

**Report of: Director of Place and Engagement**

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**Subject: Proposed Article 4 (1) Direction for 28-day use of land for camping, caravans and /or mobile homes – clarification statement**

**Decision Required: Yes**

**Recommendation:**

The Authority is recommended to:

- A. Approve the attached clarification statement for publication (see Appendix A)

**1. Key Messages**

In December 2024 Members approved the making and publicising of an Article 4 (1) Direction to remove permitted development rights for 28-day rule camping, caravans and/or mobile homes across the whole of the National Park, with non-immediate effect.

In accordance with the requirements of The Town and Country Planning (General Permitted Development etc.) (Amendment) (Wales) Order 2022 the Authority then publicised the opportunity for formal representations to be made. The opportunity to make formal representations closed on the 21<sup>st</sup> of February 2025.

During this period the Authority has received a number of inquiries about how an Article 4 (1) Direction would operate. There has also been a degree of inaccurate information circulating on social media.

Members of the Authority will be asked to take a formal decision on whether to confirm the notice of the Article 4(1) Direction along with a full report of consultations at the May 2025 National Park Authority meeting. However, ahead of this meeting Officers consider that it would be helpful to clarify the parameters that any Article 4 (1) Direction would operate within. This clarification has also been requested from some businesses operating within the National Park.

**2. Background**

Workshops with key stakeholders on options in relation to additional controls for campsites were undertaken in Autumn 2023 and at the start of 2024.

On 1<sup>st</sup> May 2024 the Authority agreed to undertake consultation and engagement on a range of options to better manage camping and caravan site developments in the National Park. This consultation took place between 29 May and 20 September 2024.

The most recent public consultation took place over a 6-week period from 10 January to 21 February 2025.

The National Park Authority will consider in full the responses to the consultation on Article 4 (1) Direction in its May meeting, however following questions raised during the consultation, Officers consider that it would be helpful to provide clarification in advance of that meeting on how any Article 4 (1) Direction would operate if confirmed in May.

### **3. Legal Background**

#### **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.

#### **4. 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 investigating 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 in relation to camping, caravans and/or mobile homes (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 organisation (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 administer 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.

## **5. Impact on our Public Sector Duties**

### **5.1 Integrated Assessment Completed: Yes (see Appendix B)**

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

A further updated Stage 3 Integrated Impact Assessment will be prepared and presented in May when the Authority considers whether to confirm the Direction.

### **5.2 Welsh language impacts**

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.

### **5.3 Section 6 Biodiversity Duty and Carbon Emission Impacts**

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 Regulation 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, CO<sub>2</sub> 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.

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

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/business diversification. 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 charge 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 and undertake 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 December 2024 NPA Report annexes)
- Officers would 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 neighboring properties and local communities are more fully considered.
  - Remote locations are more likely to be avoided for citing such sites which may be more difficult to access by emergency services.

The attached clarification document makes it clear that free pre-application advice will be provided in relation to any businesses who are unclear on how the Article 4 will affect them, Officers are happy to engage in early discussions on any sites ahead of any formal introduction.

#### **5.5 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 2015. Horizon scanning will continue as the project progresses.

## **6. Conclusion**

Members of the Authority will be asked to take a formal decision on whether to confirm the notice of the Article 4(1) Direction along with a full report of consultations at the May 2025 National Park authority meeting. However, ahead of this meeting Officers consider that it would be helpful to clarify the parameters that any Article 4 (1) Direction would operate within. This clarification has also been requested from some businesses operating within the National Park. The Authority is recommended to:

- A. Approve the attached clarification statement for publication (see Appendix A)

## **7. List of background documents:**

- Clarification statement (Appendix A)
- Integrated Impact Assessment, stage 2, (Appendix B)

For further information, please contact the Director of Place and Engagement via [saram@pembrokeshirecoast.org.uk](mailto:saram@pembrokeshirecoast.org.uk)



## **Pembrokeshire Coast National Park Authority**

### **Clarification Statement regarding Intended Implementation of Proposed Article 4 (1) Direction in relation to Camping and Caravanning March 2025**

1

#### **What is an Article 4(1) Direction?**

An Article 4 Direction withdraws the planning permission which the General Permitted Development Order grants for a class of development. Such a direction may be made by a Local Planning Authority or by the Welsh Ministers under Article 4 of that order. The National Park Authority already has some Article 4 Directions in place in relation to Conservation Areas in order to protect the historic environment.

