapt to change (for example, climate change).

<p>A Healthier<sup>7</sup> Park/ Pembrokeshire / Wales</p>	<p>Both positive and negative implications are identified have been identified under the current permitted development rights approach to caravan and camping – see Pros and Cons Table at the end of this assessment. The table in the ‘Economic’ Row, the ‘Visitor’ row and the Environment Row provides a summary of the pros and cons with a range of comments from positive wellbeing to issues in relation to water contamination.</p> <p>An Article 4 Direction does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated.</p>	<p>A more positive outcome is likely than is currently being experienced.</p>
<p>A More Equal<sup>8</sup> Park/ Pembrokeshire / Wales</p>	<p>The potential impact is positive.</p> <p>In relation to submitting the planning application there would be a period of engagement with those affected. This means there would be an opportunity for any person to submit observations on the proposal.</p> <p>The process of introducing an Article 4 Direction would:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> reduce the probability of the discrimination caused when members of the public do not receive information about changes that affect them or who feel that they do not have the ability to influence.</li> <li><input type="checkbox"/> mean the opinion of those who are affected would be sought.</li> <li><input type="checkbox"/> mean that there is better control of unregulated caravan and camping sites thus ensuring that: <ul style="list-style-type: none"> <li>• mean the amenity of neighbouring properties and local communities are more fully considered.</li> <li>• mean remote locations are more likely to be avoided for siting such sites which may be more difficult to access by emergency services.</li> </ul> </li> </ul> <p>See also commentary under a ‘Prosperous Park’ as well.</p>	<p>A positive impact</p>

<sup>7</sup> A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.

<sup>8</sup> A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).

A Park/ Pembrokeshire/ Wales of Cohesive <sup>9</sup> Communities	The need to apply for planning permission would mean that the amenity of neighbouring properties and local communities are more fully considered.	Positive Impact.
A Park/ Pembrokeshire / Wales of Vibrant Culture & Thriving Welsh Language <sup>10</sup>	Please see commentary under ‘Welsh Language’ above and under ‘Built Environment, Heritage’ under Section 6 ‘Biodiversity and Decarbonisation’.	Positive Impact.
A Globally Responsible <sup>11</sup> Park/ Pembrokeshire / Wales	Both positive and negative implications have been identified under the current permitted development rights approach to caravan and camping – see Pros and Cons Table at the end of this assessment. The table in the ‘Economic’ Row, the ‘Visitor’ row and the Environment Row provides a summary of the pros and cons with a range of comments from positive wellbeing to issues in relation to water contamination. Were an Article 4 Direction to be progressed then this does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated.	On balance a more positive outcome for well-being is identified.
Long Term <sup>12</sup>	The use of an Article 4 Direction is directly linked to the need to implement the National Park’s Local Development Plan 2 strategy which is the long-term land use planning document for the National Park.	Positive outcome.
Prevention <sup>13</sup>	This is clearly identified through the first exploratory workshop undertaken and as shown in the Pros and Cons Table.	Positive outcome.

<sup>9</sup> Attractive, viable, safe, and well-connected communities.

<sup>10</sup> A society that promotes and protects culture, heritage, and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

<sup>11</sup> A nation which, when doing anything to improve the economic, social, environmental, and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

<sup>12</sup> The importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs.

<sup>13</sup> How acting to prevent problems occurring or getting worse may help public bodies meet their objectives.

Integration <sup>14</sup>	<p>The proposed Article 4 Direction would nest within the Authority's Local Development Plan's Strategy for caravan and camping.</p> <p>The National Park Authority's Corporate and Resources Plan 2023 to 2027 identifies priorities in relation to:</p> <ul style="list-style-type: none"> <li>- Boosting biodiversity and halting its decline</li> <li>- Destination Net Zero for the National Park</li> <li>- People being healthier and happier and more connected to nature and heritage.</li> <li>- People have a chance to live work and enjoy the National Park</li> </ul>	<p>The assessment has identified significant positive impacts in terms of biodiversity and. Contributions towards reducing carbon emissions, ensuring greater inclusivity in decision making are also identified. A balanced outcome in terms of income generation (some planning applications may be refused), and enjoyment (all areas may not be accessible but sensitive sites would be protected).</p>
Collaboration <sup>15</sup>	<p>The preparation of an Article 4 Direction has been discussed with relevant Officers internally in the National Park Authority and with key stakeholders such as Natural Resources Wales, Pembrokeshire County Council and Dwr Cymru. Discussion with Exempted Organisations has led to a change in approach regarding recommending the use of an Article 4 Direction. It is now replaced with a proposal for regular meetings to monitor how sites operate. External stakeholders would be included in these meetings.</p>	<p>There has been collaboration.</p>
Involvement <sup>16</sup>	<p>Initial exploratory workshops have been undertaken. Meetings and workshops have taken place with Officers and Members of the Authority. Also, a specific meeting was undertaken with Public Protection at Pembrokeshire County Council. There would also be wider public</p>	<p>Involvement continues.</p>

<sup>14</sup> Considering how the public body's well-being objectives may impact upon each of the well-being goals, on their other objectives, or on the objectives of other public bodies.

<sup>15</sup> Acting in collaboration with any other person (or different parts of the body itself) that could help the body to meet its well-being objectives.

<sup>16</sup> The importance of involving people with an interest in achieving the well-being goals and ensuring that those people reflect the diversity of the area which the body serves.

	consultation on the proposal before a final decision is made regarding progressing.	
Horizon Scanning – Future Trends Considerations	There will be a need to monitor Welsh Government proposals for registering and licensing holiday accommodation. There will be a need to monitor outcomes from the proposed biannual meetings planned for the Exemption Organisations/ Welsh Government/Public Health etc., if this proposal is progressed.	Horizon scanning will continue.

**WFG: 7 Well-being Goals for Wales / 5 Ways of Working and Future Trends/ Horizon Scanning summary/ recommendation from Assessment:**

<p>WFG: 7 Well-being Goals for Wales / 5 Ways of Working and Future Trends/ Horizon Scanning Summary/ Recommendation from Assessment:</p> <p>The proposals fit well within the Well-being Goals and the 5 Ways of Working. Horizon scanning will continue as the project progresses.</p>
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**Section 4 – Follow up Actions – for inclusion in Integrated Assessment Log for Monitoring**

Action	Responsible Officer	Timescales
Welsh Language Standards to be complied with during preparation and approval process.	Sara Morris	

Please forward completed integrated assessments to [mairt@pembrokeshirecoast.org.uk](mailto:mairt@pembrokeshirecoast.org.uk)



## Appendix B Part 2 Caravan and Camping in the National Park – Permitted Development <sup>17</sup>- Pros and Cons

← Individual sites will exhibit these pros and cons to varying degrees →

Pros <small>18</small>	A	B	C	D	E	Cons <small>19</small>	A	B	C	D	E	F
	<b>Economic</b>											
	Income generation and spend in the locality <sup>20</sup>	Employment generator	Temporary land take.  Marginal land used.  Exempted sites tend to be small scale. <sup>21</sup>	Farmers can diversify.	Able to act now.		'Uneven playing pitch' for competitors	Agricultural land quality may be affected	Land temporarily withdrawn from agricultural use			

<sup>17</sup> **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.

<sup>18</sup> Includes findings of [The Outjoymnt Report - The Camping and Caravanning Club](#)

<sup>19</sup> **Advisory** comments only by the National Park Authority on Exemption Sites. No opportunity to comment on 28-day sites.

<sup>20</sup> 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.

<sup>21</sup> 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.

Pros 18	A	B	C	D	E	Cons 19	A	B	C	D	E	F
	<b>Visitor</b>											
	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		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 <sup>22</sup>	Sometimes visitor conflict is on the same site
	<b>Environment</b>											
	Access to the National Park increased.	Connect to nature opportunity <sup>23</sup>	Connect with landscape opportunity	Connect to historic environment opportunity	Set aside opportunity. <sup>24</sup>		Soil impaction/ erosion possible	Water Quality may be affected - Phosphates	Flood Zones may be impacted and site equipment damage	Landscape impacts. Special Qualities <sup>25</sup> Night sky.	Ecology <sup>26</sup> may be affected	Archaeology may be affected

<sup>22</sup> **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.

<sup>23</sup> 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.

<sup>24</sup> For example, draft proposals are expecting farmers to plant 10% of their land with trees. Campsites within these areas are a **perfect partnership opportunity**.

<sup>25</sup> **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.

<sup>26</sup> 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.

Pros 18	A	B	C	D	E	Cons 19	A	B	C	D	E	F
									from flood events			
								Water connection <sup>27</sup>		Cumulative Impacts of camp sites in one location		
								Sewerage capacity Sewage disposal is a potential issue <sup>28</sup>				
								Water supply <sup>29</sup>				
								Water contamination <sup>30</sup>				
	Traffic											
							May lead to congestion.	Vehicles unsuitable for minor roads	Opportunity to locate in more accessible	More likely to be reliant on the private car in		

<sup>27</sup> **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.

<sup>28</sup> **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.

<sup>29</sup> **Water Supply**: With the increase in summer population how is the water supply monitored for unregulated sites.

<sup>30</sup> **Water provision** to hot tubs also concern. Potential dangers to environmental health. Potential E-Coli outbreak.

Pros 18	A	B	C	D	E	Cons 19	A	B	C	D	E	F
									locations potentially lost.	remote locations.		

# Background Paper

Camping and Caravanning in Pembrokeshire Coast National Park –  
Managing Impacts

**May 2024**

**Updated in November 2024**

**Pembrokeshire Coast National Park Authority**

## Contents

Background and Purpose.....	3
1.0 Introduction.....	3
2.0 The National Park.....	4
3.0 Planning Policy on Camping and Caravans .....	4
4.0 The Current Situation .....	5
Table 1: Camping Sites granted Planning Permission/Certificate of Lawfulness between 2015 and 2023 .....	7
5.0 Scrutiny and Control with Planning Applications .....	7
6.0 Permitted Development – Planning Permission not needed.....	8
Table 2 Issues experienced .....	10
7.0 Actions Taken to Date.....	12
Table 3: Actions to date to try to control unauthorised development.....	12
8.0 Options for Change .....	15
Table 4: Options.....	16
9.0 Summary and Conclusions .....	17
Table 5: Issues.....	18
Table 6: Options.....	19
Annexe 1: Landscape Character Areas – Summary of Capacity for Additional Camping, Caravan and Chalet Development.....	22
Annexe 2: Policy 41 of the Adopted Local Development Plan.....	24
Annexe 3: Pros and Cons of Camping and Caravan Sites established through permitted development rights .....	27

# Background and Purpose

This paper was prepared to provide background information on camping and caravan developments in the National Park. The paper accompanied an initial consultation on a choice of options to manage camping and caravan site developments in the National Park. The options consulted upon were:

- **Option 1:** No change to current practice.
- **Option 2:** To increase engagement with permitted development site operators (preferred option for Exempted Organisations alongside option 3).
- **Option 3:** To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites (preferred option).
- **Option 4:** To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites.
- **Options 5:** To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation Certification camping and caravan sites.