#### **What does this change mean?**

The National Park Authority is considering implementing an Article 4 (1) Direction in relation to 28 day camping, caravans and mobile homes. Implementing the Article 4(1) Direction will enable the Authority to mandate the requirement for planning permission for temporary 28-day camping, caravan, and mobile home sites. This measure ensures that their placement and operation are carefully managed to safeguard the unique environment of the National Park and its communities.

If approved, the Article 4 Direction, will take effect on Wednesday 1 January 2026, to allow landowners and site operators sufficient time to understand the new requirements and submit planning applications. Planning applications for these sites will not incur fees, and the Authority will aim to prioritise applications to minimise delays. Existing sites that have planning permission or those sites that operate under an exempted organisation certificate will not be affected by the Article 4 Direction.

#### **Clarification regarding potential Implementation of Article 4**

##### **Uses which do not involve development**

A number of activities take place around the National Park on a regular basis. Many of these activities do not involve any form of physical development or change of use of land, for example triathlons and filming. These events do not constitute development and do not operate under permitted development rights. They are therefore not impacted by the potential introduction of an Article 4 (1) Direction.

##### **Uses which will continue to benefit from 28 day permitted development rights**

A range of different uses operate under permitted development rights across the National Park, the proposed Article 4 (1) Direction is in relation to camping, caravans and mobile homes only. Uses which do not involve camping, caravans or mobile homes and are only active/on site for 28 days or fewer each year will be unaffected. Such examples include:

- Using a field for a temporary car park for up to 28 days
- Siting a temporary mobile sauna for up to 28 days

### **Exempted Certificate Sites**

Organisations which meet certain requirements can apply to the Welsh Government for exemption certificates 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.

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.

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) at any one time;
- c) Paragraph 6 – allows organisations to arrange meetings of its members only, lasting up to 5 days (known as rallies).

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.

The Article 4 (1) Direction proposed by the Authority would not affect the operation of these exemption certificates. A number of bodies such as The Scouts Association operate under this route and would not be affected by the proposed Article 4(1) Direction.

### **Exempted Uses**

The Authority can confirm that the following uses will be treated as separate uses if the Article 4 (1) Direction is implemented and will not need to apply for planning permission even where some element of camping or caravanning is proposed, provided that the camping and caravanning use is considered to be ancillary to the event in nature:

- Weddings
- Festivals
- Filming for television or film where a physical camp is required
- Agricultural shows

These uses will continue to benefit from 28 day permitted development rights. In assessing whether a use does fall under the description of a wedding, festival or show or filming use – the Authority will consider the following types of information:

- Any licences gained for the event



- Any advertising undertaken
- The proportion of the site on which any ancillary tents or caravans are situated
- The length of time the event is taking place for

### **Level of information to support a planning application**

Where planning permission is necessary for camping, caravans or mobile homes from 1<sup>st</sup> January 2026, no planning fee will be charged. The Authority will also offer a free pre-application service for those seeking to apply, to provide bespoke support for applicants in preparing applications.

### **Information needed will be:**

- A site area map showing the land in question in a red line boundary
- Information on number of pitches
- Information on the dates in which the 28 day period will operate
- Information on toilet facilities and waste water disposal intentions including for hot tubs
- Access arrangements

A walkover ecology survey will be required in areas of sensitive natural environment – if this is required the Authority will clarify this at pre-application stage.

Site areas of over 1 hectare are considered major development and will require a Pre-Application Consultation (PAC) in line with Welsh Government requirements. [Planning major developments: guidance on pre-application consultation | GOV.WALES](#)

The Authority will consider on a case by case basis whether longer term planning permissions can be granted, for example for 5 year periods or permanent permission.



## 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>	<p style="text-align: right;">Sign off date:</p> <div style="text-align: center;">  </div> <p style="text-align: right;">26/11/2024</p>		

## 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 1688 517"> <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 1688 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 1688 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 1688 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 1688 472">0.1</td> </tr> <tr> <td data-bbox="551 472 913 517">White: Roma</td> <td data-bbox="913 472 1144 517">34</td> <td data-bbox="1144 472 1301 517">0.0</td> <td data-bbox="1301 472 1532 517">1,843</td> <td data-bbox="1532 472 1688 517">0.1</td> </tr> </tbody> </table> <p data-bbox="551 517 1688 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 1688 1383"> 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.
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**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. 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:
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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.		