Options 2 and 3 were identified as the authority's preferred options. Consultation and engagement was undertaken from 29 May to 20 September 2024. This background paper has been updated in November 2024 to provide the evidence base and rationale for:

- The introduction of a non-immediate effect Article 4(1) Direction to remove permitted development rights for the use of land for camping and/or caravans for not more than 28 days, and
- Officers to prepare a voluntary Code of Conduct / Working Protocol for Exempted Organisations.

## 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 visitors 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 with 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. 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 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 Guidance<sup>1</sup>. 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 Annexe 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.

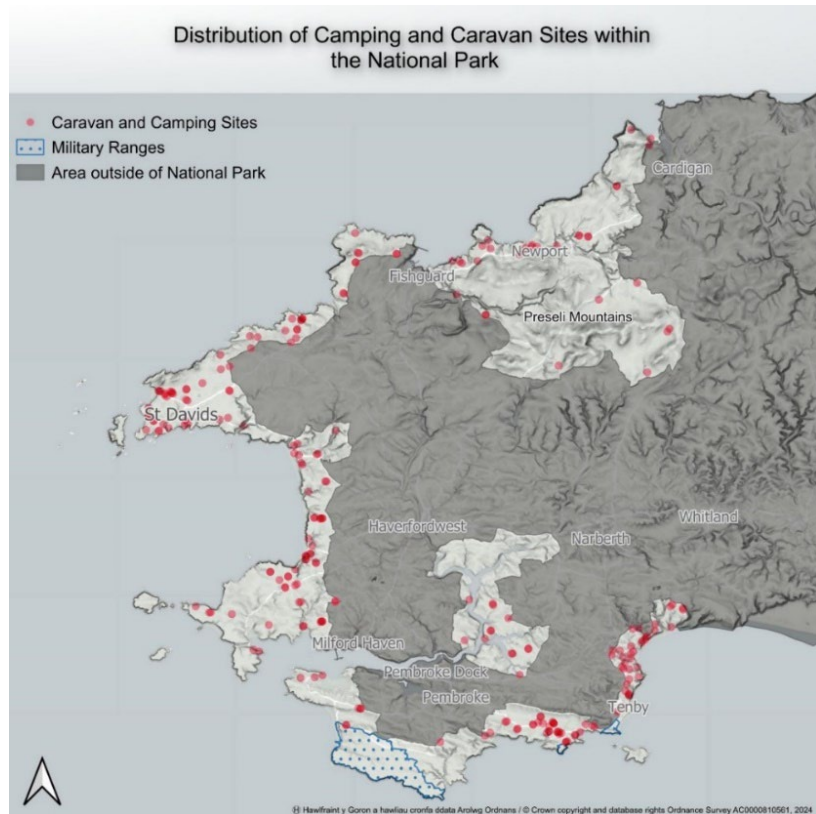
## 4.0 The Current Situation

- 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;
  - 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.

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<sup>1</sup> [Caravan and Camping Supplementary Planning Guidance - Pembrokeshire Coast 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**

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

4.8 Of the pitches gained by means of a Certificate of Lawfulness, it is estimated that 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
- Active and sustainable travel
- 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 certificates<sup>2</sup> 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).

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.

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

## 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 portaloo 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.

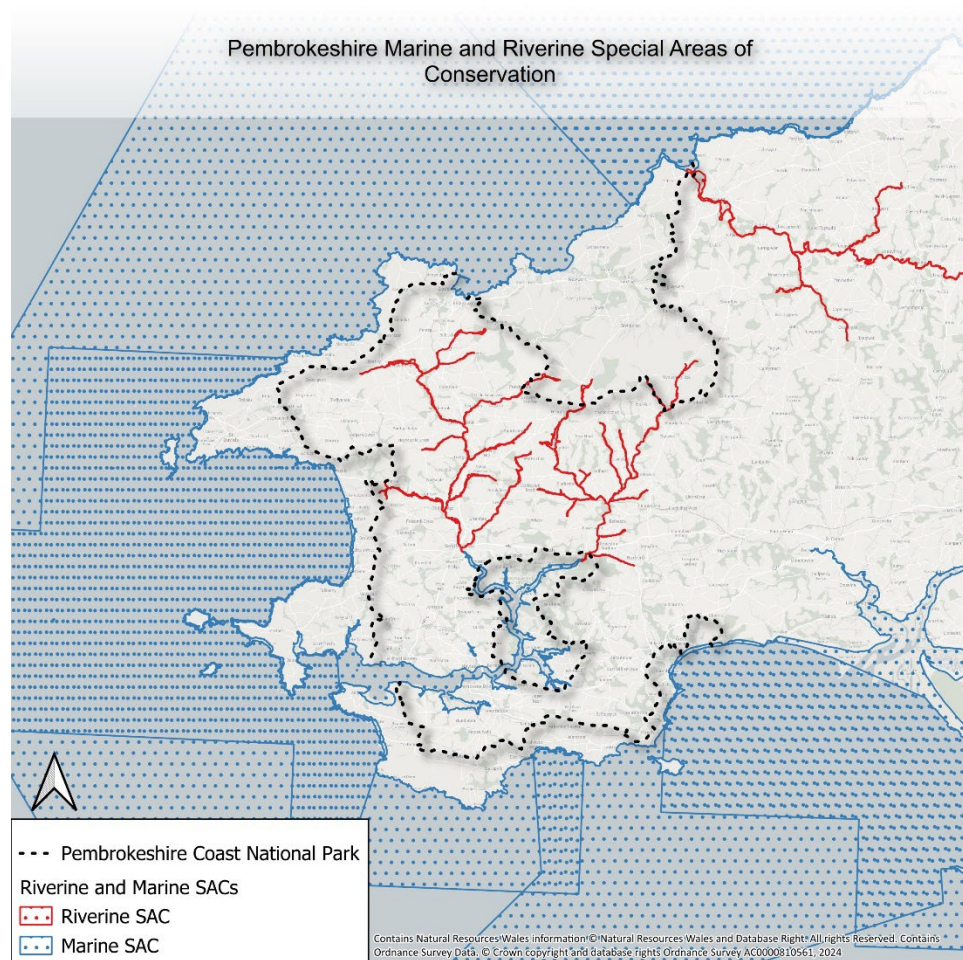
6.12 Sites set up through permitted development rights are not subject to the same scrutiny or public consultation as those requiring planning permission. Over the last few decades, laws and regulations to protect the natural environment have increased but permitted development sites are operating for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

**Table 2 Issues experienced**

	<b>Issue</b>	<b>Evidence and Reasons</b>
a.	Risk to the landscape through individual and cumulative site impacts	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. 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.
b.	Over-burdening of infrastructure –	Parts of Pembrokeshire are affected by water supply issues which are generally highlighted

	<b>Issue</b>	<b>Evidence and Reasons</b>
	particularly water supply, sewage management and highways.	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. Lack of consultation with the authorities over private water supplies with potential for significant public health impacts. 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. Sites are often accessed by narrow lane network unsuited to large increases in traffic, particularly by larger vehicles and caravans.
c.	Potential for significant increase in phosphates.	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.
d.	Camping sites being located in remote areas giving greater numbers of people instant access to sensitive locations and difficult terrains.	Potential for damage and increased erosion caused to footpaths. Potentially dangerous accesses created down steep cliff edges to beaches. Increased reports of disturbance to wildlife, e.g. seals and their pups on beaches. Gradual erosion of sense of remoteness and appearance of elements associated with more established and managed environments.
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**

	<b>Action</b>	<b>What has it achieved?</b>	<b>Is it still happening?</b>
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



	Action	What has it achieved?	Is it still happening?
			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 Authorities. Regular liaison meetings continued for a time.	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.
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 <sup>3</sup> 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	Provided the evidence required to support a	Yes. The policy is in operation and the study is

<sup>3</sup> [28 Day Guide](#)

	<b>Action</b>	<b>What has it achieved?</b>	<b>Is it still happening?</b>
	to inform future local planning policy on camping and caravanning in the National Park.	policy change in the Local Development Plan from a long-standing policy of restraint to one identifying where limited further development can be considered.	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 also by Pembrokeshire County Council to present information and awareness of issues to the local operators.	Provided information to the sector locally and garnered support for seeking further control of Certificated Sites and 28-day sites operating outside of their permitted rights.	Yes. We attend meetings whenever possible although they have been 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 Welsh Government has not yet responded to	Yes. Awaiting response/action from Welsh Government.

	Action	What has it achieved?	Is it still happening?
	the extending of 28 days to 56 days for pop-up campsites stating the reasons why we would be opposed to such a change.	this element of the consultation.	
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, which were subject to consultation with the public, stakeholders and campsites operating with planning permission and exempted organisations.

**Table 4: Options**

	<b>Option</b>	<b>Outcome</b>
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.

	<b>Option</b>	<b>Outcome</b>
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 proposing the need to use a non-immediate effect Article 4 (1) Direction to remove permitted development rights for the use of land for camping and/or caravans for not more than 28 days. 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**

	<b>Issue</b>	<b>Exemption Organisation Sites</b>	<b>28-Day Sites</b>
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 varies between a wide range of Exemption Organisations.	No accountability.
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.

	Issue	Exemption Organisation Sites	28-Day Sites
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.

Table 6: Preferred Options shown in bold<sup>4</sup>

	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.	<b>To increase engagement with permitted development site operators. (Preferred option for Exempted Organisations alongside Option iii).</b>	<b>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.</b>

<sup>4</sup> Repeat of Table 4, above

	<b>Option</b>	<b>Outcome</b>
iii.	<b>To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites. (Preferred Option)</b>	<b>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.</b>
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.

9.10 Public consultation and engagement was undertaken over a period in excess of three months from 29 May to 20 September. In terms of public consultation, notification via email or letter was sent to contacts on the Local Development Plan mailing list, planning agents and those who have already been contacted through meetings and workshops, along with Councillors in the National Park, key stakeholders, known campsites operating under exempted organisations, campsites operating with planning permission and exempted organisations. The consultation was available to view on the Authority's website and publicity of the consultation was undertaken with a press release and promoted on social media platforms.

9.11 During the consultation period, officers held a presentation and engagement event online for any members of the public or stakeholders to attend and a separate engagement event for City, Town and Community Councils. Officers also raised awareness and engaged with the public at local shows at Fishguard, Nevern, Pembroke and the County Show. Officers also raised awareness of the consultation at the quarterly Pembrokeshire Planning Agents forum meeting. Respondents were invited to complete a questionnaire online or submit comments in writing via letter or email.

9.12 A total of 120 responses were received to the online questionnaire. Emailed comments were also received from Statutory Consultees, other organisations and the public.

9.13 A Report of Consultation has been prepared by Officers. The main findings of the questionnaire were:

- The majority of those responding (62%) consider that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape. (Question 1)



- The majority of those responding to the survey (60%) consider that more controls are required for camping and caravan development. (Did not favour Option 1)
- There is majority support (61.7%) for introducing an Article 4 Direction to better manage sites currently operated under 28-day permitted development rights. (Option 3 – preferred option by National Park Authority)
- In addition, most respondents (59.8%) would support the National Park Authority increasing engagement with camping and caravan site operators. (Option 2 - preferred option by National Park Authority)
- Numerically there is an equal level of opposition and support (40.2%) to an Article 4 for sites currently operated by Exemption Organisations but with a greater strength of feeling expressed regarding opposition to the proposal. (Option 4)
- There is a greater level of opposition (42%) than support (34.6%) for introducing an Article 4 Direction for both Exemption Organisations and '28-day sites' to bring all sites operated as permitted development under control. (Option 5)

9.14 The Authority will progress with its preferred options as follows:

- To introduce a non-immediate effect Article 4 (1) Direction to remove permitted development rights for 28-day camping and caravan sites.
- To prepare a voluntary Code of Conduct / Working Protocol for exempted organisations to improve and enhance standards and effective working practices.

# 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**

<b>Type of development and site size</b>	<b>Definition</b>
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 Development <sup>5</sup> - Pros <sup>6</sup> and Cons <sup>7</sup>

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

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

<sup>5</sup> **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.

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

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

<sup>8</sup> 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.

<sup>9</sup> 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.

<sup>10</sup> **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
<b>Environment</b>	<ul style="list-style-type: none"> <li>• Access to the National Park increased.</li> <li>• Connect to nature opportunity. <sup>11</sup></li> <li>• Connect with landscape opportunity.</li> <li>• Connect to historic environment opportunity.</li> <li>• Set aside opportunity. <sup>12</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Soil impaction/ erosion possible</li> <li>• Water Quality may be affected – Phosphates.</li> <li>• Flood Zones may be impacted and site equipment damage from flood events.</li> <li>• Landscape impacts. Special Qualities <sup>13</sup> Night sky.</li> <li>• Ecology <sup>14</sup> may be affected.</li> <li>• Archaeology may be affected.</li> <li>• Water connection <sup>15</sup></li> <li>• Cumulative Impacts of camp sites in one location</li> </ul> <p>Sewerage capacity</p> <ul style="list-style-type: none"> <li>• Sewage disposal is a potential issue. <sup>16</sup></li> <li>• Water supply <sup>17</sup></li> <li>• Water contamination <sup>18</sup></li> </ul>
<b>Traffic</b>		<ul style="list-style-type: none"> <li>• May lead to congestion.</li> <li>• Vehicles unsuitable for minor roads.</li> <li>• Opportunity to locate in more accessible locations potentially lost.</li> <li>• More likely to be reliant on the private car in remote locations.</li> </ul>

<sup>11</sup> 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.

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

<sup>13</sup> **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.

<sup>14</sup> 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.

<sup>15</sup> **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.

<sup>16</sup> **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.

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

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





# PUBLIC NOTICE

## PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 1995  
(AS AMENDED BY THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT ETC) (AMENDMENT) (WALES) 2022)

### NOTICE OF MAKING OF A NON-IMMEDIATE DIRECTION UNDER ARTICLE 4(1) TO RESTRICT PERMITTED DEVELOPMENT RIGHTS IN RELATION TO CERTAIN CARAVAN AND CAMPING PROPOSALS IN THE PEMBROKESHIRE COAST NATIONAL PARK

NOTICE IS GIVEN BY the Pembrokeshire Coast National Park Authority (“the Authority”) being the appropriate Local Planning Authority that it proposes to make a Direction under article 4(1) of the Town and Country Planning (General Permitted Development) Order 1995 (as amended) (“the Order”).

The Direction **will take effect on the xx xxxxx 20xx** subject to the further consideration of any representations received by the Authority between X XXXXX 20XX and xx xxxxxx 20xx and confirmation by the Authority.

The Direction is proposed to apply to the development specified in Schedule 1 to this Notice within the whole of the area of Pembrokeshire Coast National Park.

The effect of the Direction is to remove the planning permission granted in Article 3 of the Order for the development specified in Schedule 1 within the Pembrokeshire Coast National Park. This means that an application to the Authority will be required to be made under Part III of the Town and Country Planning Act 1990 (“the 1990 Act”) to carry out the development in Schedule 1 within the area of the Pembrokeshire Coast National Park. If a planning permission is not granted for the development in Schedule 1 on application under part III of the 1990 Act or such development is not lawful for some other reason, then the Authority may take enforcement action under part VII of the 1990 Act.

The Authority considers that it is expedient to make the Order having regard to the development plan and the purposes of the Authority set out in the National Parks and Access to the Countryside Act 1949.

A copy of the Direction and a plan showing the area to which it relates may be seen at the following offices of the Authority during normal opening hours :-

- Llanion Park, Pembroke Dock, Pembrokeshire, SA72 6DY
- Oriell Parc, St Davids, Pembrokeshire, SA62 6NW

Alternatively, a copy of the Direction and a plan showing the area to which it relates can be viewed online at: **web address insert**

Any representations concerning this Direction should be submitted via the following means:-

Online: **web address**

Email: [devplans@pembrokeshirecoast.org.uk](mailto:devplans@pembrokeshirecoast.org.uk)

Letter: Strategic Policy, Pembrokeshire Coast National Park Authority, Llanion Park, Pembroke Dock, Pembrokeshire, SA72 6DY

All representations should be received between xx **xxxxx 20xx** and xx **xxxxx 20xx**. Please note that any representations received will be of public record and may be published. Any personal data will be processed in line with the Data Protection Policy which is available on the Authority’s website.

#### **Schedule 1 – Restrict Permitted Development Rights**

The following descriptions of development referred to in:

- (a) **Paragraph B of Part 4 of Schedule 2 of The Town & Country Planning (General Permitted Development) Order 1995 (As amended by The Town and Country Planning (General Permitted Development etc.) (Amendment) (Wales) 2022 Order**

*The use of any land as a campsite for tents, trailer tents and/or glamping accommodation without solid bases for the purpose of human habitation and the provision on the land of any moveable structure for such purposes for not more than 28 days in total in any calendar year.*

- (b) **Class A of Part 5 of Schedule 2 of The Town & Country Planning (General Permitted Development) Order 1995 (As amended by The Town and Country Planning (General Permitted Development etc.) (Amendment) (Wales) 2022 Order** and as specified in:

- (i) Para 2 of Schedule 1 to the Caravan Sites and Control of Development Act 1960

*Use of land as a caravan site by a person travelling with a caravan who brings the caravan on to the land for a period which includes not more than two nights—*

- (a) if during that period no other caravan is stationed for the purposes of human habitation on that land or any adjoining land in the same occupation, and*
- (b) if, in the period of twelve months ending with the day on which the caravan is brought on to the land, the number of days on which a caravan was stationed anywhere on that land or the said adjoining land for the purposes of human habitation did not exceed twenty-eight*

(ii) paragraph 3(1) of Schedule 1 to the Caravan Sites and Control of Development Act 1960:

*Use as a caravan site of land which comprises, together with any adjoining land which is in the same occupation and has not been built on, not less than five acres—*

- (a) if in the period of twelve months ending with the day on which the land is used as a caravan site the number of days on which a caravan was stationed anywhere on that land or on the said adjoining land for the purposes of human habitation did not exceed twenty-eight, and*
- (b) if in the said period of twelve months not more than three caravans were so stationed at any one time.*

(c) **Class B of Part 5 to Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995** and as specified in paragraph 2 of Schedule 1 to the Mobile Homes (Wales) Act 2013:

*Use of land by a person travelling with a mobile home who brings the mobile home on to the land for a period which includes not more than 2 nights—*

- (a) if during that period no other mobile home is stationed for the purposes of human habitation on that land or any adjoining land in the same ownership, and*
- (b) if, in the period of 12 months ending with the day on which the mobile home is brought on to the land, the number of days on which a mobile home was stationed anywhere on that land or that adjoining land for the purposes of human habitation did not exceed 28.*

**Pembrokeshire Coast National Park Authority**

**THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 1995  
(AS AMENDED BY THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED  
DEVELOPMENT ETC) (AMENDMENT) (WALES) 2022)**

**DIRECTION UNDER ARTICLE 4(1) TO RESTRICT PERMITTED DEVELOPMENT RIGHTS  
IN RELATION TO CERTAIN CARAVAN AND CAMPING DEVELOPMENTS IN THE  
PEMBROKESHIRE COAST NATIONAL PARK**

**Dated the XX day of XXXXX 20XX**

**WHEREAS** the Pembrokeshire Coast National Park Authority (“the Authority”) being the appropriate local planning authority within the meaning of Article 4 (1) of the Town and Country Planning (General Permitted Development) Order 1995 (as amended) (“the Order”) is satisfied that it expedient that development of the description set out in Schedule 1 below should not be carried out on land described in Schedule 2 below unless planning permission is granted on an application made under Part III of the Town and Planning Act 1990 (as amended).

**NOW THEREFORE** the Authority in pursuance of the power conferred on it by Article 4(1) of the said Order **HEREBY DIRECTS** that planning permission granted by Article 3 of the said Order shall not apply to development of the description set out in Schedule 1 on the land specified in Schedule 2.

**THIS DIRECTION** is made under Article 4(1) of the Order and, in accordance with the Order **will take effect on xx xxxxx 20xx** subject to the further consideration of any representations received during the **period xx xxxxx 20xx and xx xxxxxxx 20xx** and thereafter it is proposed that it will come into force, subject to confirmation by the Authority.

The effect of the Direction is that planning permissions granted by **Article 3 of the Order** shall not apply to development set out in Schedule 1 below and such development shall not be carried out within the Pembrokeshire Coast National Park unless planning permission is granted by the Authority on an application made under Part III of the Town and Country Planning Act 1990 (as amended) (“the 1990 Act”). If a planning permission is not granted for the development in Schedule 1 on application under part III of the 1990 Act or such development is not lawful for some other reason, then the Authority may take enforcement action under part VII of the 1990 Act.

The **Common Seal** of the **Pembrokeshire Coast**

**National Park Authority** was hereby affixed

On the                                  day of                                  2024

in the presence of:

Authorised Signatory

## **Schedule 1 – Restriction of Permitted Development Rights**

The following descriptions of development referred to in:

- (a) **Paragraph B of Part 4 of Schedule 2 of The Town & Country Planning (General Permitted Development) Order 1995 (As amended by The Town and Country Planning (General Permitted Development etc.) (Amendment) (Wales) 2022 Order**

*The use of any land as a campsite for tents, trailer tents and/or glamping accommodation without solid bases for the purpose of human habitation and the provision on the land of any moveable structure for such purposes for not more than 28 days in total in any calendar year.*

- (b) **Class A of Part 5 of Schedule 2 of The Town & Country Planning (General Permitted Development) Order 1995 (As amended by The Town and Country Planning (General Permitted Development etc.) (Amendment) (Wales) 2022 Order** and as specified in:

- (i) Para 2 of Schedule 1 to the Caravan Sites and Control of Development Act 1960

*Use of land as a caravan site by a person travelling with a caravan who brings the caravan on to the land for a period which includes not more than two nights—*

*(a) if during that period no other caravan is stationed for the purposes of human habitation on that land or any adjoining land in the same occupation, and*

*(b) if, in the period of twelve months ending with the day on which the caravan is brought on to the land, the number of days on which a caravan was stationed anywhere on that land or the said adjoining land for the purposes of human habitation did not exceed twenty-eight*

- (ii) paragraph 3(1) of Schedule 1 to the Caravan Sites and Control of Development Act 1960:

*Use as a caravan site of land which comprises, together with any adjoining land which is in the same occupation and has not been built on, not less than five acres—*

*(a) if in the period of twelve months ending with the day on which the land is used as a caravan site the number of days on which a caravan was stationed anywhere on that land or on the said adjoining land for the purposes of human habitation did not exceed twenty-eight, and*

*(b) if in the said period of twelve months not more than three caravans were so stationed at any one time.*

- (c) **Class B of Part 5 to Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995** and as specified in paragraph 2 of Schedule 1 to the Mobile Homes (Wales) Act 2013:

*Use of land by a person travelling with a mobile home who brings the mobile home on to the land for a period which includes not more than 2 nights—*

*(a) if during that period no other mobile home is stationed for the purposes of human habitation on that land or any adjoining land in the same ownership, and*

*(b) if, in the period of 12 months ending with the day on which the mobile home is brought on to the land, the number of days on which a mobile home was stationed anywhere on that land or that adjoining land for the purposes of human habitation did not exceed 28.*

**Schedule 2 – Area within which the restriction of Permitted Development Rights in Schedule 1 shall apply**



**Article 4 Direction**

Pembrokeshire Coast National Park Boundary

Graddfa / Scale @A4: 1:300,000

National Park Office  
Llanion Park  
Pembroke Dock  
Pembrokeshire, SA72 6DY  
Tel: 01646 624800



Parc Cenedlaethol  
Arfordir Penfro  
Pembrokeshire Coast  
National Park

Dyddiad / Date: 25/11/2024



## **Protocol for dealing with Planning Applications for 28-day camping sites**

This guidance note outlines the protocol for prioritising planning applications which are subject to a non-immediate effect Article 4 (1) Direction to remove permitted development rights for the use of land for camping, caravans and/or mobile homes for not more than 28 days.

The Article 4(1) Direction, effective from 1 January 2026, means planning permission will be required to use land for temporary camping, caravans and/or mobile homes for up to 28 days. This measure addresses concerns about the environmental impact and community disruption caused by temporary campsites, ensuring temporary campsites are properly planned.

The Authority recognises that 28-day sites may provide an income for farmers, small-holders and rural businesses and there is concern that an Article 4(1) Direction would restrict a form of income. The National Park Authority is committed to supporting economic growth and prosperous communities and the objective of this restriction is to ensure a fair, transparent, and efficient decision-making process that aligns with local strategic goals and community needs.

For those applicants who will now require formal planning consent as a result of the Article 4(1) Direction, the Authority will provide sufficient resource to ensure that consents for 28-day sites are prioritised and dealt with in a timely manner, with quality development outcomes.

The following types of planning applications will be prioritised:

1. Full Applications for 28-day campsites
2. Certificate of Lawful Development (Existing & Proposed) for 28-day campsites
3. Discharge of Conditions for 28-day campsites

Please note that officers will be unable to make any exceptions for individual cases although seek to reassure that every application will be given the required priority as stated above.

The prioritisation of planning applications is contingent on a pro-active approach from the applicant, which includes sufficient information to support a planning application. It is important that, where additional information is required by Authority officers to enable them to make a recommendation, the applicant provides it in a timely fashion.

**Advice Note to Setting Up a 28-Day Camping Site**

On 1 January 2026 a Park-wide Article 4 Direction will come into effect to protect the environment of the Pembrokeshire Coast National Park, its communities and special qualities by requiring planning permission for

- **All 28-day camping, caravan and mobile home sites**

The reason for this is due to the increasing number of ‘pop-up’ campsites that have been appearing in the National Park and widespread operation of many such sites well beyond 28 days.

This advice note is for use only for those wishing to operate a camping site<sup>1</sup> for up to 28 days a year. It should be read alongside the National Park Local Development Plan and Supplementary Planning Guidance on Camping, Caravans and Chalets.

When considering a planning application for a 28-day camping site, the National Park Authority will base its decision on the policies set out in National Planning Policy (Planning Policy Wales)<sup>2</sup> prepared by the Welsh Government, the development plan which comprises of both Future Wales: The National Plan 2040 and the adopted Local Development Plan 2 for the National Park<sup>3</sup> and the adopted Supplementary Planning Guidance on Camping, Caravans and Chalets.<sup>4</sup>

Information on how to apply for planning permission can be found on the National Park Authority’s website<sup>5</sup> – see [here](#).

**Section 1: Before you apply**

Before applying for planning permission you will need to gather the following information:

- The location of your proposed site. This will need to be shown on a map with a red line indicating the extent of the site and including any access tracks from the public highway.
- How vehicles/pedestrians will access your site.
- How many pitches you intend to provide for campers (please note that up to 3 touring caravans OR motorhomes OR camper vans only are permitted on these sites). The number of tents proposed will depend on the site area, allowing for access and pitch layout.

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<sup>1</sup> 28-day sites are temporary sites with no permanent facilities or structures and any temporary structures to be removed when the site is not operational.

<sup>2</sup> [Planning Policy Wales - Edition 12 \(gov.wales\)](#)

<sup>3</sup> Local Development Plan 2 - Pembrokeshire Coast National Park

<sup>4</sup> Caravan and Camping Supplementary Planning Guidance - Pembrokeshire Coast National Park

<sup>5</sup> [Planning Advice - Pembrokeshire Coast National Park](#)



- The time-period during which you intend to operate your site in one calendar year. The 28 days do not have to be consecutive. (Temporary facilities<sup>6</sup> sited on the land such as toilets/showers will count towards the tally – even if there are no pitches occupied.)
- How you will deal with waste generated by visitors to your site.
- How you will deal with grey water/sewage generated by visitors to your site.

## Section 2: Things to be aware of

In the first instance due to particular sensitivities or policy requirements there are locations where a planning application for a camping site would not be supported. Before making your application check these out using the links provided. The locations below are to be avoided.

1. Land designated as a Site of Special Scientific Interest (SSSI)<sup>7</sup>.
2. High grade agricultural quality land (Grade 1,2 or 3a)<sup>8</sup>;
3. Land within a C2 flood zone (Zones 2 and 3 on the Flood Map for Wales)<sup>9</sup>;
4. Land at the coast or on the Preselis or in locations visible from the coast or Preselis<sup>10</sup>. (See Policy 41 of the Local Development Plan 2).

The Supplementary Planning Guidance<sup>11</sup> indicates which areas have landscape capacity to tolerate further camping sites. Table 6 (page 20) of this guidance provides a quick guide to show where capacity for more sites is available and which areas already are at capacity in terms of impact on the landscape. In all cases however, the effects of individual sites would need to be considered on an individual basis.

In addition, you will need to consider:

1. Access and highway safety (see Policy 60 of LDP2 – Impacts of Traffic).
2. Additional nutrients (phosphorous) within the catchment areas for the Cleddau and Teifi River catchments. (For further information see [here](#)).
3. Protected habitats and species (See policies 10, 11 and 12 of LDP2).
4. Minerals safeguarding zones (See policies 21 and 22 of LDP2).

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<sup>6</sup> Temporary facilities must be limited to a stand-pipe and toilets/showers (if required by licensing) that can be readily removed from the site when not in use.

<sup>7</sup> [Natural Resources Wales / Sites of special scientific interest \(SSSI\): responsibilities of owners and occupiers](#)

<sup>8</sup> [Agricultural land classification | GOV.WALES](#)

<sup>9</sup> [Natural Resources Wales / Check your flood risk on a map \(Flood Risk Assessment Wales Map\)](#)

<sup>10</sup> [Local Development Plan 2 - Pembrokeshire Coast National Park](#)

<sup>11</sup> [Caravan and Camping Supplementary Planning Guidance - Pembrokeshire Coast National Park](#)

### **Section 3: Good Practice**

The size of the site and number of pitches will be considered as part of your planning application. As well as avoiding locations listed in section 2 above, the following points provide guidance for a positive response to your proposal:

1. Avoid prominent and/or sensitive locations.
2. Use an enclosed area which helps to reduce visual prominence.
3. Make use of existing features and landscaping to help screen the site.
4. Skyline locations are best avoided.
5. Avoid using multiple fields.
6. Associate with farm complexes if possible.
7. Use improved pasture land, arable or brownfield land<sup>12</sup>.
8. Avoid tranquil and remote locations.

### **How your application will be considered**

As well as using the documents set out above, the Authority will also consult various bodies, authorities and organisations who can provide expert advice. These will include:

1. Pembrokeshire County Council Licensing
2. Pembrokeshire County Council Highway Authority (and/or Trunk Road Agency where relevant)
3. Natural Resources Wales
4. Welsh Water/Dwr Cymru

It is also important to ensure that your site will not cause disturbance or have significant impacts on the amenity of others (Policy 30 Amenity Local Development Plan 2). The Authority also statutorily requests the views of the City, Town or Community Council and takes into account any representations made by neighbouring or affected parties.

A report will be written by a planning officer detailing all the information about your proposal, how it addresses policy requirements and any expert advice provided. Whilst some applications have to be considered by the Authority's Development Management Committee, most are determined through powers delegated by the Committee to the Chief Executive. You will need to plan ahead as planning applications can take 8 weeks to determine. The Authority has prepared a Working Protocol setting out that the Authority will seek to prioritise the determination of planning applications which are subject to the Article 4(1) Direction to remove permitted development rights for the use of land for camping, caravans and/or mobile homes for not more than 28 days.

Further information on the application process can be found [here](#).

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<sup>12</sup> See definition on page 37 of Planning Policy Wales - [Planning Policy Wales - Edition 12 \(gov.wales\)](#)

Finally, it is important to remember that your site is intended to be a light-touch development in situ for up to 28 operational days. For this reason the following elements generally will not be supported:

1. New permanent buildings/structures
2. Creation of access tracks
3. External lighting
4. Use of facilities such as outdoor kitchens/hot-tubs/individual toilets/showers
5. Amplified music

Once the 28-day period is concluded then the site should be returned to its natural or original state.

### **Your Planning Permission**

If your application to operate a site is successful it will be granted with conditions. These are intended to ensure that the site is operated as expected and will include things such as:

1. The dates during which the site can operate;
2. Details of any temporary structures;
3. Removal of any temporary structures if the site is not operational or at the end of the 28-day period;
4. Requirements relating to waste and waste-water disposal;
5. Ensuring that no permanent changes are made to the land.

There is a right of appeal against a condition in your planning permission and the refusal of planning permission, Please see [here](#) for further information.

### **Further information**

Please follow the links in this document which will provide you with additional background information. You may also wish to test your proposal in advance of making a planning application by submitting a pre-application enquiry to the Authority. More information is available [here](#).

### **Fees**

Due to the permitted development rights for 28-day sites being removed by means of the Article 4 Direction, no fees are required.

There is a standard fee of £250 for pre-application enquiries for sites up to 0.49 hectares. This rises to £600 for sites between 0.5 and 0.99 hectares and £1000 for sites of more than 0.99 hectares.